

PUBLIC DISCLOSURE

June 22, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Comerica Bank
RSSD # 60143

1717 Main Street
Dallas, Texas 75201

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

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

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INSTITUTION RATING

INSTITUTION RATING

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

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

Table of Performance Ratings

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

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

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to assessment areas' credit needs.
- A substantial majority of loans are made in the bank's assessment areas.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas.
- The distribution of Home Mortgage Disclosure Act (HMDA) lending reflects good penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes a relatively high level of community development loans.
- Has an excellent level of qualified community development investments and grants, and is often in a leadership position.
- Exhibits good responsiveness to credit and community development needs.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- Services do not vary in a way that inconveniences its assessment areas, particularly low- and moderate-income (LMI) geographies and/or low- and moderate-income individuals.
- Provides a relatively high level of community development services.

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Description of the Institution

Comerica is a multi-state commercial bank operating 482 branch offices and 637 ATMs as of December 31, 2014. As of December 31, 2014, Comerica had total assets of \$69.3 billion. The bank received a “Satisfactory” rating by the Federal Reserve Bank of Dallas at its previous Community Reinvestment Act Performance Evaluation (PE) dated August 16, 2012. The Lending and Service Tests were rated High Satisfactory and the Investment Test was rated Outstanding. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas.

For this examination, eight assessment areas were reviewed. Total deposits for the eight assessment areas as of June 30, 2014 were \$45.4 billion. Overall, the bank’s assessment areas have not changed. However, there were adjustments in statistical delineations made by the Office of Management and Budget (OMB) in February of 2013 that affected the assessment areas during the review period. Furthermore, Comerica elected to have the Metropolitan Divisions reviewed at the Metropolitan Statistical Area levels. Descriptions of the assessment areas, listed below, can be found in the applicable State sections of this report.

Texas

- Dallas-Fort Worth Metroplex
- Houston

Michigan

- Southeast Michigan
- Grand Rapids

California

- Greater Los Angeles
- San Jose

Arizona

- Phoenix (Maricopa County)

Florida

- Fort Lauderdale-West Palm Beach

Business Structure

Comerica, a wholly owned subsidiary of Comerica Incorporated (CMA), is a multi-state commercial bank headquartered in Dallas, Texas. CMA is one of the top 25 largest bank holding companies in the United States and has offices throughout the country, with select businesses operating in several states, as well as in Canada and Mexico. CMA has banking operations in Michigan, California, Texas, Florida, and Arizona. It also has a branch in Toronto, Canada and Georgetown, Cayman Islands. Its banking centers are located throughout seven of the ten most populous cities in the United States.

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

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

Loan Portfolio and Credit Products

The following table shows the distribution of Comerica's loan portfolio as of December 31, 2013 and December 31, 2014.

Product	12/31/2014 \$(000's)	% of Loans	12/31/2013 \$(000's)	% of Loans
<u>Real Estate</u>				
1-4 Family Residential Construction Loans	254,556	0.5	226,025	0.5
Other Construction Loans & Land Development & Other	2,016,283	4.2	1,785,028	3.9
Farm Land	45,458	0.1	61,218	0.1
1-4 Family – Revolving	1,590,610	3.3	1,398,634	3.1
1-4 Family Residential Secured by First Liens	1,957,846	4.0	1,881,831	4.1
1-4 Family Residential Secured by Junior Liens	85,116	0.2	111,542	0.2
Multifamily	596,778	1.2	538,173	1.2
Loans Secured Owner Occupied Nonfarm Nonresidential	5,171,893	10.6	5,222,652	11.5
Loans Secured by Other Nonfarm Nonresidential	2,288,655	4.7	2,432,425	5.3
Total Real Estate	14,007,195	28.8	13,657,528	30.0
Depository Institutions	37,252	0.1	13,083	0.0
Agricultural	48,264	0.1	72,202	0.2
Commercial and Industrial	28,661,366	59.0	26,640,554	58.6
Consumer	640,379	1.3	586,525	1.3
State and Political Subdivisions	41,428	0.1	31,087	0.1
Other	4,346,784	8.9	3,627,634	8.1
Lease Financing	805,106	1.7	845,223	1.9
Gross Loans	48,587,774	100.0	45,473,836	100.0

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Comerica provides a wide range of commercial banking services, specializing in products for all sizes of businesses, and to a lesser degree, consumer banking products and services. Commercial and industrial loans comprised the greatest percentage of the loan portfolio by dollar volume in both years. The next highest volume by dollar amount was commercial real estate.

Loans secured by commercial real estate and loans for a commercial and industrial purpose are the categories of loans from which “loans to small businesses” data is collected and reported under the CRA. Commercial loan products include business term loans for various purposes such as equipment purchases, facility expansion, asset acquisition, leasehold improvements, commercial real estate loans, Small Business Administration (SBA) loans, small business lines of credit, and equipment lease financing. This category also includes business credit cards; however, Comerica does not directly offer this product.

Credit cards tend to be for smaller dollar amounts and are often needed by small businesses to meet day to day operating expenses. Comerica recognizes the importance of meeting the needs of their commercial customers, specifically those considered small businesses, which is why they have partnered with Elan Financial Services, Minneapolis, Minnesota (Elan) to provide this credit product for their customers. These loans are not reported by Comerica and are not reflected in their CRA reportable loans. Additionally, as the chart depicts Comerica did not originate a significant volume of small farm loans during the review period; therefore, these loans are not discussed in this report.

Loans secured by residential real estate are typically reported under the HMDA. The table on page three indicates residential real estate loans represent approximately 28% percent of the bank’s lending in 2014. The bank’s primary residential real estate loan products consist of home purchase and refinance home mortgage loans. Home improvement and multi-family loans are not primary products for the bank, even though they are offered in all markets across the bank’s footprint.

Comerica also offers a variety of consumer loan products including automobile loans, installment loans, marine loans, recreational vehicle loans, motorhome loans, and open-end home equity lines of credit. The home equity lines of credit tend to have competitive rates and flexible loan terms, which many customers find more attractive than the traditional home improvement loan. It also represents a significant percentage of overall lending activity for Comerica.

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Scope of Examination

All assessment areas were evaluated for lending, investment, and service performance. Full-scope reviews were conducted for 8 of the banks 30 assessment areas. The assessment areas were selected for full-scope reviews based on the volume of lending, number of branches, and percent of total deposits, as well as the length of time since the last full-scope review. Overall, approximately 76.1% of lending activity (by number of loans), 84.7% of the total deposits, and 73.7% of total branches were evaluated through the full-scope reviews.

States and full-scope assessment areas were given different weights to arrive at overall institution ratings; these weightings are discussed in the summary of the scope. Refer to Appendix A for summary of the scope.

Examination Review Period and Products Reviewed

The evaluation period covered January 1, 2012 through December 31, 2014. The lending test performance was based on HMDA loans, small business loans, and HELOC lending for the period of January 1, 2012 through December 31, 2014. Furthermore, of the HMDA related loans, only home purchase and refinance loans were of sufficient volume to permit a meaningful assessment. Nevertheless, the remaining HMDA loan types were considered in this evaluation and are presented in the lending tables contained in Appendices G through I. Products were weighted according to the opportunities, credit needs, transaction volumes and the bank's business strategy. Accordingly, small business loans were weighted most heavily in this assessment and largely drove the results of this CRA assessment.

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

Construction and land development loans may be reportable as community development loans, provided they have a purpose that meets the definition of community development under Regulation BB – Community Reinvestment Act. Multi-family loans may also be reported both under HMDA and as community development loans; however, Comerica originates nominal multi-family loans.

Community development loans, investments, and service activities from April 1, 2012 through December 31, 2014 were considered during this evaluation.¹ In addition, the evaluation also considered prior period investments.

¹ A cut-off date of 12/31/2014 was used since exam date to exam date creates a hardship for the bank. The bank needs time to vet and review data before submitting it to the Regulator.

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Examination Analysis

The evaluation of the bank's record of lending in the individual assessment areas includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are the 2010 U.S. Census and 2012, 2013, and 2014 Dun & Bradstreet (D&B) data. Demographic characteristics of a particular assessment area are useful in analyzing the bank's record of lending as they provide a means of estimating loan demand and identifying lending opportunities. To understand small business and small farm loan demand, self-reported data of revenue size and geographical location from business and farm entities is collected and published by D&B. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The information is used to understand the bank's performance context and evaluate the bank.

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

Comerica's borrower income distribution with respect to HMDA and HELOC loans is assessed by comparing the percentage of loans made to borrowers in each income category (low, moderate, middle, and upper income) to the percentage of families in each income category. Poverty level is determined by both income and family size. Generally, a larger proportion of poverty level families are in the low-income category and, to a certain extent, the moderate-income categories. Borrowers at poverty level often do not qualify for real estate loans, so the percentage of families below the poverty level is considered when evaluating lending performance to low- and moderate-income borrowers.

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

The bank's lending performance was compared to the performance of aggregate for the period January 1, 2012 through December 31, 2014. Aggregate include all lenders required to report HMDA and CRA data within the respective assessment areas. Aggregate data is not reported for the optional consumer loan data reported under the CRA, so Comerica's HELOC loans will not be compared to aggregate loan data. Commercial credit card loans are included in many aggregate CRA loans numbers, which is not a product offered directly by the bank. Comparing the aggregate performance to Comerica does not give a true representation of Comerica's performance.

The bank's market share of lending is also discussed to give a better understanding of how the bank ranks within the respective areas. For both the geographic distribution and borrower

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income analyses, the bank's lending performance was evaluated by dollar amount and percentage by number. Unless otherwise specified, the percentages throughout the performance evaluation represents the bank's lending by number of loans originated.

Examiners conducted interviews with community representatives and reviewed other CRA performance evaluations during the review period in order to understand community credit needs. Community contacts were located throughout the assessment areas and included representatives of community-based organizations, municipalities, and quasi-government agencies.

Conclusions With Respect to Performance Tests

Lending Test

The bank's overall Lending Test rating is High Satisfactory. The overall lending performance is good in all the states (Texas, Michigan, California, Arizona, and Florida). The bank's geographic distribution of loans reflects excellent distribution throughout the assessment areas. The overall distribution among borrowers of different income levels and businesses of different sizes is adequate. The bank makes a relatively high level of community development loans.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA and small business loans as well as HELOC loans can be found in tables contained in Appendices G through I.

Lending Activity

Lending levels reflect good responsiveness to assessment areas credit needs. The following table summarizes Comerica's lending activity January 1, 2012 through December 31, 2014. As the data indicates, the bank makes more small business loans than HMDA or consumer loans by both volume and dollar amount. In 2014, the bank ranked in the top 3% of all lenders in extending small business loans and top 8% of all HMDA reporters in its assessment areas.

Summary of Comerica's Lending Activity* January 1, 2012 through December 31, 2014				
Loan Type	#	%	\$(000s)	%
Total Consumer (HELOC)	15,048	30.9	\$2,036,312	17.7
Home Improvement	117	1.8	24,474	1.0
Home Purchase	2,259	35.0	770,754	30.9
Refinance	4,013	62.1	1,286,971	51.6
Multi-family	69	1.1	413,582	16.6
Total HMDA	6,458	13.2	\$2,495,781	21.7
Total Small Business	27,242	55.9	\$6,948,973	60.5
Total Loans	48,748	100.0%	\$11,481,066	100.0%
*Includes lending both inside and outside the bank's assessment areas. Totals might not equal 100.0% due to automated rounding.				

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

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Assessment Areas Concentration								
Loan Type	Inside Assessment Areas				Outside Assessment Areas			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Total Home Equity Lines of Credit	14,234	94.6	\$1,903,645	93.5	814	5.4	\$132,667	6.5
Home Improvement	106	90.6	\$21,144	86.4	11	9.4	\$3,330	13.6
Home Purchase - Conventional	1,589	82.8	\$578,430	79	330	17.2	\$153,411	21
Home Purchase – FHA	322	95	\$36,715	94.8	17	5	\$1,998	5.2
Home Purchase – VA	1	100	\$200	100	0	0	\$0	0
Multi-Family Housing	52	75.4	\$296,784	71.8	17	24.6	\$116,798	28.2
Refinancing	3,654	91.1	\$1,092,909	84.9	359	8.9	\$194,062	15.1
Total HMDA Loans	5,724	88.6	\$2,026,182	81.2	734	11.4	\$469,599	18.8
Total Small Business Loans	24,543	90.1	\$6,103,576	87.8	2,699	9.9	\$845,397	12.2
Total Loans	44,501	91.3	\$10,046,695	87.4	4,247	8.7	\$1,451,903	12.6

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

The geographic distribution of loans reflects excellent penetration throughout the assessment areas. All of the full-scope assessment areas performances are considered excellent. No significant lending gaps were found.

The overall distribution among borrowers of different income levels and businesses of different sizes is adequate. All of the full-scope assessment areas performances are considered adequate.

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

- **HARP** – Created by the Federal Housing Finance Agency specifically to help homeowners who are current on their mortgage payments, but have little to no equity in their homes, refinance their mortgage. The following table exhibits the details of Comerica’s participation in the HARP for the review period:

State	#	\$(000s)	# in LMI Census Tracts	# LMI Applicants
Arizona	8	1,679	0	4
California	15	3,613	7	9
Florida	2	583	0	0
Michigan	272 ²	37,557	27	55
Texas	42	5,211	9	14
Total	339	48,643	43	82

² Includes one loan under the My Community Mortgage loan program – offered by Comerica - designed for low- to moderate-income homebuyers.

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

- **Ex-Im Bank Working Capital Guarantee Program** – The bank participates in this government-sponsored credit support program to provide trade financing to companies that cannot use traditional sources. During this review period, the bank originated 59 loans totaling approximately \$192.1 million. The following table summarizes the loan originations by state.

State	#	\$ (000s)
California	30	107,510
Michigan	8	15,500
Texas	21	69,075
Total Loans	59	192,085

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

State	#	\$ (000s)	# in LMI Census Tracts	\$ (000s) in LMI Census Tracts
Arizona	49	3,940	9	632
California	382	35,564	141	14,324
Florida	7	400	0	0
Michigan	1,509	125,981	449	52,067
Texas	1,041	93,050	408	37,475
Total Loans	2,988	258,935	1,007	104,498

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

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State	FHA		VA		SBA	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Arizona	0	0	0	0	11	1,413
California	2	330	0	0	56	45,610
Florida	54	7,009	0	0	4	100
Michigan	139	12,836	1	200	84	66,573
Texas	22	3,135	0	0	70	68,773
Total Loans	217	23,310	1	200	225	182,469

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

Community Development Lending

The bank makes a relatively high level of community development loans. Comerica originated or renewed 271 community development loans totaling approximately \$813.4 million during the review period, which is a substantial increase from the previous examination when the bank reported 84 loans totaling approximately \$280.7 million. In addition, Comerica's assessment areas benefitted from \$3.9 million in consortia lending.

The community development loans originated during the evaluation period were for a variety of purposes, including financing of affordable housing and high-impact community development projects; promotion of economic development, including job creation; and revitalization of targeted communities located in low- and moderate-income census tracts and empowerment zones. The table below summarizes the bank's community development lending.

Community Development Lending		
Purpose	# Loans	\$('000s)
Affordable Housing	47	193,683
Community Services	159	287,422
Economic Development	42	93,355
Revitalize and Stabilize	23	238,927
Total Loans	271	\$813,387

Investment Test

The bank's overall Investment Test rating is Outstanding. The bank has an excellent level of qualified community development investments and grants. The various investments were particularly responsive to needs in providing opportunities for affordable housing and investing in several vehicles that provide financial assistance to small businesses. While Comerica rarely used innovativeness to support community development investments, it made extensive use of complex community development investments. Performance is outstanding in all states. Comerica had an excellent level of qualified investments. Comerica made approximately 1,933

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qualified investments totaling approximately \$273.8 million to numerous organizations that provide services that meet the definition of community development.

Comerica's investments demonstrate good responsiveness to the most pressing credit and community development needs throughout the assessment areas. Affordable housing and small business loans were identified by community contacts as a common opportunity and need, which have been addressed by the institution through investments in Low-Income Housing Tax Credits (LIHTCs), Government National Mortgage Association (GNMA) and Federal National Mortgage Association (FNMA) mortgage backed securities (MBS), Small Business Investment Corporations (SBICs), Community Development Financial Institutions (CDFI), general obligation bonds benefitting low- and moderate-income individuals, zero-interest deposits, and mutual funds that support the affordable housing industry.

The bank's primary vehicle for qualified community development investing is LIHTC projects throughout its five-state footprint. These investments address vital needs for affordable housing throughout the bank's assessment areas and have a material impact on the communities the bank serves. LIHTC transactions are extremely complex. The technical expertise required to complete a LIHTC project is an array of real estate, legal, tax, development, and policy acumen. As of December 31, 2014, Comerica has commitments in 79 separate tax credit funds, including 25 in Michigan, 28 California, 7 in Texas, 1 Florida, 2 in Arizona, and 16 nationwide that directly benefit the bank's assessment areas. The table below details the bank's LIHTC activity by state.

State	LIHTC – Prior Period Book Value	LIHTC – Current Period Investments	Total	
	\$	\$	\$	% Total \$
Arizona	0	9,217,327	9,217,327	4.1
California	37,328,048	29,725,110	67,053,257	29.5
Florida	0	1,275,000	1,275,000	0.6
Michigan	20,415,710	30,785,935	51,201,645	22.5
Texas	13,488,784	14,330,199	27,818,983	12.3
Nationwide	54,453,289	16,004,095	70,457,384	31.0
Total	\$125,685,831	\$101,337,666	\$227,023,497	100.0%

The nationwide LIHTC investments benefit 17 of Comerica's assessment areas. The table below details the funds by each state. The funds' totals are included in the table above.

State	# Assessment Areas	# Funds	Current Period \$	Prior Period Book Value \$	Total \$
Arizona	1	3	0	4,294,114	4,294,115
California	7	13	8,888,571	13,820,742	22,709,313
Florida	2	6	279,467	6,116,961	6,396,427
Michigan	3	8	1,996,129	14,920,997	16,917,126
Texas	4	11	4,839,928	15,300,475	20,140,403
Total	17	N/A	\$16,004,095	\$54,453,289	\$70,457,384

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The nationwide funds will be discussed in each state and assessment area sections which benefitted from the investments.

Comerica invested \$18.7 million in mortgage-backed securities and \$10.7 million in general obligation bonds during the review period. The MBS investments allow lenders to lower financing costs and create opportunities for affordable housing for low- and moderate- income families seeking home ownership. The general obligation bonds benefit various schools where more than 50% of the students are from low- and moderate-income families.

Comerica's investment performance is enhanced by investments in the aforementioned products, as well as an in-kind donation of a banking center valued at \$100,000 and approximately \$11 million in charitable grants and donations. The bank's charitable contributions supported affordable housing initiatives; small business development; and educational, health care and social service organizations that primarily serve low- and moderate-income geographies, individuals, and families.

Service Test

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

Retail Services

Retail delivery systems are accessible to the geographies and individuals of different income levels. During the review period, Comerica opened one drive thru branch and closed six branches. None of these branches were located in a low- or moderate-income census tract. A specific listing of the branches opened or closed during the period may be obtained by accessing the bank's CRA public file. Also, refer to the individual assessment areas for details regarding the bank's distribution of branches and ATMs. Comerica's opening and closing of branches has generally not adversely affected the accessibility of banking services in low- and moderate-income geographies. In addition, the banking services and business hours do not vary in a way that inconveniences any portion of the bank's assessment areas, particularly low- and moderate-income geographies and individuals.

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

- **Online Banking** – This delivery system includes the following: Web Banking; Quicken® Banking with Comerica; Quicken® for Business; QuickBooks®; Comerica Web Bill Pay; and Telephone Bill Pay.
- **Mobile Banking** – Comerica also offers mobile banking, which includes a downloadable application for smartphone and iPad® devices. From this mobile web browser, customers

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can access online banking accounts where they can view balances, make account transfers, pay bills, deposit checks with Click&Capture DepositSM (not available for mobile web browser), and find Comerica ATM and banking center locations.

- **Customer Contact Centers** – This delivery system includes the bank’s call and service centers. These centers handle a variety of services including customer service calls, sales, online banking questions, emails, and applications.
- **Interactive Voice Response** – This service is a toll-free number available for business customers to access account information, request account details, transfer funds between accounts, and perform other business banking transactions.
- **On-the-Job Banking** – The bank enters into agreements with businesses to offer the business’s employees convenient, work-based no or low-cost personal banking products and services. The employees of these businesses receive benefits such as direct deposit of pay checks, waivers or discounts on fees, and discounted installment loans if automated payments are made from the On-the-Job Banking Checking account. Many of the businesses that choose to offer this program as a benefit to their employees are located in low- and moderate-income census tracts and/or consist of lower wage positions, qualifying their employees as low- or moderate-income individuals.
- **Credit Card Partnership** – Although Comerica does not originate credit card loans, the bank partners with Elan, which originates small dollar credit card loans to small businesses on behalf of Comerica. During the review period, 180,340 business credit card lines were originated. These loans are not included in the bank’s reportable small business loans for CRA purposes. However, these loans were considered when evaluating the number of loans Comerica made to small businesses.

Community Development Services

The bank provides a relatively high level of community development services and demonstrated leadership in providing community development services during the review period. Comerica’s staff participated in more than 4,500 events/meetings during the review period. Approximately 3,300 of those were in the full-scope assessment areas. The level of community development services were considered excellent in Arizona and Florida, good in California and Texas, and adequate in Michigan.

The bank has appointed regional CRA Officers in each of the states where it has banking operations. The regional CRA officers are responsible for identifying and, where appropriate, participating in community development-related activities. The bank’s directors, officers, and staff members are involved in numerous organizations and activities that promote affordable housing for low- and moderate-income individuals, services for low- and moderate-income individuals, economic development, and revitalization of low- and moderate-income areas. Additionally, the bank participates in numerous financial literacy initiatives to help provide financial education to low- and moderate-income school children throughout its assessment areas, including the following:

- Junior Achievement
- Youth Incentive Savings Program
- Project Money Smart

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- Golightly Academy of Finance
- Youth Savings Accounts – Financial Literacy Program
- How To Do Your Banking
- Operation Hope’s “Banking On Our Future”
- Arizona Saves

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

Fair Lending or Other Illegal Credit Practices Review

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve System retains authority to enforce compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Federal Reserve Bank of Dallas did not cite violations involving illegal discrimination or other illegal credit practices that adversely affected the evaluation of the bank’s CRA performance. As of the date of this evaluation, the Federal Reserve Bank of Dallas is unaware of any violations of the Equal Credit Opportunity Act or Regulation B, or any unfair, deceptive, or abusive acts or practices identified by the CFPB.

STATE OF TEXAS

CRA Rating for Texas: Satisfactory

The Lending Test is Rated: High Satisfactory

The Investment Test is Rated: Outstanding

The Service Test is Rated: High Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to assessment areas' credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes a relatively high level of community development loans.
- Has an excellent level of qualified community development investments and grants, and is often in a leadership position.
- Provides a relatively high level of community development services.

Scope

Full scope reviews were conducted for two assessment areas in Texas, including:

- Dallas-Fort Worth-Arlington, TX MSA
- Houston-The Woodlands-Sugar Land, TX MSA

Limited scope reviews were conducted for the remaining three assessment areas, including:

- Austin-Round Rock, TX MSA
- San Antonio-New Braunfels, TX MSA
- Kerr County, TX NonMSA

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

Description of Institution's Operations in Texas

The bank operates 138 branch offices in its assessment areas in Texas, representing 28.6% of total branches. As of June 30, 2014, the bank's Texas market accounted for \$10.3 billion in deposits, representing 19.3% of its total deposits. There are 579 FDIC-Insured institutions in Texas, operating 6,808 offices with \$719.8 billion deposits. Comerica ranked 12th among the institutions in market share of deposits in Texas with 1.4%. JPMorgan Chase Bank, N.A. ranks first in deposit market share with 22.8%, followed by Bank of America with 12.2%, and Wells Fargo Bank, N.A. with 9.2%.

Of the 5,724 HMDA loans originated and purchased by the bank, 1,217 (21.3%) were in the Texas assessment areas. Of the 24,543 small business loans originated and purchased by the bank, 6,231 (25.4%) were in the Texas assessment areas. Additionally, Texas assessment areas HELOC lending represented 24.1% (3,430) of the 14,234 loans originated by the bank.

As of 2010 Census, the Texas assessment areas population was 14,308,094. There were 5,428,466 housing units, of which 55.4% were owner-occupied, 34.8% rental, and 9.8% vacant. There were 2,824 census tracts in the Texas assessment areas; of which 12.0% are low-, 27.2% are moderate-, 27.6% are middle-, 32.8% are upper-, and 0.5% are unknown-income. According to the FFIEC data, median family income ranged from \$49,300 to \$75,900 for the assessment areas during the review period.

The unemployment rate in Texas is significantly lower than the national level. Statewide annual average unemployment rate decreased from 6.7% in 2012 to 5.1% in 2014. National annual average unemployment rate decreased from 8.1% in 2012 to 6.2% in 2014. Texas economy at \$1.6 trillion is the second biggest in the U.S., behind only California. Texas ranks first for current economic climate. It is the second fastest job and economic growth over the past five years. In addition, there are 121 of the 1,000 largest public and private companies in the U.S. based in Texas, including giants like AT&T, ExxonMobil and Dell. One of the only things holding Texas back is the education rate among its labor supply. Only 82% of adults have a high school degree, which is second lowest among the states.³

Conclusions with Respect to Performance Tests in Texas

Lending Test

The bank's overall Lending Test rating is High Satisfactory. Lending levels reflect good responsiveness to assessment areas credit needs in the Dallas-Fort Worth MSA and the Houston, TX Assessment Areas. The small business lending was given greatest consideration in determining the Lending Test rating for Texas because the bank originated more small business loans by number and dollar volume than HMDA or HELOC loans. The bank's performance in

³ <http://www.forbes.com/places/tx/>

the Dallas-Fort Worth MSA Assessment Area was given greater consideration due to the bank's higher level of deposits and loans.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA and small business loans as well as HELOC lending can be found in tables in Appendices G through I.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs based on small business and HMDA market share ranking as discussed below. The assessment areas in Texas contain 24.2% of the bank's small business, HMDA, and consumer lending by number of loans and 22.1% by dollar volume totaling \$2.2 billion. In comparison, 19.3% of the bank's total deposits are in Texas.

Summary of Statewide Lending Activity* Assessment Areas Located in Texas January 1, 2012 through December 31, 2014				
Loan Type	#	%	\$(000s)	%
Total Home Equity Lines of Credit	3,340	30.9	\$335,780	15.1
Home Improvement	17	1.4	3,594	0.9
Home Purchase	407	33.4	138,705	34.6
Refinance	780	64.1	205,352	51.2
Multi-family	13	1.1	53,101	13.3
Total HMDA	1,217	11.3	\$400,752	18.1
Total Small Business	6,231	57.8	\$1,482,617	66.8
Total Loans	10,788	100.0%	\$2,219,149	100.0%
*Originations and purchases within the bank's assessment areas.				

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

The geographic distribution of loans in Texas reflects excellent penetration throughout the assessment areas. Of the two assessment areas reviewed utilizing the full-scope procedures, performance is considered excellent in both

The overall distribution among borrowers of different income levels and businesses of different sizes in Texas is adequate. The performance in both full-scope assessment areas is considered adequate.

During the review period the bank also originated 14 loans through the Ex-Im Bank Guaranty Program; 349 small business micro loans, 40.1% of which were to businesses located in low- and moderate-income geographies; and originated or purchased 92 Government Guaranteed Loans.

More information on the distribution of lending can be found in each full-scope assessment area sections of this report.

Community Development Loans

In Texas, the bank makes a relatively high level of community development loans. Comerica originated or renewed 75 community development loans totaling \$299.4 million in Texas. The community development loans originated during the evaluation period were for a variety of purposes. The majority of the loans, by volume, were to organizations that provide community development services to low- and moderate-income individuals. However, by dollar volume, the majority were for revitalization and stabilization.

Comerica is a leader in making community development loans in the DFW Assessment Area and makes a low level in the Houston, TX Assessment Area. There were no community development loans in Kerr County and a few were originated or renewed in the San Antonio and Austin Assessment Areas. However, of the seven community development loans originated or renewed in the San Antonio Assessment Area four totaling approximately \$63 million related to the city's Downtown Strategic Framework Plan. The Strategic Framework Plan provides a critical road map for future development activity by the city, including a focus on building new housing downtown, an urban infrastructure, including parks, improved streets, mass transit, enhanced cultural institutions, increased parking to spur housing growth, in locations where growth would provide the greatest benefit for the least cost.⁴ More information on community development lending can be found in each full-scope assessment area sections.

Investment Test

In Texas, the bank's overall Investment Test rating is Outstanding. The bank has an excellent level of qualified community development investments and grants. Community development investments for the state of Texas totaled \$43.3 million. The bank's investments were primarily focused in LIHTC investments. The Texas assessment areas current period investments in LIHTC total \$14.3 million compared to the prior period total of \$13.5 million. The bank also invested in mortgage-backed securities, general obligation bonds, and made various contributions to organizations that provide community development services.

Furthermore, four of Comerica's assessment areas were positively impacted from eleven of Comerica's nationwide LIHTC investments. The investments benefitted the two full-scope assessment areas, Dallas-Fort Worth-Arlington, TX MSA and Houston-The Woodlands-Sugar Land, TX MSA; as well as two of the limited scope assessment areas, Austin-Round Rock, TX MSA and San Antonio-New Braunfels, TX MSA. During the review period for the nationwide LIHTC investments, Comerica invested \$4.8 million. Comerica also holds outstanding LIHTC that have a book value of \$15.3 million. The related amounts are included in total investments in

⁴ City Center Downtown Strategic Plan – HR&A Advisors – February 2012 – page 4
<http://www.sanantonio.gov/Portals/0/files/CCDO/City%20Implementation%20Plan.pdf>

the Institution section of this report. Specific details regarding investments can be found in the full-scope assessment area sections of this report.

Service Test

In Texas, the bank's overall Service Test rating is High Satisfactory. Of the two full-scope assessment areas reviewed, Dallas-Fort Worth is considered excellent and Houston is considered adequate.

Retail Services

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

Community Development Services

The bank provides a relatively high level of community development services. Particularly noteworthy is the bank's participation in the following financial literacy initiatives:

- **Comerica's Youth Incentive Savings Program** - Comerica's Youth Incentive Savings Program is designed to aid the development of a new generation of savers, by providing a basic knowledge of banking, including how and why to save, how to make a bank deposit, and how important saving is to long-range planning. The in-school savings program's main purposes are to encourage students to learn the value of savings and how basic math applies to the real world.

Comerica's relationship with the schools involved in the program reflect a commitment to provide students an opportunity to interact with bankers and are designed to aid the development of a new generation of savers. During the review period, Comerica participated with five different schools, all of which had a majority enrollment of low- and moderate-income students.

- **Junior Achievement** - During the review period, Comerica taught financial literacy in classrooms at four schools in the DFW and Houston, TX Assessment Areas. All of the schools sponsored have a majority of students who are considered low- and moderate-income.
- **Basic Banking Initiative** - The Comerica Basic Banking Initiative provides confidential financial guidance, free consumer credit counseling services, educational resources, and debt management assistance to low- and moderate-income individuals and communities through a partnership with Money Management International, a non-profit community service

organization, headquartered in Sugar Land, Texas. The Basic Banking Initiative is a financial literacy program that addresses a critical need in communities for the basic cornerstone of achieving economic self-sufficiency and establishing a healthy relationship with a financial institution. The curriculum covers topics including; understanding money and credit, understanding a credit report, when the income increases but the bills do not, and first time homebuyer classes. The Basic Banking Initiative primarily serves the un-banked, under-banked, minority, and low- to moderate-income consumers.

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

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Dallas-Fort Worth, TX

The Dallas-Fort Worth-Arlington, TX MSA includes the Dallas-Plano-Irving MD and the Fort Worth-Arlington MD. The Dallas-Plano-Irving MD is comprised of Collin, Dallas, Denton, Ellis, Hunt, Kaufman, and Rockwall Counties. Hood, Johnson, Parker, Somervell, Tarrant, and Wise Counties make up the Fort Worth-Arlington, MD. The bank delineated portions of the Dallas-Plano-Irving MD and the Fort Worth-Arlington MD as its assessment area. The assessment area consists of the entire counties of Dallas, Ellis, Rockwall, and Tarrant, and the delineated portions of Collin and Denton Counties, hereafter referred to as Dallas-Fort Worth, TX Metroplex.

Within the assessment area portions of the Dallas-Fort Worth-Arlington, TX MSA there are 143 low-, 306 moderate-, 325 middle-, and 398 upper-income census tracts. There are also four census tracts where the income level is unknown. As of June 30, 2014 the bank operated 54 branches in the assessment area representing 11.2 % of its branches. Of these, there are 5 branches located in low-income census tracts, 12 branches in moderate-income census tracts, 15 branches in middle-income census tracts, and 22 branches in upper-income census tracts.

The competition among financial institutions within the assessment area is high. As of June 30, 2014, the assessment area was home to 155 FDIC insured institutions operating 1,575 offices with total deposits of \$199.0 billion. The bank had \$5.3 billion in deposits in the DFW Assessment Area representing 10.0% of Comerica's total deposits in all its assessment areas, representing a market share of 2.7% in this assessment area, ranking 7th. Bank of America, N.A., Charlotte, North Carolina holds the largest deposit share at 28.9%, followed by JP Morgan Chase Bank, N.A., Columbus, Ohio at 23.2%, and Wells Fargo Bank, N.A., Sioux Falls, South Dakota at approximately 9.0%. The bank considers the aforementioned banks to be its competitors, as well as Amegy Bank, Houston, Texas, Frost Bank, San Antonio, Texas, and Regions Bank, Birmingham, Alabama.

During the review period, the bank reported 3,041 (60.7%) small business loans totaling \$703.4 million; 1,425 (28.4%) HELOC loans totaling \$147.4 million; compared to 548 (10.9%) HMDA loans totaling \$193.2 million in the DFW Assessment Area.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Dallas-Fort Worth-Arlington, TX MSA as a whole and not the specific assessment area. However, it is reasonable to believe that the data for the MD/MSA area provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 87.5% of the Dallas-Fort Worth-Arlington, TX MSA, and distribution of low-, and moderate-, middle-, and upper-income families for the two areas is similar according to 2010 census data.

The assessment area is part of the region that is commonly known as the DFW Metroplex or DFW area, located in North Texas. The cities of Dallas and Fort Worth are the two central cities and are demographically diverse. However, Rockwall County is one of the fastest growing counties in the state. Listed in the following table is information about population and land area for each county within the DFW Assessment Area, as it relates to statewide ranking.⁵

County	County Seat ⁶	Population		Population Density/ sq. mile		Land Area (sq. mile)	
		#	Rank	#	Rank	#	Rank
Dallas	Dallas	2,448,943	2	2,695	1	871	177
Tarrant	Fort Worth	1,881,469	3	2,085	3	864	180
Collin	McKinney	836,947	6	945	6	841	186
Denton	Denton	708,627	9	744	8	878	172
Ellis	Waxahachie	154,447	25	162	32	935	92
Rockwall	Rockwall	82,239	44	560	10	127	254

Refer to the end of the Performance Context section for more detailed demographic information of the assessment area.

Income Characteristics

According to the 2014 FFIEC Census data, the DFW Assessment Area contained 1,176 census tracts. The area is made up of approximately 12.2% low- and 26.0% moderate-income census tracts while the remaining were middle, upper, and unknown-income census tracts. The assessment area consists of 22.9% low- and 16.7% moderate-income families. It is estimated that 10.6% of the families live below the poverty level, which is below the 13% statewide poverty level for Texas. The median family income decreased during the review period. The following charts reflect the assessment area's estimated median family income for the years 2012-2014.

Dallas-Plano-Irving MD			
Income Level	2012	2013	2014
Median Income	\$70,600	\$69,000	\$69,100
Low-income	< \$35,300	< \$34,500	< \$34,550
Moderate-income	\$35,300-\$56,479	\$34,500-\$55,199	\$34,550-\$55,279
Middle-income	\$56,480-\$84,719	\$55,200-\$82,799	\$55,280-\$82,919
Upper-income	≥ \$84,720	≥ \$82,800	≥ \$82,920

⁵ Texas Land Area County Rank, USA.com; available from: <http://www.usa.com/texas-state.htm>

⁶ Texas State Library – Counties and County Seats; available from: <https://www.tsl.texas.gov/ref/abouttx/countyseats.html>

Fort Worth-Arlington MD			
Income Level	2012	2013	2014
Median Income	\$69,200	\$65,500	\$68,700
Low-income	< \$34,600	< \$32,750	< \$34,350
Moderate-income	\$34,600-\$55,359	\$32,750-\$52,399	\$34,350-\$54,959
Middle-income	\$55,360-\$83,039	\$52,400-\$78,599	\$54,960-\$82,439
Upper-income	≥ \$83,040	≥ \$78,600	≥ \$82,440

Housing Characteristics

Of total housing units in the assessment area, 55.6% of the units are classified as owner-occupied while 35.2% are classified as rental units and 9.2% of the available housing is vacant. Rental units represent 57.9% of housing units in low-income census tracts and 44.3% in moderate-income census tracts.

The following table⁷ lists the median price of a house, growth rate, and year built, for the period 2010-2014, for counties within the assessment area, the state, and United States. Collin, Denton, and Rockwall Counties median housing value is above the state and national levels, and they are also newer homes. Overall, the Texas price growth rate exceeds the national growth rate.

Area	Median Value	Price Growth Rate since 2000	Median Year Built
Dallas	\$129,200	39.3%	1978
Tarrant	\$137,700	52.5%	1985
Collin	\$211,900	36.3%	1996
Denton	\$189,000	41.9%	1995
Ellis	\$140,200	53.45%	1991
Rockwall	\$187,600	27.5%	2000
Texas	\$131,400	59.3%	1984
National	\$175,700	46.9%	1974

New residential construction in the Dallas-Fort Worth-Arlington MSA has increased considerably since the prior review period. In 2011, new single-family home building permits totaled 15,350. In 2014, new single-family building permits totaled 25,126, an increase of 63.7%. While continuing to improve, the housing market remains well below where it was before the last economic recession.⁸

According to 2010 Census, the median housing value for the DFW Assessment Area in 2010 was \$149,610, compared to \$155,697 for the Dallas-Plano-Irving, TX MD and \$133,767 for Fort Worth-Arlington, TX MD. In 2010, the affordability ratio was at 36.6% for the Dallas-Plano-

⁷ Texas Local Data, USA.com; available from: <http://www.usa.com/texas-state.htm>

⁸ https://www.recenter.tamu.edu/data/building-permits/#!/msa/Dallas-Fort_Worth-Arlington%2C_TX

Irving, TX MD and 41.5% for Fort Worth-Arlington, TX MD. The affordability ratio is defined as the median household income divided by the median housing value. The closer the ratio is to 100% the more affordable the homes. A ratio of 100% indicates that median family income is just sufficient to purchase the median priced home. These affordability ratios indicate that the majority of households have less income than necessary to purchase the average house. This can limit a bank's ability to originate home mortgage loans in this assessment area.

The DFW Assessment Area still has some of the lowest priced homes in the United States when compared to other large cities. However, this assessment area is experiencing its worst housing shortage in decades. As a result, the tight market and booming population increase the cost of housing and economic stress on both renters and potential homebuyers. This is particularly true when it comes to affordable housing.⁹

Overall, the DFW Assessment Area fared well during the most recent national foreclosure crisis; however, the southern sector of Dallas County was more adversely affected than other sectors of the county. Foreclosure rates in metropolitan areas across the country ranged from 0.7% to 16.0% throughout the nation in September 2013. The foreclosure rate for the Dallas-Fort Worth-Arlington, TX MSA was 3.1% in September 2013. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in the Dallas-Fort Worth-Arlington, TX MSA decreased from 3.8% in December 2011 to 2.9% in September 2013.¹⁰

With home costs and apartment rents in North Texas at record high levels, more and more residents are struggling to pay for housing. While there are about 40,000 apartments being built in North Texas, average rents on new units are above \$1,200 a month. Almost 43 million U.S. households now live in rental housing, an increase of 9 million in the last decade. More than a third of Americans are now renters, the largest share since the 1960s, according to a new report by the Joint Center for Housing Studies of Harvard University. Currently, the cost of housing in the DFW area is growing at a multiple of the increase in median incomes.¹¹

The median gross rent in 2010 for the Dallas-Plano-Irving, TX MD was \$857 and Fort Worth-Arlington, TX MD rent was \$831, which is slightly higher than the Texas state average of \$786. In 2010, 45.6% of renters had rent costs greater than 30% of their income. Because there are fewer people buying, both rents and construction permits for new multi-family housing are

⁹ Brown, Steve. Affordable-housing Proposals have Dallas Developers Scrambling for Bigger Say – Dallas Morning News August 6, 2015; available from <http://www.dallasnews.com/business/columnists/steve-brown/20150806-affordable-housing-proposals-have-dallas-developers-scrambling-for-bigger-say.ece>

¹⁰ Serious Mortgage Delinquency Data for All 366 U.S. Metropolitan Areas, September 2013; available from; http://foreclosure-response.org/assets/maps&data/MetropolitanAreaDelinquencyRates_Methodology_September2013.pdf.

¹¹ Brown, Steve – Record Housing Costs Put the Squeeze on DFW Residents April 16, 2016; available from <http://www.dallasnews.com/business/columnists/steve-brown/20160414-record-housing-costs-put-the-squeeze-on-d-fw-residents.ece>

rising. Multi-family permits totaled 11,029 in 2011 and 18,520 in 2014 in the Dallas-Fort Worth Arlington, TX MSA. This represents an increase of 67.9%.¹²

Employment and Economic Conditions

DFW Assessment Area's economy is highly diverse and is home to some of the nation's largest companies and employers. They range from retail stores, transportation companies, health care systems, financial services, universities, and municipalities. Some of the largest employers are: Wal-Mart Stores, Inc.; AMR Corporation (American Airlines); Texas Health Resources, Lockheed Martin Aeronautics Co.; Baylor Health Care System; Citigroup, and AT&T.¹³

The Texas unemployment rates for 2012 through 2014 were lower than the national averages for that same period. Overall, the Dallas – Fort Worth Arlington, TX MSA fared slightly better than the state and the nation. According to the 2010 Census, the unemployment rate was 11.7% in low-income census tracts and 9.1% in moderate-income census tracts. The higher than average unemployment rates in low- and moderate-income census tracts could affect loan demand from these census tracts.

The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Assessment Area¹⁴			
	2012	2013	2014
National	8.1%	7.4%	6.2%
Texas	6.7%	6.2%	5.1%
Dallas County	7.1%	6.5%	5.4%
Collin County	5.9%	5.5%	4.5%
Denton County	5.7%	5.3%	4.4%
Ellis County	6.8%	6.1%	4.9%
Rockwall County	6.2%	5.7%	4.5%
Dallas-Plano-Irving-TX, MD	6.6%	6.1%	5.0%
Tarrant County	6.5%	6.0%	5.0%
Fort Worth-Arlington TX, MD	6.5%	6.0%	5.0%
Dallas-Fort Worth-Arlington TX, MSA	6.6%	6.1%	5.0%

¹² Texas A&M Real Estate Center Data – Building Permits available from; <https://www.recenter.tamu.edu/data/building-permits>.

¹³ Dallas Business Journals; available from <http://www.bizjournals.com/dallas/subscriber-only/2015/07/17/largest-employers.html>

¹⁴ Unemployment Rate available from; <http://data.bls.gov/cgi-bin/dsrv?la>.

Community Contacts and Community Development Opportunities

We determined assessment area credit needs by reviewing information from seven community contacts conducted by the Federal Reserve Bank of Dallas during the evaluation period. The organizations provide services to the bank's assessment areas. Community contacts included nonprofit organizations that support lending to small businesses, lending to low- and moderate-income people, affordable housing, and community services to low- and moderate-income people. Critical credit, banking, and service needs identified included the following:

- Affordable housing loans
- Small business loans
- Working capital loans
- Lines of credit for very small businesses
- Micro consumer loans with low and no predatory interest rates – to replace payday loans
- Flexible underwriting standards
- Financial literacy for low- and moderate-income individuals and small business owners
- Homebuyers counseling

Dallas-Fort Worth, TX Metroplex

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

Dallas-Fort Worth, TX Metroplex								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	143	12.2	123,393	9.2	40,743	33.0	307,265	22.9
Moderate-Income	306	26.0	317,861	23.7	56,937	17.9	224,949	16.7
Middle-Income	325	27.6	397,396	29.6	30,333	7.6	246,421	18.3
Upper-Income	398	33.8	504,799	37.6	14,255	2.8	564,823	42.0
Unknown-Income	4	0.3	9	0.0	0	0.0	0	0.0
Total AA	1,176	100.0	1,343,458	100.0	142,268	10.6	1,343,458	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	235,554	61,650	5.1	26.2	136,377	57.9	37,527	15.9
Moderate-Income	540,371	237,707	19.8	44.0	239,214	44.3	63,450	11.7
Middle-Income	652,808	362,602	30.3	55.5	235,947	36.1	54,259	8.3
Upper-Income	726,098	535,689	44.7	73.8	147,374	20.3	43,035	5.9
Unknown-Income	18	18	0.0	1.0	0	0.0	0	0.0
Total AA	2,154,849	1,197,666	100.0	55.6	758,912	35.2	198,271	9.2
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	23,890	7.7	20,333	7.2	2,529	13.2	1,028	9.2
Moderate-Income	61,486	19.8	54,097	19.3	4,997	26.1	2,392	21.5
Middle-Income	85,935	27.6	78,064	27.8	4,734	24.7	3,137	28.2
Upper-Income	139,311	44.8	127,960	45.6	6,795	35.4	4,556	40.9
Unknown-Income	551	0.2	412	0.1	116	0.6	23	0.2
Total AA	311,173	100.0	280,866	100.0	19,171	100.0	11,136	100.0
	Percent of Total Businesses:			90.3		6.2		3.6
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	76	3.4	68	3.1	7	18.9	1	16.7
Moderate-Income	270	12.1	263	12.0	7	18.9	0	0.0
Middle-Income	694	31.2	686	31.4	8	21.6	0	0.0
Upper-Income	1,185	53.2	1,165	53.4	15	40.5	5	83.3
Unknown-Income	1	0.0	1	0.0	0	0.0	0	0.0
Total AA	2,226	100.0	2,183	100.0	37	100.0	6	100.0
	Percent of Total Farms:			98.1		1.7		0.3
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Conclusions With Respect to Performance Tests in Dallas-Fort Worth, Texas**Overview****Lending Test**

The bank's lending performance is good. Lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. Comerica's lending performance is good given Comerica's business strategy is middle-market commercial lending and its mortgage terms are not as accommodating as its competitors. Furthermore, the bank makes a relatively high level of community development loans; which mitigates the low level of HMDA lending in low- and moderate-income census tracts and to low- and moderate-income families.

Lending Activity

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, given its volume is more significant than its HMDA lending. Small business lending were given more weight than HELOC and HMDA lending in determining the bank's Lending Test rating in the assessment area. Details of the bank's HMDA, HELOC, and small business lending and information regarding lending by aggregate can be found in Appendix G.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica			CRA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	18 th	838	191.4	177	105,769	3.7
2013	14 th	1,121	256.8	195	99,780	4.2
2014	16 th	1,082	252.4	203	115,595	4.5
Total		3,041	700.6		321,144	12.4

Comerica's focus is middle-market commercial lending. Conversely, home mortgage loans are the primary business line for many of the top HMDA reporters. The following table details key data about HMDA reporters operating within the assessment area.

Year	Comerica			HMDA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	127 th	231	80.8	886	237,182	46.3
2013	133 rd	193	73.7	926	225,656	50.8
2014	158 th	124	38.7	927	166,431	35.8
Total		548	193.2		629,269	132.9

Of the 14,234 HELOC loans the bank originated, 1,425 or 10.0% were in the DFW Assessment Area.

Geographic Distribution of Loans

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

Small Business Loans

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

The bank's small business lending in low-income census tracts is excellent. Comerica's performance is above aggregate throughout the review period. However, its performance is comparable to the percentage of small businesses in low-income census tracts for 2012 and 2013, but above in 2014.

The bank's small business lending in moderate-income census tracts is excellent. Comerica's performance is above aggregate and the percentage of small businesses throughout the review period.

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

HMDA Loans

The geographic distribution of HMDA loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of aggregate. As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 900 HMDA aggregate lenders in this assessment area. More than half of the aggregate lenders originated or purchased less than 25 HMDA loans in this assessment area.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. The bank's performance was slightly better than aggregate. The bank originated or purchased six home purchase loans during the review period in this assessment area. Comerica's performance for 2012 was above aggregate and similar in 2013 and 2014.

Home purchase lending in moderate-income census tracts is good. Comerica's performance was slightly below aggregate in 2012. However, the bank's performance was slightly above aggregate in 2013 and 2014. Both performances were below the percentages of owner-occupied housing units in moderate-income census tracts.

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

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. Comerica's performance was comparable to aggregate, but below the percentages of owner-occupied housing units in low-income census tracts.

Home refinance lending in moderate-income census tracts is good. Comerica's performance was above aggregate throughout the review period, but below the percentages of owner-occupied housing units in moderate-income census tracts. Comerica originated or purchased 359 refinance loans during the review period, 45 of which were in moderate-income census tracts.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is good. Comerica originated 4.0% in 2012, 4.4% in 2013, and 4.4% in 2014 of its HELOC loans in low-income census tracts during

the review period, which is comparable to the percentage of owner occupied units in the assessment area low-income census tracts.

Comerica's HELOC lending in moderate-income census tracts is adequate. During the review period, Comerica originated 14.5%, 15.8%, and 12.5% of its HELOC loans in moderate-income census tracts in 2012, 2013, and 2014, respectively. This performance represents a level of lending that is below the percentage of owner-occupied units in these census tracts.

The bank's HELOC lending in middle-income census tracts was below the percentage of owner-occupied housing units in these census tracts while the lending in upper-income census tracts was greater than the percentage of owner-occupied housing units.

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

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

Small Business Loans

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. Of the 3,041 small business loans originated during the review period by Comerica, 24.3% were originated to small businesses, which is less than the percentage of businesses with annual gross revenues of \$1 million or less. However, 25.4% of the small business loans did not have revenues reported. Aggregate originated 42.1%, 48.3%, and 43.4% of loans to small businesses in 2012, 2013, and 2014, respectively.

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance was below the aggregate performance who originated slightly more than 90% of the small business loans of \$100,000 or less throughout the review period. Comerica originated slightly more than 49% of small dollar loans to small businesses during the review period. Additionally, Comerica reported 21.7% of its small business lending in amounts of \$100,000 - \$250,000 during the review period.

Aggregate included more than 200 CRA reporters. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top CRA reporters throughout the review period included American Express Bank, FSB; Chase Bank USA, N.A.; Citibank, N.A., Capital One Bank USA, N.A. and Wells Fargo Bank, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered good when compared to demographic characteristics of the assessment area, as well as the performance of aggregate.

Home Purchase Lending

The bank's home purchase lending to low-income families is adequate. The bank's performance was slightly below aggregate in 2012, but above in 2013 and 2014. Home purchase lending for aggregate and the bank is significantly below the percentage of low-income families in the assessment area.

The bank's home purchase lending to moderate-income families is adequate. Comerica's performance was slightly above aggregate and the percentage of moderate-income families in 2012, but below aggregate performance in 2013 and 2014.

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

Home Refinance Lending

The bank's home refinance lending to low-income families is good. Comerica's performance was above aggregate throughout the review period, but below the percentage of low-income families in the assessment area.

The bank's home refinance lending to moderate-income families is good when compared to the percentage of moderate-income families in the assessment area. The bank's performance was comparable to aggregate in 2012 and 2013, but below the percentage of moderate-income families in the assessment area. In 2014, Comerica's performance was significantly above aggregate and the percentage of moderate-income families. The bank's refinance lending to middle- and upper-income families was greater than the percentage of middle- and upper-income families located within the assessment area.

Home Equity Lines of Credit

HELOC lending by family income in the assessment area is considered excellent when compared to the demographic characteristics of the assessment area. Comerica originated 14.2% in 2012, 13.5% in 2013, and 12.9% in 2014 of its HELOC loans to low-income families. The bank's performance was significantly below the percentage of low-income families in the assessment area. Considering there are approximately 11.0% of families living below the poverty level the bank's performance is excellent. It should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

Comerica's HELOC lending to moderate-income families is excellent. Comerica originated 20.7% in 2012, 18.2% in 2013, and 15.8% in 2014 of its HELOC loans to moderate-income families. The bank's performance is above the 16.4% of moderate-income families in the assessment area.

The bank's HELOC lending to middle-income families was below the percentage of middle-income families in the assessment area throughout the review period. However, the bank's HELOC lending to upper-income families was above the percentage of upper-income families in the assessment area throughout the review period.

Community Development Loans

The bank is a leader in making community development loans in the assessment area. Comerica originated or renewed 45 loans totaling \$172.5 million, to 25 borrowers. As noted in the following table, of the community development loans the bank made, 60.3% (11) are associated with revitalization projects totaling approximately \$104 million.

Community Development Lending		
Purpose	#	\$000s
Affordable Housing	9	44,931
Community Services	19	10,615
Economic Development	6	13,013
Revitalization and Stabilization	11	103,973
Total Loans	45	172,532

While all of the loans are noteworthy, the following are a sample of the bank's community development loans:

- Two loans totaling \$22.8 million to finance an industrial warehouse facility. The 220 acre project will eventually be home to nine industrial buildings totaling 2.8 million square feet. The project is in a Tax Incremental Finance District located in a moderate income area in the city of Grand Prairie, Texas.
- A \$30.0 million loan to construct student housing. The project is located within a Tax Increment Reinvestment Zone (TIRZ) in the city of Arlington, Texas.
- An \$11.1 million construction loan to facilitate the opening of new stores, new buildings for City Hall, the Chamber of Commerce, a library, recreation center and apartment buildings; resulting in the creation of new jobs. The loan funds will be utilized in a moderate-income census tract which has been designated by the city of Desoto, Texas as the Town Center Catalyst Project and Vision Project (public improvement to the Town Center).
- An \$11.0 million loan to a Community Development Entity, that will bring jobs to low-income areas by investing in companies already located in these areas or by acquiring businesses and relocating them to a low-income area.

Investment Test

The bank's performance under the Investment Test is excellent. The bank's investments were primarily focused in LIHTC investments. The bank also invested \$3.5 million in MBS and made \$1.3 million in contributions to 71 organizations that provide community development services.

However, this assessment area benefitted significantly from statewide donations and investments, and nationwide investments that included this assessment area. Comerica contributed \$258,926 to organizations that provide community development services throughout Texas, which includes this assessment area.

During the current review period for the statewide investments, Comerica invested approximately \$5.0 million in a LIHTC project in this assessment area. Comerica also holds an outstanding LIHTC investment that has a current book value of \$1.6 million. For nationwide investments, Comerica invested \$1.1 million in a LIHTC project during the review period. Comerica also holds outstanding LIHTC investments, among three projects, that have a current book value of \$5.8 million. The related amounts are included in total investments in the Institution section of this report.

Service Test

The bank's Service Test performance is excellent. Its retail and community development services reflect excellent responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 54 branch offices and 61 ATMs within the assessment area as of December 31, 2014, were compared to the distribution of households and businesses among the census tract categories within the assessment area. The table below summarizes the bank's retail locations in the DFW Assessment Area.

Tract Income	% of Geographies	% of Households	% Businesses	Branches		Full Service ATMs		Cash Only ATMs	
				#	%	#	%	#	%
Low	12.3	10.1	7.7	5	9.3	5	8.6	0	0.0
Moderate	26.0	24.4	19.8	12	22.2	13	22.4	0	0.0
Middle	27.6	30.6	27.6	15	27.8	15	25.9	0	0.0
Upper	33.8	34.9	44.7	22	40.7	25	43.1	3	100.0
Unknown	0.3	0.0	0.2	0	0.0	0	0.0	0	0.0
Total	100.0	100.0	100.0	54	100.0	58	100.0	3	100.0

The bank did not open or close any branches in the assessment area, during the review period. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by the bank is generally the

same throughout the assessment area. The bank offers extended and weekend hours with convenient drive-thru services. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining the reasonableness of accessibility to the bank's product and services.

Community Development Services

The bank is a leader in providing community development services in the assessment area. The bank's management and employees served as board members and in other leadership roles contributing their financial expertise to 55 organizations offering community development services. The organizations services focused on financial literacy, business development, home buyers education, after-school care, and various other community services that aided LMI individuals. Employees participated in 816 events or meetings during the review period.

Particularly commendable and responsive is Comerica's involvement throughout the assessment area in providing financial literacy through programs such as Comerica's Youth Savings Incentive Program, Junior Achievement, and the Basic Banking Initiative. In addition to those programs, Comerica also provided financial literacy training through other programs. The table below shows the number of events by type of involvement.

Purpose	# Events/Meetings
Affordable Housing	9
Benefits LMI Individuals/Geographies	710
Provides Economic Development	97
Total	816

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 1,570 credit cards loans to small business customers. This partnership is also responsive to assessment area credit needs that were identified by community contacts.

Description of Operations in Houston, TX

The Houston-The Woodlands-Sugar Land, TX MSA includes nine counties. The bank delineated as its assessment area, the entire area of Harris and Montgomery counties and portions of Brazoria, Fort Bend, and Galveston Counties, hereafter referred to as the Houston Assessment Area. Although Austin, Chambers, Liberty, and Waller Counties are part of the Houston-The Woodlands-Sugar Land, TX MSA the bank chose not to include these counties as part of its assessment area. Further, the Houston-The Woodlands-Sugar Land, TX MSA name was changed as of result of the 2014 OMB changes. The MSA was formerly Houston-Sugar Land-Baytown MSA and included the aforementioned counties in addition to San Jacinto County. The change had no effect on the Houston Assessment Area.

According to the 2014 FFIEC Census Data, within the assessment area portions of the MSA there are 125 low-, 278 moderate-, 249 middle-, and 325 upper-income census tracts. There are also four census tracts where income is unknown. As of June 30, 2014 the bank operated 57 branches in the Houston Assessment Area representing approximately 12.0% of its total branches. There are 6 branches located in low-income census tracts, 10 branches in moderate-income census tracts, 13 branches in middle-income census tracts, and 28 branches in upper-income census tracts.

The competition among financial institutions, within the assessment, is highly competitive. As of June 30, 2014, the assessment area was home to 96 FDIC insured institutions operating 1,469 offices with total deposits of \$239.5 billion. The bank reported \$3.5 billion in deposits in the Houston Assessment Area for the same date, representing 6.6% of Comerica's total deposits in all its assessment areas, which represents a market share of 1.5% in this assessment area, ranking 9th. JP Morgan Chase Bank, N.A. holds the largest deposit share at 43.5%, followed by Wells Fargo Bank South Central, N.A. 11.2%, and Wells Fargo Bank, N.A. at 9.3%. The bank considers the aforementioned banks to be its competitors, as well as Amegy Bank, Bank of America, N.A.; Frost Bank; and Regions Bank.

During the review period, the bank reported 2,413 (53.2%) small business loans totaling \$615.8 million; 1,664 (36.7%) HELOC loans totaling \$158.9 million; compared to 455 (10.0%) HMDA loans totaling \$143.5 million in the Houston Assessment Area.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Houston-The Woodlands-Sugar Land, TX MSA as a whole and not the specific assessment area. However, it is reasonable to believe that the data for the MSA area provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 93.4% of the Houston-The Woodlands-Sugar Land, TX MSA, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to 2010 census data.

The Houston Assessment Area is located in southeast Texas. It is bordered on the south by the Gulf of Mexico, to the north by Walker and San Jacinto Counties, to the east by Liberty and Chambers Counties, and on the west by Grimes, Waller, and Wharton Counties. Additionally, Houston is the largest city in the state of Texas.

The Houston Assessment Area contains 86 incorporated cities. Listed in the following table¹⁵ is information about population and land area for each county within the Houston Assessment Area, as it relates to statewide ranking.

County	County Seat ¹⁶	Population		Population Density/ sq. mile		Land Area (sq. mile)	
		#	Rank	#	Rank	#	Rank
Brazoria	Angleton	325,477	15	202	28	1,358	28
Fort Bend	Richmond	632,946	10	815	9	861	181
Galveston	Galveston	302,276	17	346	15	378	244
Harris	Houston	4,269,608	1	2,402	2	1,703	14
Montgomery	Conroe	487,028	11	452	12	1,041	64

Refer to the end of the Performance Context section for more detailed demographic information for the assessment area.

Income Characteristics

The following chart reflects the estimated median family income for the years 2012 through 2014 for the Houston-The Woodlands-Sugar Land, TX MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 Census, 11.9% of the families in the assessment area lived below the poverty level.

Income Level	2012	2013	2014
Median Income	\$66,900	\$66,200	\$68,400
Low-income	< \$33,450	< \$33,100	< \$34,200
Moderate-income	\$33,450-\$53,519	\$33,100-\$52,959	\$34,200-\$54,719
Middle-income	\$53,520-\$80,279	\$52,960-\$79,439	\$54,720-\$82,079
Upper-income	≥ \$80,280	≥ \$79,440	≥ \$82,080

Housing Characteristics

Of total housing units in the assessment area, 55.8% are classified as owner-occupied while 33.2% are classified as rental units and 11.0% of the available housing is vacant. Rental units

¹⁵ Texas Land Area County Rank, USA.com; available from: <http://www.usa.com/texas-state.htm>

¹⁶ Texas State Library – Counties and County Seats; available from: <https://www.tsl.texas.gov/ref/abouttx/countyseats.html>

represent 59.4% of housing units in low-income census tracts and 41.7% in moderate-income census tracts.

The following table¹⁷ lists the median price of a house, growth rate, and year built, for the period 2010-2014, for counties within the assessment area, the state, and United States. The assessment area median housing value is above the state; however, all are below the national value, excluding Fort Bend County. Overall, the Texas price growth rate exceeds the national growth rate.

Area	Median Value	Price Growth Rate since 2000	Median Year Built
Brazoria	\$148,800	68.1%	1989
Fort Bend	\$189,500	64.6%	1997
Galveston	\$150,300	76.4%	1984
Harris	\$133,400	53.3%	1982
Montgomery	\$169,800	47.9%	1996
Texas	\$131,400	59.3%	1984
National	\$175,700	46.9%	1974

New residential construction in the Houston-The Woodlands-Sugar Land MSA has increased considerably since the prior review period. In 2011, new single-family home building permits totaled 22,887. In 2014, new single-family building permits totaled 38,319, an increase of 67.4%. While improving, the housing market remains below where it was before the most recent recession.

According to 2010 Census, the median housing value for the Houston Assessment Area in 2010 was \$140,564, compared to \$138,343 for the Houston-The Woodlands-Sugar Land TX MSA. Additionally, in 2010, the affordability ratio was at 39.6% for the Houston-The Woodlands-Sugar Land, TX MSA. The affordability ratio is defined as the median household income divided by the median housing value. The closer the ratio is to 100% the more affordable the homes. A ratio of 100% indicates that the median family income is just sufficient to purchase the median priced home. These affordability ratios indicate that the majority of households have less income than necessary to purchase the average house. This can limit a bank's ability to originate HMDA and HELOC loans in this assessment area.

While home prices are increasing, the Houston Assessment Area still has some of the lowest priced homes in the United States when compared to other large cities in the country. However, currently the housing inventory, especially affordable housing, is low in this assessment area.

¹⁷ Texas Local Data, USA.com; available from: <http://www.usa.com/texas-state.htm>

Rising prices are forcing more low- and moderate-income households out of the home buying market.¹⁸

The Houston Assessment Area housing market never experienced serious declines during the most recent economic downturn. Foreclosure rates in metropolitan areas in the country ranged from 0.7% to 16.0% throughout the nation in September 2013. Comparatively, the foreclosure rate for the Houston-The Woodlands-Sugar Land, TX MSA was 2.5% in September 2013. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in the process of foreclosure) in the Houston-The Woodlands-Sugar Land, TX MSA decreased from 3.4% in December 2011 to 2.6% in September 2013.¹⁹

The median gross rent in 2010 for the Houston-The Woodlands-Sugar Land, TX MSA was \$836, which is slightly higher than the Texas state average of \$786. In 2010, 45.8% of renters had rent costs greater than 30% of their income. Due to the low levels of housing inventory, home costs have increased, resulting in fewer people buying homes. As a result of the increased demand, rental housing, particularly in the multi-family market, rents and construction permits for new multi-family housing have increased. Multi-family permits totaled 8,281 in 2011 and 25,044 in 2014 in the Houston-The Woodlands-Sugar Land, TX MSA. This represents an increase of 202.4%.²⁰

Employment and Economic Conditions

The Houston Assessment Area is one of the most important industrial bases in the world. From energy to health care, nanotechnology, aerospace and information technology, the Houston region offers a strong infrastructure to support these growing industries plus a highly trained and skilled workforce. Houston ranks third among areas that are headquarters to Fortune 500 companies as of June 2014. Twenty-six Fortune 500 companies base their operations in the MSA. Some of the largest employers include: Wal-Mart Stores, Memorial Hermann Health System, The University of Texas MD Anderson Cancer Center, Shell Oil, and United Airline.²¹

The national average unemployment rates for 2012 through 2014 were higher than the state of Texas. Overall, the unemployment rates in the MSA as a whole were comparable to those of the state, and were better than national average unemployment rates for this period. Unemployment rates for most of the counties in the MSA were lower or comparable to the state level, with the exception of Galveston County. According to the 2010 Census, the unemployment rate was 11.5% in low-income census tracts and 9.3% in moderate-income census tracts for the

¹⁸ Sarnoff, Nancy. Q&A: How long will the Real Estate Upswing Last? May 3, 2014; available from <http://www.houstonchronicle.com/business/real-estate/article/Q-A-How-long-will-the-real-estate-upswing-last-5444085.php>

¹⁹ Serious Mortgage Delinquency Data for All 366 U.S. Metropolitan Areas, September 2013; available from; http://foreclosure-response.org/assets/maps&data/MetropolitanAreaDelinquencyRates_Methodology_September2013.pdf.

²⁰ Texas A&M Real Estate Center Data – Building Permits available from; <https://www.recenter.tamu.edu/data/building-permits>.

²¹ Houston's top Industries; available from <http://www.houston.org/business/industry-sectors.html>

assessment area. The higher than average unemployment rates in low- and moderate-income census tracts could adversely affect loan demand in these census tracts.

The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Assessment Area²²			
	2012	2013	2014
National	8.1%	7.4%	6.2%
Texas	6.7%	6.2%	5.1%
Brazoria County	6.7%	6.1%	5.1%
Fort Bent County	5.9%	5.4%	4.5%
Galveston County	7.6%	6.8%	5.6%
Harris County	6.6%	6.0%	5.0%
Montgomery County	5.9%	5.4%	4.4%
Houston-The Woodlands-Sugar Land TX, MSA	6.6%	6.0%	4.9%

Community Contacts and Community Development Opportunities

Federal Reserve examiners conducted two community contact interviews with organizations that provide housing for low- and moderate- income individuals. During these interviews the contacts stated that a number of the new housing being built utilizes tax credits; however, the housing is still not affordable for a majority of their clients. Furthermore, low rent units are also not affordable for the contacts' clients. One of the contacts stated, clients also find it difficult to obtain home improvement loans. Some of the general banking and credit needs that still remain for the contacts' clients are flexible credit underwriting of mortgage loans and down payment/closing cost assistance programs. The general banking and credit needs of the organizations contacted include operating grants specifically to cover their homebuyer education and financial literacy/education workshops. The contacts further stated that additional funding to support operations is always needed by organizations engaged in community development work, like theirs.

²² Unemployment Rate available from; <http://data.bls.gov/cgi-bin/dsrf?la>.

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

Houston, TX								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	125	12.7	116,349	9.0	39,956	34.3	306,726	23.7
Moderate-Income	278	28.3	318,673	24.6	61,201	19.2	212,404	16.4
Middle-Income	249	25.4	351,019	27.1	34,072	9.7	224,538	17.3
Upper-Income	325	33.1	508,585	39.3	18,342	3.6	550,958	42.6
Unknown-Income	4	0.4	0	0.0	0	0.0	0	0.0
Total AA	981	100.0	1,294,626	100.0	153,571	11.9	1,294,626	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	224,690	48,213	4.2	21.5	133,554	59.4	42,923	19.1
Moderate-Income	522,623	234,643	20.6	44.9	217,936	41.7	70,044	13.4
Middle-Income	542,165	324,005	28.4	59.8	164,235	30.3	53,925	9.9
Upper-Income	756,648	534,458	46.8	70.6	163,533	21.6	58,657	7.8
Unknown-Income	79	0	0.0	0.0	50	63.3	29	36.7
Total AA	2,046,205	1,141,319	100.0	55.8	679,308	33.2	225,578	11.0
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	23,957	8.3	20,530	7.9	2,345	12.4	1,082	10.1
Moderate-Income	57,219	19.7	50,648	19.4	4,359	23.1	2,212	20.7
Middle-Income	70,696	24.4	63,609	24.4	4,500	23.9	2,587	24.2
Upper-Income	138,234	47.6	125,800	48.3	7,635	40.5	4,799	44.9
Unknown-Income	103	0.0	88	0.0	11	0.1	4	0.0
Total AA	290,209	100.0	260,675	100.0	18,850	100.0	10,684	100.0
	Percent of Total Businesses:			89.8		6.5		3.7
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	56	2.7	53	2.6	3	11.5	0	0.0
Moderate-Income	228	11.0	223	10.9	3	11.5	2	40.0
Middle-Income	596	28.6	584	28.5	11	42.3	1	20.0
Upper-Income	1,201	57.7	1,190	58.0	9	34.6	2	40.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,081	100.0	2,050	100.0	26	100.0	5	100.0
	Percent of Total Farms:			98.5		1.2		0.2
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Conclusions With Respect to Performance Tests in Houston, Texas

Overview

The bank's lending performance is good. Lending activity reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. The HMDA performance is adequate given Comerica's business strategy is middle-market commercial lending and its mortgage terms are not as accommodating as its competitors. Additionally, the bank makes an adequate level of community development loans; which mitigates the low level of HMDA lending in low- and moderate-income census tracts and to low- and moderate-income families.

Lending Activity

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending evaluated, given the volume is more significant than HMDA. Small business lending was given more weight than HELOC and HMDA lending in determining the bank's Lending Test rating in the assessment area.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica			CRA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	20 th	666	166.5	171	107,269	3.7
2013	16 th	871	223.1	165	98,594	4.1
2014	17 th	876	226.2	174	118,230	4.4
Total		2,413	615.8		324,093	12.2

Home mortgage loans are the primary business line for many of the top HMDA reporters. It should be noted that Comerica's focus is middle-market commercial lending. The following table details key data about HMDA reporters operating within the assessment area.

Year	Comerica			HMDA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	120 th	179	51.4	886	194,044	38.4
2013	135 th	164	46.7	926	203,168	45.4
2014	158 th	112	45.3	927	157,482	34.9
Total		455	143.4		554,694	118.7

Further, of the 14,234 HELOC loans Comerica originated during the review period, 1,664 or 11.7% were originated in this assessment area.

Details of the bank's HMDA, HELOC, and small business lending and information regarding lending by aggregate can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

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

The bank's small business lending in low- as well as moderate-income census tracts is excellent. Throughout the review period, Comerica's performance was above aggregate and the percentage of small businesses in low- and moderate-income census tracts in this assessment area.

The bank's small business lending in middle-income census tracts was comparable to the percentage of small businesses located in these census tracts. Conversely, Comerica's performance in upper-income census tracts was lower than the percentage of small businesses in these tracts. When compared to the aggregate by percentage, the bank originated fewer loans in middle- and upper-income census tracts than the aggregate, throughout the review period.

HMDA Loans

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. . As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 800 HMDA aggregate lenders in this assessment area. More than half of the aggregate lenders originated or purchased less than 25 HMDA loans in this assessment area.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. Comerica did not originate any loans in 2012 or 2013 in low-income census tracts. While the bank originated only two loans, representing 3.4% of Comerica's home purchase loans in 2014, its performance was better than that of the aggregate. Comerica's and aggregate performance were below the percentage of owner-occupied housing units these census tracts.

Home purchase lending in moderate-income census tracts is good. Comerica's performance was above aggregate throughout the review period. Comerica's and aggregate performance were below the percentage of owner-occupied housing units located in these census tracts.

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

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. Comerica's performance was above that of the aggregate in 2012 and 2014, but below aggregate in 2013. Comerica originated six refinance loans during the review period in the Houston, TX Assessment Area low-income census tracts. Aggregate and the bank's performance were below the percentage of owner-occupied units in these census tracts.

Home refinance lending in moderate-income census tracts is adequate. Comerica's performance was above that of the aggregate in 2012, but below the aggregate level in 2013 and 2014. Aggregate and the bank's performance were below the percentage of owner-occupied units in these census tracts.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is good. Comerica originated 3.2% in 2012, 3.4% in 2013, and 3.5% in 2014 of the HELOC loans in low-income census tracts located in the Houston Assessment Area. This performance was slightly below the percentage of owner occupied units located in the assessment area's low-income census tracts.

Comerica's HELOC lending in moderate-income census tracts is good. During the review period 2012 through 2014, Comerica originated, respectively, 14.5%, 17.6%, and 14.5% of its HELOC loans in moderate-income census tracts. This performance was slightly below the percentage of owner-occupied units in this census tract category.

The bank's HELOC lending in middle-income census tracts was below the percentage of owner-occupied housing units in these census tracts while the lending in upper-income census tracts was greater than the percentage of owner-occupied housing units in these census tracts.

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

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

Small Business Loans

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. Of the 2,413 small business loans originated during the review period by Comerica, 26.1% were originated to small businesses, which is less than the percentage of businesses in this assessment area with annual gross revenues of \$1 million or less. However, 22.9% of Comerica's small business loans for the review period did not have revenues reported. Aggregate originated 37.8%, 45.8%, and 44.2% of loans to small businesses in 2012, 2013, and 2014, respectively.

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance was below the aggregate performance who originated slightly more than 90.0% of loans for \$100,000 or less throughout the review period. Comerica originated small dollar loans of slightly more than 40.0% during the review period. Additionally, Comerica reported small business lending in amounts of \$100,000 - \$250,000 during the review period of 24.4%.

Aggregate included approximately 170 CRA reporters. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top

CRA reporters throughout the review period included American Express Bank, FSB; Chase Bank USA, N.A.; Capital One Bank USA, N.A. and Wells Fargo Bank, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered good when compared to demographic characteristics of the assessment area, as well as the performance of aggregate.

Home Purchase Lending

The bank's home purchase lending to low-income families is adequate. The bank's performance is slightly below aggregate in 2012, but above the aggregate in 2013 and 2014. Aggregate and the bank's performance for the review period are below the percentage of low-income families in the assessment area.

The bank's home purchase lending to moderate-income families is good. Comerica's performance was above that of the aggregate throughout the review period, as well as above the percentage of moderate-income families in the assessment area for 2012 and 2013.

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

Home Refinance Lending

The bank's home refinance lending to low-income families is adequate. The bank's performance was comparable to that of aggregate in 2012 and above aggregate lender performance in 2013 and 2014.

The bank's home refinance lending to moderate-income families is good when compared to the performance of aggregate. Comerica's performance was above that of aggregate throughout the review period. The performance of aggregate and the bank were below the percentage of moderate-income families in the assessment area.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending to low-income families is good. Comerica originated 12.5% in 2012, 14.9% in 2013, and 12.0% in 2014 of its HELOC loans to low-income families. The bank's performance was below the 23.7% of low-income families in the assessment area. However, this compares favorably to the 11.9% of families living below the poverty level.

Comerica's HELOC lending to moderate-income families is excellent. Comerica originated 20.9% in 2012, 15.8% in 2013, and 15.5% in 2014 of its HELOC loans to moderate-income families. The bank's performance is comparable to the 16.4% of moderate-income families in the assessment area, and better than the 11.9% of families in the assessment area living below the poverty level.

The bank's HELOC lending to middle- and upper- income families was greater than the percentage of middle- and upper-income families in the assessment area throughout the review period.

Community Development Loans

The bank makes an adequate level of community development loans in this assessment area. Comerica originated or renewed 19 loans totaling \$48.4 million, to 16 borrowers. As noted in the following table, of the community development loans the bank made, 31.5% (six) are associated with affordable housing, and totaled \$25 million. The affordable housing purpose loans will construct or rehabilitate approximately 550 units.

Community Development Lending		
Purpose	#	\$000s
Affordable Housing	6	25,037
Community Services	4	3,536
Economic Development	5	10,275
Revitalization and Stabilization	4	9,516
Total Loans	19	\$48,364

Investment Test

The bank's performance under the Investment Test is excellent. The bank's investments were primarily centered in LIHTC investments. The Houston, TX Assessment Area current period investments in LIHTC investments total \$2.3 million and the value of prior period investments book value totaled \$4.1 million. The bank also invested \$5.1 million in mortgage-backed securities, \$2.2 million in general obligation bonds that have a community development definition, and made \$549,912 contributions to 36 organizations that provide community development services.

This assessment area benefitted from Comerica's statewide investments, donations and nationwide investments that included this assessment area. Comerica contributed \$258,926 to organizations that provide community development services throughout Texas, which includes this assessment area.

During the current review period for the statewide investments, Comerica invested approximately \$2.7 million in a LIHTC project in this assessment area. Comerica also holds an outstanding LIHTC investment that has a current book value of \$4.0 million. For nationwide investments, Comerica invested \$1.8 million in a LIHTC project during the review period. Comerica also holds outstanding LIHTC investments, among four projects, that have a current book value of \$6.7 million. The related amounts are included in total investments in the Institution section of this report.

Service Test

The bank's Service Test performance is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in this assessment area. The distribution of the bank's 57 branch offices and 63 ATMs in the Houston TX Assessment Area as of December 31, 2014, were compared to the distribution of households and businesses among the census tract categories within the assessment area.

The following table summarizes the bank's retail locations in the assessment area.

Tract Income	% of Geographies	% of Households	% Businesses	Branches		Full Service ATMs		Cash Only ATMS	
				#	%	#	%	#	%
Low	12.7	10.0	8.3	6	10.5	6	10.2	1	25.0
Moderate	28.3	24.9	19.7	10	17.5	11	18.6	1	25.0
Middle	25.4	26.8	24.4	13	22.5	14	23.7	0	0.0
Upper	33.1	38.3	47.6	28	49.1	28	47.5	2	50.0
Unknown	0.4	0.0	0.0	0	0.0	0	0.0	0	0.0
Total	100.0	100.0	100.0	57	100.0	59	100.0	4	100.0

The bank closed two branches in this assessment area during the review period. One of the two branches was located in a middle-income census tract and the second in an upper-income census tract. The overall percentage of branches in low- and moderate-income census tracts improved since the last performance evaluation. This can be attributed to the census updates, as well as the closing of the two branches. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility. Banking services, products, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-

income individuals. Comerica offers extended hours at its branch offices located in this assessment area.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. The bank's management and employees served as board members and other leadership roles contributing their financial expertise to 23 organizations offering community development services. The organizations focused on financial literacy, business development, home buyers education, after-school care, and various other community services that aided LMI individuals. Employees participated in 366 community development service events during the review period.

Particularly commendable and responsive is Comerica's involvement throughout the assessment area in providing financial literacy through programs such as Comerica's Youth Savings Incentive Program, Junior Achievement, and Basic Banking Initiative. In addition, other low- and moderate-income individuals also received financial literacy training through organizations where Comerica is involved. The table below shows the number of events by type of involvement.

Purpose	# Events/Meetings
Affordable Housing	12
Benefits LMI Individuals/Geographies	338
Provides Economic Development	16
Total	366

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 2,253 credit cards loans to small business customers. This partnership is also responsive to assessment area credit needs that were identified by community contacts.

METROPOLITAN AREAS (Limited Scope Review)

Description of Institution's Operations

- **Austin-Round Rock, TX MSA Assessment Area (Austin)**
 - As of December 31, 2014, the bank operated 11 branches in the assessment area, representing 8.0% of its branches in Texas.
 - As of June 30, 2014, the bank had \$1.1 billion in deposits in this assessment area, representing a market share of 3.5%. The bank ranked 7th out of 59 institutions. The \$1.1 billion also represents 10.4% of the bank's total deposits in Texas.
- **San Antonio-New Braunfels MSA Assessment Area (San Antonio)**
 - As of December 31, 2014, the bank operated nine branches in the assessment area, representing 6.5% of its branches in Texas.
 - As of June 30, 2014, the bank had \$175.0 million in deposits in this assessment area, representing a market share of 0.2%. The bank ranked 15th out of 44 institutions. The \$175.0 million also represents 1.7% of the bank's total deposits in Texas.

Conclusions With Respect to Performance Tests

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

Assessment Area	Lending Test	Investment Test	Service Test
Austin-Round Rock	Consistent	Consistent	Consistent
San Antonio-New Braunfels	Consistent	Consistent	Below

The full-scope assessment areas selected together represent 85.8% of the bank's deposits in the Texas assessment areas, as well as 81.2% of the branches. The full-scope assessment areas represent 87.8% of the bank's total loans in the state. As a result, the state rating is based on those areas in the state with the greatest volume of deposits, lending, and branches.

The limited-scope assessment areas (Austin and San Antonio) performances were consistent with the bank's performance in the state; excluding San Antonio's Service Test, which is below the bank's performance.

NONMETROPOLITAN STATISTICAL AREA (Limited scope Review)

Description of Institution's Operations in the Nonmetropolitan Assessment Area

As of December 31, 2014, the bank operated six branches in Kerr County, Texas representing 4.3% of its branches in Texas. As of June 30, 2014, the bank had \$217.4 million in deposits in this assessment area, representing a market share of 18.3%. The bank ranked 2nd out of 10 institutions in this assessment area. The \$217.4 million also represents 0.4% of the bank's total deposits in Texas.

Conclusions With Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, the assessment area's performance was evaluated and compared with the bank's performance in the state. Comerica's lending in this assessment area is minimal. Additional information regarding detailed demographic information and, HMDA and CRA lending for the limited scope assessment area can be found in Appendices F and I. The bank's performance in Kerr County for the Lending, Investment, and Service Tests were below the bank's performance in the state.

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

STATE OF MICHIGAN

CRA Rating for Michigan: Satisfactory

The Lending Test is Rated: High Satisfactory

The Investment Test is Rated: Outstanding

The Service Test is Rated: Low Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to assessment areas' credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas and reflects adequate penetration among businesses of different revenue sizes and low- and moderate-income individuals.
- Makes a low level of community development loans.
- Has an excellent level of qualified community development investments and grants in the assessment areas, and is often in a leadership position in response to the community development needs of the assessment areas.
- Exhibits good responsiveness to credit and community development needs.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- Provides an adequate level of community development services.

Scope

Full scope reviews were conducted for two assessment areas in Michigan, including:

- Detroit-Warren-Dearborn, MI MSA
- Grand Rapids-Wyoming, MI MSA

As a result of the OMB revised delineations effective in 2014, the Grand Rapids-Wyoming, MI MSA changed. The Grand Haven-Holland, MI MSA (Holland County) was combined with the Grand Rapids-Wyoming, MI MSA in 2014.

Limited scope reviews were conducted for the remaining eleven assessment areas, including:

- Ann Arbor, MI MSA
- Battle Creek, MI MSA
- Flint, MI MSA

- Grand Haven-Holland, MI MSA
- Jackson, MI MSA
- Kalamazoo-Portage, MI MSA
- Lansing-East Lansing, MI MSA
- Midland, MI MSA
- Muskegon, MI MSA
- Gladwin County, MI NonMSA
- Lenawee County, MI NonMSA

As a result of the OMB revised delineations effective in 2014, Midland County became a MSA. It was previously a nonMSA contiguous to Gladwin County.

The assessment areas' lending data were separated in 2014. However, for consistency, these assessment areas' rating will be treated as one. Performance was similar for the affected counties.

The time period and products evaluated for this state are consistent with the scope discussed in the Institution section of this report. The bank's performance in the Detroit-Warren-Dearborn, MI MSA was given greater consideration in the state rating, because the majority of the bank branches, deposits, and lending are in this Michigan assessment area.

Description of Institution's Operations in Michigan

The bank operates 215 branch offices in its Michigan assessment areas, representing 44.5% of the bank's total branches. As of June 30, 2014, the bank had \$25.8 billion in deposits in the state, representing 48.2% of total deposits. There are 151 FDIC-Insured institutions in Michigan, operating 2,846 offices with \$176.9 billion deposits. Comerica ranked 2nd among the institutions in market share of deposits in Michigan with 14.6%. JPMorgan Chase Bank, N.A. ranks 1st in deposit market share with 20.9%, followed by PNC Bank, N.A. with 8.8%, and Fifth Third Bank with 7.8%.

Of the 5,724 HMDA loans originated and purchased by the bank during the review period, 3,420 (59.7%) were in the Michigan assessment areas. Additionally, of the 24,543 small business loans originated and purchased by the bank, 13,084 (53.3%) were in the Michigan assessment areas. Furthermore, of the 14,234 HELOC loans originated and purchased by the bank, 6,879 (48.3%) were in the Michigan assessment areas.

As of 2010 Census, the Michigan assessment areas population was 6,536,815. There were 2,838,074 housing units, of which 64.1% were owner-occupied, 24.9% rental, and 11.0% vacant. There were 1,841 census tracts in the Michigan assessment areas; of which 10.4% are low-, 22.8% are moderate-, 37.3% are middle-, 27.6% are upper-, and 1.8% are unknown-income. According to the FFIEC data, median family income ranged from \$49,500 to \$87,400 for the assessment areas during the review period.

The unemployment rate in Michigan is significantly higher than the national level. Statewide annual average unemployment rate decreased from 9.1% in 2012 to 7.3% in 2014. National annual average unemployment rate decreased from 8.1% in 2012 to 6.2% in 2014.

The automotive industry is still one of Michigan's biggest attributes. Over the past five years, this industry created about 500,000 new jobs. There is no place more ideal to design, engineer, and mass-produce automobiles or auto-related components than Michigan. It is home to world-class academic institutions and programs, an extensive supply base, and an expansive research and development footprint, all supporting a vibrant and growing automotive cluster.²³

Advanced manufacturing as well as the food and agriculture business are also top industries in Michigan. Michigan's food and agriculture businesses have helped lay the foundation for its economic turnaround. The state produces grandly in at least one niche. According to the University of Illinois, Michigan ranks third in the country in real Christmas trees grown but cultivates a wider variety of Christmas trees than any other state.

Farming and advanced manufacturing industries are in need of clean water. According to the Associated Press, Michigan is one of the nation's top developers of freshwater technology. This increased recognition of these services' importance comes in part due to the University Research Corridor; made up the University of Michigan, Michigan State, and Wayne State University, all of which conduct extensive research on the matter.²⁴

Conclusions with Respect to Performance Tests in Michigan

Lending Test

The bank's overall Lending Test rating is High Satisfactory. Lending levels reflect good responsiveness to assessment area credit needs in the Detroit-Warren-Dearborn MSA (Southeast Michigan Assessment Area) and adequate responsiveness in the Grand Rapids Assessment Area. The small business lending was given greatest consideration in determining the Lending Test rating for Michigan because the bank originated more small business loans by number and dollar than HMDA or HELOC loans.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA and small business loans, as well as HELOC loans, can be found in tables in Appendices G through I.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs based on small business, HELOC, and HMDA market share ranking as discussed below. The assessment areas in Michigan contain 52.5% of the bank's small business, HMDA, and consumer lending by

²³ http://www.detroitchamber.com/wp-content/uploads/2013/05/Michigan-Is-Auto-2.0_Final.pdf

²⁴ <http://www.newsmax.com/FastFeatures/industries-michigan-economy/2015/04/16/id/637632/>

number of loans and 44.2% by dollar volume totaling \$4.4 billion. In comparison, 48.2% of the bank's total deposits are in Michigan.

Summary of Statewide Lending Activity* Assessment Areas Located in Michigan January 1, 2012 through December 31, 2014				
Loan Type	#	%	\$(000s)	%
Total Home Equity Lines of Credit	6,879	29.4	671,667	15.1
Home Improvement	79	2.3	4,912	0.8
Home Purchase	1,109	32.4	164,546	28.0
Refinance	2,212	64.7	369,552	62.8
Multi-family	20	0.6	49,174	8.4
Total HMDA	3,420	14.6	\$588,184	13.3
Total Small Business	13,084	56.0	3,179,010	71.6
Total Loans	23,383	100.0%	\$4,438,861	100.0%
*Originations and purchases within the bank's assessment areas.				

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

The geographic distribution of loans in Michigan reflects excellent penetration throughout the assessment areas. The two full-scope assessment areas are considered excellent. Further, the limited-scope assessment areas performance were consistent with the full-scope assessment areas performance. The Flint, MI Assessment Area did not have any low- or moderate-income census tracts and was not assessed for geographic distribution.

As mentioned previously, the bank is also involved in numerous other responsive and flexible lending activities in Michigan including HARP, the Ex-Im Bank Working Capital Guarantee Program, micro lending to small businesses and various Government Insured Loan Programs.

The overall distribution among borrowers of different income levels and businesses of different revenue sizes in Michigan is adequate. The two full-scope assessment areas are considered adequate. Comerica's performance was better in the distribution of loans to low- and moderate-income individuals when compared to loans to businesses with revenue less than or equal to \$1 million. The limited-scope assessment areas performance was consistent with the full-scope assessment areas performance.

More information on the distribution of lending can be found in each of the full-scope assessment area sections.

Community Development Lending

In Michigan, the bank makes a low level of community development loans. However, the community development loans originated during the evaluation period were for a variety of purposes. Comerica originated or renewed 73 loans, to 38 entities, totaling \$144.6 million in

Michigan during this review period. One of the assessment areas reviewed under the full scope review provided a low level of community development lending and the other full scope assessment area reviewed had one community development loan. Further, the limited scope assessment areas had few, if any, community development loans. Performance in Southeast Michigan had the greatest impact on the community development lending assessment due to its relatively high concentration of branches, deposits, lending, and population. Approximately 88% of the community development loans were to organizations that provide services to low- and moderate-income individuals.

Investment Test

In Michigan, the bank's overall Investment Test rating is Outstanding. Comerica made excellent use of qualified investments and contributions with total investments of \$61.7 million during this review period in the state of Michigan. The bank exhibited excellent responsiveness to credit and community development needs through its investment activities in ten of thirteen assessment areas. Performance in the Southeast Michigan Assessment Area was good and Midland MSA, a limited-scope assessment area was poor. Midland MSA performance had limited impact on the overall rating given only 0.2% of the bank's total deposits, less than one percent (four) of the bank's branches and lending are in this assessment area.

Comerica is commended for the investments in LIHTC and mortgage-backed securities, as well as an in-kind donation of a branch building. The Comerica Community Economic Development Fund, established in 1991, is administered by the Community Foundation for Southeast Michigan, to provide grants to nonprofit economic development organizations in the city of Detroit and other low- or moderate- income areas in the Detroit-Warren-Dearborn, MI MSA. The purpose of the Comerica Community Economic Development Fund is to support and strengthen neighborhood economic development activities. Five projects were positively impacted from contributions by the bank during this review period.

The bank also had \$3.8 million investments in mortgage-backed securities and \$4.4 million in general obligation bonds that have a community development purpose. Comerica provided \$2.1 million in contributions to organizations that have community development purposes.

Comerica's current period LIHTC investments in Michigan totaled \$30.8 million and prior period LIHTC investments are valued at \$20.5 million. Approximately \$12.3 million of LIHTC investments in Michigan are statewide and directly benefits seven of its assessment areas. Comerica also holds outstanding statewide LIHTC investments with a book value of \$9.2 million. In addition, three funds benefit the state of Michigan.

The state investment rating also reflects nationwide investments and contributions that benefit a broader area that includes the State of Michigan. Three of Michigan's assessment areas benefitted from Comerica's nationwide LIHTC investments. The assessment areas that benefitted includes the two full-scope: Southeast Michigan and Grand Rapids MSA as well as a limited-scope Lansing. Comerica's nationwide current period investments for Michigan totaled

approximately \$2.0 million and also hold outstanding LIHTC investments that have a book value of \$14.9 million. The related amounts are included in total investments in the Institution section of this report. Specific details regarding investments can be found in the full-scope assessment area sections of this report.

Service Test

In Michigan, the bank's overall Service Test rating is Low Satisfactory. Of the two full-scope assessment areas reviewed, Grand Rapids was rated Outstanding and Detroit-Warren-Dearborn MI received a Low Satisfactory rating. Given that the majority of the bank's Michigan branches and lending are in the Detroit-Warren-Dearborn MI, MSA this area was given the greatest weight.

Retail Services

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

Community Development Services

The bank provides an adequate level of community development services. Noteworthy is the bank's participation in financial literacy initiatives. More than 6,000 individuals were provided financial literacy services through the following initiatives in which Comerica's volunteers participated in throughout the state:

- **Comerica's Youth Savings Program** - Comerica's Youth Savings Program is designed to aid the development of a new generation of savers to learn the basic knowledge of banking including how and why to save, how to make a bank deposit, and how important saving is to long-range planning. The in-school savings program's main purposes are to encourage students to learn the value of savings and how basic math applies to the real world.

Comerica's relationship with the schools involved in the Youth Savings Program reflect a commitment to provide students an opportunity to interact with bankers and are designed to aid the development of a new generation of savers. Comerica's programs are specifically targeted to schools that have a majority of low- and moderate-income students.

- **Golightly Academy of Finance** - The Golightly Academy of Finance (Golightly) was established to combine the resources of business and education. The goal of this partnership is to enhance the learning experience of the student, and to better prepare students for careers in the financial service industry. The Academy recognizes the responsibility of educators to prepare students for rewarding careers and is grounded in a commitment to economic development through education and training. The Golightly Career and Technical Center is a part of the Detroit Public School District. Each day of the school year, the students from across the District attend Golightly for half of their school day.

The bank's commitment to the Golightly is an investment in the future of tomorrow's banking and finance professionals. This commitment is multifaceted and encompasses financial support as well as human capital. Comerica's officers served on the board of the Academy of Information Technology and the Academy of Finance. Specifically, there are five components to the program, which include:

- **Golightly Shopping Mall** - The Golightly Career and Technical Center is promoted and operated as a convenient "one" stop shopping destination (or "Mall") servicing the consumer needs of residents and downtown commuters on the lower east side of Detroit.
 - **Small Business Development Training** - The bank supports the entrepreneurial thrust of Golightly by providing quality training to Golightly students and provides hands-on instruction and evaluation of the student's entrepreneurial plans.
 - **Comerica Expert Lecture Series** - Financial experts from the bank present lectures to enhance the Academy of Finance curriculum by presenting real-life experiences and knowledge.
 - **Comerica Career Partnership Day** - Golightly Academy of Finance students are given an opportunity to spend one day with a Comerica management employee to observe and gain an understanding of the day-to-day responsibilities of that employee.
 - **Comerica Scholarships** - Golightly Academy of Information Technology students who graduate and attend college are awarded a scholarship. Comerica awarded funding for five student scholarships in 2013.
- **Golightly Academy of Information Technology** - The Academy of Information Technology (AOIT) introduces students to the broad career opportunities in today's digital workforce and equips them with personal, analytical, technical and communication skills needed in today's digital workforce. It prepares students for post-secondary education and careers through a theme-based, contextualized curriculum approach.

Comerica has committed both financial and human resources to AOIT. An officer of Comerica's Information Systems department served as the chairperson of the AOIT Advisory Board. The Advisory Board plans and financially supports workplace related activities for the students of AOIT. Such activities include:

- **Job Shadow Day** – Students visit the workplace of the business partners, which includes Comerica, and shadow them as they perform their day-to-day activities.

- **Pre-Internship Conference** – An Annual Conference to prepare students for summer internships. Business partners conduct mock interviews and employment related workshops.

The Golightly Academies are part of the Detroit Public School District, which has a majority of low- and moderate-income students.

- **Operation Hope** - Comerica's Detroit, MI market provides funding and volunteers for the Operation Hope "Banking On Our Future" program. This financial education program is taught exclusively at schools whose enrollment is greater than 51% low- and moderate-income students. During the review period 51 classrooms, and 1,284 students throughout the Detroit, MI assessment area participated in this Comerica sponsored program.
- **Rock Financial Junior Achievement Finance Park** - JA Finance Park is a Junior Achievement program that teaches financial literacy concepts and career exploration opportunities. At the end of the program, students have a one-day budget simulation where they put their knowledge into practice. They obtain an understanding of the importance of developing a personal budget, maintaining good credit and recognizing the true cost of purchases.

During the review period, Comerica taught financial literacy through several programs at multiple schools throughout many of the bank's assessment areas in Michigan. All of the schools sponsored have a majority of students who are considered low- and moderate-income.

Furthermore, several bank representatives served on the board of directors of various statewide organizations. A bank representative also served on the board of directors of the Neighborhood Associations of Michigan (NAMI). Over 90% of the bank's memberships are located in low- and moderate-income census tracts. NAMI purposes are to educate, empower, and advocate for community members to upgrade their quality of life and to improve their communities. Additionally, a bank representative served on the board of directors and fund development committee of Communities in Schools of Michigan, Inc. The organization provides and promotes supportive activities and services to low- and moderate-income students. They provide human services to support academic achievement in public schools and in non-traditional education sites for the purpose of increasing high school graduation rates in the state of Michigan.

An analysis of the community development services delivered in each assessment area is discussed further within each specific assessment area.

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Grand Rapids, MI

The Grand Rapids-Wyoming MI, MSA includes Barry, Kent, Montcalm, and Ottawa Counties. The bank delineated Kent and Ottawa Counties as its assessment area, hereafter referred as the Grand Rapids Assessment Area. Comerica elected to exclude Barry and Montcalm Counties from its assessment area. Further, this assessment area changed in 2014 as a result of the United States OMB revised delineations for the MSAs. Ottawa County was in the Holland-Grand Haven MSA prior to the OMB revisions. Furthermore, Montcalm County was added to the Grand Rapids-Wyoming MSA; however, Ionia and Newaygo Counties were deleted as a result of the OMB changes.

Within the assessment area portions of the MSA there are 12 low-, 35 moderate-, 90 middle-, and 44 upper-income census tracts. There is also one census tract where income is unknown. As of June 30, 2014 the bank operated 13 branches in the assessment area representing 2.7 % of its branches. There are no branches located in low-income census tracts, one branch in a moderate-income census tract, 11 branches in middle-income census tracts, and one branch in an upper-income census tract.

This assessment area is competitive with financial institutions. As of June 30, 2014, the assessment area was home to 27 FDIC insured institutions operating 287 offices with total deposits of \$16.9 billion. Comerica had \$511.2 million in deposits in the Grand Rapids Assessment Area representing 1.0% of Comerica's total deposits in all its assessment areas, representing a market share of 3.0% in this assessment area, ranking 10th. Fifth Third Bank, Cincinnati, Ohio holds the largest deposit share at 22.9%, followed by The Huntington National Bank, Columbus, Ohio at 12.3%, JPMorgan Chase Bank, N.A., Columbus, Ohio at 10.8%, and Wells Fargo Bank, N.A., Sioux Falls, South Dakota at 10.4%. The bank considers the aforementioned banks to be its competitors as well as KeyBank, N.A., Cleveland, Ohio.

During the review period, the bank reported 607 (50.3%) small business loans totaling \$41.2 million, 368 (30.5%) HELOC loans totaling \$41.2 million, compared to 232 (19.2 %) HMDA loans totaling \$15.0 million in the Grand Rapids Assessment Area.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Grand Rapids-Wyoming, MI MSA as a whole and not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 89.7% of the Grand Rapids-Wyoming, MI MSA, and distribution of low-, and moderate-, middle-, and upper-income families for the two areas is similar according to 2010 census data.

The Grand Rapids Assessment Area is located between Detroit, Michigan and Chicago, Illinois. It is approximately 40 miles east of Lake Michigan and in the mid-western portion of the state.

The assessment area is bordered on the west by the Holland-Grand Haven, MI assessment area and on the east by Ionia County. Approximately 60 miles to the north is the Manistee National Forest and just south are Barry and Allegan Counties.

Located in the Grand Rapids Assessment Area, Kent County ranks 16th statewide in terms of total land area (847 square miles), and is the 4th most densely populated county in Michigan, with 706 people per square mile in 2010. As of 2014, Kent County had a population of 629,237.²⁵ It is composed of 21 townships, 5 villages, and 9 cities. Grand Rapids is the county seat, which is the 2nd largest city in Michigan.²⁶

Ottawa County ranks 52nd statewide in terms of total land area (563 square miles) and is the 17th most densely populated county in Michigan, with 165 people per square mile in 2010. As of 2014, Ottawa County had a population of 263,801.²⁷ It is composed of 17 townships and 7 cities. Grand Haven is the county seat.²⁸ Refer to the end of the Performance Context section for more detailed demographic information for the assessment area.

Income Characteristics

According to the 2014 FFIEC Census data, the Grand Rapids Assessment Area contained 182 census tracts. The area is made up of 6.6% low- and 19.2% moderate-income census tracts while the remaining were middle-, upper-, and unknown-income census tracts. The assessment area consists of 19.1% low- and 17.9% moderate-income families. According to the 2010 Census, it is estimated that 8.8% of the families live below the poverty level, compared to the 10.8% statewide poverty level for Michigan. This assessment area is one of the areas that the median family income increased during the review period.

For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the MSA. The following chart reflects the estimated median family income for the years 2012 through 2014 for the Grand Rapids-Wyoming, MI MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). Median family income decreased 1.2% between 2012 and 2013, and increased 8.4% between 2013 and 2014. This MSA is one of a few that had an increase in the median family income over the review period, where it was higher in 2014 than it was in 2012.

²⁵ U.S. Census Bureau – 2014 Population Estimate; available from:
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

²⁶ County Profile – Access Kent - <https://www.accesskent.com/about.htm>

²⁷ U.S. Census Bureau – 2014 Population Estimate; available from:
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

²⁸ County Information – available from: <https://www.miottawa.org/ctvdirectory.htm>

Income Level	2012	2013	2014
Median Income	\$60,300	\$59,600	\$64,600
Low-income	< \$30,150	< \$29,800	< \$32,300
Moderate-income	\$30,150-\$48,239	\$29,800-\$47,679	\$32,300-\$51,679
Middle-income	\$48,240-\$72,359	\$47,680-\$71,519	\$51,680-\$77,519
Upper-income	≥ \$72,360	≥ \$71,520	≥ \$77,520

Housing Characteristics

Of total housing in the assessment area, 68.2% of the units are classified as owner-occupied while 23.9% are classified as rental units and 7.9% of the available housing is vacant. Rental units represent 50.2% of housing units in low-income census tracts and 40.0% units in moderate-income census tracts.

During the review period 2010-2014, the median price of a house in Kent County was \$136,700, and \$153,500 in Ottawa County, which is higher than the state average of \$120,200 and lower than the national average of \$175,700. The Kent County median house value has grown by 18.8% since 2000 and 15.4% in Ottawa County. The growth rate for the price of a house in Kent and Ottawa Counties is higher than the state average rate of 4.0% and substantially lower than the national average rate of 46.9%. The median year that a house in Kent County was built is 1973 and 1982 in Ottawa County, compared to the median year for the state which is 1969. Kent County median house ages are older and Ottawa County houses are newer than median house ages for the United States, where the median year for a house built is 1976.²⁹

Although Grand Rapids was affected significantly by the most recent economic crisis, housing has regained its losses and home owners are seeing steady gains in their home equity. The housing market has stabilized in Grand Rapids.³⁰ New residential construction in the Grand Rapids-Wyoming, MI MSA has increased considerably since the prior review period. In 2011, new single-family home building permits totaled 1,305 compared to 2014, new single-family building permits of 2,273, an increase of 74.1%.³¹

According to the 2010 Census, the median housing value for the Grand Rapids Assessment Area in 2010 was \$152,486, compared to \$149,805 for the Grand Rapids-Wyoming, MI MSA, \$144,200 for the state, \$147,600 for Kent County, and \$161,200 for Ottawa County. In 2010, the affordability ratio was 33.6% for the assessment area, 33.6% for Kent County and 34.2% for Ottawa County. The affordability ratio is defined as the median household income divided by the median housing value. The closer the ratio is to 100% the more affordable the homes. A ratio of 100% indicates that median family income is just sufficient to purchase the median priced home. These affordability ratios indicate that the majority of households have less

²⁹ Michigan Local Data, USA.com; available from: <http://www.usa.com/michigan-state.htm>

³⁰ Grand Rapids Real Estate Musings – January 10, 2015; available from: <https://sellgrandrapidshomes.wordpress.com/category/west-michigan-real-estate-statistics-and-trends/>

³¹ https://www.recenter.tamu.edu/data/building-permits/#!/msa/Grand_Rapids-Wyoming%2C_MI

income than necessary to purchase the average house. This can limit a bank's ability to originate HMDA loans in its assessment area.

Foreclosure rates in the country's metropolitan areas ranged from 0.7% to 16.0% throughout the nation in September 2013. The foreclosure rate for the Grand Rapids-Wyoming, MI MSA was 2.4% in September 2013. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in the Grand Rapids-Wyoming, MI MSA decreased from 3.0% in December 2011 to 2.3% in September 2013.³²

The median gross rent in 2010 for the assessment area was \$706, \$699 for Kent County and \$726 for Ottawa County, which is comparable to the Michigan state average of \$723. In 2010, 47.9% of renters, in the assessment area, had rent costs greater than 30% of their income, compared to 48.5% in Kent County, 45.8% in Ottawa County, and 49.8% for the state. Multi-family permits totaled 170 in 2011 and 823 in 2014 in the Grand Rapids-Wyoming, MI MSA. This represents an increase of 384.1%.³³

Employment and Economic Conditions

The Greater Grand Rapids region, which the assessment area is a part of, has one of the best economies in the nation. Their diverse economies allowed them to emerge from the most recent recession more quickly than other locations. Over the past decade, the region has rapidly diversified its business base and strengthened its education base. Key industries are advanced manufacturing, life sciences, agribusiness, aerospace and defense, and information technology. With these productive science-based sectors, the Grand Rapids-Wyoming, MI MSA ranks 13th for science and engineering occupations as a percentage of its total workforce. In 2014, this MSA announced 22 projects totaling \$315 million in capital investments, creating 2,183 jobs. For example, Chinese auto supplier Dicastal North America decided to establish its first United States facility in Greenville, Michigan. The \$140 million plant will hire 300 workers over the next four years to manufacture aluminum-alloy wheels.³⁴

West Michigan companies produce everything from cell phone components to software. Some of the largest employers in the assessment area include: Spectrum Health, Meijer, Mercy Health, Amway Corporation, Perrigo Company, Herman Miller Inc., and Steelcase Inc.³⁵

³² Serious Mortgage Delinquency Data for All 366 U.S. Metropolitan Areas, September 2013; available from; http://foreclosure-response.org/assets/maps&data/MetropolitanAreaDelinquencyRates_Methodology_September2013.pdf.

³³ Texas A&M Real Estate Center Data – Building Permits available from; <https://www.recenter.tamu.edu/data/building-permits>.

³⁴ Martinez, Shandra – Live – Grand Rapids Join Big Leagues: Ranks 3rd in Nation for Economic Growth – June 23, 2015; available from: http://blog.mlive.com/businessreview/western_impact/print.html?entry=/2015/06/greater_grand_rapids_metro_are.html

³⁵ Major Employers; available from <http://www.rightplace.org/why-west-michigan/site-selection-center/top-industries-and-employers>

The average unemployment rates for 2012 through 2014 were lower in the assessment area than the state of Michigan and the national average. This is one indication that the health of the economy in the assessment area is better than the state and United States. According to the 2010 Census, the unemployment rate was 12.0% in low-income census tracts and 18.1% in moderate-income census tracts. The high unemployment rates in low- and moderate-income census tracts could adversely affect loan demand from these census tracts.

The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Grand Rapids Assessment Area³⁶			
	2012	2013	2014
National	8.1%	7.4%	6.2%
Michigan	9.1%	8.8%	7.3%
Kent County	6.8%	6.3%	4.9%
Ottawa County	6.6%	6.1%	4.8%
Grand Rapids-Wyoming, MI MSA	6.9%	6.4%	5.1%

Community Contacts and Community Development Opportunities

Two community contact interviews were conducted by Federal Reserve System examiners. Both organizations provide job training and placement. The organizations serve several counties in Michigan that includes the assessment area. The contacts stated assistance with financing businesses and addressing workforce development issues, such as transportation, maybe opportunities in which bank could participate. Assistance could be in the form of donations, to assist with the cost of training and transportation or loans to businesses to help with expansion.

³⁶ Unemployment Rate available from; <http://data.bls.gov/cgi-bin/dsrv?la>.

Grand Rapids, MI

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

Grand Rapids								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	12	6.6	8,781	4.0	3,238	36.9	42,201	19.1
Moderate-Income	35	19.2	33,110	15.0	6,761	20.4	39,460	17.9
Middle-Income	90	49.5	114,206	51.7	7,610	6.7	49,204	22.3
Upper-Income	44	24.2	64,658	29.3	1,899	2.9	89,890	40.7
Unknown-Income	1	0.5	0	0.0	0	0.0	0	0.0
Total AA	182	100.0	220,755	100.0	19,508	8.8	220,755	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	16,095	5,594	2.4	34.8	8,082	50.2	2,419	15.0
Moderate-Income	65,387	31,254	13.2	47.8	26,152	40.0	7,981	12.2
Middle-Income	179,678	127,186	53.7	70.8	39,947	22.2	12,545	7.0
Upper-Income	86,080	72,631	30.7	84.4	8,857	10.3	4,592	5.3
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	347,240	236,665	100.0	68.2	83,038	23.9	27,537	7.9
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	1,651	4.4	1,299	4.0	301	8.1	51	4.7
Moderate-Income	5,996	16.0	5,056	15.4	677	18.3	263	24.4
Middle-Income	18,256	48.6	16,052	49.0	1,721	46.5	483	44.8
Upper-Income	11,653	31.0	10,368	31.6	1,003	27.1	282	26.1
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	37,556	100.0	32,775	100.0	3,702	100.0	1,079	100.0
	Percent of Total Businesses:			87.3		9.9		2.9
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	3	0.3	3	0.3	0	0.0	0	0.0
Moderate-Income	17	1.8	14	1.6	3	6.5	0	0.0
Middle-Income	605	65.4	574	65.3	31	67.4	0	0.0
Upper-Income	300	32.4	288	32.8	12	26.1	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	925	100.0	879	100.0	46	100.0	0	0.0
	Percent of Total Farms:			95.0		5.0		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Conclusions With Respect to Performance Tests in Grand Rapids, Michigan**Overview**

The bank's lending performance is good. Lending activity reflects good responsiveness to assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and adequate penetration to businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. However, Comerica did an excellent job at originating HMDA loans to low- and moderate-income families. Additionally, Comerica's business strategy is middle-market commercial lending and its mortgage terms are not as accommodating as its competitors. It was further noted that the bank makes few, if any, community development loans.

Lending Activity

The bank is both a small business and HMDA lender. Comerica elected to have its HELOC lending evaluated, given the volume in this loan product is more significant than home purchase or refinance lending. Small business lending was given more weight than HELOC and HMDA lending in determining the bank's Lending Test rating in this assessment area.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica			CRA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	16 th	135	41.2	60	13,179	966.2 million
2013	14 th	203	46.4	62	10,008	916.2 million
2014	15 th	269	73.3	80	15,723	1.2
Total		607	160.9		38,910	3.1

Comerica's focus is middle-market commercial lending. Home mortgage loans are the primary business line for many of the top HMDA reporters. The table below details key data about HMDA reporters operating within the assessment area. HMDA lending volume decreased substantially throughout the review period for the bank and aggregate. The top ranked reporters

were Lake Michigan Credit Union; Fifth Third Mortgage Company; Wells Fargo Bank, N.A.; Fifth Third Mortgage MI - LLC; and JP Morgan Chase Bank, N.A.

Year	Comerica			HMDA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	37 th	119	15.0	322	30,673	4.3
2013	52 nd	64	10.1	318	27,084	3.9
2014	64 th	49	6.4	362	27,703	4.3
Total		232	31.5		85,460	12.5

HELOC lending volume increased substantially throughout the review period. For this assessment area, Comerica originated 59, 126, and 183 HELOC loans in 2012, 2013, and 2014, respectively. Of the 14,234 total HELOC loans Comerica originated throughout all of its locations, 2.6% (368) of the HELOC loans were originated in this assessment area.

Details of the bank's HMDA, HELOC lending, and small business lending and information regarding lending by aggregate can be found in Appendix G.

Geographic Distribution of Loans

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

As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 350 HMDA aggregate lenders in this assessment area. More than half of the aggregate lenders originated or purchased less than 10 HMDA loans in this assessment area, each year of the review period.

Small Business Loans

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

The bank's small business lending in low-income census tracts is excellent. Comerica's performance was significantly better than aggregate and the percentage of businesses in the low-income census tracts throughout the review period.

The bank's small business lending in moderate-income census tracts is excellent. For 2012, the bank's performance was slightly below aggregate and the percentage of small businesses in moderate-income census tracts. However, in 2013 and 2014, the bank's lending was above aggregate and the percentage of small businesses in these census tracts.

The bank's small business lending in middle-income census tracts was lower than the percentage of small businesses in these census tracts; while the bank's small business lending in upper-income census tracts was higher than the percentage of small businesses in these census tracts. When compared to the aggregate by percentage, the bank originated fewer loans in middle- and upper-income tracts in 2013 and 2014 than the aggregate, but slightly more than the aggregate in 2012.

HMDA Loans

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. Comerica did not originate any home improvement or multi-family loans during the review period in this assessment area; therefore, an analysis was not performed for those products.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. While Comerica originated only one loan in a low-income census tract during the review period, its performance at 3.6% was better than aggregate at 1.9% in 2012 and the percentage of owner-occupied units at 3.1%. Aggregate performance was below the percentage of owner-occupied units in 2013 and 2014.

Home purchase lending in moderate-income census tracts is adequate. The bank's performance was below aggregate in 2012 and 2013. The bank and aggregate lender performance for the same period were both below the percentage of owner-occupied units. Comerica's performance was above aggregate and owner-occupied units in 2014.

The bank's home purchase lending in middle-income census tracts was below the percentage of owner-occupied units in these census tracts in 2012 and 2013 while the lending in upper-income census tracts was greater than the percentage of owner-occupied units.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. Comerica's and aggregate performance were below the 2.4% of owner-occupied units throughout the review period. The bank originated only one loan during the review period and aggregate originated less than 2.0% of their home refinance loans in low-income census tracts.

Home refinance lending in moderate-income census tracts is adequate. Comerica's lending was comparable to aggregate in 2012 and 2014, but slightly below aggregate in 2013; while both were below the percentage of owner-occupied units for the review period.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is adequate. Comerica did not originate a HELOC in a low-income census tract in 2012. However, the bank originated 0.8% in 2013, and 2.7% in 2014, or six HELOC loans in low-income census tracts during the review period; these census tracts contain 4.0% of the families and 2.4% of the owner occupied units in the assessment area.

Comerica's HELOC lending in moderate-income census tracts is adequate. During the review period, Comerica originated 18 of its HELOC loans in moderate-income census tracts, which contain 15.0% of the families and 13.2% of the owner occupied units in the assessment area. Comerica originated 5.1% in 2012, 4.8% in 2013, and 4.9% in 2014.

The bank's HELOC lending in middle-income census tracts was below the percentage of owner-occupied housing units in these census tracts. However, the lending in upper-income census tracts was greater than the percentage of owner-occupied housing units in these census tracts.

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

The bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. However, Comerica did an excellent job in originating HMDA loans to low- and moderate-income families within the assessment area. For this analysis, the distribution of small business lending across business revenue sizes and HMDA and HELOC lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other lenders.

Small Business Loans

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The bank's performance is below aggregate throughout the review period. Comerica's and aggregate performance is significantly below the percentage of small businesses in the assessment area. Comerica reported 19.3% of its loans to businesses with revenue less than or equal to \$1 million, 59.0% to businesses with revenue greater than \$1 million, and 21.7% of loans to businesses with unknown revenue.

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance was below the aggregate performance, which can be attributed in part, to the large number of aggregate institutions who originate small dollar credit card loans. However, Comerica reported

22.4% of their small business lending to amounts of \$100,000 - \$250,000 during this review period.

Aggregate included between 59 and 79 CRA reporters, during the review period. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top ranked reporters were predominantly credit card issuers, including American Express Bank, FSB; Fifth Third Bank; U.S. Bank, N.A.; Chase Bank USA, N.A.; and Capital One Bank, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered excellent when compared to demographic characteristics of the assessment area, as well as the performance of aggregate.

Home Purchase Lending

The bank's home purchase lending to low-income families is excellent. Comerica's performance was above aggregate throughout the review period as well as above the percentage of low-income families in 2012. Aggregate performance was below the percentage of low-income families throughout the review period.

The bank's home purchase lending to moderate-income families is excellent. Comerica's performance was slightly below aggregate; however, its performance exceeded the percentage of moderate-income families in the assessment area.

The bank's home purchase lending to middle-income families was below the percentage of middle-income families in the assessment area in 2012 and 2013; however, the percentage of lending in 2014 was above the percentage of middle-income families. Lending to upper-income families was below the percentage of upper-income families in 2012 and 2014 and above in 2013.

Home Refinance Lending

The bank's home refinance lending to low-income families is excellent. Comerica's performance was significantly above aggregate throughout the review period. Comerica's and aggregate performance were below the percentage of low-income families in the assessment area.

The bank's home refinance lending to moderate-income families is excellent. Comerica's performance was significantly above aggregate throughout the review period. Its performance

was also above the percentage of moderate-income families in the assessment area in 2013 and 2014, while performance was below in 2012.

The bank's refinance lending to middle-income families was greater than the percentage of middle-income families in the assessment area in 2012 and 2014, but below in 2013 when the bank originated only one refinance loan to a middle-income borrower. Lending to upper-income families was below the percentage of upper-income families in 2013 and 2014; while it was above in 2012.

Home Equity Lines of Credit

HELOC lending by family income in the assessment area is considered good when compared to demographic characteristics of the assessment area. Further, per a community contact, property values are still depressed, which could make it difficult for low- and moderate-income individuals to qualify for a HELOC loan.

Comerica's HELOC lending to low-income families is adequate. Comerica originated 10.2% in 2012, 8.7% in 2013, and 12.6% in 2014 of its HELOC loans to low-income families. The bank's performance was below the 19.1% of low-income families in the assessment area.

Comerica's HELOC lending to moderate-income families is good. Comerica originated 15.3% in 2012, 15.9% in 2013, and 19.1% in 2014 of its HELOC loans to moderate-income families. The bank's performance is comparable to the 17.9% of moderate-income families in the assessment area.

The bank's HELOC lending to middle-income families was below the percentage of middle-income families in the assessment area in 2012 and 2013, but above in 2014. Lending to upper-income families was greater than the percentage of families for the review period.

Community Development Lending

The bank makes few community development loans in this assessment area. Comerica originated one community development loan in this assessment area during the review period. The loan was for \$100,000 to an organization that provides services to low- and moderate-income individuals. Community contacts, from two organizations that provide job training and placement, stated there are opportunities for banks to provide loans for business expansion. The expansion could allow employers to hire more people.

Investment Test

The bank's performance under the Investment Test is excellent. The bank invested \$689,000 in mortgage-backed securities and made \$127,650 in contributions to 30 organizations that provide community development services.

Additionally, this assessment area benefitted significantly from statewide and nationwide LIHTC investments that included this assessment area. During the review period for the statewide

LIHTC investments, Comerica invested approximately \$3.5 million in four LIHTC projects. Comerica also holds outstanding LIHTC investments with a book value of approximately \$1.7 million among six projects. Comerica also holds outstanding nationwide LIHTC that have a book value of approximately \$5.9 million among two projects. The related amounts are included in total investments in the Institution section of this report.

Service Test

The bank's Service Test performance is excellent. Its retail and community development services reflect good responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Comerica's 13 branch offices and 16 ATMs, in this assessment area, as of December 31, 2014 was compared to the distribution of households and businesses among the census tract categories within the assessment area.

Comerica has not closed any branches in this assessment area during the review period. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly to low- and moderate-income individuals and geographies. The level of branch services and hours offered by Comerica is generally the same throughout the assessment area. The bank offers extended and weekend hours with convenient drive-thru services. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility.

The table below summarizes the bank's retail locations in the Grand Rapids Assessment Area.

Tract Income	% of Geographies	% of Households	% Businesses	Branches		Full Service ATMs		Cash Only ATMS	
				#	%	#	%	#	%
Low	6.6	4.3	4.4	0	0.0	0.0	0.0	0.0	0.0
Moderate	19.2	18.0	16.0	1	7.7	2	13.3	0.0	0.0
Middle	49.5	52.3	48.6	11	84.6	11	73.4	1	100.0
Upper	24.2	25.5	31.0	1	7.7	2	13.3	0	0.0
Unknown	0.5	0.0	0.0	0	0.0	0	0.0	0	0.0
Total	100.0	100.0	100.0	13	100.0	15	100.0	1	0.0

Community Development Services

The bank is a leader in providing community development services in the assessment area. Bank management and staff served as board members, treasurers, and other leadership roles, contributing their financial expertise to 14 community development organizations offering community development services focused on business development, financial literacy, youth-services, home buyers education, and various other community services that aid low- and moderate-income individuals. Employees participated in 179 events during the review period. These events included attending meetings and teaching financial literacy classes/workshops.

Particularly commendable and responsive is Comerica's involvement throughout the assessment area in providing financial literacy.

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 239 credit cards loans to small business customers. This partnership is also responsive to community credit needs that were identified by community contacts.

Description of Operations in Southeast Michigan

The Detroit-Warren-Dearborn, MI MSA includes the Detroit-Dearborn-Livonia, MI MD and Warren-Troy-Farmington Hills, MI MD. The bank delineated the Detroit-Dearborn-Livonia, MI MD (Wayne County) and a portion of the Warren-Troy-Farmington Hills, MI MD as its assessment area. The Warren-Troy-Farmington Hills, MI MD includes the entire counties of Livingston, Macomb, and Oakland and a portion of Lapeer County, hereafter referred to as the Southeast Michigan Assessment Area. Saint Clair County is in the Warren-Troy-Farmington Hills, MI MD and the bank excluded it from its assessment area.

Within the assessment area portions of the MSA there are 139 low-, 297 moderate-, 423 middle-, and 363 upper-income census tracts. There are also 17 census tracts where income is unknown. As of June 30, 2014 the bank operated 153 branches in the assessment area representing 31.7 % of its branches. There are 14 branches located in low-income census tracts, 19 branches in moderate-income census tracts, 60 branches in middle-income census tracts, 59 branches in upper-income census tracts, and 1 branch in unknown-income census tract.

This assessment area is highly competitive with financial institutions. As of June 30, 2014, the assessment area was home to 50 FDIC insured institutions operating 1,040 offices with total deposits of \$103.4 billion. The bank had \$22.8 billion in deposits in Southeast Michigan representing 42.6% of Comerica's total deposits in all the assessment areas, and representing a market share of 22.1% in this assessment area, ranking 2nd. JP Morgan Chase Bank, N.A. holds the largest deposit share at 29.3%, followed 3rd by Bank of America, N.A. at 10.8%, and PNC Bank at 10.2%. The bank considers the aforementioned banks to be its competitors, as well as Key Bank, Fifth Third, and The Huntington National Bank.

During the review period, the bank reported 16,936 loans in this assessment area. Comerica originated and purchased 9,526 (56.2%) small business loans totaling \$2.4 billion, 5,085 (30.0%) HELOC loans totaling \$509.7 million, compared to 2,325 (13.8 %) HMDA loans totaling \$426.1 million in the Southeast Michigan Assessment Area.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Detroit-Warren-Dearborn, MI MSA as a whole but not the specific area of the Southeast Michigan Assessment Area. However, it is reasonable to believe that the data for the MSA or MD area provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 95.2% of the Detroit-Warren-Dearborn, MI MSA, and distribution of low-, and moderate-, middle-, and upper-income families for the two areas is similar according to 2010 census data.

The Southeast Michigan Assessment Area is a region in the Lower Peninsula of the United States. It is bordered on the north east by Lake St. Clair; on the west by Ann Arbor, MI MSA; and to the south is Lake Erie, Detroit River, and Windsor, Canada. Detroit is the largest city in the assessment area as well as the state. Warren and Sterling Heights are other principal cities in

the assessment area. The assessment area is demographically diverse. This assessment area consists of 60 separate cities, towns, and/or incorporated communities. Listed in the following table is information about population and land area for each county within the Southeast Michigan Assessment Area, as it relates to statewide ranking.³⁷

County	County Seat ³⁸	Population		Population Density/ sq. mile		Land Area (sq. mile)	
		#	Rank	#	Rank	#	Rank
Lapeer	Lapeer	88,155	23	133	21	643	32
Livingston	Howell	183,264	11	313	6	565	47
Macomb	Mount Clemens	849,344	3	1,487	2	479	75
Oakland	Pontiac	1,220,298	2	1,345	3	868	15
Wayne	Detroit	1,790,078	1	2,661	1	612	34

Refer to the end of the Performance Context section for more detailed demographic information for the assessment area.

Income Characteristics

According to the 2014 FFIEC Census data, the Southeast Michigan Assessment Area contained 1,239 census tracts. The area is made up of approximately 11.2% low- and 24.0% moderate-income census tracts while the remaining were middle, upper, and unknown-income census tracts. The assessment area consists of 21.7% low- and 17.0% moderate-income families. It is estimated that 10.8% of the families live below the poverty level, which is comparable to the 10.6% statewide poverty level for Michigan.

For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the MD. The median family income decreased slightly during the review period. The Warren-Troy-Farmington Hills, MI MD median family income is higher than the Detroit-Dearborn-Livonia, MI MD. The following charts reflect the estimated median family income for the years 2012-2014 for the assessment area.

Detroit-Dearborn-Livonia, MI MD			
Income Level	2012	2013	2014
Median Income	\$51,200	\$52,300	\$51,000
Low-income	< \$25,600	< \$26,150	< \$25,500
Moderate-income	\$25,600-\$40,959	\$26,150-\$48,839	\$25,500-\$40,799
Middle-income	\$40,960-\$61,439	\$48,840-\$62,759	\$40,800-\$61,199
Upper-income	≥ \$61,440	≥ \$62,760	≥ \$61,200

³⁷ Michigan Land Area County Rank, USA.com; available from: <http://www.usa.com/michigan-state.htm>

³⁸ Michigan Counties and County Seats; available from: https://ballotpedia.org/Counties_in_Michigan

Warren-Troy-Farmington Hills, MI MD			
Income Level	2012	2013	2014
Median Income	\$74,800	\$72,400	\$73,800
Low-income	< \$37,400	< \$36,200	< \$36,900
Moderate-income	\$37,400-\$59,839	\$36,200-\$57,919	\$36,900-\$59,039
Middle-income	\$59,840-\$89,759	\$57,920-\$86,879	\$59,040-\$88,559
Upper-income	≥ \$89,760	≥ \$86,880	≥ \$88,560

Housing Characteristics

The Southeast Michigan Assessment Area was hit hard with the downturn in the economy. House prices decreased significantly. However, Detroit is on the rebound and was one of the cities to see double digit price growth in 2014.³⁹

Of total housing in the assessment area, 64.3% of the units are classified as owner-occupied while 23.9% are classified as rental units and 11.8% of the available housing is vacant. Rental units represent 43.6% of housing units in low-income census tracts and 32.5% units in moderate-income census tracts.

The following table lists median price of a house, growth rate, and year built, as of 2010-2014, for counties within the assessment area, the state, and United States.⁴⁰ Michigan's price growth rate was far below the national growth rate.

Area	Median Value	Price Growth Rate since 2000	Median Year Built
Lapeer	\$131,100	-2.6%	1977
Livingston	\$183,800	-2.0%	1986
Macomb	\$121,300	-12.9%	1973
Oakland	\$170,600	-5.6%	1973
Wayne	\$83,200	-16.3%	1955
Michigan	\$120,200	-4.0%	1969
National	\$175,700	46.9%	1974

New residential construction in the Detroit-Warren-Dearborn, MI MSA has increased considerably since the prior review period. In 2011, new single-family home building permits totaled 2,862. In 2014, new single-family building permits totaled 4,830, an increase of 68.8%. While improving, the housing market remains well below where it was before the recession.⁴¹

³⁹ Esswein, Pat, From Kiplinger's Personal Finance, January 2015; available from:

<http://www.kiplinger.com/article/real-estate/T010-C000-S002-housing-outlook-2015.html>

⁴⁰ Michigan Local Data, USA.com; available from: <http://www.usa.com/michigan-state.htm>

⁴¹ https://www.recenter.tamu.edu/data/building-permits/#!/msa/Detroit-Warren-Dearborn%2C_MI

According to 2010 Census, the median housing value for the Southeast Michigan Assessment Area in 2010 was \$157,933, compared to \$112,092 for the Detroit-Dearborn-Livonia, MI MD and \$177,745 for Warren-Troy-Farmington Hills, MI MD. In 2010, the affordability ratio was at 33.3% for the assessment area, 34.9% for the Detroit-Dearborn-Livonia, MI MD and 34.1% for Warren-Troy-Farmington Hills, MI MD. The affordability ratio is defined as the median household income divided by the median housing value. The closer the ratio is to 100% the more affordable the homes. A ratio of 100% indicates that median family income is just sufficient to purchase the median priced home. These affordability ratios indicate that the majority of households have less income than necessary to purchase the average house. This can limit a bank's ability to originate HMDA loans in this assessment area.

While home prices are increasing, Detroit is one of the most affordable markets in the United States.⁴² There is very little housing supply in the assessment area and it is driving prices up. That is particularly true when it comes to affordable housing.⁴³

The Southeast Michigan Assessment Area was among the top areas in numbers of foreclosures. The majority of the people facing foreclosure were in Wayne County; specifically, the city of Detroit because of unpaid property taxes.⁴⁴ Foreclosure rates in metropolitan areas in the country ranged from 0.7% to 16.0% throughout the nation in September 2013. The foreclosure rate for the Detroit-Warren-Dearborn, MI MSA was 3.3% in September 2013. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in the Detroit-Warren-Dearborn, MI MSA decreased from 5.1% in December 2011 to 3.7% in September 2013.⁴⁵

There is strong demand in the Detroit metro area apartment market, resulting in this area being the highest yielding apartment market in the nation. Higher home prices in some of the desirable cities, within the assessment area, preclude many tenants from transitioning to home ownership, keeping rental demand high.⁴⁶

The median gross rent in 2010 for the assessment area was \$789, for the Detroit-Dearborn-Livonia, MI MD it was \$759 and the Warren-Troy-Farmington Hills, MI MD rent was \$812, which is slightly higher than the Michigan state average of \$723. In 2010, 49.9% of renters, in

⁴² Kolko, Jed – Trulia – Where is Homeownership Within Reach of the Middle Class and Millennials? Available from: <http://www.trulia.com/blog/trends/middle-class-millennials-report/>

⁴³ Reindl and Tanner, Detroit Free Press – October 13, 2014; Hot Sports in Southeast Michigan Housing Market; available from: <http://www.freep.com/story/money/real-estate/home-sales/2014/10/12/real-estate-hot-spots-michigan-housing/17107651/>

⁴⁴ Cwiek, Sarah – March 6, 2015; available from: <http://michiganradio.org/post/detroit-faces-its-biggest-foreclosure-crisis-yet-thousands-look-help#stream/0>

⁴⁵ Serious Mortgage Delinquency Data for All 366 U.S. Metropolitan Areas, September 2013; available from; http://foreclosure-response.org/assets/maps&data/MetropolitanAreaDelinquencyRates_Methodology_September2013.pdf.

⁴⁶ Navarre, Gordon and Marcus & Millichap - Real Estate Journal – Detroit Leads Nation as Highest-Yielding Apartment Market – February 11, 2015; available from: <http://www.rejournals.com/2015/02/11/detroit-leads-nation-as-highest-yielding-apartment-market/#sthash.VBfj8Arv.dpbs>

the assessment area, had rents costs greater than 30% of their income, compared to 53.7% in the Detroit-Dearborn-Livonia, MI MD, and 46.0% in the Warren-Troy-Farmington Hills, MI MD. The state of Michigan's ratio for this period was 49.8%. Because there are fewer people buying, the rental market is hot, with both rents and construction permits for new multi-family housing rising. Multi-family permits totaled 385 in 2011 and 1,205 in 2014 in the Detroit-Warren-Dearborn, MI MSA. This represents an increase of 214.7%.⁴⁷

Employment and Economic Conditions

In 2013, Detroit declared bankruptcy. Despite great difficulty, it has managed over \$2.4 billion in investment and development since January of that year. In many key economic categories, including gross domestic product, private sector job growth, and per capita income, the Detroit region is now outperforming national averages. Technological shifts encourage growth in more highly skilled occupations, such as engineering and IT. Architecture and engineering jobs grew 28% between 2009 and 2013, computer and mathematical jobs grew 14%, and management jobs grew 9%; demonstrating that the quality of jobs in Detroit is improving, even if the region has not caught up to pre-recession job counts.⁴⁸

While the automobile industry had struggles the last half-decade, the Southeast Michigan Assessment Area's economy still relies heavily on the automobile industry. In order to diversify the industry, it is pushing advance manufacturing including technology and innovation. It is also looking at the product life cycle.⁴⁹ Although automobile manufacturing is a driver industry for the assessment area's economy, it is not the only one. There are a number of thriving industries in Detroit including healthcare; aerospace and defense; transportation, distribution, and logistics; and information technology. Other than the big three automobile companies, some of the top companies are: Henry Ford Health Systems, Beaumont Health System, and St. John Hospital and Detroit Medical Center, Wayne State University, MotorCity Casino, MGM Grand Detroit, as well as municipalities and federal government.⁵⁰

A \$650 million Red Wings arena and entertainment district is being developed, which encompasses 45 blocks in the lower Cass Corridor. This project will create an estimated 5,500 construction jobs by completion in 2017. Thousands of other jobs will come from the M-1 light-rail project that will travel through the downtown and midtown areas of Detroit.⁵¹

⁴⁷ Texas A&M Real Estate Center Data – Building Permits available from:
<https://www.recenter.tamu.edu/data/building-permits>.

⁴⁸ Pizzo, Laura – Detroit Regional Chamber – Beyond Bankruptcy: How Detroit Has Used Data to Encourage Opportunity, Investment, and a Resurgence of Its Auto Industry – July 28, 2015; available from:
<http://www.economicmodeling.com/2015/07/28/beyond-bankruptcy-how-detroit-has-used-data-to-encourage-opportunity-investment-and-a-resurgence-of-its-auto-industry/>

⁴⁹ Kampe, Paul – Diversification of Automotive Manufactureres Credited for Industry Turnaround – Macomb Daily News – January 12, 2016; available from: <http://www.macombdaily.com/article/MD/20160112/NEWS/160119886>

⁵⁰ Major Employers; available from <http://www.degc.org/site-selectors/major-employers>; and
<http://www.detroitthomecoming.com/assets/PDF/CD94258420.PDF>

⁵¹ Navarre, Gordon and Marcus & Millichap - Real Estate Journal – Detroit Leads Nation as Highest-Yielding Apartment Market – February 11, 2015; available from: <http://www.rejournals.com/2015/02/11/detroit-leads-nation-as-highest-yielding-apartment-market/#sthash.VBfj8Arv.dpbs>

The national average unemployment rates for 2012 through 2014 were higher in the assessment area than the state of Michigan and the national average. This means that the health of the economy in the assessment area did not fare as well as the state or the United States. According to the 2010 Census, the unemployment rate was 25.1% in low-income census tracts and 18.3% in moderate-income census tracts. The high unemployment rates in low- and moderate-income census tracts could affect loan demand from these census tracts.

The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Assessment Area⁵²			
	2012	2013	2014
National	8.1%	7.4%	6.2%
Michigan	9.1%	8.8%	7.3%
Lapeer County	11.6%	11.5%	9.7%
Livingston County	7.9%	7.5%	6.5%
Macomb County	9.8%	9.5%	8.0%
Oakland County	8.2%	7.9%	6.6%
Warren-Troy-Farmington Hills, MI MD	9.0%	8.7%	7.4%
Wayne County	11.7%	11.6%	9.8%
Detroit-Dearborn-Livonia, MI MD	11.7%	11.6%	9.8%
Detroit-Warren-Dearborn, MI MSA	10.1%	9.8%	8.3%

Community Contacts and Community Development Opportunities

Federal Reserve examiners conducted two interviews in this assessment area. One was with a CDFI and the second with an organization that provides services to low- and moderate-income individuals, develops real estate, promotes economic development, and revitalizes/stabilizes low- and moderate-income geographies. One of the contacts identified financial literacy for senior citizens and small business owners as a need. The contact also stated that a bank branch is needed in The Villages, a low-income area in Detroit. The Villages is an eclectic group of neighborhoods three miles east of downtown via Jefferson Avenue falling entirely within the boundaries of City Council District 5.⁵³ Flexible underwriting for low- and moderate-income individuals was also identified as a need. However, both contacts stated flexible underwriting is needed for very small business owners.

⁵² Unemployment Rate available from; <http://data.bls.gov/cgi-bin/dsrv?la>.

⁵³ <http://www.modeldmedia.com/features/detroitdistrict1013.aspx>

Southeast Michigan

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

Southeast Michigan								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	139	11.2	71,115	6.8	28,979	40.7	227,372	21.7
Moderate-Income	297	24.0	219,749	21.0	44,405	20.2	177,481	17.0
Middle-Income	423	34.1	392,662	37.6	28,135	7.2	206,432	19.7
Upper-Income	363	29.3	361,912	34.6	11,536	3.2	434,189	41.5
Unknown-Income	17	1.4	36	0.0	0	0.0	0	0.0
Total AA	1,239	100.0	1,045,474	100.0	113,055	10.8	1,045,474	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	172,011	51,413	4.4	29.9	75,015	43.6	45,583	26.5
Moderate-Income	437,372	220,935	19.1	50.5	142,197	32.5	74,240	17.0
Middle-Income	660,402	459,367	39.7	69.6	141,829	21.5	59,206	9.0
Upper-Income	530,115	426,127	36.8	80.4	70,398	13.3	33,590	6.3
Unknown-Income	571	53	0.0	0.1	60	10.5	458	80.2
Total AA	1,800,471	1,157,895	100.0	64.3	429,499	23.9	213,077	11.8
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	11,481	6.1	9,587	5.7	1,419	9.7	475	8.1
Moderate-Income	34,798	18.6	30,296	18.1	3,347	23.0	1,155	19.8
Middle-Income	67,934	36.3	60,965	36.5	4,835	33.2	2,134	36.5
Upper-Income	72,479	38.7	65,672	39.3	4,754	32.6	2,053	35.1
Unknown-Income	656	0.4	414	0.2	215	1.5	27	0.5
Total AA	187,348	100.0	166,934	100.0	14,570	100.0	5,844	100.0
	Percent of Total Businesses:			89.1		7.8		3.1
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	23	2.1	21	2.0	1	4.8	1	50.0
Moderate-Income	89	8.3	87	8.3	2	9.5	0	0.0
Middle-Income	577	53.8	571	54.4	6	28.6	0	0.0
Upper-Income	384	35.8	371	35.3	12	57.1	1	50.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,073	100.0	1,050	100.0	21	100.0	2	100.0
	Percent of Total Farms:			97.9		2.0		0.2
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Conclusions With Respect to Performance Tests in Southeast Michigan**Overview**

The bank's lending performance is good. Lending activity reflects excellent responsiveness to assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. However, Comerica did an excellent job in originating HMDA loans to low- and moderate-income families. The bank makes an adequate level of community development loans; which mitigates the low level of HMDA lending in low- and moderate-income census tracts and to low- and moderate-income families. Further, Comerica's business strategy is middle-market commercial lending and its mortgage terms are not as accommodating as its competitors.

Lending Activity

The bank is both a small business and HMDA lender. Further, Comerica elected to have its HELOC lending reviewed, given the volume is more significant than HMDA. Small business lending was given more weight than HELOC and HMDA lending in determining the bank's Lending Test rating in the assessment area.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica			CRA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	8 th	2,701	744.6	121	72,825	3.4
2013	8 th	3,465	847.2	109	61,974	3.2
2014	7 th	3,360	792.4	116	70,098	3.2
Total		9,526	2,384.2		204,897	9.8

Comerica's focus is middle-market commercial lending. Home mortgage loans are the primary business line for many of the top HMDA reporters. The table below details key data about HMDA reporters operating within the assessment area. The top ranked reporters were Quicken Loans, Inc.; CitiBank, N.A.; Wells Fargo Bank, N.A.; CitiMortgage, Inc.; and JP Morgan Chase Bank, N.A.

Year	Comerica			HMDA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	30 th	1,105	181.6	557	72,825	3.4
2013	32 nd	825	158.9	546	61,974	3.2
2014	49 th	395	85.6	568	70,098	3.2
Total		2,325	426.1		204,897	9.8

In addition, the bank originated 14,234 consumer purpose HELOC loans of which 5,085 (35.7%) were in this assessment area.

Details of the bank's HMDA, HELOC, and CRA lending and information regarding lending by aggregate can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

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

The bank's small business lending in low-income census tracts is excellent. Comerica's performance was better than aggregate and comparable to the percentage of small businesses in the low-income census tracts throughout the review period.

The bank's small business lending in moderate-income census tracts is excellent. The bank's performance was above aggregate and the percentage of small businesses in moderate-income census tracts throughout the review period.

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

HMDA Loans

The geographic distribution of HMDA loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 550 HMDA aggregate lenders in this assessment area. More than half of the aggregate lenders originated or purchased less than 25 HMDA loans in this assessment area, each year of the review period.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. Comerica's performance was slightly above aggregate. Both originated less than 1.0% of home purchase loans in low-income census tracts in 2012 and 2013, and slightly more than 1.0% in 2014. The lending performance was below the 4.4% of owner-occupied units in these census tracts throughout the review period.

Home purchase lending in moderate-income census tracts is good. Comerica's performance was slightly above aggregate and below the percentage of owner-occupied units throughout the review period.

The bank's home purchase lending in middle-income census tracts was below the percentage of owner-occupied units in these census tracts. The lending in upper-income census tracts was greater than the percentage of owner-occupied units, except for 2014 when it was equal to the percentage of owner-occupied units.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. Comerica's and aggregate originated less than 1.0% of refinance loans in 2012 and 2013 slightly more than 1.0% in 2014. Aggregate and the bank's performance were below the percentage of owner-occupied units. Negative equity has improved; however, it continues to be an issue for this assessment area. Negative equity typically affect owners of less expensive homes, which are usually in low- and moderate-income census tracts.

Home refinance lending in moderate-income census tracts is good. Comerica's performance was below aggregate performance in 2012 and 2013, but above in 2014. Aggregate and the bank's performance were below the percentage of owner-occupied units throughout the review period.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is adequate. During the review period, Comerica originated approximately 1.0% of HELOC loans in low-income tracts each year; however, these census tracts contain only 4.4% of owner-occupied units.

Comerica's HELOC lending in moderate-income census tracts is good. During the review period, Comerica originated 8.0% in 2012, 7.9% in 2013, and 8.4% in 2014 of HELOC loans in moderate-income census tracts; however, its performance was below the percentage 19.1% of owner-occupied units. Southeast Michigan housing prices are increasing; however, properties in low- and moderate-income census tracts typically do not appreciate in value as quickly.⁵⁴ Having less equity could hamper HELOC lending.

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

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

The bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. However, Comerica did an excellent job in originating HMDA loans to low- and moderate-income families. For this analysis, the distribution of small business lending across business revenue sizes and HMDA and HELOC lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other lenders.

Small Business Loans

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The bank's performance was below aggregate throughout the review period. Comerica's and aggregate performance is significantly below the percentage of small businesses in the assessment area. Comerica reported 23.5% of loans to businesses with revenue less than or equal to \$1 million, 50.0% to businesses with revenue greater than \$1 million, and 26.5% of loans to businesses with revenue unknown.

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance was below the aggregate performance, which can possibly be attributed to the large number of

⁵⁴ <http://www.freep.com/story/money/business/michigan/2016/01/09/michigan-home-prices-keep-rising/78019058/>

aggregate institutions who originate small dollar credit card loans. However, Comerica reported 21.0% small business lending in amounts of \$100,000 - \$250,000 during this review period.

Aggregate included between 108 and 120 CRA reporters, during the review period. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top ranked reporters throughout the review period included American Express Bank, FSB; CitiBank, N.A.; U.S. Bank, N.A.; Chase Bank USA, N.A.; and Capital One Bank USA, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered excellent when compared to demographic characteristics of the assessment area, as well as the performance of aggregate.

Home Purchase Lending

The bank's home purchase lending to low-income families is excellent. Comerica's performance exceeded aggregate; however, both were below the percentage of low-income families.

The bank's home purchase lending to moderate-income families is excellent. Comerica's performance was above to aggregate; however, both were below percentage of moderate-income families.

The bank's home purchase lending to middle- and upper-income families was below the percentage of families in these census tracts through the review period, excluding 2012 when home purchase lending was above the percentage of middle-income families.

Home Refinance Lending

The bank's home refinance lending to low-income families is excellent. Comerica's refinance lending performance to low-income families was comparable to aggregate; however, both were below the percentage of low-income families.

The bank's home refinance lending to moderate-income families is excellent. The bank's performance was better than aggregate; however, both were below the percentage of moderate-income families in the assessment area.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending to low-income families is good. During the review period, Comerica's HELOC loans to low-income families ranged from 11.6% to 16.6%. The bank's performance was below the 21.7% of low-income families in the assessment area.

Comerica's HELOC lending to moderate-income families is excellent. During the review period, Comerica's performance was above the percentage of moderate-income families in the assessment area.

The bank's HELOC lending to middle-income families was slightly below the percentage of middle-income families in the assessment area in 2012, but above in 2013 and 2014; while the lending to upper-income families was greater than the percentage of families.

Community Development Lending

The bank makes a low level of community development loans in Southeast Michigan Assessment Area, given its deposits market share, lending activity, and branch locations. Comerica originated 47 loans totaling \$101.5 million, to 21 entities. These entities primarily provide services for low- and moderate-income individuals.

Of the community development loans the bank made, 12.8% (six) are associated with affordable housing. The six affordable housing purpose loans totaled \$24.2 million. Three of the affordable housing purpose loans were used to bridge the timing gap between the funding necessary to complete a low income housing development, and the receipt of proceeds from the sale of the associated LIHTC. One of the loans were to purchase a 266 unit apartment complex that will operate under the Section 8 housing subsidy program. Additionally, the assessment area further benefitted from \$60,000 in consortia loans originated or renewed through Community or Economic Development Corporations.

Investment Test

The bank's performance under the Investment Test is good. The bank's investments were primarily focused LIHTC investments. The Southeast Michigan Assessment Area current period investments in LIHTC total \$8.6 million and prior period LIHTC investments book value totaled \$11.2 million. The bank also invested \$2.1 million in mortgage-backed securities, \$1.7 million in general obligation bonds with a community development purpose, and made \$1.6 million contributions to 221 organizations that provide community services. This assessment area had total investments of \$25.3 million during the review period.

Comerica also endowed the Comerica Community Economic Development Fund, which was established in 1991, with gifts totaling \$75,000. This fund provides grants to nonprofit economic

development organizations in the city of Detroit. During the review period, four organizations benefitted from the \$162,700 allocations.

Particularly responsive was an in-kind donation. Comerica donated a branch building that was no longer in use to a nonprofit organization that provides services to low- and moderate-income individuals. It was valued at \$110,000.

However, this assessment area benefitted significantly from LIHTC statewide and nationwide investments that included this assessment area. During the review period for the statewide investments, Comerica invested \$5.2 million in four LIHTC projects. Comerica also holds outstanding LIHTC investments in 11 projects; that have a current book value of approximately \$6.6 million. For nationwide investments, Comerica invested approximately \$2.0 million among two LIHTC projects and holds outstanding LIHTC investments that have a current book value of \$6.5 million among three projects. The related amounts are included in total investments in the Institution section of this report.

Service Test

The bank's Service Test performance is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Comerica's 152 branch offices and 263 ATMs as of December 31, 2014 was compared to the distribution of households and businesses among the census tract categories within the assessment area.

Comerica closed one branch, in an upper-income census tract, in this assessment area during the review period. Three ATMs located in moderate-income census tracts were also closed. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly to low- and moderate-income geographies and low- and moderate-income individuals. The level of branch services and hours offered by Comerica is basically the same throughout the assessment area. The bank offers extended and weekend hours with convenient drive-thru services. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility.

The table below summarizes the bank's retail locations in the Southeast Michigan Assessment Area.

Tract Income	% of Geographies	% of Households	% Businesses	Branches		Full Service ATMs		Cash Only ATMs	
				#	%	#	%	#	%
Low	11.2	8.0	6.1	14	9.2	22	10.3	8	16.0
Moderate	24.0	22.9	18.6	19	12.5	36	16.9	5	10.0
Middle	34.1	37.9	36.3	60	39.5	82	38.5	25	50.0
Upper	29.3	31.3	38.7	58	38.2	72	33.8	8	16.0
Unknown	1.4	0.0	0.4	1	0.7	1	0.5	4	8.0
Total	100.0	100.0	100.0	152	100.0	213	100.0	50	100.0

Community Development Services

The bank provides an adequate level of community development services in the assessment area, given its footprint. Bank management and staff served as board members, treasurers, and other leadership roles, contributing their financial expertise to 76 organizations offering community development services that focused on business development, financial literacy, youth-services, home buyers education, and various other community services that aided low- and moderate-income individuals. Employees participated in 395 events/meetings during the review period. These events included attending meetings, making presentations, and teaching financial literacy classes/workshops.

However, particularly commendable and responsive is Comerica's involvement throughout the assessment area in providing financial literacy through programs like Comerica's Youth Savings Program, Junior Achievement, Operation Hope's "Banking On Our Future," and participation in the annual Money Smart Week and the Golightly Academies. During the review period, the bank taught financial literacy to low- and moderate-income students at multiple schools that have a majority enrollment of low- and moderate-income students.

Purpose	# Events/Meetings
Affordable Housing	23
Benefits LMI Individuals/Geographies	329
Revitalize/Stabilize	18
Provides Economic Development	25
Total	395

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 5,340 credit cards loans to small business customers. This partnership is also responsive to assessment area credit needs that were identified by community contacts.

METROPOLITAN AREAS (Limited Scope Review)

As a result of the OMB revised delineations effective in 2014, Midland County became a MSA. It is the only county that makes up the Midland, MI MSA.

Description of Institution's Operations

- **Ann Arbor, MI MSA Assessment Area**
 - As of December 31, 2014, the bank operated nine branches in the assessment area, representing 4.2% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$691,086 million in deposits in this assessment area, representing a market share of 10.0%. The \$691,086 million also represents 1.3% of the bank's total deposits in Michigan.
- **Battle Creek, MI MSA Assessment Area**
 - As of December 31, 2014, the bank operated five branches in the assessment area, representing 2.3% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$196,743 million in deposits in this assessment area, representing a market share of 20.4%. The \$196,743 million also represents 0.4% of the bank's total deposits in Michigan.
- **Flint, MI MSA Assessment Area**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 0.5% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$49,327 million in deposits in this assessment area, representing a market share of 1.4%. The \$49,327 million also represents 0.1% of the bank's total deposits in Michigan.
- **Jackson, MI MSA Assessment Area**
 - As of December 31, 2014, the bank operated 10 branches in the assessment area, representing 4.7% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$386,444 million in deposits in this assessment area, representing a market share of 25.2%. The \$386,444 million also represents 0.7% of the bank's total deposits in Michigan.
- **Kalamazoo-Portage, MI MSA Assessment Area (Kalamazoo)**
 - As of December 31, 2014, the bank operated six branches in the assessment area, representing 2.8% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$249,848 million in deposits in this assessment area, representing a market share of 8.9%. The \$249,848 million also represents 0.5% of the bank's total deposits in Michigan.
- **Lansing-East Lansing, MI MSA Assessment Area**
 - As of December 31, 2014, the bank operated eight branches in the assessment area, representing 3.7% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$591,265 million in deposits in this assessment area, representing a market share of 10.8%. The \$591,265 million also represents 1.1% of the bank's total deposits in Michigan.

- **Midland, MI MSA Assessment Area**
 - As of April 30, 2014, the bank operated three branches in the assessment area, representing 1.4% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$101,586 million in deposits in this assessment area, representing a market share of 8.0%. The \$101,586 million also represents 0.2% of the bank's total deposits in Michigan.
- **Muskegon, MI MSA Assessment Area**
 - As of December 31, 2014, the bank operated five branches in the assessment area, representing 2.3% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$212,528 million in deposits in this assessment area, representing a market share of 15.1%. The \$212,528 million also represents 0.4% of the bank's total deposits in Michigan.

Conclusions With Respect to Performance Tests

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

Assessment Area	Lending Test	Investment Test	Service Test
Ann Arbor MSA	Consistent	Consistent	Below
Battle Creek, MI MSA	Consistent	Consistent	Below
Flint, MI MSA	Below	Consistent	Below
Jackson, MI MSA	Exceeds	Consistent	Below
Kalamazoo-Portage, MSA	Consistent	Consistent	Consistent
Lansing-East Lansing	Consistent	Consistent	Below
Midland, MI MSA	Consistent	Below	Below
Muskegon, MI MSA	Consistent	Consistent	Consistent

The full-scope areas (Southeast Michigan and Grand Rapids) selected together represents 90.2% of the deposits in the assessment areas in Michigan, as well as 77.2% of the branches. The full-scope assessment areas represent 77.6% of the total loans in the state. Therefore, the state rating is based on those areas in the state with the greatest volume of deposits, lending, and branches.

Six of the limited-scope assessment areas Lending Test performances were consistent with the bank's performance in the state; while one exceeded and one was below. Investment Test performance was consistent in the state for seven of the limited scope assessment areas, but below for one. Only two of the limited scope assessment areas Service Test performances were consistent in the state, while six were below. The performance in the limited-scope assessment areas did not impact the state rating, given the full-scope assessment areas included majority of deposits, lending, and branches.

NONMETROPOLITAN STATISTICAL AREAS (Limited scope Review)

As a result of the OMB revised delineations effective in 2014, Midland County became a MSA. It was a nonMSA contiguous to Gladwin County. For consistency, Gladwin and Midland counties rating will be treated as one. However, the assessment areas were separated in 2014. Performance was the same for both of these counties.

Description of Institution's Operations in the Nonmetropolitan Assessment Areas

- **Gladwin County Assessment Area**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 0.2% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$16.3 million in deposits in this assessment area, representing a market share of 8.2%. The \$16.3 million also represents .02% of Comerica's total deposits in Michigan.
- **Lenawee County Assessment Area**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 0.2% of its branches in Michigan.
 - As of June 30, 2014, the bank had \$28.5 million in deposits in this assessment area, representing a market share of 3.8%. The \$28.5 million also represents .05% of Comerica's total deposits in Michigan.

Conclusions With Respect to Performance Tests

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

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

Gladwin County's performance is consistent with the Midland MSA. As discussed earlier, Midland County became a MSA as a result of the OMB changes effective 2014. The two counties are contiguous; however, they are now considered separate because of the OMB changes. Lenawee County is consistent with the bank's performance in the state; excluding the Service Test, where it is below.

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

STATE OF CALIFORNIA

CRA Rating for California: Satisfactory

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

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to assessment areas' credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes a relatively high level of community development loans.
- Has an excellent level of qualified community development investments and donations.
- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- Provides a relatively high level of community development services.

Scope

Full scope reviews were conducted for two assessment areas in California, including:

- Los Angeles-Long Beach-Anaheim, CA MSA
- San Jose-Sunnyvale-Santa Clara, CA MSA

Limited scope reviews were conducted for the remaining eight assessment areas, including:

- Fresno, CA MSA
- Oxnard-Thousand Oaks-Ventura, CA MSA
- Riverside-San Bernardino-Ontario, CA MSA
- Sacramento-Roseville-Arden-Arcade, CA MSA
- Salinas, CA MSA
- San Diego-Carlsbad, CA MSA
- San Francisco-Oakland-Hayward, CA MSA
- Santa Cruz-Watsonville, CA MSA

The time period and products evaluated for this state are consistent with the scope discussed in the Institution section of this report. The Greater Los Angeles Assessment Area had a greater influence on the statewide ratings across all three tests. Therefore, the bank's performance in the Greater Los Angeles Assessment Area was given greater consideration because of its larger concentration of lending activity and branches in California.

Description of Institution's Operations in California

The bank operates 103 branch offices in its assessment areas in California, representing 21.3% of total branches. As of June 30, 2014, the bank had \$16.7 million in deposits in the state, representing 31.2% of total deposits. Of the 5,721 HMDA loans originated and purchased by the bank, 672 (11.7%) were in the California assessment areas. Of the 24,543 small business loans originated and purchased by the bank, 4,616 (18.8%) were in the California assessment areas. Of the 14,234 HELOC loans originated by the bank, 3,592 (25.2%) were in the California assessment areas.

As of 2010 Census, the California assessment areas population was 26,893,134. There were 9,611,405 housing units, of which 51.2% were owner-occupied, 42.2% rental, and 6.6% vacant. There were 5,896 census tracts in the California assessment areas; of which 7.4% are low-, 24.4% are moderate-, 32.3% are middle-, 36.0% are upper-, and less than .01% are unknown-income. According to the FFIEC data, median family income ranged from \$54,600 to \$105,400 for the assessment areas during the review period.

The unemployment rate in California is significantly higher than the national level. Statewide annual average unemployment rate decreased from 10.4% in 2012 to 7.5% in 2014. National annual average unemployment rate decreased from 8.1% in 2012 to 6.2% in 2014.

California is a robust and diverse state with an economy larger than that of many countries, and it's considered the nation's leading industrial state. Agriculture, technology, tourism, and the motion picture industry provide a wide range of jobs statewide.

California is home to many technology products, but mostly high-tech computer products. The largest maker of hard disk drives, Western Digital, is also considered one of the state's leading companies.

California is also known for its agriculture. The long growing season and good soil in California plays a vital part in crop production. California is the top state in the United States for all farm income. California was also the third-ranked producer of livestock cash receipts, behind Texas and Iowa.

Aerospace is a very large chunk of the California economy. California is responsible for nine percent of the global market share in the aerospace industry. While a reduction in aerospace jobs in the past two decades has cut into the industry's growth, California has implemented tax incentives to keep aerospace giants, such as Lockheed Martin Corp., in the state.

The service industry is one of the most successful and busiest in the country. Tourists make California a vacation destination to visit world famous places like Hollywood, Sea World, Disneyland, Yosemite National Park, and the San Francisco Bay Area.

The motion picture industry, also known as Hollywood, accounts for a significant amount of California's economy. The motion picture industry supports more than 2.4 million jobs nationwide.⁵⁵

Conclusions with Respect to Performance Tests in California

Lending Test

The bank's overall Lending Test rating is High Satisfactory.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA and small business as well as HELOC loans can be found in tables in Appendices G and H, respectively.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs based on small business and HMDA market share ranking as discussed below. The assessment areas in California contain 20.0% of the bank's small business, HMDA, and consumer lending by number of loans and 29.3% by dollar volume totaling \$2.9 billion. In comparison, 31.2% of the bank's total deposits are in California.

Summary of Statewide Lending Activity* Assessment Areas Located in California January 1, 2012 through December 31, 2014				
Loan Type	#	%	\$(000s)	%
Home Equity Lines of Credit	3,592	7.6	\$837,312	28.4
Home Improvement	7	1.0	\$7,971	0.9
Home Purchase	180	26.8	\$256,665	28.8
Refinance	466	69.4	\$430,344	48.4
Multi-family	19	2.8	\$194,509	21.9
Total HMDA	672	49.4	\$889,489	30.2
Total Small Business	4,616	43.0	\$1,217,678	41.4
Total Loans	8,880	100.0%	\$2,944,479	100.0%
*Originations and purchases within the bank's assessment areas.				

⁵⁵ <http://www.newsmax.com/FastFeatures/industries-in-california-strongest/2015/03/08/id/626901/>

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

The geographic distribution of loans in California reflects excellent penetration throughout the assessment areas. The two full-scope assessment areas, the Greater Los Angeles Assessment Area and the San Jose Assessment Area is considered excellent. The geographic distribution of small business loans is excellent for both assessment areas.

The overall distribution among borrowers of different income levels and businesses of different sizes in California is adequate. Of the two full-scope assessment areas, both are considered adequate. While majority of the loans were originated to businesses with revenue greater than \$1 million; there were 2,216 small business credit card loans originated through the bank's partnership with Elan in the two full-scope assessment areas. These loans are not included in the small business loan percentages. Further, the top ranked reporters were predominantly credit card issuers.

More information on the distribution of lending can be found in each full-scope assessment area sections.

Community Development Lending

In California, the bank makes a relatively high level of community development loans. The community development loans originated during the evaluation period were for a variety of purposes. The bank originated or renewed 116 community development loans totaling \$365.3 million in the California assessment areas during the review period, including 33 loans for \$116.8 million in the Greater Los Angeles full-scope assessment area and 37 loans for \$82.9 million in the San Jose full-scope assessment area.

The bank makes a relatively high level of community development loans in both full-scope assessment areas. Statewide community development lending also includes 14 loans for \$65.6 million to borrowers located in a broader statewide area that includes the bank's assessment areas and that have a purpose, mandate or function of serving one or more California assessment areas. Statewide community development lending performance was driven by performance in the full-scope assessment areas and the Greater Los Angeles Assessment Area had the greatest impact. Further, Comerica provided \$3.2 million in consortia loans through Community or Economic Development Corporations in the assessment areas. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts. More information on community development loans can be found in the full-scope assessment area sections of this report.

Investment Test

In California, the bank's overall Investment Test rating is Outstanding. The bank has an excellent level of qualified community development investments and grants in California. Comerica's community development investments totaled \$80.4 million in California. Current period investments totaled \$43.1 million and prior period investments totaled \$37.3 million.

The bank exhibited excellent responsiveness to credit and community development needs through its investment activities in one of two full-scope assessment areas while performance in one was good. Of particular responsiveness was the bank's support of affordable housing, specifically its volume of participation in LIHTCs and mortgage-backed securities. Many of the California assessment areas suffered from the housing crisis and the need for affordable housing was a priority identified in many of these areas. Comerica also provided zero interest certificates of deposits to three community development organizations in California during the review period. The purpose of these organizations varies from providing direct loans for affordable housing to community development programs geared to low- and moderate individuals or small businesses. Bonds were also provided to three schools to meet the cash flow deficit due to the lag in payment by the State of California. For the evaluation period, the bank used the following investment vehicles:

- Statewide LIHTC investments (21 projects) - \$29.7 million current period (14 projects) and \$37.3 million prior period book value (7 projects).
- Contributions - \$5.9 million to support organizations and/or activities with a community development purpose.
- Three bonds - \$4.2 million to support schools in California low- and moderate-income census tracts. The school also provides free or reduced price lunches to more than 50% of the students in these schools.
- Mortgage-backed instruments - \$1.9 million mortgages targeted to low-and moderate-income families.
- Prior period certificates of deposit - \$165,000 zero interest deposits in a CDC and two CDFIs.

Further, seven of Comerica's assessment areas in California was positively impacted from 13 of Comerica's nationwide LIHTC investments. The investment benefitted two of the full-scope assessment areas (Greater Los Angeles and San Jose-Santa Clara) as well as five limited-scope assessment areas (Santa Cruz, San Diego, San Francisco, Fresno, and Sacramento).

California's nationwide LIHTC current period investments totaled approximately \$8.9 million and prior period book value totaled \$13.8 million. The related amounts are included in total investments in the Institution section of this report. Specific details regarding investments can be found in the full-scope assessment area sections of this report.

Service Test

In California, the bank's overall Service Test rating is High Satisfactory. Of the two full-scope assessment areas one was rated Outstanding and one received a Needs to Improve rating. The performance in the San Jose-Santa Clara Assessment Area negated the state rating; given it has a substantial portion of California deposits, as well as 12.5% of the bank's total deposits. Community development services provided in San Jose-Santa Clara Assessment Area represents approximately 1.3% of the bank's total community development services.

Retail Services

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

Community Development Services

The bank is a leader in providing community development services in one assessment area and provides a limited level of community development services in the other assessment area. Staff provided community development services to approximately 80 organizations and participated in more than 800 events. However, particularly noteworthy is the bank's participation in financial literacy initiatives. The bank participated in the following financial literacy initiatives throughout the state:

- **Operation Hope** - Comerica's California Market provides funding and volunteers for the Operation Hope "Banking On Our Future" program. This financial education program is taught exclusively at schools in low- and moderate-income communities. During the review period, Comerica sponsored numerous schools, and almost 17,500 students in low- and moderate-income communities throughout California participated in the program.
- **How To Do Your Banking** – How To Do Your Banking is a seven-lesson course in banking skills taught by high school faculty as a complement to their regular curriculum. Bank employees visited various schools and conducted seminars for students on one of the program subjects (credit, checking and savings, investments, etc.). More than 4,700 students in low- and moderate-income communities in California participated in the program.
- **Junior Achievement** - During the review period, Comerica sponsored several schools and had over 5,100 students in low- and moderate-income communities participate in the program.

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

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Greater Los Angeles, CA

The Los Angeles-Long Beach-Anaheim, CA MSA includes Los Angeles-Long Beach-Glendale, CA MD and Anaheim-Santa Ana-Irvine, CA MD. Los Angeles County makes up the Los Angeles-Long Beach-Glendale, CA MD and Orange County makes up the Anaheim-Santa Ana-Irvine, CA MD. The bank delineated a portion of Los Angeles County and all of Orange County, hereafter referred as Greater Los Angeles, as its assessment area.

Within the assessment area portions of the MSA there are 239 low-, 798 moderate-, 784 middle-, and 921 upper-income census tracts. There are also 32 census tracts where income is unknown. As of June 30, 2014, the bank operated 41 branches in the assessment area representing 8.5 % of its branches. There are 2 branches located in low-income census tracts, 7 branches in moderate-income census tracts, 10 branches in middle-income census tracts, 20 branches in upper-income census tracts, and 2 branches in unknown-income census tracts.

Greater Los Angeles is a very competitive market for financial services. As of June 30, 2014, the bank had \$5.9 million in deposits in this assessment area representing 10.9% of the bank's total deposits. Comerica ranked 12th (1.5%) in deposit market share, which includes all other FDIC insured deposits that are located in the assessment area. There were 135 banks with 2,507 offices in this assessment area, where Comerica only represents 1.6% of total offices. Bank of America, N.A., holds the largest deposit market share at 19.2%; followed by Wells Fargo Bank, N.A. at 16.5%; JPMorgan Chase Bank, N.A. at 10.5 %; and Union Bank at 10.4%. The bank considers the aforementioned banks to be its competitors, as well as Bank of the West and City National.

During the review period, the bank reported 1,749 (50.9%) small business loans totaling \$513.3 million; 1,395 (40.6%) HELOC loans totaling \$362.8 million; compared to 293 (8.5%) HMDA loans totaling \$521.3 million in the Great Los Angeles Assessment Area.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Los Angeles-Long Beach-Glendale, CA MD and Anaheim-Santa Ana-Irvine, CA MD as a whole and not the specific assessment area. However, it is reasonable to believe that the data for the MD/MSA areas provide a good representation of the characteristics of the assessment area because the population of the assessment area includes 94.9% of the Los Angeles-Long Beach-Anaheim, CA MSA, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to 2010 census data.

The Greater Los Angeles Assessment Area is located in southern California. The assessment area is bordered by Kern and Ventura Counties to the north, San Bernardino and Riverside Counties to the east, San Diego County to the south, and the Pacific Ocean to the west. The geographic distribution of population, economic activity, and land use in the assessment area is

diverse, and the county is home to numerous beaches, national forests, mountains, and deserts. As of 2014, Los Angeles County had a population of 10.1 million, making it the most populated county in the U.S., and Orange County had a population of 3.1 million, making it the 3rd most populous county in California and sixth in the U.S.⁵⁶

Los Angeles County ranks 11th statewide in terms of total land area (4,058 square miles), and is the 3rd most densely populated county in California, with 2,420 people per square mile in 2010.⁵⁷ Los Angeles County contains 88 separate incorporated cities as well as many unincorporated communities.⁵⁸ The City of Los Angeles is the county seat, and with a population of 3.9 million is the largest city in California and 2nd largest in the U.S.⁵⁹

Orange County ranks 47th statewide in terms of total land area (791 square miles), and is the 2nd most densely populated county in the state, with 3,255 people per square mile in 2010.⁶⁰ Orange county contains 34 separate incorporated cities as well as many unincorporated communities.⁶¹ The City of Santa Ana is the county seat, and with a population of 334,909.⁶²

Income Characteristics

The following chart reflects the estimated median family income for the years 2012 through 2014 for the Los Angeles-Long Beach-Glendale, CA MD and Anaheim-Santa Ana-Irvine, CA MD. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 Census, 11.3% of the families in the assessment area lived below the poverty level.

Los Angeles-Long Beach-Glendale, CA MD			
Income Level	2012	2013	2014
Median Income	\$64,800	\$61,900	\$60,600
Low-income	< \$32,400	< \$30,950	< \$30,300
Moderate-income	\$32,400-\$51,839	\$30,950-\$49,519	\$30,300-\$48,479
Middle-income	\$51,840-\$77,759	\$49,520-\$74,279	\$48,480-\$72,719
Upper-income	≥ \$77,760	≥ \$74,280	≥ \$72,720

⁵⁶Community Facts, Los Angeles and Orange Counties, California; available from:

<http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>.

⁵⁷ California Land Area County Rank, USA.com; available from: <http://www.usa.com/rank/california-state--land-area--county-rank.htm>.

⁵⁸ List of Cities in Los Angeles County, California; available from:

https://en.wikipedia.org/wiki/List_of_cities_in_Los_Angeles_County,_California.

⁵⁹ U.S. Census Bureau – 2014 Population Estimate; available from:

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

⁶⁰ California Land Area County Rank, USA.com; available from: <http://www.usa.com/rank/california-state--land-area--county-rank.htm>.

⁶¹ Orange County, California; available from https://en.wikipedia.org/wiki/Orange_County,_California.

⁶² U.S. Census Bureau – 2014 Population Estimate; available from:

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

Anaheim-Santa Ana-Irvine, CA MD			
Income Level	2012	2013	2014
Median Income	\$85,300	\$84,100	\$84,900
Low-income	< \$42,650	< \$42,050	< \$42,450
Moderate-income	\$42,650-\$68,239	\$42,050-\$67,279	\$42,450-\$67,919
Middle-income	\$68,240-\$102,359	\$67,280-\$100,919	\$67,920-\$101,779
Upper-income	≥ \$102,360	≥ \$100,920	≥ \$101,880

Housing Characteristics

The median sold price of a Los Angeles metro area house increased to \$411,050 in December 2014, up from \$400,040 in December 2013.⁶³ New residential construction in the Los Angeles-Long Beach-Anaheim MSA has increased considerably since the prior review period. In 2011, new single-family home permits totaled 4,097. In 2014, new single-family home permits totaled 8,300; an increase of 102.6%. While showing significant signs of improvement, the housing market remains well below where it was previously.⁶⁴

According to 2010 Census, the median housing value for the Greater Los Angeles Assessment Area in 2010 was \$554,690, compared to \$508,800 for the Los Angeles-Long Beach-Glendale, CA MD and \$607,900 for Anaheim-Santa Ana-Irvine, CA MD. In 2010, the affordability ratio was at 10.9% for the Los Angeles-Long Beach-Glendale, CA MD and 12.2% for Anaheim-Santa Ana-Irvine, CA MD. The affordability ratio is defined as the median household income divided by the median housing value. The closer the ratio is to 100% the more affordable the homes. A ratio of 100% indicates that median family income is just sufficient to purchase the median priced home. These affordability ratios indicate that the substantial majority of households have less income than necessary to purchase the average house. This can limit a bank's ability to originate HMDA loans in this assessment area. A recent study found that Los Angeles County ranked 2nd and Orange County ranked 3rd as the least affordable area in the nation for a middle class family looking to buy a home.⁶⁵

Of total housing in the assessment area, 47.3% of the units are classified as owner-occupied while 46.8% are classified as rental units and 5.8% of the available housing is vacant. A majority of the assessment area's housing units are owner-occupied, but only 2.5% of these are located in the low-income census tracts and 17.6% are located in moderate-income census tracts. Rental units represent 76.1% of housing units located in low-income census tracts and 62.7% in moderate-income census tracts. A large number of renters in an area with high-valued housing

⁶³California Association of Realtors Home Sales and Price Report, available from: <http://www.car.org/newsstand/newsreleases/2015releases/dec2014sales>.

⁶⁴Texas A& M Real Estate Center Data – Building Permits, available from: <https://www.recenter.tamu.edu/data/building-permits/>.

⁶⁵Kolko, Jed. Where Can the Middle Class Afford to Buy a Home? *Trulia*. May 13, 2014; available from: <http://www.trulia.com/blog/trends/middle-class-may-2014/>

units may be due to the residents' inability to afford local homes. The median age of housing stock in the assessment area is 46 years.

The Los Angeles-Long Beach-Santa Ana, CA MSA was one of the areas hit hardest by the foreclosure rate during the recession. Foreclosure rates in metropolitan areas in the country ranged from 0.7% to 16.0% throughout the nation in September 2013. The foreclosure rate for the Los Angeles-Long Beach-Santa Ana, CA MSA was 2.6% in September 2013. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in the Los Angeles-Long Beach-Santa Ana, CA MSA decreased from 3.9% in December 2011 to 2.5% in September 2013.⁶⁶

Additionally, rental housing remains very unaffordable, and in some instances unavailable, for many households in the county. The median gross rent in the Los Angeles-Long Beach-Glendale, CA MD in 2010 was \$1,117, which is slightly lower than the California state average of \$1,147; however, Anaheim-Santa Ana-Irvine, CA MD rent at \$1,423 is 24.1% above the state average. In 2010, 44.1% of renters had rents costs greater than 30% of their income. Because there are fewer people buying, the rental market is very competitive, with both rents and construction permits for new multi-family housing rising. Multi-family permits totaled 9,628 in 2011 and 17,756 in 2014 in the Los Angeles-Long Beach-Santa Ana, CA MSA. This represents an increase of 844.2%.⁶⁷

Employment and Economic Conditions

The economy of the greater Los Angeles region is driven by more than its famed entertainment industry. The region's broad economic base also includes aerospace, automotive, biotechnology, fashion, manufacturing and international trade. The Los Angeles Customs District, which includes the ports of Long Beach and Los Angeles, Port Hueneme, and Los Angeles International Airport, was the nation's largest in 2014. The value of two-way trade passing through the Los Angeles Customs District totaled \$416.6 billion in 2014. Major investments are under way to expand the ports, LAX airport and related transportation facilities in Los Angeles County.

Higher and specialized education is a core strength of the Greater Los Angeles Assessment area, with over 100 four-year public and private college and university campuses. These range from UCLA, USC, the California Institute of Technology, University of California-Irvine (which has a medical school), California State University-Fullerton, Chapman University, the Southern California College of Optometry and the Claremont Colleges, to top-rated specialized institutions like the Art Center College of Design, the California Institute for the Arts, the Fashion Institute of Design and Merchandising, and the Otis College of Art and Design.⁶⁸

⁶⁶ Serious Mortgage Delinquency Data for All 366 U.S. Metropolitan Areas, September 2013; available from; http://foreclosure-response.org/assets/maps&data/MetropolitanAreaDelinquencyRates_Methodology_September2013.pdf.

⁶⁷ Texas A&M Real Estate Center Data – Building Permits available from; <https://www.recenter.tamu.edu/data/building-permits>.

⁶⁸ LAEDC – L.A. Stats 2015 available from; http://laedc.org/wp-content/uploads/2015/08/2015-LA-Stats_Final.pdf

According to the 2010 Census, the unemployment rate was 11.1% in low-income census tracts and 10.0% in moderate-income census tracts. The high unemployment rates in low- and moderate-income census tracts could affect loan demand from these census tracts. Los Angeles County's unemployment rate was higher than the state and nationally. The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Assessment Area⁶⁹			
	2012	2013	2014
National	8.1%	7.4%	6.2%
California	10.4%	8.9%	7.5%
Los Angeles County	10.9%	9.7%	8.2%
Orange County	7.8%	6.5%	5.5%
Los Angeles-Long Beach-Anaheim, CA MSA	10.2%	9.0%	7.6%

Community Contacts and Community Development Opportunities

Examiners ascertained the assessment area's credit needs from three interviews. The organizations provide services to the bank's assessment area. Community contacts included nonprofit organizations that support lending to small businesses, lending to low- and moderate-income individuals, affordable housing, and community services to low- and moderate-income individuals. Critical credit, banking, and service needs identified included the following:

- Affordable housing - grants, loans, and outreach education
- Small business loans

⁶⁹ <http://data.bls.gov/cgi-bin/dsrv?la>

Greater Los Angeles, CA

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

Greater Los Angeles, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	239	8.6	188,796	6.9	63,438	33.6	648,827	23.8
Moderate-Income	798	28.8	757,160	27.8	140,520	18.6	456,655	16.8
Middle-Income	784	28.3	793,078	29.1	67,404	8.5	493,022	18.1
Upper-Income	921	33.2	981,717	36.1	36,382	3.7	1,122,329	41.2
Unknown-Income	32	1.2	82	0.0	0	0.0	0	0.0
Total AA	2,774	100.0	2,720,833	100.0	307,744	11.3	2,720,833	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	304,770	49,780	2.5	16.3	231,481	76.0	23,509	7.7
Moderate-Income	1,132,703	354,309	17.6	31.3	709,831	62.7	68,563	6.1
Middle-Income	1,221,441	608,605	30.2	49.8	549,109	45.0	63,727	5.2
Upper-Income	1,596,783	1,002,712	49.7	62.8	501,359	31.4	92,712	5.8
Unknown-Income	2,209	115	0.0	0.1	1,830	82.8	264	12.0
Total AA	4,257,906	2,015,521	100.0	47.3	1,993,610	46.8	248,775	5.8
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	38,082	6.1	32,613	5.8	3,935	8.3	1,534	7.4
Moderate-Income	132,104	21.1	116,043	20.8	11,090	23.4	4,971	24.1
Middle-Income	175,764	28.1	155,317	27.8	14,398	30.4	6,049	29.3
Upper-Income	273,214	43.6	249,143	44.6	16,315	34.4	7,756	37.5
Unknown-Income	6,929	1.1	4,952	0.9	1,625	3.4	352	1.7
Total AA	626,093	100.0	558,068	100.0	47,363	100.0	20,662	100.0
	Percent of Total Businesses:			89.1		7.6		3.3
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	65	4.0	61	3.9	4	5.6	0	0.0
Moderate-Income	242	14.8	230	14.8	11	15.3	1	11.1
Middle-Income	410	25.1	381	24.5	25	34.7	4	44.4
Upper-Income	901	55.1	866	55.8	31	43.1	4	44.4
Unknown-Income	16	1.0	15	1.0	1	1.4	0	0.0
Total AA	1,634	100.0	1,553	100.0	72	100.0	9	100.0
	Percent of Total Farms:			95.0		4.4		0.6
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Conclusions With Respect to Performance Tests in Greater Los Angeles, California**Overview**

The bank's lending performance is good. Lending activity reflects adequate responsiveness to assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. The HMDA performance is adequate given Comerica's business strategy is middle-market commercial lending and its mortgage terms are not as accommodating as its competitors. Additionally, the bank makes a relatively high level of community development loans; which mitigates the low level of HMDA lending in low- and moderate-income census tracts and to low- and moderate-income families.

Lending Activity

The bank is both a small business and HMDA lender. Further, Comerica elected to have its HELOC lending reviewed, given its volume is more significant than HMDA. During the review period, the bank reported 1,749 (50.9%) small business loans, 1,395 (40.6%) consumer loans, and 293 (8.5 %) HMDA loans in the Greater Los Angeles Assessment Area. Therefore, small business lending was given more weight. Details of the bank's HMDA, HELOC, and small business lending and information regarding lending by aggregate can be found in Appendix G.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica			CRA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	17 th	425	127.0	195	302,140	9.5
2013	12 th	643	232.8	193	295,172	10.1
2014	13 th	681	161.4	206	345,380	11.2
Total		1,749	521.2		942,692	30.8

Comerica's focus is middle-market commercial lending. Home mortgage loans are the primary business line for many of the top HMDA reporters. The table below details key data about HMDA reporters operating within the assessment area.

Year	Comerica			HMDA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	221 st	118	127.0	829	533,372	201.5
2013	215 th	111	232.8	838	418,340	184.1
2014	226 th	64	161.4	849	253,516	118.2
Total		293	521.2		1,205,228	503.8

In addition, the bank originated 14,234 consumer purpose HELOC loans of which 1,395 (10.2%) were in this assessment area.

Geographic Distribution of Loans

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

Small Business Loans

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

The bank's small business lending in low-income census tracts is excellent. Comerica's percentage of small business lending in low-income census tracts was comparable to the distribution of businesses operating in low-income census tracts. Additionally, the bank exceeded aggregate in 2012 and 2013, but was slightly below in 2014.

The bank's small business lending in moderate-income census tracts is excellent. Comerica's and aggregate performance exceeded the percentage of businesses operating in moderate-income census tracts. Comerica exceeded aggregate performance in 2012, but was similar in 2013 and 2014.

The bank's small business lending in middle-income census tracts was below the percentage of small businesses and above the percentage of small businesses in upper-income census tracts. When compared to the aggregate by percentage, the bank originated fewer loans in middle- and upper-income census tracts throughout the review period than the aggregate.

HMDA Loans

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 800 HMDA aggregate lenders in this assessment area. Approximately half of the aggregate lenders originated or purchased less than 25 HMDA loans in this assessment area.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. Comerica made two home purchase loans in low-income census tracts during the review period. However, Comerica's percentage of lending was comparable to the percentage of owner-occupied units in low-income census tracts as well as aggregate performance throughout the review period.

Home purchase lending in moderate-income census tracts is adequate. Aggregate performance exceeded Comerica's throughout the review period. Comerica's performance was below the percentage of owner-occupied units in moderate-income census tracts, while aggregate were slightly above. However, considering the competition in the area, its performance is adequate.

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

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. The bank did not make a refinance loan in a low-income census tract; however, these census tracts contain only 2.5% of the owner-occupied units in the assessment area. Aggregate performance was less than owner-occupied units in low-income census tracts.

Home refinance lending in moderate-income census tracts is adequate. Comerica's performance was below aggregate as well as percentage of owner-occupied units in moderate-income census tracts. While aggregate performance improved each year, it was also below owner-occupied units. The majority of the units are rental properties in these census tracts. This could mean that there are limited opportunities for the bank to originate loans in these census tracts.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is adequate. Comerica originated eight (less than 1% each year) HELOC loans in low-income census tracts during the review period; these census tracts only contain 6.9% of families and 2.5% of owner occupied units in the assessment area.

Comerica's HELOC lending in moderate-income census tracts is adequate. During the review period, Comerica originated 80 of its HELOC loans in moderate-income census tracts. Comerica originated 4.7% in 2012, 6.1% in 2013, and 5.8% in 2014 of its HELOC loans in moderate-income census tracts. The census tracts contain 27.8% of the families and 17.6% of owner occupied units in the assessment area.

The bank's HELOC lending in middle-income census tracts was below the percentage of families in these census tracts while the lending in upper-income census tracts was greater than the percentage of families.

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

The bank's borrower distribution of loans reflects adequate distribution among borrowers of different income levels and businesses of different sizes. For this analysis, the distribution of small business lending across business revenue sizes as well as HELOC and HMDA lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other lenders.

Small Business Loans

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The bank's performance was below aggregate throughout the review period. Comerica's and aggregate performance is significantly below the percentage of small businesses in the assessment area. Comerica reported 16.3% of loans to businesses with revenue less than or equal to \$1 million, 51.1% to businesses with revenue greater than \$1 million, and 32.6% of loans to businesses with revenue unknown.

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance was below the aggregate performance, which can possibly be attributed to the large number of aggregate institutions who originate small dollar credit card loans. Comerica originated 24.7%, 47.0%, and 46% loans \$100,000 or less, in 2012, 2013, and 2014, respectively. Additionally, Comerica reported 20.1% small business lending in amounts of \$100,000 - \$250,000 during this review period.

Aggregate included more than 190 CRA reporters. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top CRA reporters throughout the review period included American Express Bank FSB; Wells Fargo Bank, N.A.; Chase Bank USA, N.A.; CitiBank, N.A.; and FIA Card Service, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the assessment area, as well as the performance of aggregate. Comerica's HMDA lending (70.4%) was primarily to upper-income families. Aggregate performance decreased substantially each year throughout the review period, while the bank's decreased substantially in 2014. Comerica's and aggregate performance were below the percentage of low- and moderate-income families throughout the review period. The high housing values and poverty level could be factors contributing to the low level of lending to low- and moderate-income families.

Home Purchase Lending

The bank's home purchase lending to low-income families is adequate. Comerica made only one loan to a low-income borrower during the review period. However, aggregate made 2.6%, 1.3%, and 0.9% to low-income families in 2012, 2013, and 2014, respectively. When considering the affordability ratio of only 10.7% in 2010, and the high-cost of homes in the assessment area, low-income families would likely have a difficult time qualifying for a home purchase loan.

The bank's home purchase lending to moderate-income families is adequate. Comerica made one loan each year to moderate-income families. Its performance is below aggregate throughout the review period. The aggregate and Comerica's performance is below the percentage of moderate-income families. Moderate-income families would likely have a difficult time qualifying for a home purchase loan when considering the high cost of homes, the poverty level, and affordability ratio in the assessment area.

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

Home Refinance Lending

The bank's home refinance lending to low-income families is adequate. Comerica originated five (5.7%) of refinance loans to low-income families in 2012 and none in 2013 or 2014. The bank's percentage of lending in 2012 was above aggregate.

The bank's home refinance lending to moderate-income families is adequate. Comerica's performance exceeded aggregate in 2012, but was slightly below in 2013 and 2014. Comerica's and aggregate lending performance was below the percentage of moderate-income families in the assessment area, throughout the review period.

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

Home Equity Lines of Credit

HELOC lending by family income in the assessment area is considered adequate when compared to demographic characteristics of the assessment area. Further, house values in this assessment area experienced significant depreciation. While house values are increasing, negative equity makes it difficult for families to qualify for HELOC loans.

Comerica's HELOC lending to low-income families is adequate. During the review period, Comerica originated 33 HELOC loans to low-income families. Its HELOC lending to low-income families ranged from 1.4% to 4.2%. The bank's performance was below the 23.8% of low-income families in the assessment area. However, the poverty rate of low-income families was also considered.

Comerica's HELOC lending to moderate-income families is adequate. During the review period, Comerica originated 57 HELOC loans to moderate-income families. Its HELOC lending to moderate-income families ranged from 3.4% to 6.6%. The bank's lending was below the percentage (16.9%) of moderate-income families in the assessment area. The volume increased each year of the review. However, as the volume increased, the percentage of lending to moderate-income families decreased.

The bank's HELOC lending to middle-income families was below the percentage of middle-income families in the assessment area; while the lending to upper-income families was greater than the percentage of families.

Community Development Lending

The bank makes a relatively high level of community development loans in the assessment area. Comerica originated or renewed 33 loans totaling \$116.8 million, to 22 entities. As noted in the following table, of the community development loans the bank originated, one loan is associated with revitalization and stabilization. The loan purpose is for the construction of a retail center located in a moderate-income census tract designated as South Los Angeles Plan. South Los

Angeles initiatives will increase affordable housing, improve and expand retail opportunities, create new jobs, and improve the education system.

Community Development Lending		
Purpose	#	\$000s
Affordable Housing	12	25,126
Community Services	11	12,650
Economic Development	10	29,003
Revitalization and Stabilization	1	50,000
Total Loans	33	\$116,779

While all of the loans are noteworthy, the following are a sample of some of the loans:

- A \$12 million loan to finance the acquisition and rehab of an underperforming 150-unit apartment complex built in 1970 in a moderate-income census tract located in Canoga Park, CA. The project will provide affordable housing for low- and moderate-income individuals.
- Three loans totaling \$19.5 million to meet working capital need of a multi-bank consortium to provide financing for the development of affordable multi-family housing throughout California.
- SBA 504 loans were for the purpose of purchasing commercial real estate and/or to expand businesses.

The Greater Los Angeles Assessment Area was also positively impacted by the statewide community development lending. The bank originated or renewed 14 loans for \$65.6 million to borrowers located in a broader statewide area. Further, Comerica provided \$794,163 in consortia loans through Community or Economic Development Corporations in the assessment area. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts.

Investment Test

The bank's performance under the Investment Test is excellent. The bank's investments were primarily focused LIHTC investments. Comerica holds outstanding LIHTC investments in the Greater Los Angeles Assessment Area that have a book value of approximately \$7.1 million. However, this assessment area benefitted from statewide and nationwide investments that included California. During the review period for the statewide LIHTC investments, Comerica invested approximately \$5.9 million in 10 LIHTC projects. Comerica also holds outstanding LIHTC investments among 10 LIHTC projects; that have a current book value of approximately \$6.6 million. For nationwide LIHTC investments, Comerica invest approximately \$2.8 million in a LIHTC project and holds outstanding LIHTC investments that have a current book value of approximately \$4.4 million among four projects. The related amounts are included in total investments in the Institution section of this report.

Further, the bank also made contributions to 107 organizations, that provide community development services, totaling \$2.0 million.

Service Test

Comerica's performance under the Service Test is excellent based on being a leader in providing community development services and the accessibility of delivery systems.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 41 branch offices and 41 ATMs as of December 31, 2014, was compared to the distribution of households and businesses among the census tract categories within the assessment area. The table below summarizes the bank's retail locations in the assessment area.

Tract Income	% of Geographies	% of Households	% Businesses	Branches		Full Service ATMs		Cash Only ATMS	
				#	%	#	%	#	%
Low	8.6	7.0	6.1	2	4.9	2	5.0	0	0.0
Moderate	28.8	26.5	21.1	7	17.1	7	17.5	1	100.0
Middle	28.3	28.9	28.1	10	24.4	10	25.0	0	0.0
Upper	33.2	37.5	43.6	20	48.8	19	47.5	0	0.0
Unknown	1.2	0.0	1.1	2	4.9	2	5.0	0	0.0
Total	100.0	100.0	100.0	41	100.0	40	100.0	1	100.0

The bank has not opened or closed any branches in this assessment area during the review period. However, the assessment area branch distribution changed as a result of update to census. Overall, there was a decrease of three branches in low- and moderate-income census tracts. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Comerica offers extended hours and provides weekend hours at many of its branch offices, including those located in low- and moderate-income census tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

Community Development Services

The bank is a leader in providing community development services in the assessment area. Bank management and staff served as board members, treasurers, and other leadership roles, contributing their financial expertise to 30 community development organizations offering community development services that focused on business development, financial literacy, youth-services, home buyers education, and various other community services that aided low- and moderate-income individuals. Employees attended 477 community development events during the review period. These events included attending meetings and teaching financial

literacy classes/workshops. The table below shows the number of events by type of involvement.

Purpose	# Organizations	# Events/Meetings
Affordable Housing	2	23
Benefits LMI Individuals/Geographies	20	362
Revitalize/Stabilize	2	8
Provides Economic Development	6	84
Total	30	477

Particularly commendable and responsive is Comerica's involvement throughout the assessment area in providing financial literacy. Approximately 36% of the community development services were provided via the JA curriculum.

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 1,629 credit cards loans to small business customers. This partnership is also responsive to assessment area credit needs that were identified by community contacts.

Description of Operations in San Jose-Santa Clara, CA

The San Jose-Sunnyvale-Santa Clara, CA MSA includes Santa Clara and San Benito Counties. The bank delineated a portion of Santa Clara County, hereafter referred to as Santa Clara, as its assessment area. San Benito County is excluded from the assessment area. The assessment area includes 36 low-, 84 moderate-, 138 middle-, and 112 upper-income census tracts. There is also one census tract where income is unknown. As of December 31, 2014 the bank operated 14 branches in the assessment area representing 2.9 % of its branches. There is one branch located in a low-, one in a moderate-, five branches are in middle-, and seven branches are in upper-income census tracts.

Santa Clara County is a very competitive market for financial services. As of June 30, 2014, the bank had \$6.7 million in deposits in this assessment area representing 12.5% of the bank's total deposits. Comerica ranked 4th (6.8%) in deposit market share, which includes all other FDIC insured deposits that are located in the assessment area. There were 51 banks with 355 offices in this assessment area, where Comerica only represents 3.9% of total offices. Wells Fargo Bank, N.A. holds the largest deposit market share at 27.1%; followed by Silicon Valley Bank, at 22.6 %; and Bank of America, N.A., at 13.3 %. The bank considers the aforementioned banks to be its competitors, as well as Bank of the West and City National.

During the review period, the bank reported 1,032 (63.3%) small business loans totaling \$272.8 million; 532 (32.6%) HELOC loans totaling \$143.1 million; compared to 67 (4.1%) HMDA loans totaling \$57.9 million in the Santa Clara Assessment Area.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the San Jose-Sunnyvale-Santa Clara, CA MSA and Santa Clara County as a whole and not the specific assessment area. However, it is reasonable to believe that the data for the MSA and Santa Clara County provide a good representation of the characteristics of the assessment area because the population of the assessment area includes 96.9% of the San Jose-Sunnyvale-Santa Clara, CA MSA, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to 2010 census data.

Santa Clara County is the sixth most populous county in the state of California out of 58 counties. It is also known as Silicon Valley. Fifteen cities and towns are located in Santa Clara County. Its largest city, San Jose, is the County seat. The County of Santa Clara is located at the southern end of the San Francisco Bay and encompasses 1,312 square miles. It is bordered on the west by San Mateo and Santa Cruz counties, on the north by Alameda County, on the east by Stanislaus and Merced Counties, and on the south by San Benito County.⁷⁰ The assessment area consists of 371 census tracts, of which 9.7% are low- and 22.6% are moderate-income.

⁷⁰ <http://www.usa.com/santa-clara-county-ca.htm>

According to the 2010 Census, the assessment area population was 1,780,498 compared to 1,781,642 for Santa Clara County and 1,836,911 for the San Jose-Sunnyvale-Santa Clara, CA MSA. San Jose is the largest city within the assessment area, with an estimated 2014 population of 1,015,785, which accounts for 57.0% of the population in Santa Clara County. Santa Clara and Sunnyvale are the other two cities with population exceeding 100,000. Refer to the end of the Performance Context section for more detailed demographic information for the assessment area.

Income Characteristics

The following chart reflects the estimated median family income for the years 2012 through 2014 for the San Jose-Sunnyvale-Santa Clara, CA MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 Census, 6.1% of the families in the assessment area lived below the poverty level. Santa Clara County is one of the most affluent in the country.

Income Level	2012	2013	2014
Median Income	\$105,000	\$101,300	\$101,900
Low-income	< \$52,500	< \$50,650	< \$50,950
Moderate-income	\$52,500-\$83,999	\$50,650-\$81,039	\$50,950-\$81,519
Middle-income	\$84,000-\$125,999	\$81,040-\$121,559	\$81,520-\$122,279
Upper-income	≥ \$126,000	≥ \$121,560	≥ \$122,280

Housing Characteristics

The median sold price of a Santa Clara County house climbed to \$846,500 in December 2014, up from \$769,900 in December 2013⁷¹. New residential construction in the San Jose-Sunnyvale-Santa Clara, CA MSA has increased considerably since the prior review period. In 2011, new single-family home permits totaled 1,002. In 2014, new single-family home permits totaled 1,861; an increase of 85.7%. While showing significant signs of improvement, the housing market remains well below where it was previously.⁷²

The median housing value for the Santa Clara Assessment Area in 2010 was \$700,995, compared to \$696,179 for the San Jose-Sunnyvale-Santa Clara, CA MSA. In 2010, the affordability ratio was reasonable at 12.3%. The affordability ratio is defined as the median household income divided by the median housing value. The closer the ratio is to 100% the more affordable the homes. A ratio of 100% indicates that median family income is just sufficient to purchase the median priced home. An affordability ratio of 12.3% indicates that the majority of households have less income than necessary to purchase the average house. This can limit a bank's ability to originate HMDA loans in this assessment area. A recent study found

⁷¹California Association of Realtors Home Sales and Price Report, available from:
<http://www.car.org/newsstand/newsreleases/2015releases/dec2014sales>.

⁷²Texas A& M Real Estate Center Data – Building Permits, available from:
<https://www.recenter.tamu.edu/data/building-permits/>.

that San Jose ranked 7th as the least affordable area in the nation for a middle class family looking to buy a home.⁷³

Of total housing in the assessment area, 56.4% of the units are classified as owner-occupied while 38.9% are classified as rental units and 4.7% of the available housing is vacant. A majority of the assessment area's housing units are owner-occupied, but only 4.5% of these are located in the low-income census tracts. Rental units represent 33.1% of housing units located in low-income census tracts. The median age of housing stock in the assessment area is 39 years.

The San Jose-Sunnyvale-Santa Clara, CA MSA has fared relatively well in terms of foreclosures compared to many metropolitan areas in the country, which ranged from 0.7% to 16.0% throughout the nation in September 2013. The foreclosure rate for the San Jose-Sunnyvale-Santa Clara, CA MSA was 2.3% in September 2013. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in the San Jose-Sunnyvale-Santa Clara, CA MSA decreased from 2.7% in December 2011 to 1.7% in September 2013.⁷⁴

Additionally, rental housing remains very unaffordable, and in some instances unavailable, for many households in the county. The median gross rent in the assessment area in 2010 was \$1,402, which is slightly higher than the California state average of \$1,147. In 2010, 44.1% of renters had rents costs greater than 30% of their income. Because there are fewer people buying, the rental market is very competitive, with both rents and construction permits for new multi-family housing rising. Multi-family permits totaled 2,043 in 2011 and 8,017 in 2014. This represents an increase of 292.4%.⁷⁵

Employment and Economic Conditions

Santa Clara County's economy is highly diverse and is home to some of the nation's largest companies and employers. They range from tech giants and sprawling health care systems, to massive universities and municipalities.⁷⁶

The national average unemployment rates for 2012 through 2014 were lower than the state of California. However, Santa Clara County fared better than the state and nationally. According to the 2010 Census, the unemployment rate was 11.5% in low-income census tracts and 9.1% in moderate-income census tracts. The high unemployment rates in low- and moderate-income census tracts could affect loan demand from these census tracts.

⁷³ Kolko, Jed. Where Can the Middle Class Afford to Buy a Home? *Trulia*. May 13, 2014; available from: <http://www.trulia.com/blog/trends/middle-class-may-2014/>

⁷⁴ Serious Mortgage Delinquency Data for All 366 U.S. Metropolitan Areas, September 2013; available from; http://foreclosure-response.org/assets/maps&data/MetropolitanAreaDelinquencyRates_Methodology_September2013.pdf.

⁷⁵ Texas A&M Real Estate Center Data – Building Permits available from; <https://www.recenter.tamu.edu/data/building-permits>.

⁷⁶ Federal Reserve Bank of San Francisco, 12th District County Profile; available from <http://www.frbsf.org/community-development/files/santa-clara-county-profile.pdf>.

The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Assessment Area⁷⁷			
	2012	2013	2014
National	8.1%	7.4%	6.2%
California	10.4%	8.9%	7.5%
Santa Clara County	7.9%	6.5%	5.2%
San Jose-Sunnyvale-Santa Clara, CA MSA	8.1%	6.7%	5.3%

Community Contacts and Community Development Opportunities

Examiners determined community credit needs in the assessment area by conducting an interview with an organization that provides services to small businesses in the bank's assessment area. Contact stated there are opportunities for banks to work with its organization. Banks can participate via financial literacy outreach and grant support. The contact stated micro dollar (\$5,000-\$100,000) small business loans are needed in the assessment area.

⁷⁷ Unemployment Rate available from; <http://data.bls.gov/cgi-bin/dsrv?la>.

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

San Jose - Santa Clara County, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	36	9.7	31,709	7.5	6,489	20.5	98,611	23.4
Moderate-Income	84	22.6	91,939	21.8	8,162	8.9	68,076	16.2
Middle-Income	138	37.2	159,464	37.9	7,531	4.7	81,502	19.4
Upper-Income	112	30.2	138,027	32.8	3,586	2.6	172,960	41.1
Unknown-Income	1	0.3	10	0.0	0	0.0	0	0.0
Total AA	371	100.0	421,149	100.0	25,768	6.1	421,149	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	47,950	15,850	4.5	33.1	29,203	60.9	2,897	6.0
Moderate-Income	144,779	63,373	17.9	43.8	73,849	51.0	7,557	5.2
Middle-Income	240,947	137,780	39.0	57.2	92,184	38.3	10,983	4.6
Upper-Income	192,109	136,209	38.6	70.9	47,801	24.9	8,099	4.2
Unknown-Income	239	0	0.0	0.0	239	100.0	0	0.0
Total AA	626,024	353,212	100.0	56.4	243,276	38.9	29,536	4.7
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	5,752	6.3	5,062	6.2	417	5.9	273	8.9
Moderate-Income	19,931	21.8	17,070	21.1	2,143	30.2	718	23.4
Middle-Income	32,442	35.6	28,905	35.6	2,440	34.4	1,097	35.7
Upper-Income	33,057	36.2	29,996	37.0	2,088	29.5	973	31.7
Unknown-Income	61	0.1	48	0.1	1	0.0	12	0.4
Total AA	91,243	100.0	81,081	100.0	7,089	100.0	3,073	100.0
	Percent of Total Businesses:			88.9		7.8		3.4
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	9	1.9	7	1.6	2	6.9	0	0.0
Moderate-Income	81	17.3	72	16.5	9	31.0	0	0.0
Middle-Income	151	32.3	142	32.5	9	31.0	0	0.0
Upper-Income	227	48.5	216	49.4	9	31.0	2	100.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	468	100.0	437	100.0	29	100.0	2	100.0
	Percent of Total Farms:			93.4		6.2		0.4
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Conclusions With Respect to Performance Tests in San Jose-Santa Clara, California**Overview**

The bank's lending performance is good. Lending activity reflects adequate responsiveness to assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. The HMDA performance is adequate given Comerica's business strategy is commercial lending and its mortgage terms are not as accommodating as its competitors. Additionally, the bank makes a relatively high level of community development loans; which mitigates the low level of HMDA lending in low- and moderate-income census tracts and to low- and moderate-income families.

Lending Activity

The bank is both a small business and HMDA lender. Further, Comerica elected to have its HELOC lending reviewed, given its volume is more significant than HMDA. During the review period, the bank reported 1,032 (63.3%) small business loans, 532 (32.6%) HELOC loans, and 67 (4.1 %) HMDA loans in the Santa Clara Assessment Area. Small business lending was given more weight. Details of the bank's HMDA, HELOC, and small business lending and information regarding lending by aggregate can be found in Appendix G.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica			CRA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	17 th	245	87.0	86	44,835	1.4
2013	12 th	410	100.5	86	42,817	1.4
2014	13 th	377	85.2	92	48,609	1.5
Total		1,032	272.7		136,261	4.3

Comerica's focus is middle-market commercial lending. Home mortgage loans are the primary business line for many of the top HMDA reporters. The table below details key data about HMDA reporters operating within the assessment area. The top ranked reporters were Wells Fargo Bank, N.A.; Provident Funding Associates; Flagstar Bank, FSB; JPMorgan Chase Bank, N.A.; and Chicago Mortgage Solutions.

Year	Comerica			HMDA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	138 th	7	22.7	513	48,248	27.4
2013	128 th	31	26.6	509	88,975	43.0
2014	131 st	29	8.6	530	129,439	56.4
Total		67	57.9		266,662	126.8

In addition, the bank originated 14,234 consumer purpose HELOC loans of which 532 (3.7%) were in this assessment area.

Geographic Distribution of Loans

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

Small Business Loans

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. As the economy improved, small business lending activity increased. Small business lending increased 81.0% from 2012 to 2013.

The bank's small business lending in low-income census tracts is excellent. During the review period, Comerica originated 9.5% of its small business loans in low-income census tracts, which contain 6.2% of the small businesses in the assessment area. In addition, the bank outperformed the aggregate throughout the review period. The aggregate originated 5.1%, 5.2%, and 5.4% of loans to businesses located in low-income census tracts in 2012, 2013, and 2014, respectively.

The bank's small business lending in moderate-income census tracts is excellent. During the review period, Comerica originated 30.5% of its small business loans in moderate-income census tracts, which contain 21.1% of the small businesses in the assessment area. In addition, the bank outperformed the aggregate throughout the review period. The aggregate originated 22.0% in

2013 and 2014 as well as 22.2% in 2014 of loans to businesses located in moderate-income census tracts.

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

HMDA Loans

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 500 HMDA aggregate lenders in this assessment area. A significant number of the aggregate lenders originated or purchased less than 25 HMDA loans in this assessment area.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. Comerica did not make a home purchase loan in a low-income census tract during the review period. Low-income census tracts contain only 4.5% of the owner-occupied units. Aggregate performance was above the percentage of owner-occupied units in low-income census tracts. In 2012, 2013, and 2014, aggregate originated or purchased 5.0%, 5.1%, and 5.5% of loans in low-income census tracts, respectively.

Home purchase lending in moderate-income census tracts is adequate. Comerica made two (20.0%) home purchase loans in moderate-income census tracts during the review period. Moderate-income census tracts contain 17.9% of the owner-occupied units. The bank and aggregate performance were above the percentage of owner-occupied units in moderate-income census tracts. In 2012, 2013, and 2014, aggregate originated or purchased 20.6%, 20.4%, and 22.6% of loans in moderate-income census tracts, respectively.

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

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. During the review period, Comerica originated one (1.9%) refinance loans in a low-income census tract, which contain 4.5% of the owner-occupied units in the assessment area. However, the aggregate originated 5.0% or slightly above of refinance loans in low-income census tracts for each year of the review period.

Home refinance lending in moderate-income census tracts is adequate. During the review period, Comerica originated seven (13.0%) refinance loans in moderate-income census tracts which contain 17.9% of the owner-occupied units in the assessment area. Comerica's performance was less than aggregate throughout the review period. However, the aggregate originated 13.8, 16.9%, and 19.1% of refinance loans in moderate-income census tracts for 2012, 2013, and 2014, respectively. Comerica's performance decreased throughout the review period. In 2012, the bank originated 23.1% of refinance loans in moderate-income census tracts. It decreased to 4.3% in 2013 and Comerica did not make a refinance loan in a moderate-income census tract in 2014.

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

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is adequate. Comerica originated 532 HELOC loans during the review period, of those 6 were in low-income census tracts. Comerica originated 2.6% in 2012, 1.4% in 2013, and 0.4% in 2014 of HELOC loans in low-income census tracts. These census tracts contain only 7.5% of families and 4.5% of owner-occupied units in the assessment area.

Comerica's HELOC lending in moderate-income census tracts is adequate. During the review period, Comerica originated 49 of its HELOC loans in moderate-income census tracts. Comerica originated 6.5% in 2012, 8.9% in 2013, and 10.3% in 2014 of HELOC loans in moderate-income census tracts. These census tracts contain 21.8% of the families and 17.9% of owner-occupied units in the assessment area.

The bank's HELOC lending in middle-income census tracts was below the percentage of families in these census tracts while the lending in upper-income census tracts was greater than the percentage of families.

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

The bank's borrower distribution of loans reflects adequate distribution among borrowers of different income levels and businesses of different sizes. For this analysis, the distribution of small business lending across business revenue sizes and HMDA lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other lenders.

Small Business Loans

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. Of the 1,032 small business loans originated during the review period by Comerica, 17.2% were originated to small businesses, which is less than the percentage of businesses with annual gross revenues of \$1 million or less at 88.9% in Santa Clara County. Comerica also performed below the aggregate who originated 45.9%, 51.8%, and 45.5% to this group of borrowers in 2012, 2013, and 2014, respectively..

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance was below the aggregate performance; however, many of the larger reporters also originate smaller dollar credit card loans. However, Comerica reported 21.4% small business lending in amounts of \$100,000 - \$250,000 during this review period.

Aggregate included more than 80 CRA reporters. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top CRA reporters throughout the review period included American Express Bank FSB; Wells Fargo Bank, N.A.; Chase Bank USA, N.A.; FIA Card Service, N.A.; and Capital One Bank USA, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the assessment area, as well as the performance of aggregate. Low- and moderate-income families would likely have a difficult time qualifying for a home purchase loan when considering the high cost of homes, the poverty level, and affordability ratio of 12.3% in the assessment area.

Home Purchase Lending

The bank's home purchase lending to low-income families is adequate. Comerica did not originate a home purchase loan to a low-income borrower during the review period. Aggregate originated 4.1%, 1.7%, and 1.3% in 2012, 2013, and 2014, respectively.

The bank's home purchase lending to moderate-income families is adequate. Comerica originated only one (10.0%) loan to a moderate-income borrower during the review period. Aggregate originated 13.1%, 9.3%, and 6.7% in 2012, 2013, and 2014, respectively.

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

Home Refinance Lending

The bank's home refinance lending to low-income families is adequate. Comerica originated two (7.7%) refinance loans to low-income families in 2012 and none in 2013 or 2014. The bank's performance was better than aggregate in 2012. Aggregate originated 4.4%, 5.3%, and 3.8% in 2012, 2013, and 2014, respectively; to low-income families. The refinance lending level decreased substantially (77.8%) throughout the review period.

The bank's home refinance lending to moderate-income families is adequate when compared to the percentage of moderate-income families in the assessment area and aggregate performance. Comerica originated seven (26.9%) and two (8.7%) refinance loans in 2012 and 2013, respectively, to moderate-income families. The bank did not make a refinance loan to a moderate-income borrower in 2014. Aggregate originated 11.3%, 12.2%, and 9.5% in 2012, 2013, and 2014, respectively.

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

Home Equity Lines of Credit

HELOC lending by family income in the assessment area is considered good when compared to demographic characteristics of the assessment area. During the review period, Comerica originated 16 (3.0%) of HELOC loans to low-income families. Comerica originated 2.6% in 2012, 4.2% in 2013, and 2.1% in 2014 of its HELOC loans to low-income families. In the assessment area, 23.4% of families in the assessment area are considered low-income. Oftentimes low-income families have difficulty qualifying for HELOC loans because of lending restrictions such as reserves and debt-to-income ratio.

Comerica's HELOC lending to moderate-income families is good. During the review period, Comerica originated 39 (7.3%) of its HELOC loans to moderate-income families. Comerica originated 7.8% in 2012, 5.2% in 2013, and 9.1% in 2014 of its HELOC loans to moderate-income families. In the assessment area, 16.2% of families in the assessment area are considered moderate-income.

The bank's HELOC lending to middle-income families was below the percentage of middle-income families in the assessment area while the lending to upper-income families was greater than the percentage of families.

Community Development Lending

The bank makes a relatively high level of community development loans in the assessment area, given the bank's size and presence in the assessment area, the qualitative aspects of the loans, and the availability of community development lending opportunities. Comerica extended 37 community development loans totaling \$82.9 million. This level of lending was consistent with the bank's presence within the Santa Clara Assessment Area.

Community Development Lending		
Purpose	#	\$000s
Affordable Housing	1	3,000
Community Services	24	57,250
Economic Development	12	22,668
Total Loans	37	\$82,918

Examples of community development lending include but are not limited to:

- Organizations which provided a variety of services such as, food, clothing, housing, child care, training and job placement, utility payments, as well as medical treatment/referral.
- Twelve SBA 504 loans that promote economic development by financing small businesses.

Statewide community development lending had a positive impact on this assessment area. Comerica originated or refinanced 14 loans totaling \$65.6 million to borrowers located in a broader statewide area. Further, Comerica provided \$35,669 in consortia loans through Community or Economic Development Corporations in the assessment area. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts.

Investment Test

The bank's performance under the Investment Test is excellent. The bank's investments were primarily focused on investments in LIHTCs. This assessment area was positively impacted by 10 statewide LIHTC investments, discussed earlier in the report. During the review period this assessment area benefitted from \$4.1 million in investments for six projects that provided affordable housing. Comerica also holds outstanding LIHTC investments, among two projects, that have a current book value of approximately \$4.6 million. The related amounts are included in Comerica's \$29.7 million in current period LIHTC investments for California and prior period LIHTC investments book value of \$24.3 million.

Comerica holds outstanding investments that have a current book value of \$3.4 million in two nationwide LIHTC projects. The related amount is included in the total investments in the Institution section of this report.

Further, the bank also made \$388,400 contributions to 37 organizations that provide community development services.

Service Test

The bank's Service Test performance is poor. Its community development services reflect poor responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 13 branch offices and 20 ATMs as of December 31, 2014, was compared to the distribution of households and businesses among the census tract categories within the assessment area. The table below summarizes the bank's retail locations in the assessment area.

Tract Income	% of Geographies	% of Households	% Businesses	Branches		Full Service ATMs		Cash Only ATMS	
				#	%	#	%	#	%
Low	9.7	7.6	6.3	1	7.1	1	6.3	0	0.0
Moderate	22.6	23.0	21.8	1	7.1	1	6.3	0	0.0
Middle	37.2	38.6	35.6	5	35.7	6	37.5	3	75.0
Upper	30.2	30.8	36.2	6	46.1	8	50.0	1	25.0
Unknown	0.3	0.0	0.1	0	0.0	0	0.0	0	0.0
Total	100.0	100.0	100.0	13	100.0	16	100.0	4	100.0

The bank has not opened or closed a branch in this assessment area during the review period. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility. Banking services, products, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Comerica offers extended hours at its branch offices. However, weekend hours are not provided at branch offices located in the low- and moderate-income census tracts.

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 587 credit cards loans to small business customers. This partnership is also responsive to assessment area credit needs that were identified by community contacts.

Community Development Services

The bank provides a limited level of community development services in the assessment area. Employees provided community development services to four organizations and attended 58 community development events during the review period. Fifty-five of the events were teaching the JA curriculum at schools where majority of the students are low- and moderate-income. An employee also served on the board of an organization that provide services to low- and moderate-income individuals.

METROPOLITAN AREAS (Limited Scope Review)

There were no non-metropolitan assessment areas in California; therefore, the following metropolitan assessment areas were reviewed using limited-scope examination procedures.

Description of Institution's Operations

- **Fresno, CA MSA Assessment Area**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 1.0% of its branches in California.
 - As of June 30, 2014, the bank had \$126.7 million in deposits in this assessment area, representing a market share of 1.1%. The \$126.7 million also represents 1.0% of the bank's total deposits in California.
- **Oxnard-Thousand Oaks-Ventura, CA MSA Assessment Area (Ventura County)**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 1.0% of its branches in California.
 - As of June 30, 2014, the bank had \$104.4 million in deposits in this assessment area, representing a market share of 0.7%. The \$104.4 million also represents 0.6 % of the bank's total deposits in California.
- **Riverside-San Bernardino-Ontario, CA MSA Assessment Area (Inland Empire)**
 - As of December 31, 2014, the bank operated three branches in the assessment area, representing 2.9% of its branches in California.
 - As of June 30, 2014, the bank had \$63.9 million in deposits in this assessment area, representing a market share of 0.2%. The \$63.9 million also represents 0.4 % of the bank's total deposits in California.
- **Sacramento-Arden-Arcade-Roseville, CA MSA Assessment Area (Sacramento)**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 1.0% of its branches in California.
 - As of June 30, 2014, the bank had \$432.5 million in deposits in this assessment area, representing a market share of 1.1%. The \$432.5 million also represents 2.6% of the bank's total deposits in California.
- **Salinas, CA MSA Assessment Area**
 - As of December 31, 2014, the bank operated four branches in the assessment area, representing 3.9% of its branches in California.
 - As of June 30, 2014, the bank had \$156.4 million in deposits in this assessment area, representing a market share of 2.0%. The \$156.4 million also represents 0.9% of the bank's total deposits in California.
- **San Diego-Carlsbad, CA MSA Assessment Area (San Diego)**
 - As of December 31, 2014, the bank operated 15 branches in the assessment area, representing 14.6% of its branches in California.
 - As of June 30, 2014, the bank had \$444.1 million in deposits in this assessment area, representing a market share of 0.6%. The \$444.1 million also represents 2.7% of the bank's total deposits in California.
- **San Francisco-Oakland-Hayward, CA MSA Assessment Area (San Francisco Bay)**

- As of December 31, 2014, the bank operated 17 branches in the assessment area, representing 16.5% of its branches in California.
- As of June 30, 2014, the bank had \$2.2 billion in deposits in this assessment area, representing a market share of 0.7%. The \$2.2 billion also represents 13.1% of the bank's total deposits in California.
- **Santa Cruz, CA MSA Assessment Area**
 - As of December 31, 2014, the bank operated seven branches in the assessment area, representing 6.8% of its branches in California.
 - As of June 30, 2014, the bank had \$688.4 million in deposits in this assessment area, representing a market share of 13.1%. The \$688.4 million also represents 3.7% of the bank's total deposits in California.

Conclusions With Respect to Performance Tests

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

Assessment Area	Lending Test	Investment Test	Service Test
Fresno, CA MSA	Below	Consistent	Below
Inland Empire	Below	Consistent	Below
Sacramento	Below	Consistent	Consistent
Salinas, CA MSA	Exceeds	Consistent	Consistent
San Diego	Consistent	Consistent	Below
San Francisco Bay	Consistent	Consistent	Below
Santa Cruz, CA MSA	Exceeds	Consistent	Consistent
Ventura County	Below	Consistent	Below

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

As stated earlier, the Greater Los Angeles as well as San Jose, CA MSA Assessment Areas received full-scope reviews. The bank's performance in the Greater Los Angeles Assessment Area was given greatest consideration in determining the overall rating for the state as it is the bank's largest market in California in terms of loans and branches. The full-scope areas selected together represent 75.3% of the deposits in the assessment areas in California, as well as 52.4% of the branches. The full-scope assessment areas represent 51.1% of the total loans in the state. Therefore, the state rating is based on those areas in the state with the greatest volume of deposits, lending, and branches.

The Lending Test performance was stronger in two limited-scope assessment areas. Salinas, CA MSA and Santa Cruz, CA MSA lending performance for lending to small businesses were higher by percentage when compared to the full-scope assessment areas. The bank's performance was consistent in two assessment areas (San Diego and San Francisco Bay); and weaker in four

assessment areas (Fresno, Inland Empire, Sacramento, and Ventura County, CA). Community development lending positively impacted all the limited-scope assessment areas. Negating the bank's performance is the low level of lending in the limited-scope assessment areas as well as the geographic distribution of loans. The geographic distribution was slightly weaker overall for the limited scope assessment areas.

For the Investment Test, the performance was consistent in the limited-scope assessment areas. All the assessment areas were positively impacted by the nationwide LIHTC investments.

For the Service Test, performance was weaker in the limited-scope assessment areas. Three of the limited-scope assessment areas performance was consistent with Comerica's; while five was below. Only a few community development services were provided in Fresno, Inland Empire, Sacramento, and Ventura County Assessment Areas; while a limited level were provided in San Francisco Bay Assessment Area.

STATE OF ARIZONA

CRA Rating for Arizona: Satisfactory

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

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the assessment area.
- The distribution of HMDA, HELOC lending, and small business lending reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- Makes few community development loans.
- Has an excellent level of qualified community development investments and grants.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.
- Is a leader in providing community development services.

Scope

A full scope review was conducted for the Phoenix, AZ Assessment Area in the state of Arizona. As a result of the OMB 2014 updates, the MSA name changed. It was formerly known as Phoenix-Mesa-Glendale and it is now Phoenix-Mesa-Scottsdale. The MSA will be referred to using the current MSA name throughout the report. The time period and products evaluated for this assessment area are consistent with the scope discussed in the Institution section of this report. The statewide rating will be based on the CRA activity within the Phoenix, AZ Assessment Area and any other investment or services that are provided on a broader, statewide basis since this is the only assessment area in Arizona.

METROPOLITAN AREA (Full Scope Review)

Description of Operations in Phoenix, AZ

Comerica is a full-service bank providing the typical mix of consumer loan and deposit products in the state. However, the Arizona market primary focus is commercial lending, specifically within the small business and middle market business lines, and wealth management and trust services. The Phoenix, AZ Assessment Area includes the northeast portion of Maricopa County in Arizona, which consists of the city of Phoenix and its surrounding suburbs. Maricopa County along with Pinal County makes up the Phoenix-Mesa-Scottsdale MSA. Pinal County is excluded from the bank's assessment area. As of December 31, 2014, Comerica operates 18 branch offices in the Phoenix, AZ Assessment Area representing 3.8% of the bank's total branches.

Comerica has a relatively small presence and limited market share in this highly competitive assessment area. As of June 30, 2014, the assessment area was home to 57 FDIC insured institutions operating 857 offices with total deposits of \$70.3 billion. The bank had \$363.9 million in deposits in Arizona representing 0.6% of Comerica's total deposits in all the assessment areas, and representing a market share of 0.5% in this assessment area. JP Morgan Chase Bank, N.A. holds the largest deposit share at 26.7%; followed by Wells Fargo Bank, N.A. at 25.6%; and Bank of America, N.A. at 20.3%. The bank considers the aforementioned banks to be its competitors, as well as BBVA Compass, U.S. Bank, Alliance Bank of Arizona and Bank of Arizona.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Phoenix-Mesa-Scottsdale, AZ MSA or Maricopa County as a whole and not the specific assessment area. However, it is reasonable to believe that the data for the MSA and Maricopa County provide a good representation of the characteristics of the assessment area because the population of the assessment area includes 88.8% of the Phoenix-Mesa-Scottsdale MSA, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to 2010 census data.

According to the 2010 Census, the assessment area population was 3,721,922. Maricopa is the nation's fourth largest county in terms of population.⁷⁸ As of 2014, Maricopa County has an estimated population of 4,087,191 and the Phoenix-Mesa-Scottsdale, AZ MSA has an estimated population of 4,191,887. Phoenix is the largest city within the assessment area, with an estimated 2014 population of 1,537,058, which accounts for 37.6% of the population in Maricopa County. Other major cities in the Phoenix, AZ Assessment Area are Scottsdale, Mesa, and Tempe.

⁷⁸ https://en.wikipedia.org/wiki/List_of_the_most_populous_counties_in_the_United_States

Twenty-five cities and towns are located in Maricopa County. Its largest city, Phoenix, is the County seat and State capital. Measuring 137 miles east to west and 102 miles north to south, Maricopa County covers 9,225 square miles, making it the 15th largest county in land area in the continental United States.⁷⁹ The assessment area consists of 893 census tracts, of which 9.4% are low- and 24.4% are moderate-income. Refer to the end of the Performance Context section for more detailed demographic information for the assessment area.

Income Characteristics

Twenty-one percent of the families living in the assessment area are considered to be low- and 17.5% are considered moderate-income. It is estimated that 10.1% of the families live below the poverty level, which is below the 10.9% statewide poverty level for Arizona.

For purposes of classifying borrower income, this evaluation uses FFIEC Estimated Median Family Income. The following chart reflects the estimated median family income for the years 2012-2014 for Phoenix-Mesa-Scottsdale, AZ MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). As noted in the table, the median family income declined throughout the review period.

Income Level	2012	2013	2014
Median Income	\$66,400	\$62,200	\$61,900
Low-income	< \$33,200	< \$31,100	< \$30,950
Moderate-income	\$33,200-\$53,119	\$31,100-\$49,759	\$30,950-\$49,519
Middle-income	\$53,120-\$79,679	\$49,760-\$74,639	\$49,520-\$74,279
Upper-income	≥ \$79,680	≥ \$74,640	≥ \$74,280

Housing Characteristics

The median housing value in Phoenix increased to \$172,300 in 2014, up from \$161,500 in 2013.⁸⁰ The increase in 2013 was 23% compared to 7% in 2014. New residential construction in the Phoenix-Mesa-Scottsdale, AZ MSA has increased considerably since the prior review period. In 2011, new single-family home permits totaled 7,297. In 2012, new single-family home permits totaled 11,931; an increase of 63.5%. Single-family home permits totaled 12,959 in 2013 and 11,557 in 2014. While showing significant signs of improvement, the housing market remains well below where it was previously.⁸¹

The median housing value for the Phoenix, AZ Assessment Area in 2010 was \$238,013, compared to \$232,295 for the Phoenix-Mesa-Scottsdale, AZ MSA. In 2010, the affordability ratio was reasonable at 23.1%. The affordability ratio is defined as the median household income divided by the median housing value. The closer the ratio is to 100% the more affordable the homes. A ratio of 100% indicates that median family income is just sufficient to

⁷⁹ https://en.wikipedia.org/wiki/List_of_the_largest_counties_in_the_United_States_by_area

⁸⁰ <http://www.azcentral.com/story/money/real-estate/2015/02/20/check-maricopa-county-home-values-address-23705605/>

⁸¹ https://www.recenter.tamu.edu/data/building-permits/#/msa/Phoenix-Mesa-Scottsdale%2C_AZ: Accessed April 1, 2016.

purchase the median priced home. An affordability ratio of 23.1% indicates that the majority of households have less income than necessary to purchase the average house. This can limit a bank's ability to originate HMDA loans in this assessment area.

Of total housing in the assessment area, 57.2% of the units are classified as owner-occupied while 29.6% are classified as rental units and 13.2% of the available housing is vacant. A majority of the assessment area's housing units are owner-occupied, but only 3.7% of these are located in the low-income census tracts. Rental units represent 54.4% of housing units located in low-income census tracts. The median age of housing stock in the assessment area is 24 years.

The median gross rent in the assessment area in 2010 was \$912, which is slightly higher than the Arizona state average of \$856. In 2010, 48.1% of renters had rents costs greater than 30% of their income. Because there are fewer people buying, the rental market is very competitive, with both rents and construction permits for new multi-family housing rising.⁸² Multi-family permits totaled 1,686 in 2011 and 8,503 in 2014. This represents an increase of 404.3%.

The Phoenix-Mesa-Scottsdale, AZ MSA has fared relatively well in terms of foreclosures compared to many metropolitan areas in the country, which ranged from 0.7% to 16.0% throughout the nation in September 2013. The foreclosure rate for the Phoenix-Mesa-Scottsdale, AZ MSA was 2.5% in September 2013. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in the Phoenix-Mesa-Scottsdale, AZ MSA decreased from 10.3% in December 2011 to 4.6% in September 2013⁸³.

Employment and Economic Conditions

The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Assessment Area ⁸⁴			
	2012	2013	2014
National	8.1%	7.4%	6.2%
Arizona	8.3%	7.7%	6.8%
Phoenix-Mesa-Scottsdale, AZ MSA	6.7%	6.0%	5.2%
Maricopa County	7.3%	6.6%	5.9%

Maricopa County average unemployment rates were slightly higher than the Phoenix-Mesa-Scottsdale, AZ MSA and lower than the state of Arizona and the national average. This indicates the Phoenix-Mesa-Scottsdale, AZ MSA is doing slightly better than the rest of the state as well as the nation. A higher unemployment rate can impact loan demand. According to the 2010 Census, the unemployment rate was 10.2% in low-income census tracts and 9.3% in moderate-

⁸² https://www.recenter.tamu.edu/data/building-permits/#!/msa/Phoenix-Mesa-Scottsdale%2C_AZ

⁸³ http://www.foreclosure-response.org/assets/maps&data/MetropolitanAreaDelinquencyRates_Methodology_September2013.pdf Accessed: April 1, 2016

⁸⁴ Bureau of Labor Statistics: Local Area Unemployment Statistics. <http://data.bls.gov/cgi-bin/dsrv?la>

income census tracts. The high unemployment rates in low- and moderate-income census tracts could affect loan demand from these census tracts. High-tech aerospace and service industries make up the major portion of the economic base in Phoenix. The largest employers in the metropolitan statistical area include government and state agencies, Banner Health, Wal-Mart Stores, Wells Fargo Bank, N.A., Fry's Food and Drug Stores, Arizona State University, Intel Corporation.⁸⁵

Community Contacts and Community Development Opportunities

Examiners ascertained the assessment area's credit needs from five interviews. The organizations provide services to the bank's assessment area. Community contacts included nonprofit organizations that support lending to small businesses, lending to low- and moderate-income individuals, affordable housing, and community services to low- and moderate-income individuals. Critical credit, banking, and service needs identified included the following:

- Affordable housing loans
- Small business loans
- Working capital loans
- Lines of credit for nonprofit organizations
- Grants to support the operation of non-profit and community service organizations
- Flexible underwriting terms for low- and moderate-income individuals and nonprofit organizations
- Financial literacy instructors and funding for classes
- Active board members
- Grocery stores in low- and moderate-income areas.

⁸⁵ <http://www.gpec.org/doing-business-in-phoenix/top-employers>

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

Phoenix - Maricopa County, AZ								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	84	9.4	61,688	6.9	22,989	37.3	187,573	21.0
Moderate-Income	218	24.4	206,040	23.1	35,187	17.1	155,705	17.5
Middle-Income	281	31.5	298,452	33.5	20,682	6.9	179,085	20.1
Upper-Income	302	33.8	325,066	36.5	10,803	3.3	368,886	41.4
Unknown-Income	8	0.9	3	0.0	0	0.0	0	0.0
Total AA	893	100.0	891,249	100.0	89,661	10.1	891,249	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	120,172	32,615	3.7	27.1	65,363	54.4	22,194	18.5
Moderate-Income	413,021	189,833	21.3	46.0	158,493	38.4	64,695	15.7
Middle-Income	515,885	312,069	35.0	60.5	142,847	27.7	60,969	11.8
Upper-Income	509,463	357,186	40.1	70.1	93,863	18.4	58,414	11.5
Unknown-Income	481	131	0.0	0.3	226	47.0	124	25.8
Total AA	1,559,022	891,834	100.0	57.2	460,792	29.6	206,396	13.2
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	12,992	7.1	10,441	6.3	1,994	17.9	557	9.5
Moderate-Income	30,082	16.4	26,601	16.0	2,374	21.3	1,107	18.8
Middle-Income	54,170	29.6	49,704	29.9	2,692	24.2	1,774	30.2
Upper-Income	84,849	46.4	78,601	47.4	3,866	34.7	2,382	40.5
Unknown-Income	902	0.5	643	0.4	203	1.8	56	1.0
Total AA	182,995	100.0	165,990	100.0	11,129	100.0	5,876	100.0
	Percent of Total Businesses:			90.7		6.1		3.2
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	40	3.1	38	3.2	1	1.4	1	50.0
Moderate-Income	162	12.8	146	12.2	16	21.6	0	0.0
Middle-Income	364	28.7	341	28.6	23	31.1	0	0.0
Upper-Income	698	55.0	663	55.5	34	45.9	1	50.0
Unknown-Income	6	0.5	6	0.5	0	0.0	0	0.0
Total AA	1,270	100.0	1,194	100.0	74	100.0	2	100.0
	Percent of Total Farms:			94.0		5.8		0.2
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Conclusions With Respect to Performance Tests in Phoenix, Arizona**Overview**

The bank's lending performance is good. Lending activity reflects adequate responsiveness to assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. The HMDA performance is adequate given Comerica's business strategy is middle-market commercial lending and its mortgage terms are not as accommodating as its competitors. Additionally, the bank makes few community development loans.

Lending Activity

The bank is both a small business and HMDA lender. Further, Comerica elected to have its HELOC lending reviewed, given its volume is more significant than HMDA. During the review period, the bank reported 378 (44.3%) HELOC loans, 357 (41.8%) small business loans, and 119 (13.9%) HMDA loans in the Phoenix, AZ Assessment Area. Small business lending was given more weight than HMDA and HELOC lending in determining the bank's Lending Test rating in the assessment area. Details of the bank's HMDA, HELOC, and small business lending and information regarding lending by aggregate can be found in Appendix G.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica			CRA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	30 th	81	23.0	158	72,242	2.3
2013	25 th	132	31.5	151	70,413	2.4
2014	22 nd	144	31.8	163	77,332	2.5
Total		357	86.3		219,987	7.2

Comerica's focus is middle-market commercial lending. Home mortgage loans are the primary business line for many of the top HMDA reporters. The top ranked reporters were Wells Fargo Bank, N.A.; JPMorgan Chase Bank, N.A.; Quicken Loans, Inc.; Bank of America, N.A. and US Bank, N.A. The table below details key data about HMDA reporters operating within the assessment area.

Year	Comerica			HMDA Reporters		
	Rank	# Loans (Originations/ Purchases)	\$(000s)	# Lenders	#Loans (Originations/ Purchases)	\$ Billion
2012	166 th	51	12.7	770	213,160	42.6
2013	180 th	40	14.4	745	198,626	45.3
2014	192 nd	28	11.2	734	138,962	30.3
Total		119	38.3		550,748	118.2

In addition, the bank originated 14,234 consumer purpose HELOC loans of which 378 (2.7%) were in this assessment area.

Lending Activity

Lending levels reflect adequate responsiveness to the assessment area's credit needs based on small business and HMDA market share ranking as discussed below. The Phoenix, AZ Assessment Area contains 1.9% of the bank's small business, HMDA, and consumer lending by number of loans and 1.4% by dollar volume totaling \$140.7 million. In comparison, 0.7% of the bank's total deposits are in this assessment area.

Summary of Statewide Lending Activity* Assessment Area Located in Arizona January 1, 2012 through December 31, 2014				
Loan Type	#	%	\$(000s)	%
Total Home Equity Lines of Credit	378	44.3	\$49,639	3.1
Home Improvement	1	0.8	\$2,560	6.7
Home Purchase	37	31.1	\$9,122	23.8
Refinancing	81	68.1	\$26,607	69.5
Total HMDA	119	13.9	\$38,289	20.6
Total Small Business	357	41.8	\$86,289	76.3
Total Loans	854	100.0%	\$140,717	100.0%
*Originations and purchases within the bank's assessment area.				

During the review period the bank originated 80 small business micro loans, 22.5% of which were to businesses located in low- and moderate-income geographies; and originated or purchased 11 Government Guaranteed Loans.

Geographic Distribution of Loans

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

Small Business Loans

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

Comerica's small business lending in low-income census tracts is excellent. During the review period, Comerica outperformed the aggregate all years and performance exceeded the percentage of small businesses in the assessment area.

Comerica's small business lending in moderate-income tracts is excellent. During the review period, Comerica's performance was better than the aggregate and comparable to the 16.8% of small businesses in the assessment area.

The bank's small business lending in middle- and upper-income census tracts was lower than the percentage of small businesses in these census tracts. When compared to the aggregate by percentage, the bank originated fewer loans in middle- and upper-income census tracts all years during the review period, excluding 2012 in middle-income census tracts where Comerica originated slightly more than the aggregate.

HMDA Loans

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 700 HMDA aggregate lenders in this assessment area. More than half of the aggregate lenders originated or purchased less than 25 HMDA loans in this assessment area, each year of the review period.

The unemployment and poverty rates and the level of owner-occupied units in low- and moderate-income census tracts were issues considered when assessing the bank's performance. In addition, the bank's market share, business strategy, and performance of the aggregate was

also considered when assessing the bank's performance. The limited overall HMDA lending for this assessment area was also considered. Comerica originated and purchased 37 home purchase loans and 81 home refinance loans. Only nine of the HMDA loans were in low- or moderate-income census tracts. Considering these factors, the geographic distribution of Comerica's HMDA lending is adequate.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. Comerica made one home purchase loan in a low-income census tract during the review period. Low-income census tracts contain only 3.7% of the owner-occupied units. Aggregate also struggled to originate home purchase loans at a level above the percentage of owner-occupied units in low-income census tracts. In 2012, 2013, and 2014, they only originated and purchased 1.3%, 1.7%, and 2.1% of loans in low-income census tracts, respectively.

Home purchase lending in moderate-income census tracts is adequate. Comerica made five home purchase loans in moderate-income census tracts. Moderate-income census tracts contain 21.3% of the owner-occupied units. Comerica outperformed aggregate in 2012 and 2013; however, it did not originate a home purchase loan in a moderate-income census tract in 2014. In 2012, 2013, and 2014 aggregate originated and purchased 12.6%, 14.2%, and 16.4% in moderate-income census tracts, respectively.

The bank's home purchase lending in middle-income tracts was below the percentage of owner-occupied units in these census tracts for 2012 and 2013; however, it was above in 2014. The lending in upper-income census tracts was below the percentage of owner-occupied units throughout the review period.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. Comerica originated two refinance loans in low-income census tracts in 2012 and none in 2013 or 2014; however, low-income census tracts contain only 3.7% of the owner-occupied units in the assessment area. Comerica's performance exceeded aggregate in 2012. Aggregate also struggled to make loans. There were limited opportunities considering the competition and the low percentage of owner-occupied units in low-income census tracts.

Home refinance lending in moderate-income census tracts is adequate. Comerica originated one refinance loan in a moderate-income census tract during the review period. Aggregate performance was better than Comerica's for the review period. However, the lending level was below the percentage of owner-occupied units throughout the review period.

The bank's refinance lending in middle-income census tracts was greater than the percentage of owner-occupied units in these census tracts in 2012 and 2013 and below in 2014. Lending in upper-income census tracts was greater than the percentage of owner-occupied units throughout the review period.

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is adequate. Comerica originated six HELOC loans in low-income census tracts during the review period, this represented 5.0% in 2012, 1.4% in 2013, and 0.6% in 2014. These census tracts contain 6.9% of families and 3.7% of owner occupied units in the assessment area.

Comerica's HELOC lending in moderate-income census tracts is good. During the review period, Comerica originated 31, or 8.2% of its HELOC loans in moderate-income census tracts, which contain 23.1% of the families and 21.3% of owner occupied units in the assessment area. In moderate-income census tracts, 17.1% of families live below the poverty level.

The bank's HELOC lending in middle-income census tracts was below the percentage of owner-occupied units in these census tracts while the lending in upper-income census tracts was greater than the percentage of owner-occupied units throughout the review period.

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

The bank's borrower distribution of loans reflects adequate distribution among businesses of different sizes and adequate among borrowers of different income levels. For this analysis, the distribution of small business lending across business revenue sizes and HMDA and HELOC lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other lenders.

Small Business Loans

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. Of the 357 small business loans originated during the review period by Comerica, 28.6% were originated to small businesses, which is less than the percentage of businesses with annual gross revenues of \$1 million or less at approximately 91% in the assessment area. Comerica also performed below the aggregate who originated 39.6%, 48.5%, and 46.1% to this group of borrowers in 2012, 2013, and 2014, respectively.

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance was below the aggregate performance; however, many of the larger reporters also originate smaller dollar credit card loans. Additionally, Comerica reported approximately 20% small business lending in amounts of \$100,000 - \$250,000 during this review period.

Aggregate included more than 150 CRA reporters. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top CRA reporters throughout the review period included American Express Bank FSB; Wells Fargo

Bank, N.A.; Chase Bank USA, N.A.; and Citibank, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the assessment area, as well as the performance of aggregate HMDA.

Home Purchase Lending

The bank's home purchase lending to low-income families is adequate. While Comerica only originated five (13.5%) loans to low-income families during the review period, its performance was better than aggregate in 2012 and 2013. Comerica did not originate a home purchase loan to a low-income family in 2014.

The bank's home purchase lending to moderate-income families is adequate. While Comerica only originated seven (18.9%) loans to moderate-income families during the review period, its performance was better than aggregate in 2012 and 2013. Comerica did not originate a home purchase loan to a moderate-income family in 2014.

The bank's home purchase lending to middle-income families was above the percentage of middle-income families in the assessment area for 2012 and 2014 while the lending to upper-income families was greater than the percentage of upper-income families 2013 and 2014, but below in 2012. Comerica did not originate a home purchase loan to a middle-income family in 2013.

Home Refinance Lending

The bank's home refinance lending to low-income families is adequate. Comerica originated seven (8.6%) refinance loans to moderate-income families. However, its performance exceeds aggregate in 2012 and 2013. Comerica did not originate a refinance loan to a low-income family in 2014.

The bank's home refinance lending to moderate-income families is adequate when compared to the percentage of moderate-income families in the assessment area. Comerica originated 15 (18.5%) loans to moderate-income families. Comerica's performance exceeded aggregate in 2012 and 2014, but was below aggregate in 2013.

The bank's refinance lending to middle-income families was greater than the percentage of middle-income families in the assessment area in 2012 and 2013, but below in 2014. Lending to upper-income families was greater than the percentage of upper-income families in 2013 and 2014, but comparable in 2012.

Home Equity Lines of Credit

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

Comerica's HELOC lending to low-income families is good. During the review period, Comerica originated 29 (7.7%) of HELOC loans to low-income families, this represented 18.3% in 2012, 4.8% in 2013, and 6.4% in 2014. In the assessment area, 21.0% of families in the assessment area are considered low-income.

Comerica's HELOC lending to moderate-income families is adequate. During the review period, Comerica originated 47 (12.4%) of its HELOC loans to moderate-income families, this represented 15.0% in 2012, 8.9% in 2013, and 14.5% in 2014. In the assessment area, 17.5% of families in the assessment area are considered moderate-income.

The bank's HELOC lending to middle-income families was below the percentage of middle-income families in the assessment area while the lending to upper-income families was greater than the percentage of families.

Community Development Loans

Comerica makes few community development loans in the assessment area. The bank originated four community development loans totaling \$2.6 million during the review period. In addition, Comerica provided \$343,574 in consortia loans through Community or Economic Development Corporations in the assessment area. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts.

Community Development Lending		
Purpose	#	\$000s
Community Services	3	1,229
Economic Development	1	1,375
Total Loans	4	\$2,604

Investment Test

The bank's performance under the Investment Test is excellent. Comerica exhibited excellent responsiveness to credit and community development needs through its investment activities, current period investments totaled \$9.4 million. Of those, \$9.2 million was investments in two LIHTC funds. The investments are responsive to community needs for affordable housing.

Assessment area performance was positively impacted by three of Comerica's nationwide LIHTC investments. Comerica holds outstanding investments that have a book value of approximately \$4.3 million in this assessment area. The related amounts are included in total investments in the Institution section of this report.

In addition, the bank made contributions to 21 different organizations totaling \$244,433. Contributions were donated to organizations involved primarily in affordable housing initiatives, providing community services targeted to low- and moderate-income individuals or activities, which revitalize or stabilize low- and moderate-income areas. One of these organizations has a primary mission to fund a loan pool program which will provide low-cost community development loans to small businesses.

Service Test

The bank's Service Test performance is excellent. Its retail services reflect good responsiveness and community development services reflect excellent responsiveness to the needs of the Phoenix, AZ Assessment Area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Comerica's 18 branch offices and 18 full-service ATMs as of December 31, 2014 was compared to the distribution of households and businesses among the census tract categories within the assessment area.

Tract Income	% of Geographies	% of Households	% of Businesses	Branches w/Full Service ATMs	
				#	%
Low	9.4%	7.2%	7.1%	0	0.0
Moderate	24.4%	25.8%	16.4%	3	16.7
Middle	31.5%	33.6%	29.6%	7	38.9
Upper	33.8%	33.3%	46.4%	7	38.9
Unknown	0.9%	0.0%	0.5%	1	5.5
Total	100.0%	100.0%	100.0%	18	100.0

Comerica has not opened or closed any branches in this assessment area during the review period. However, the branch disposition changed as a result of the census changes. A branch was located in a low-income census tract during the last review period; however, as a result of the OMB changes it was changed to unknown. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Comerica is generally the same throughout the assessment area. They offer extended and weekend hours with convenient drive-thru services. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility.

Community Development Services

Comerica is a leader in providing community development services in the assessment. Comerica provided services to 16 different organizations, attending 596 meetings/events. These organizations offered community development services that focused on business development, education, youth-services and various other community services that aided low- and moderate-income individuals. Comerica officers and employees served on the boards of directors and committees of various community organizations. Noteworthy is the bank's participation in financial literacy initiatives.

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 797 credit cards loans to small business customers. This partnership is also responsive to assessment area credit needs that were identified by community contacts.

STATE OF FLORIDA

CRA Rating for Florida: Satisfactory

The Lending Test is Rated: Low Satisfactory

The Investment Test is Rated: Outstanding

The Service Test is Rated: Outstanding

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects adequate responsiveness to assessment areas' credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the full-scope assessment area.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes few community development loans.
- Has an excellent level of qualified community development investments and grants, and is often in a leadership position in response to the community development needs of the assessment areas.
- Is a leader in providing community development services.

Scope

A full scope review was conducted for the Ft. Lauderdale-West Palm Beach Assessment Area in Florida. Limited scope reviews were conducted for the remaining three assessment areas, including:

- Naples-Marco Island MSA Assessment Area (Collier County)
- Port St. Lucie Assessment Area (portion of Martin County)
- Sarasota Assessment Area (portion of Sarasota County)

The time period and products evaluated for this state are consistent with the scope discussed in the Institution section of this report. The bank's performance in the Ft. Lauderdale-West Palm Beach Assessment Area was given greater consideration because 81.3% of the deposits are in this assessment area, as well as 66.7% of the branches. Further, more than 80.0% of the total loans in Florida are in this assessment area.

Description of Institution's Operations in Florida

The bank operates nine branch offices in its assessment areas in Florida, representing 1.9% of total branches. As of June 30, 2014, the bank had \$312.3 million in deposits in the state, representing 0.6% of total deposits. Of the 5,724 HMDA loans originated and purchased by the bank, 296 (5.2%) were in the Florida assessment areas. Of the 24,543 small business loans originated and purchased by the bank, 255 (1.1%) were in the Florida assessment areas. Of the 14,234 consumer originated and purchased by the bank, 45 (0.3%) were in the Florida assessment areas. Comerica primarily focuses on trust related activities in Florida.

As of 2010 Census, the Florida assessment areas population was 3,502,725. There were 1,755,352 housing units, of which 56.0% were owner-occupied, 22.4% rental, and 21.6% vacant. There were 809 census tracts in the Florida assessment areas; of which 5.1% are low-, 26.2% are moderate-, 36.2% are middle-, 31.6% are upper-, and less than 0.9% are unknown-income. According to the FFIEC data, median family income ranged from \$53,300 to \$72,800 for the assessment areas during the review period.

The unemployment rate in Florida is slightly higher than the national level. Statewide annual average unemployment rate decreased from 8.5% in 2012 to 6.3% in 2014. National annual average unemployment rate decreased from 8.1% in 2012 to 6.2% in 2014.

Florida is home to two of the nine active spaceports in the United States: Cape Canaveral Spaceport and the Cecil Field Spaceport. The state is the leader by far in active launch licenses held by private industry; 8 of the 17 licenses permitting a firm to send a rocket into space are authorized from sites in Florida. Further, the aerospace and aviation industries in Florida boast more than 2,000 privately operated air and space flight-related firms, making it one of the largest marketplaces for aerospace and aviation technology of any state in the nation.

Florida's life sciences sector is also growing and innovating. While there are more than 1,000 biotech, pharmaceutical, and medical device companies, a foundation of more than 45,000 healthcare establishments, including 700 hospitals, Florida's life sciences industry is now seen as one of the nation's hub for innovation and research.

Innovations in biotech industries in Florida won't be manufactured abroad. The state is home to more than 18,200 manufacturers employing more than 317,000 workers, ranking it among the nation's top 10 states for manufacturing. The industry produces a wide variety of goods from parts for rocket ships to tacos.

From cybersecurity to securing ports of entry, Florida's defense and homeland security industry remains at the top. Twenty military installations, three unified combatant commands, and nearly all of the nation's leading contractors are located in Florida.

Since the birth of the personal computer in Boca Raton, Florida's information technology industry has grown and diversified into photonics, mobile technologies, communications equipment, modeling and simulation, and digital media. Florida's digital media industry comprises nearly 4,200 companies, employing nearly 11,000 people, developing some of the best video games, mobile applications, and theme park applications in the world.⁸⁶

Conclusions with Respect to Performance Tests in Florida

Lending Test

The bank's overall Lending Test rating is Low Satisfactory.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA and small business loans as well as HELOC loans can be found in tables in Appendices G and H, respectively.

Although Comerica originated a similar number of small business and HMDA loans during the review period, small business lending was given slightly more consideration in determining the Lending Test rating for the Florida assessment areas because the dollar amount of small business loans was greater than HMDA loans. The HELOC loans were given less weight due to the limited number of loans originated by the bank in comparison to the small business and HMDA loans.

Lending Activity

Lending levels reflect adequate responsiveness to the assessment area's credit needs based on small business and HMDA market share ranking as discussed below. The assessment areas in Florida contain 1.3% of the bank's small business, HMDA, and consumer lending by number of loans and 2.4% by dollar volume totaling \$242.8 million. In comparison, 0.6% of the bank's total deposits are in Florida.

⁸⁶ <http://www.newsmax.com/FastFeatures/industries-in-florida-economy/2015/03/03/id/628026/>

Summary of Statewide Lending Activity* Assessment Areas Located in Florida January 1, 2012 through December 31, 2014				
Loan Type	#	%	\$(000s)	%
Total Home Equity Lines of Credit	45	7.6	\$49,639	20.4
Home Improvement	2	0.7	\$2,107	1.9
Home Purchase	177	60.4	\$46,157	42.3
Refinance	114	38.9	\$60,957	55.8
Total HMDA	293	49.4	\$109,221	45.0
Total Small Business	255	43.0	\$83,982	34.6
Total Loans	593	100.0%	\$242,842	100.0%
*Originations and purchases within the bank's assessment areas.				

During the review period, the bank also originated 7 small business micro loans, none of which were to businesses located in low- and moderate-income geographies; and originated or purchased 58 Government Guaranteed Loans.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

The geographic distribution of loans in Florida reflects excellent penetration throughout the assessment areas. The full-scope assessment area reviewed is considered excellent. However, the limited scope assessment areas had minimal loans and their performance is considered poor.

The overall distribution among borrowers of different income levels and businesses of different sizes in Florida is adequate. The full-scope assessment areas reviewed are considered adequate. However, the limited scope assessment areas had minimal loans and their performance is considered poor.

More information on the distribution of lending can be found in the full-scope assessment area section.

Community Development Lending

Comerica makes few community development loans in the Florida assessment areas. The bank originated four community development loans totaling \$1.6 million during the review period. In addition, Comerica provided \$52,437 in consortia loans through an organization that provides micro-loans to small businesses throughout the state which includes the bank's assessment areas. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts. More information on community development lending can be found in the full-scope assessment area section.

Community Development Lending			
Assessment Area	Purpose	#	\$000s
Ft. Lauderdale-West Palm Beach	Community Services	2	200
Ft. Lauderdale-West Palm Beach	Affordable Housing	1	350
Statewide	Affordable Housing	1	1,000
Total Loans		4	\$1,550

Investment Test

In Florida, the bank's overall Investment Test rating is Outstanding. The bank made qualified community development investments of approximately \$2.5 million and contributions of \$308,229 (45 organizations) within the Florida assessment areas. The investments included an investment in a LIHTC fund and mortgage-backed securities.

Further, two of Comerica's assessment areas (Fort Lauderdale-West Palm Beach and Sarasota) in Florida performance were positively impacted by nationwide LIHTC investments. During the review period, Comerica invested \$279,467 in a project that supported affordable housing and holds outstanding LIHTC investments, among six projects, that have a current book value of \$6.1 million. The related amounts are included in total investments in the Institution section of this report. Specific details regarding investments can be found in the full-scope assessment area section.

Service Test

In Florida, the bank's overall Service Test rating is Outstanding. All four of the assessment areas were rated Outstanding.

Retail Services

Delivery systems, including ATMs and branch office locations are reasonably accessible to the bank's assessment areas and individuals of different income levels. Overall, banking services and hours of operations do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or to low- and moderate-income individuals. One branch and a full-service ATM were closed in Florida during this review period. However, the record of opening and closing offices has not affected the accessibility of its delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

The bank is a leader in providing community development services that benefit low- and moderate-income individuals and small businesses in all of the Florida assessment areas. Additional detail on the bank's retail and community development services can be found in the full-scope assessment area section of this report.

METROPOLITAN AREA (Full Scope Review)

Description of Operations in Ft. Lauderdale-West Palm Beach, FL

The Ft. Lauderdale-West Palm Beach Assessment Area includes Broward County and a portion of Palm Beach County. Broward County makes up the Ft. Lauderdale-Pompano Beach-Deerfield MD. Palm Beach County makes up the West Palm Beach-Boca Raton-Delray Beach MD. These MDs are a part of the Miami-Ft. Lauderdale-West Palm Beach MSA. Miami-Miami Beach-Kendall MD completes the MSA; however, it is not a part of the bank's assessment area. As a result of the OMB 2014 updates, the West Palm Beach-Boca Raton-Delray Beach MD name changed. The MD was formerly known as West Palm Beach-Boca Raton-Boynton Beach. The MD will be referred to using the current MD name throughout the report.

Within the assessment area, there are 34 low-, 181 moderate-, 237 middle-, and 212 upper-income census tracts. As of December 31, 2014, Comerica operated six branches in this assessment area representing 66.7% of its branches in Florida. One branch is in a moderate-income census tract, two branches are in middle-income census tracts, and three branches are in an upper-income census tract. There are no branches in low-income census tracts.

Comerica has a relatively small presence and limited market share in this highly competitive assessment area. As of June 30, 2014, the assessment area was home to 72 FDIC insured institutions operating 956 offices with total deposits of \$84.6 billion. The bank had \$253.8 million in deposits in Ft. Lauderdale-West Palm Beach Assessment Area representing 0.5% of Comerica's total deposits in all the assessment areas, and representing a market share of 0.3% in this assessment area. Bank of America, N.A. holds the largest deposit share at 20.1%, followed by Wells Fargo Bank, N.A. at 19.9%, and JP Morgan Chase Bank, N.A. at 8.3%. The bank considers the aforementioned banks to be its competitors, as well as Northern Trust Bank, TD Bank, Bank United, and SunTrust Bank.

Demographic Characteristics

Broward County is located on the southeastern tip of Florida and is bordered on the east by the Atlantic Ocean. Palm Beach County is to the north. Just south is Miami-Dade County and to the west is Collier County, which makes up the Naples, FL, assessment area. The Ft. Lauderdale-West Palm Beach Assessment Area consists of 670 census tracts, of which 5.1% are low-income, 27.0% are moderate-income, 35.4% are middle-income, and 31.6% upper-income.

According to the 2010 Census, the assessment area's population was 2,953,412, which accounts for 15.7% of the population in the state. By 2014, Broward County had an estimated population of 1,869,235 and Palm Beach County had an estimated population of 1,397,710. Fort Lauderdale is the largest city within the assessment area, with a 2014 population of 176,013, which accounts for 9.4% of the population in Broward County. West Palm Beach is the largest city within Palm Beach County, with a 2014 population of 104,031, which accounts for 7.4% of

the population in Palm Beach County. Other major cities in the assessment area are Pembroke Pines, Hollywood, Miramar, Boca Raton, and Boynton Beach.

Refer to the table at the end of the Performance Context section for more detailed demographic information for the assessment area.

Income Characteristics

Approximately twenty-two percent of the families living in the assessment area are considered to be low- and 17.8% are considered moderate-income. It is estimated that 8.8% of the families live below the poverty level, which is below the 9.9% statewide poverty level for Florida.

For purposes of classifying borrower income, this evaluation uses FFIEC Estimated Median Family Income. The following chart reflects the estimated median family income for the years 2012-2014 for the assessment area. As noted in the table, the median family income declined throughout the review period.

Ft. Lauderdale-Pompano Beach-Deerfield Beach MD			
Income Level	2012	2013	2014
Median Income	\$62,600	\$61,700	\$61,800
Low-income	< \$31,300	< \$30,850	< \$30,900
Moderate-income	\$31,300-\$50,079	\$30,850-\$49,359	\$30,900-\$49,439
Middle-income	\$50,080-\$75,119	\$49,360-\$74,039	\$49,440-\$74,159
Upper-income	≥ \$75,120	≥ \$74,040	≥ \$74,160

West Palm Beach-Boca Raton-Delray Beach MD			
Income Level	2012	2013	2014
Median Income	\$64,100	\$64,600	\$63,300
Low-income	< \$32,050	< \$32,300	< \$31,650
Moderate-income	\$32,050-\$51,279	\$32,300-\$51,679	\$31,650-\$50,639
Middle-income	\$51,280-\$76,919	\$51,680-\$77,519	\$50,640-\$75,959
Upper-income	≥ \$76,920	≥ \$77,520	≥ \$75,960

Housing Characteristics

Broward County housing prices increased 45.4% since 2011. According to the University of Florida the median housing price in Broward County was \$168,500 in 2011 and \$245,000 in 2014; compared to a statewide median sales price of \$185,000. The average sales price for a single family home was \$314,261 in 2014. In 2014, 352,049 Broward County households (49%) pay more than 30% of income for housing. By comparison, 43% of households statewide pay more than 30% of income for rent or mortgage costs. Further, 183,693 households in Broward County (26%) pay more than 50% of income for housing. The median gross rent was \$1,171 for 2009-2013.⁸⁷

⁸⁷ <http://flhousingdata.shimberg.ufl.edu/a/profiles?action=results&nid=600> Accessed: April 1, 2016

In Palm Beach County, the average sales price for a single family home was \$532,724 in 2014. The median sales price that year was \$293,500. Palm Beach County housing prices increased 24.9% since 2011 when the median sales price was \$235,000. In 2014, 271,900 Palm Beach County households (48%) pay more than 30% of income for housing. By comparison, 43% of households statewide pay more than 30% of income for rent or mortgage costs. Further, 151,299 households in Palm Beach County (27%) pay more than 50% of income for housing. The median gross rent was \$1,149 for 2009-2013.⁸⁸

Annual permits for new residential construction in the Miami-Ft. Lauderdale-West Palm Beach MSA has increased since 2011. However, the housing market remains well below where it was previously.⁸⁹ The MSA had a foreclosure rate for 1-4 unit homes of 11.6% and a serious delinquency (90+ day) rate of 4.2% in September 2013.⁹⁰

Of total housing in the assessment area, 57.6% of the units are classified as owner-occupied while 23.6% are classified as rental units, and 18.8% of the available housing is vacant. A majority of the assessment area's housing units are owner-occupied. However, of all rental units 75.5% are in low- and moderate-income census tracts. This could limit the opportunities for owner-occupied mortgage originations in these tracts. Further, 29.7% of families in low-income census tracts and 14.8% of families in moderate-income census tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

In 2010, the affordability ratio was 20.8%. A higher ratio means the housing is considered more affordable, while a lower ratio means the housing is considered less affordable. An affordability ratio of 20.8% indicates that the majority of families have less income than necessary to purchase the average house. This can limit a bank's ability to originate HMDA loans in this assessment area. The median gross rent in the assessment area is above Florida's at \$990. Palm Beach County is 16.1% greater than and Broward County is 18.2% greater than the state.

Only 4.1% of the housing stock in the assessment area is in low-income census tracts. In these census tracts, 29.5% of the housing units are owner-occupied, 46.0% are rental units, and 24.5% are vacant. The median age of housing stock in these census tracts is 37 years.

Moderate-income census tracts account for 28.7% of the housing stock in the assessment area. In these census tracts, 51.3% of the housing units are owner-occupied, 29.5% are rental units, and 19.2% are vacant. The median age of housing stock in these census tracts is 35 years.

⁸⁸ <http://flhousingdata.shimberg.ufl.edu/a/profiles?action=results&nid=600> Accessed: April 1, 2016

⁸⁹ Real Estate Center at Texas A&M University. Building Permits: MSA: Miami-Ft. Lauderdale-West Palm Beach, FL. Available at https://www.recenter.tamu.edu/data/building-permits/#/msa/Miami-Fort_Lauderdale-West_Palm_Beach%2C_FL Accessed April 1, 2016

⁹⁰ http://www.foreclosure-response.org/maps_and_data/metro_delinquency_data_tables.html Accessed April 1, 2016

The middle-income census tracts account for 37.2% of the housing stock in the assessment area. In these census tracts, 58.6% of the housing units are owner-occupied, 23.1% are rental units, and 18.3% are vacant. The median age of housing stock in these census tracts is 29 years and 7.1% of families in middle-income census tracts have incomes below the poverty level.

Finally, 30.1% of the housing stock in the assessment area is in upper-income census tracts. In these census tracts, 66.4% of the housing units are owner-occupied, 15.4% are rental units, and 18.3% are vacant. The median age of housing stock in these census tracts is 23 years and 3.8% of families in upper-income census tracts have incomes below the poverty level.

Employment and Economic Conditions

The following chart shows unemployment rates relevant to the assessment area for 2012 through 2014.

Unemployment Rates Relative to the Assessment Area⁹¹			
	2012	2013	2014
National	8.1%	7.4%	6.2%
Florida	8.5%	7.3%	6.3%
Ft. Lauderdale-Pompano Beach-Deerfield Beach MD (Broward County)	7.9%	6.7%	5.8%
West Palm Beach-Boca Raton-Delray Beach MD (Palm Beach County)	8.6%	7.3%	5.9%

As of 2014, the assessment area's average unemployment rates were slightly lower than the state of Florida and the national average. This indicates the assessment area's economy is improving slightly better than the state. According to the 2010 Census, the unemployment rate was 16.0% in low-income census tracts and 11.4% in moderate-income census tracts. The high unemployment rates in low- and moderate-income census tracts could affect loan demand from these census tracts. From software technology to international trade, from financial services to tourism, Greater Fort Lauderdale enjoys a robust, diversified business climate.⁹² Further, the largest industry sectors by employment in Palm Beach County includes trade, transportation, and utilities; education and health services, and leisure and hospitality.⁹³

Community Contacts and Community Development Opportunities

Examiners determined assessment area credit needs in the assessment area from two interviews conducted by Federal Reserve System examiners. The organizations provide services to the bank's assessment area. Community contacts included a CDFI and a small business micro-loan

⁹¹ Bureau of Labor Statistics: Local Area Unemployment Statistics. <http://data.bls.gov/cgi-bin/dsrv?la>

⁹²

<http://www.ftlchamber.com/index.php?src=gendocs&ref=Business%20%26%20Industry&category=On%20the%20Town> Accessed April 1, 2016

⁹³ <http://www.dot.state.fl.us/planning/systems/programs/mspi/pdf/Freight/onlineviewing/Palm%20Beach.pdf> Accessed April 1, 2016

lender. The CDFI provide services to low- and moderate-income individuals as well as small businesses. Contacts believe there is a great deal of opportunity for banks to work with organizations that provide services to low- and moderate-income individuals and small businesses. Banks can participate via financial literacy outreach, client referrals, grant support, loan fund support, and general community awareness.

Financial literacy to small business owners was mentioned as a major need; given many organizations have had to close their doors as result of funding available for this activity. Further, building the region's enterprenurial base is one of many community development opportunities that an institution serving the area could consider. Contacts believe banks are not using unique or creative financing programs for the very small businesses. It is the perception of the contacts that banks do not lend to very small businesses in South Florida. Collaboration is key to responsiveness, especially with regard to start-up businesses.

Key Assessment Area Demographics:

The following table details selected characteristics of the assessment area.

Fort Lauderdale-West Palm Beach, FL								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	34	5.1	25,584	3.6	7,600	29.7	156,940	21.9
Moderate-Income	181	27.0	188,474	26.3	27,881	14.8	127,530	17.8
Middle-Income	237	35.4	258,994	36.1	18,341	7.1	139,759	19.5
Upper-Income	212	31.6	243,942	34.0	9,178	3.8	292,773	40.8
Unknown-Income	6	0.9	8	0.0	0	0.0	0	0.0
Total AA	670	100.0	717,002	100.0	63,000	8.8	717,002	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	57,925	17,065	2.1	29.5	26,657	46.0	14,203	24.5
Moderate-Income	407,996	209,294	25.5	51.3	120,444	29.5	78,258	19.2
Middle-Income	528,360	309,462	37.8	58.6	122,212	23.1	96,686	18.3
Upper-Income	427,750	283,905	34.6	66.4	65,769	15.4	78,076	18.3
Unknown-Income	8	0	0.0	0.0	8	100.0	0	0.0
Total AA	1,422,039	819,726	100.0	57.6	335,090	23.6	267,223	18.8
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	8,354	3.6	7,274	3.4	769	6.5	311	4.3
Moderate-Income	53,569	23.0	48,379	22.6	3,456	29.4	1,734	23.7
Middle-Income	79,464	34.1	73,283	34.2	3,725	31.7	2,456	33.6
Upper-Income	91,569	39.3	85,018	39.7	3,761	32.0	2,790	38.2
Unknown-Income	210	0.1	157	0.1	38	0.3	15	0.2
Total AA	233,166	100.0	214,111	100.0	11,749	100.0	7,306	100.0
	Percent of Total Businesses:			91.8		5.0		3.1
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	23	2.6	21	2.5	2	5.7	0	0.0
Moderate-Income	118	13.5	113	13.5	4	11.4	1	100.0
Middle-Income	250	28.6	241	28.8	9	25.7	0	0.0
Upper-Income	482	55.2	462	55.2	20	57.1	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	873	100.0	837	100.0	35	100.0	1	100.0
	Percent of Total Farms:			95.9		4.0		0.1
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

**Conclusions With Respect to Performance Tests in
Fort Lauderdale-West Palm Beach, Florida****Overview**

The bank's lending performance is adequate. Lending activity reflects good responsiveness to assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Comerica's performance exceeded aggregate. In addition, the distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Comerica's HMDA lending is minimal when compared to small business and HELOC lending. The HMDA performance is adequate given Comerica's business strategy is middle-market commercial lending and its mortgage terms are not as accommodating as its competitors. Additionally, the bank makes few community development loans.

Lending Activity

The bank is both a small business and HMDA lender. Further, Comerica elected to have its HELOC lending reviewed. During the review period, the bank reported 33 (6.9%) HELOC loans, 198 (41.4%) small business loans, and 247 (51.7%) HMDA loans in the Ft. Lauderdale-West Palm Beach Assessment Area. Small business was given more weight than HMDA and HELOC lending in determining the bank's Lending Test rating in the assessment area. Details of the bank's HMDA, HELOC, and small business lending and information regarding lending by aggregate can be found in Appendix G.

CRA reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area. The table below presents key data about small business lenders operating within the assessment area subject to the reporting requirements of CRA.

Year	Comerica		CRA Reporters		
	Rank	# Originations	# CRA Reporters	#Loans (Originations/ Purchases)	\$ Billion
2012	32 nd	66	158	82,130	2.0
2013	34 th	58	163	77,565	2.3
2014	36 th	74	168	89,514	2.4
Total		198		249,209	6.7

Comerica's focus is middle-market commercial lending. Home mortgage loans are the primary business line for many of the top HMDA reporters. The following table details key data about HMDA reporters operating within the assessment area.

Year	Comerica		HMDA Reporters		
	Rank	# Originations	# HMDA Reporters	#Loans (Originations/ Purchases)	\$ Billion
2012	83 rd	99	749	90,855	20.1
2013	101 st	81	814	91,765	23.9
2014	111 th	67	810	65,502	16.5
Total		247		248,122	60.5

In addition, the bank originated 14,234 consumer purpose HELOC loans of which 33 (0.2%) were in this assessment area.

Geographic Distribution of Loans

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

Small Business Loans

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the 168 aggregate.

Comerica's small business lending in low-income census tracts is good. Comerica originated one (0.5%) loan in a low-income census tract. There are 34 low-income census tracts which contain 3.4% of the small businesses in the assessment area. In addition, the bank's performance was slightly below aggregate during the review period.

Comerica's small business lending in moderate-income census tracts is excellent. During the review period, Comerica originated 24.7% its small business loans in moderate-income census tracts, which contain 22.6% of the small businesses in the assessment area. Comerica's performance was better than the aggregate who originated 20.5%, 20.4%, and 20.9% of small business loans in moderate-income census tracts in 2012, 2013, and 2014, respectively.

There were also 117 small business credit card loans originated through the bank's partnership with Elan. However, only one (0.8%) was to a business located in a low-income census tract and 22 (18.8%) to businesses located in moderate-income census tracts. These loans are not included in the previously discussed percentages.

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

HMDA Loans

The geographic distribution of HMDA loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate. As previously noted, Comerica's business strategy does not result in the origination of a large volume of HMDA loans. In addition this assessment area is very competitive. There are more than 800 HMDA aggregate lenders in this assessment area. More than half of the aggregate lenders originated or purchased less than 25 HMDA loans in this assessment area, each year of the review period.

The unemployment and poverty rates and the level of owner-occupied units in low- and moderate-income census tracts were issues considered when assessing the bank's performance. In addition, the bank's market share, business strategy, and performance of the aggregate were also considered when assessing the bank's performance. Comerica originated and purchased 148 home purchase loans and 98 home refinance loans during the review period. Overall 0.8 % (2) of the HMDA loans were in low- and 36.0% (89) were in moderate-income census tracts. Considering these factors, the geographic distribution of Comerica's HMDA lending is good.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. Comerica made 1.9% (2) home purchase loans in low-income census tracts during the review period. Low-income census tracts contain only 2.1% of the owner-occupied units. Aggregate also struggled to originate home purchase loans at a level above the percentage of owner-occupied units in low-income census tracts. In 2012, 2013, and 2014, they only originated and purchased 0.9%, 1.0%, and 1.2% of loans in low-income census tracts, respectively.

Home purchase lending in moderate-income census tracts is excellent. Comerica made 38.5% (20) home purchase loans in moderate-income census tracts during the review period. Moderate-income census tracts contain 25.5% of the owner-occupied units. Comerica outperformed aggregate during the review period. In 2012, 2013, and 2014 aggregate originated and purchased 16.6%, 16.0%, and 17.8% in moderate-income census tracts, respectively.

The bank's home purchase lending in middle- and upper- income census tracts was below the percentage of owner-occupied units in these census tracts for the review period.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. Comerica did not originate a refinance loan in a low-income census tract during the review period; however, low-income census tracts contain only 2.1% of the owner-occupied units in the assessment area. Aggregate also struggled to make loans. During the review period, aggregate originated and purchased less than 1.0% refinance loans in low-income census tracts. There were limited opportunities considering the demographics of the assessment area.

Home refinance lending in moderate-income census tracts is excellent. Comerica originated or purchased (23.5%) 23 refinance loans in moderate-income census tracts during the review period. Comerica's performance was better than aggregate for the review period. However, the bank's lending level was slightly below the 25.5% of owner-occupied units.

The bank's refinance lending in middle-income census tracts was below the percentage of owner-occupied units in these census tracts. Lending in upper-income census tracts was greater than the percentage of owner-occupied units in 2012 and 2013 and below in 2014.

Home Equity Lines of Credit

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

Comerica's HELOC lending in low-income census tracts is poor. Comerica did not originate a HELOC loan in a low-income census tract during the review period, these census tracts contain 21.9% of families and 2.1% of owner occupied units in the assessment area. In addition, 29.7% of families in the low-income census tracts live below the poverty level, thus making it difficult to qualify for a loan.

Comerica's HELOC lending in moderate-income census tracts is poor. During the review period, Comerica originated only one, or 3.0% of its HELOC loans in a moderate-income census tract, which contain 17.8% of the families and 25.5% of owner occupied units in the assessment area. In moderate-income census tracts, 14.8% of families live below the poverty level.

The bank's HELOC lending in middle- and upper income census tracts was greater than the percentage of families in these census tracts during the review period.

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

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

Small Business Loans

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

Of the 198 small business loans originated during the review period by Comerica, 25.3% were originated to small businesses, which is less than the percentage of businesses with annual gross revenues of \$1 million or less at approximately 92% in the assessment area. Comerica also performed below the aggregate who originated 42.9%, 52.6%, and 51.8% to this group of borrowers in 2012, 2013, and 2014, respectively.

With regard to small business lending in amounts of \$100,000 or less, Comerica's performance at 34.3% was below the aggregate performance; however, many of the larger reporters also originate smaller dollar credit card loans. However, Comerica reported 20.7% small business lending in amounts of \$100,000 - \$250,000 during this review period.

Aggregate included approximately 160 CRA reporters. Among the top CRA reporters are institutions that are credit card lenders. Credit cards typically are smaller dollar loans. The top CRA reporters throughout the review period included American Express Bank, FSB; FIA Card Service, N.A.; Chase Bank USA, N.A.; and Wells Fargo Bank, N.A. Further, Comerica has competition for small business loans from other lenders that are not CRA reporters.

The competition limits Comerica's ability to lend to small business customers. However, the partnership with Elan enables Comerica to help meet the credit needs of its assessment area by providing a conduit to Elan who extends credit card loans to Comerica's small business customers. Consideration of this arrangement is given under the Service Test.

Community contacts identified small business loans as a critical need, especially for the smallest of businesses.

HMDA Loans

HMDA lending by borrower income in the assessment area is considered excellent when compared to demographic characteristics of the assessment area, as well as the performance of aggregate.

Home Purchase Lending

The bank's home purchase lending to low-income families is excellent. Comerica originated or purchased 21 (14.2%) loans to low-income families during the review period, its performance was better than aggregate. Aggregate originated 6.5%, 4.2%, and 3.1% to low-income families in 2012, 2013, and 2014, respectively.

The bank's home purchase lending to moderate-income families is excellent. Comerica originated or purchased 65 (43.9%) loans to moderate-income families during the review period, its performance was better than aggregate. Aggregate originated 17.4%, 15.0%, and 14.4% to moderate-income families in 2012, 2013, and 2014, respectively.

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

Home Refinance Lending

The bank's home refinance lending to low-income families is adequate. Comerica originated or purchased five (5.1%) refinance loans to moderate-income families. However, its performance is slightly below aggregate.

The bank's home refinance lending to moderate-income families is excellent. Comerica originated 33 or purchased (33.7%) loans to moderate-income families. Its performance exceeded aggregate performance and the percentage of moderate-income families (17.8%) in the assessment area.

Comerica's refinance lending to middle and upper-income families was below the percentage of middle- and upper-income families in the assessment area.

Home Equity Lines of Credit

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

Comerica's HELOC lending to low-income families is poor. During the review period, Comerica did not originate a HELOC loan to a low-income borrower. Approximately 22.0% of families in the assessment area are considered low-income.

Comerica's HELOC lending to moderate-income families is adequate. During the review period, Comerica originated four (12.1%) of its HELOC loans to moderate-income families; this represented 30.0% in 2013 and 6.7% in 2014. Comerica did not originate a HELOC loan to a moderate-income family in 2012. In the assessment area, 17.8% of families in the assessment area are considered moderate-income.

The bank's HELOC lending to middle-income families was below the percentage of families in these tracts while the lending to upper-income families was greater than the percentage of families.

Community Development Loans

Comerica makes few community development loans in the assessment area. The bank originated or renewed three community development loans totaling \$550,000 during the review period. The affordable housing loan is to an entity that will construct 8 – 12 homes to sell to low-income individuals. The community development service loans are to an organization that provides clothing, home improvement assistance, utility assistance, and other services to low- and moderate-income individuals.

Community Development Lending		
Purpose	#	\$000s
Community Service	2	200
Affordable Housing	1	350
Total Loans	3	\$550

Additionally, this assessment area benefitted from a statewide community development loan for \$1 million to a CDFI that provides funding to non-profit organizations that have a community development purposes. Further, Comerica provided \$52,437 in consortia loans through an organization that provides micro-loans to small businesses throughout the state which includes this assessment area.

Investment Test

The bank's performance under the Investment Test is excellent. Comerica exhibited excellent responsiveness to credit and community development needs through its investment activities, current period investments totaled \$2.6 million. Of those, \$1.3 million was in a LIHTC investment fund. The bank also had investments in purchases of 10 HUD and GNMA investment instruments totaling \$1.1 million. The investments are responsive to assessment area needs for affordable housing.

In addition, the bank made contributions to 28 different organizations totaling \$209,865. Organizations involved in providing community services targeted to low- and moderate-income individuals or activities received 82.9% of the funds. The remaining funds were contributed to organizations involved in affordable housing initiatives and economic development.

Assessment area performance was positively impacted by five of Comerica's nationwide LIHTC investments. During the review period Comerica invested \$279,467 in a LIHTC project, which supported the development of affordable housing. Comerica also holds outstanding LIHTC investments that have a book value of \$5.2 million. The related amounts are included in total investments in the Institution section of this report.

Service Test

The bank's Service Test performance is excellent. Its retail and community development services reflect excellent responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Comerica's six branch offices and five ATMs as of December 31, 2014 was compared to the distribution of households and businesses among the tract categories within the assessment area.

Tract Income	% of Geographies	% of Households	% of Businesses	Branches w/Full Service ATMs		Branch w/o ATM	
				#	%	#	%
Low	5.1	3.8	3.6	0	0.0	0	0.0
Moderate	27.0	28.6	23.0	1	20.0	0	0.0
Middle	35.4	37.4	34.1	1	20.0	1	100.0
Upper	31.6	30.3	39.3	3	60.0	0	0.0
Unknown	0.9	0.0	0.1	0	0.0	0	0.0
Total	100.0%	100.0%	100.0%	5	100.0%	1	100.0%

Comerica closed one branch with a full-service ATM located in an upper-income census tract in this assessment area during the review period. Closing of the branch did not adversely affect low- or moderate-income individuals or geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Comerica is generally the same throughout the assessment area. They offer extended and weekend hours with convenient drive-thru services. Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility.

Community Development Services

Comerica is a leader in providing community development services in the assessment. Comerica provided services to 23 different organizations, participating in 530 meetings/events. These organizations offered community development services that focused on business development, education, youth-services and various other community services that aided low- and moderate-income individuals. Comerica officers and employees served on the boards of directors and committees of various community organizations. Noteworthy is the bank's participation in financial literacy initiatives.

Purpose	# Events/Meetings
Affordable Housing	19
Benefits LMI Individuals/Geographies	424
Revitalize/Stabilize	20
Provides Economic Development	67
Total	530

Comerica's willingness to help its small business customers is further demonstrated by its partnership with Elan; originating 117 credit cards loans to small business customers. This partnership is also responsive to assessment area credit needs that were identified by community contacts.

METROPOLITAN AREAS (Limited Scope Review)

Description of Institution's Operations

- **Naples-Marco Island MSA Assessment Area (Collier County)**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 11.1% of its branches in Florida.
 - As of June 30, 2014, the bank had \$32.6 million in deposits in this assessment area, representing a market share of 0.3%; as well as 10.4% of the bank's total deposits in Florida.
- **Orlando Assessment Area (portion of Orange County)**
 - The one branch and full-service ATM located in this assessment area was closed August 16, 2012. This assessment area performance will not be compared to the bank's performance in the state since the branch and ATM was open for less than a year during this review period.
- **Port St. Lucie MSA Assessment Area (portion of Martin County)**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 11.1% of its branches in Florida.
 - As of June 30, 2014, the bank had \$9.2 million in deposits in this assessment area, representing a market share of 0.3%; as well as 3.0% of the bank's total deposits in Florida.
- **Sarasota Assessment Area (portion of Sarasota County)**
 - As of December 31, 2014, the bank operated one branch in the assessment area, representing 11.1% of its branches in Florida.
 - As of June 30, 2014, the bank had \$16.7 million in deposits in this assessment area, representing a market share of 0.1%; as well as 5.3% of the bank's total deposits in Florida.

Conclusions With Respect to Performance Tests

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

Assessment Area	Lending Test	Investment Test	Service Test
Naples-Marco Island MSA	Below	Consistent	Consistent
Port St. Lucie	Below	Below	Consistent
Sarasota	Below	Below	Consistent

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

As stated earlier, the Ft. Lauderdale-West Palm Beach Assessment Area received a full-scope review. The full-scope assessment area selected represent 81.3% of the deposits in the assessment areas in Florida, as well as 66.7% of the branches. The full-scope assessment area represents 80.1% of the total loans in the state. Therefore, the state rating is based on the assessment area in the state with the greatest volume of deposits, lending, and branches.

For the Lending Test, a limited level of loans were originated or purchased; therefore, meaningful analyses could not be performed. The limited-scope assessment areas lending is below the bank's performance.

For the Investment Test, the performance in the Naples, Florida limited-scope assessment area was consistent with the bank's performance. A slightly lower level of qualified investments relative to the bank's operations contributed to weaker performance in the Port St. Lucie and Sarasota, Florida Assessment Areas.

For the Service Test, the performance in the limited-scope assessment areas was consistent with the bank's performance in the state.

APPENDICES

Appendix A – Scope of Examination

SCOPE OF EXAMINATION		
Time Period Reviewed		
Lending Test: January 1, 2012 to December 31, 2014 Community Development Loans, Investment Test, and Service Test: April 1, 2012 to December 31, 2014		
Financial Institution	Products Reviewed	
Comerica Bank Dallas, Texas	Small Business and HMDA Reportable Loans Community Development Loans HELOC Loans	
Affiliates	Affiliate Relationship	Products Reviewed
Comerica Securities, Inc.	Holding Company Subsidiary	Investments
Comerica Foundation (Community Economic Development Fund)	Foundation	Investments

List of Assessment Areas			
Assessment Area	Type of Examination	Branches Visited ⁹⁴	Other Information
Texas			
• Austin-Round Rock-San Marcos MSA (12420)	Limited		
• Dallas-Fort Worth-Arlington MSA (19100)	Full		
• Houston-The Woodlands-Sugar Land MSA (26420)	Full		
• Kerr County (NonMSA – 265)	Limited		
• San Antonio-New Braunfels MSA (41700)	Limited		
Michigan			
• Ann Arbor MSA (11460)	Limited		
• Battle Creek MSA (12980)	Limited		

⁹⁴ No branches were visited.

Appendix A

List of Assessment Areas			
Assessment Area	Type of Examination	Branches Visited ⁹⁴	Other Information
<ul style="list-style-type: none"> • Detroit-Warren-Dearborn MSA (19820) • Flint MSA (22420) • Gladwin County (NonMSA – 051) • Grand Rapids-Wyoming MSA (24340) • Jackson MSA (27100) • Kalamazoo-Portage MSA (28020) • Lansing-East Lansing MSA (29620) • Lenawee County (NonMSA – 091) • Midland MSA (33220) • Muskegon MSA (34740) 	<p>Full</p> <p>Limited</p> <p>Limited</p> <p>Full</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Limited</p>		
California <ul style="list-style-type: none"> • Fresno MSA (23420) • Los Angeles-Anaheim-Long Beach MSA (31080) • Oxnard-Thousand Oaks-Ventura (37100) • Riverside-San Bernardino-Ontario MSA (40140) • Sacramento-Roseville-Arden-Arcade MSA (40900) • Salinas MSA (41500) 	<p>Limited</p> <p>Full</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Limited</p>		

Appendix A

List of Assessment Areas			
Assessment Area	Type of Examination	Branches Visited ⁹⁴	Other Information
<ul style="list-style-type: none"> San Diego-Carlsbad MSA (41740) San Francisco-Oakland-Hayward MSA (41860) San Jose-Sunnyvale-Santa Clara MSA (41940) Santa Cruz-Watsonville MSA (421200) 	<p>Limited</p> <p>Limited</p> <p>Full</p> <p>Limited</p>		
Florida <ul style="list-style-type: none"> Miami-Fort Lauderdale-West Palm Beach MSA (33100) Naples-Immokalee-Marco Island MSA (34940) Port St. Lucie MSA (39460) North Port-Sarasota-Brandenton (35840) 	<p>Full</p> <p>Limited</p> <p>Limited</p> <p>Limited</p>		
Arizona <ul style="list-style-type: none"> Phoenix-Mesa-Glendale, MSA (38060) 	<p>Full</p>		

Appendix B – Summary of Ratings

Summary of Ratings				
State	Lending Test	Investment Test	Service Test	Overall Rating
Texas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Michigan	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
California	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Florida	Low Satisfactory	Outstanding	Outstanding	Satisfactory
Arizona	Low Satisfactory	Outstanding	Outstanding	Satisfactory

Appendix C – General Information

Acronyms:

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

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

Appendix D - Glossary

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

Census tract: A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

- i. Low-or moderate-income geographies;
- ii. Designated disaster areas; or
- iii. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a) Rates of poverty, unemployment, and population loss; or
 - b) Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of the applicants; the amount of loan requested; and the disposition of the application (for example, approved, denied, or withdrawn).

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

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

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

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

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

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Appendix E

Appendix E – Metropolitan Limited Scope Assessment Areas Demographics

Fresno, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	22	11.1	19,227	9.3	8,363	43.5	50,839	24.7
Moderate-Income	56	28.1	56,736	27.6	15,970	28.1	33,021	16.0
Middle-Income	51	25.6	56,403	27.4	8,780	15.6	35,245	17.1
Upper-Income	68	34.2	73,442	35.7	3,359	4.6	86,716	42.1
Unknown-Income	2	1.0	13	0.0	0	0.0	0	0.0
Total AA	199	100.0	205,821	100.0	36,472	17.7	205,821	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	30,054	7,729	5.0	25.7	19,408	64.6	2,917	9.7
Moderate-Income	84,071	32,485	20.8	38.6	44,587	53.0	6,999	8.3
Middle-Income	87,136	43,326	27.7	49.7	37,253	42.8	6,557	7.5
Upper-Income	108,945	72,592	46.5	66.6	26,443	24.3	9,910	9.1
Unknown-Income	13	0	0.0	0.0	13	100.0	0	0.0
Total AA	310,219	156,132	100.0	50.3	127,704	41.2	26,383	8.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	3,047	9.8	2,648	9.5	272	12.3	127	11.6
Moderate-Income	7,484	24.0	6,501	23.3	696	31.4	287	26.2
Middle-Income	8,179	26.2	7,315	26.2	573	25.8	291	26.6
Upper-Income	12,494	40.0	11,430	40.9	678	30.5	386	35.3
Unknown-Income	26	0.1	22	0.1	1	0.0	3	0.3
Total AA	31,230	100.0	27,916	100.0	2,220	100.0	1,094	100.0
	Percent of Total Businesses:			89.4		7.1		3.5
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	93	4.3	63	3.3	30	14.0	0	0.0
Moderate-Income	665	31.0	591	30.6	73	34.0	1	100.0
Middle-Income	786	36.6	717	37.1	69	32.1	0	0.0
Upper-Income	604	28.1	561	29.0	43	20.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,148	100.0	1,932	100.0	215	100.0	1	100.0
	Percent of Total Farms:			89.9		10.0		0.0

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Inland Empire, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	28	5.4	26,567	4.3	8,671	32.6	121,980	19.9
Moderate-Income	135	26.0	142,881	23.3	26,096	18.3	104,730	17.1
Middle-Income	173	33.3	194,392	31.7	18,364	9.4	120,585	19.7
Upper-Income	182	35.0	249,194	40.6	9,075	3.6	265,739	43.3
Unknown-Income	2	0.4	0	0.0	0	0.0	0	0.0
Total AA	520	100.0	613,034	100.0	62,206	10.1	613,034	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	42,215	12,589	2.4	29.8	25,076	59.4	4,550	10.8
Moderate-Income	206,456	98,972	18.8	47.9	90,042	43.6	17,442	8.4
Middle-Income	275,008	166,277	31.6	60.5	87,253	31.7	21,478	7.8
Upper-Income	321,418	248,462	47.2	77.3	53,025	16.5	19,931	6.2
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	845,097	526,300	100.0	62.3	255,396	30.2	63,401	7.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	3,673	3.8	3,261	3.8	210	3.2	202	6.1
Moderate-Income	22,419	23.3	19,532	22.6	2,050	30.8	837	25.5
Middle-Income	31,106	32.3	27,700	32.1	2,333	35.0	1,073	32.7
Upper-Income	39,117	40.6	35,893	41.5	2,053	30.8	1,171	35.6
Unknown-Income	45	0.0	25	0.0	18	0.3	2	0.1
Total AA	96,360	100.0	86,411	100.0	6,664	100.0	3,285	100.0
	Percent of Total Businesses:			89.7		6.9		3.4
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	4	0.5	4	0.5	0	0.0	0	0.0
Moderate-Income	89	10.8	83	10.9	6	9.2	0	0.0
Middle-Income	286	34.7	260	34.3	25	38.5	1	100.0
Upper-Income	445	54.0	411	54.2	34	52.3	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	824	100.0	758	100.0	65	100.0	1	100.0
	Percent of Total Farms:			92.0		7.9		0.1
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Sacramento, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	36	9.0	30,663	7.1	8,326	27.2	98,464	23.0
Moderate-Income	102	25.6	104,153	24.3	16,023	15.4	73,839	17.2
Middle-Income	142	35.7	156,228	36.4	10,054	6.4	86,036	20.1
Upper-Income	117	29.4	137,800	32.1	4,235	3.1	170,515	39.8
Unknown-Income	1	0.3	10	0.0	0	0.0	0	0.0
Total AA	398	100.0	428,854	100.0	38,638	9.0	428,854	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	58,467	18,123	4.5	31.0	33,566	57.4	6,778	11.6
Moderate-Income	180,971	80,313	20.1	44.4	84,207	46.5	16,451	9.1
Middle-Income	257,502	154,503	38.7	60.0	85,628	33.3	17,371	6.7
Upper-Income	198,673	146,058	36.6	73.5	41,243	20.8	11,372	5.7
Unknown-Income	21	0	0.0	0.0	21	100.0	0	0.0
Total AA	695,634	398,997	100.0	57.4	244,665	35.2	51,972	7.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	6,783	8.0	5,901	7.6	646	13.3	236	8.7
Moderate-Income	19,030	22.4	17,071	22.1	1,283	26.4	676	24.9
Middle-Income	32,431	38.2	29,672	38.4	1,701	34.9	1,058	39.0
Upper-Income	26,700	31.4	24,724	32.0	1,237	25.4	739	27.3
Unknown-Income	3	0.0	2	0.0	0	0.0	1	0.0
Total AA	84,947	100.0	77,370	100.0	4,867	100.0	2,710	100.0
	Percent of Total Businesses:			91.1		5.7		3.2
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	19	2.5	19	2.5	0	0.0	0	0.0
Moderate-Income	101	13.1	98	13.0	3	15.8	0	0.0
Middle-Income	355	45.9	344	45.6	11	57.9	0	0.0
Upper-Income	298	38.6	293	38.9	5	26.3	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	773	100.0	754	100.0	19	100.0	0	0.0
	Percent of Total Farms:			97.5		2.5		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Salinas - Monterey County, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	4	5.1	4,514	6.0	1,532	33.9	16,251	21.7
Moderate-Income	15	19.0	14,479	19.3	2,409	16.6	11,855	15.8
Middle-Income	31	39.2	29,625	39.5	2,679	9.0	14,575	19.4
Upper-Income	27	34.2	26,419	35.2	1,155	4.4	32,356	43.1
Unknown-Income	2	2.5	0	0.0	0	0.0	0	0.0
Total AA	79	100.0	75,037	100.0	7,775	10.4	75,037	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	5,358	1,193	2.1	22.3	3,803	71.0	362	6.8
Moderate-Income	21,189	6,636	11.9	31.3	12,874	60.8	1,679	7.9
Middle-Income	47,750	21,089	37.8	44.2	23,228	48.6	3,433	7.2
Upper-Income	43,859	26,909	48.2	61.4	11,217	25.6	5,733	13.1
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	118,156	55,827	100.0	47.2	51,122	43.3	11,207	9.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	251	1.7	238	1.8	6	0.6	7	1.5
Moderate-Income	2,507	17.0	2,238	16.8	168	17.7	101	21.4
Middle-Income	5,992	40.7	5,359	40.3	426	44.9	207	43.8
Upper-Income	5,896	40.1	5,408	40.7	338	35.6	150	31.7
Unknown-Income	70	0.5	51	0.4	11	1.2	8	1.7
Total AA	14,716	100.0	13,294	100.0	949	100.0	473	100.0
	Percent of Total Businesses:			90.3		6.4		3.2
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-Income	29	7.4	24	7.9	4	4.6	1	33.3
Middle-Income	199	50.5	137	45.1	61	70.1	1	33.3
Upper-Income	161	40.9	140	46.1	20	23.0	1	33.3
Unknown-Income	4	1.0	2	0.7	2	2.3	0	0.0
Total AA	394	100.0	304	100.0	87	100.0	3	100.0
	Percent of Total Farms:			77.2		22.1		0.8
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

San Diego, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	55	10.9	50,232	9.2	14,717	29.3	122,995	22.5
Moderate-Income	102	20.3	105,864	19.3	14,407	13.6	94,848	17.3
Middle-Income	176	35.0	187,675	34.3	11,899	6.3	99,909	18.2
Upper-Income	166	33.0	203,953	37.2	7,204	3.5	229,972	42.0
Unknown-Income	4	0.8	0	0.0	0	0.0	0	0.0
Total AA	503	100.0	547,724	100.0	48,227	8.8	547,724	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	83,941	16,384	3.5	19.5	61,395	73.1	6,162	7.3
Moderate-Income	184,128	65,007	14.0	35.3	104,060	56.5	15,061	8.2
Middle-Income	331,357	173,179	37.3	52.3	133,519	40.3	24,659	7.4
Upper-Income	332,686	209,511	45.1	63.0	98,916	29.7	24,259	7.3
Unknown-Income	9	0	0.0	0.0	9	100.0	0	0.0
Total AA	932,121	464,081	100.0	49.8	397,899	42.7	70,141	7.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	8,960	6.4	8,073	6.4	557	6.0	330	7.5
Moderate-Income	21,528	15.3	19,404	15.3	1,391	15.0	733	16.6
Middle-Income	48,889	34.8	44,049	34.7	3,277	35.4	1,563	35.4
Upper-Income	61,086	43.4	55,292	43.6	4,009	43.3	1,785	40.4
Unknown-Income	135	0.1	114	0.1	16	0.2	5	0.1
Total AA	140,598	100.0	126,932	100.0	9,250	100.0	4,416	100.0
	Percent of Total Businesses:			90.3	6.6		3.1	
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	14	1.7	14	1.8	0	0.0	0	0.0
Moderate-Income	98	11.9	94	12.2	4	8.0	0	0.0
Middle-Income	249	30.3	235	30.5	14	28.0	0	0.0
Upper-Income	461	56.1	427	55.5	32	64.0	2	100.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	822	100.0	770	100.0	50	100.0	2	100.0
	Percent of Total Farms:			93.7	6.1		0.2	
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

San Francisco Bay, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	115	13.2	86,783	10.2	19,147	22.1	203,177	23.8
Moderate-Income	172	19.7	156,867	18.4	17,472	11.1	140,047	16.4
Middle-Income	298	34.2	310,603	36.4	15,133	4.9	159,458	18.7
Upper-Income	282	32.3	299,640	35.1	6,529	2.2	351,220	41.1
Unknown-Income	5	0.6	9	0.0	0	0.0	0	0.0
Total AA	872	100.0	853,902	100.0	58,281	6.8	853,902	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	195,608	39,220	5.1	20.1	130,412	66.7	25,976	13.3
Moderate-Income	293,745	113,159	14.8	38.5	157,495	53.6	23,091	7.9
Middle-Income	535,940	287,532	37.6	53.7	210,822	39.3	37,586	7.0
Upper-Income	494,625	324,620	42.5	65.6	140,297	28.4	29,708	6.0
Unknown-Income	59	0	0.0	0.0	59	100.0	0	0.0
Total AA	1,519,977	764,531	100.0	50.3	639,085	42.0	116,361	7.7
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	28,772	13.7	24,372	13.1	3,039	19.0	1,361	18.2
Moderate-Income	32,415	15.4	28,789	15.4	2,351	14.7	1,275	17.0
Middle-Income	66,783	31.8	59,880	32.1	4,529	28.4	2,374	31.7
Upper-Income	81,760	39.0	73,243	39.3	6,041	37.8	2,476	33.1
Unknown-Income	102	0.0	84	0.0	15	0.1	3	0.0
Total AA	209,832	100.0	186,368	100.0	15,975	100.0	7,489	100.0
	Percent of Total Businesses:			88.8		7.6		3.6
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	53	6.8	43	5.8	9	27.3	1	20.0
Moderate-Income	94	12.1	92	12.4	2	6.1	0	0.0
Middle-Income	203	26.1	196	26.5	6	18.2	1	20.0
Upper-Income	428	55.0	409	55.3	16	48.5	3	60.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	778	100.0	740	100.0	33	100.0	5	100.0
	Percent of Total Farms:			95.1		4.2		0.6
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Santa Cruz, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	1	2.2	1,334	2.6	474	35.5	13,040	25.2
Moderate-Income	15	32.6	17,447	33.7	2,222	12.7	9,138	17.6
Middle-Income	18	39.1	19,002	36.7	1,045	5.5	9,416	18.2
Upper-Income	12	26.1	14,000	27.0	459	3.3	20,189	39.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	46	100.0	51,783	100.0	4,200	8.1	51,783	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	1,859	261	0.6	14.0	1,495	80.4	103	5.5
Moderate-Income	26,865	12,475	26.3	46.4	12,749	47.5	1,641	6.1
Middle-Income	39,660	18,952	40.0	47.8	15,604	39.3	5,104	12.9
Upper-Income	23,149	15,659	33.1	67.6	5,326	23.0	2,164	9.3
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	91,533	47,347	100.0	51.7	35,174	38.4	9,012	9.8
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	298	2.1	261	2.1	16	2.0	21	5.0
Moderate-Income	3,183	22.8	2,831	22.3	244	30.5	108	26.0
Middle-Income	6,681	48.0	6,114	48.1	365	45.6	202	48.6
Upper-Income	3,769	27.1	3,508	27.6	176	22.0	85	20.4
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	13,931	100.0	12,714	100.0	801	100.0	416	100.0
	Percent of Total Businesses:			91.3	5.7		3.0	
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	9	2.9	8	3.0	1	2.8	0	0.0
Moderate-Income	117	37.9	92	33.9	24	66.7	1	50.0
Middle-Income	114	36.9	103	38.0	10	27.8	1	50.0
Upper-Income	69	22.3	68	25.1	1	2.8	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	309	100.0	271	100.0	36	100.0	2	100.0
	Percent of Total Farms:			87.7	11.7		0.6	
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Ventura County, CA								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	8	6.0	7,030	4.5	2,095	29.8	32,573	21.0
Moderate-Income	36	26.9	34,504	22.3	4,175	12.1	25,866	16.7
Middle-Income	46	34.3	54,513	35.2	2,974	5.5	31,360	20.2
Upper-Income	44	32.8	58,968	38.0	1,215	2.1	65,216	42.1
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	134	100.0	155,015	100.0	10,459	6.7	155,015	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	9,683	2,539	1.8	26.2	6,686	69.0	458	4.7
Moderate-Income	50,590	23,483	16.9	46.4	23,112	45.7	3,995	7.9
Middle-Income	77,311	50,501	36.3	65.3	23,314	30.2	3,496	4.5
Upper-Income	77,154	62,663	45.0	81.2	11,465	14.9	3,026	3.9
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	214,738	139,186	100.0	64.8	64,577	30.1	10,975	5.1
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	1,298	4.1	1,122	3.9	142	6.7	34	3.9
Moderate-Income	6,259	19.8	5,545	19.4	494	23.4	220	25.1
Middle-Income	11,409	36.2	10,208	35.8	858	40.6	343	39.2
Upper-Income	12,567	39.9	11,671	40.9	618	29.3	278	31.8
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	31,533	100.0	28,546	100.0	2,112	100.0	875	100.0
	Percent of Total Businesses:			90.5		6.7		2.8
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	47	10.2	30	7.6	16	25.0	1	100.0
Moderate-Income	122	26.5	100	25.3	22	34.4	0	0.0
Middle-Income	172	37.3	154	38.9	18	28.1	0	0.0
Upper-Income	120	26.0	112	28.3	8	12.5	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	461	100.0	396	100.0	64	100.0	1	100.0
	Percent of Total Farms:			85.9		13.9		0.2
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Naples - Collier County, FL								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	6	8.1	4,181	5.2	1,603	38.3	17,150	21.1
Moderate-Income	15	20.3	15,305	18.9	1,780	11.6	14,862	18.3
Middle-Income	28	37.8	35,999	44.4	1,934	5.4	15,449	19.0
Upper-Income	24	32.4	25,650	31.6	1,070	4.2	33,674	41.5
Unknown-Income	1	1.4	0	0.0	0	0.0	0	0.0
Total AA	74	100.0	81,135	100.0	6,387	7.9	81,135	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	8,154	2,191	2.4	26.9	3,532	43.3	2,431	29.8
Moderate-Income	33,145	15,007	16.4	45.3	7,875	23.8	10,263	31.0
Middle-Income	84,139	42,071	46.0	50.0	10,889	12.9	31,179	37.1
Upper-Income	69,091	32,128	35.2	46.5	5,824	8.4	31,139	45.1
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	194,529	91,397	100.0	47.0	28,120	14.5	75,012	38.6
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	657	2.6	590	2.5	34	2.9	33	3.9
Moderate-Income	3,335	13.1	3,123	13.3	102	8.8	110	13.2
Middle-Income	11,017	43.4	10,199	43.6	459	39.7	359	42.9
Upper-Income	10,380	40.9	9,485	40.5	561	48.5	334	40.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	25,389	100.0	23,397	100.0	1,156	100.0	836	100.0
	Percent of Total Businesses:			92.2	4.6			3.3
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	24	12.6	17	9.9	7	41.2	0	0.0
Moderate-Income	26	13.7	21	12.2	5	29.4	0	0.0
Middle-Income	95	50.0	91	52.9	4	23.5	0	0.0
Upper-Income	45	23.7	43	25.0	1	5.9	1	100.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	190	100.0	172	100.0	17	100.0	1	100.0
	Percent of Total Farms:			90.5	8.9			0.5
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Port St. Lucie - Martin County, FL								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	1,856	14.5
Moderate-Income	2	14.3	1,244	9.7	169	13.6	2,456	19.2
Middle-Income	7	50.0	6,704	52.3	373	5.6	2,485	19.4
Upper-Income	5	35.7	4,873	38.0	236	4.8	6,024	47.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	14	100.0	12,821	100.0	778	6.1	12,821	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-Income	3,543	1,115	6.7	31.5	1,696	47.9	732	20.7
Middle-Income	17,096	8,912	53.4	52.1	3,523	20.6	4,661	27.3
Upper-Income	12,250	6,649	39.9	54.3	1,586	12.9	4,015	32.8
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	32,889	16,676	100.0	50.7	6,805	20.7	9,408	28.6
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-Income	1,445	24.6	1,214	22.8	173	46.5	58	29.7
Middle-Income	2,860	48.6	2,622	49.3	136	36.6	102	52.3
Upper-Income	1,577	26.8	1,479	27.8	63	16.9	35	17.9
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,882	100.0	5,315	100.0	372	100.0	195	100.0
	Percent of Total Businesses:			90.4		6.3		3.3
	Total Businesses 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	16.7	3	17.6	0	0.0	0	0.0
Middle-Income	9	50.0	9	52.9	0	0.0	0	0.0
Upper-Income	6	33.3	5	29.4	1	100.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	17	100.0	1	100.0	0	0.0
	Percent of Total Farms:			94.4		5.6		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Sarasota, FL								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	1	2.0	785	1.8	299	38.1	9,209	20.6
Moderate-Income	14	27.5	11,617	26.0	1,865	16.1	8,177	18.3
Middle-Income	21	41.2	20,280	45.4	1,213	6.0	8,644	19.4
Upper-Income	15	29.4	11,983	26.8	503	4.2	18,635	41.7
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	51	100.0	44,665	100.0	3,880	8.7	44,665	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	1,717	583	1.0	34.0	901	52.5	233	13.6
Moderate-Income	27,848	13,514	24.2	48.5	8,815	31.7	5,519	19.8
Middle-Income	40,744	25,336	45.3	62.2	8,758	21.5	6,650	16.3
Upper-Income	35,586	16,504	29.5	46.4	4,224	11.9	14,858	41.8
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	105,895	55,937	100.0	52.8	22,698	21.4	27,260	25.7
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	176	1.0	157	1.0	17	2.0	2	0.4
Moderate-Income	5,046	28.8	4,561	28.2	334	40.1	151	29.5
Middle-Income	7,140	40.7	6,713	41.4	229	27.5	198	38.7
Upper-Income	5,184	29.5	4,771	29.4	253	30.4	160	31.3
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	17,546	100.0	16,202	100.0	833	100.0	511	100.0
	Percent of Total Businesses:			92.3		4.7		2.9
	Total Businesses 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	13	18.3	12	17.4	1	50.0	0	0.0
Middle-Income	32	45.1	31	44.9	1	50.0	0	0.0
Upper-Income	26	36.6	26	37.7	0	0.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	71	100.0	69	100.0	2	100.0	0	0.0
	Percent of Total Farms:			97.2		2.8		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Ann Arbor, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	11	11.0	5,300	6.7	1,305	24.6	17,167	21.7
Moderate-Income	18	18.0	14,231	18.0	2,008	14.1	13,369	16.9
Middle-Income	44	44.0	38,126	48.2	1,769	4.6	16,958	21.4
Upper-Income	23	23.0	21,470	27.1	518	2.4	31,644	40.0
Unknown-Income	4	4.0	11	0.0	0	0.0	0	0.0
Total AA	100	100.0	79,138	100.0	5,600	7.1	79,138	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	14,374	3,367	4.0	23.4	8,993	62.6	2,014	14.0
Moderate-Income	29,394	12,583	14.9	42.8	13,716	46.7	3,095	10.5
Middle-Income	69,696	43,820	51.9	62.9	20,019	28.7	5,857	8.4
Upper-Income	33,589	24,717	29.3	73.6	6,844	20.4	2,028	6.0
Unknown-Income	216	0	0.0	0.0	102	47.2	114	52.8
Total AA	147,269	84,487	100.0	57.4	49,674	33.7	13,108	8.9
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	803	4.7	711	4.6	58	4.6	34	6.0
Moderate-Income	2,078	12.1	1,837	11.9	159	12.7	82	14.4
Middle-Income	8,636	50.1	7,718	50.1	650	52.0	268	46.9
Upper-Income	5,518	32.0	4,987	32.4	366	29.3	165	28.9
Unknown-Income	191	1.1	152	1.0	17	1.4	22	3.9
Total AA	17,226	100.0	15,405	100.0	1,250	100.0	571	100.0
	Percent of Total Businesses:			89.4		7.3		3.3
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	2	0.5	2	0.5	0	0.0	0	0.0
Moderate-Income	4	1.0	4	1.1	0	0.0	0	0.0
Middle-Income	293	76.1	289	76.1	4	80.0	0	0.0
Upper-Income	86	22.3	85	22.4	1	20.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	385	100.0	380	100.0	5	100.0	0	0.0
	Percent of Total Farms:			98.7		1.3		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Battle Creek, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	4	10.3	2,231	6.2	950	42.6	7,528	21.0
Moderate-Income	11	28.2	8,557	23.9	1,780	20.8	6,475	18.1
Middle-Income	15	38.5	13,975	39.0	1,308	9.4	7,362	20.5
Upper-Income	9	23.1	11,096	30.9	403	3.6	14,494	40.4
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39	100.0	35,859	100.0	4,441	12.4	35,859	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	4,442	1,908	4.9	43.0	1,766	39.8	768	17.3
Moderate-Income	16,141	8,720	22.4	54.0	5,161	32.0	2,260	14.0
Middle-Income	24,036	15,138	38.9	63.0	6,033	25.1	2,865	11.9
Upper-Income	16,483	13,125	33.7	79.6	2,074	12.6	1,284	7.8
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	61,102	38,891	100.0	63.6	15,034	24.6	7,177	11.7
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	437	8.0	364	7.4	51	13.1	22	11.6
Moderate-Income	1,274	23.3	1,076	22.0	142	36.6	56	29.6
Middle-Income	2,091	38.2	1,923	39.3	102	26.3	66	34.9
Upper-Income	1,666	30.5	1,528	31.2	93	24.0	45	23.8
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,468	100.0	4,891	100.0	388	100.0	189	100.0
	Percent of Total Businesses:			89.4	7.1		3.5	
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-Income	25	8.1	25	8.2	0	0.0	0	0.0
Middle-Income	192	62.1	188	61.8	4	80.0	0	0.0
Upper-Income	91	29.4	90	29.6	1	20.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	309	100.0	304	100.0	5	100.0	0	0.0
	Percent of Total Farms:			98.4	1.6		0.0	
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Flint, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	1,237	9.1
Moderate-Income	0	0.0	0	0.0	0	0.0	1,846	13.6
Middle-Income	5	38.5	5,028	37.2	363	7.2	3,026	22.4
Upper-Income	8	61.5	8,503	62.8	358	4.2	7,422	54.9
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	13	100.0	13,531	100.0	721	5.3	13,531	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-Income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-Income	8,125	5,591	34.8	68.8	1,830	22.5	704	8.7
Upper-Income	13,550	10,466	65.2	77.2	1,868	13.8	1,216	9.0
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	21,675	16,057	100.0	74.1	3,698	17.1	1,920	8.9
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-Income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-Income	941	42.0	853	41.5	64	50.4	24	42.1
Upper-Income	1,300	58.0	1,204	58.5	63	49.6	33	57.9
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,241	100.0	2,057	100.0	127	100.0	57	100.0
	Percent of Total Businesses:			91.8		5.7		2.5
	Total Businesses 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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-Income	31	56.4	31	56.4	0	0.0	0	0.0
Upper-Income	24	43.6	24	43.6	0	0.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	55	100.0	55	100.0	0	0.0	0	0.0
	Percent of Total Farms:			100.0		0.0		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Jackson, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	7	18.4	3,595	8.7	1,179	32.8	8,584	20.7
Moderate-Income	5	13.2	4,507	10.9	815	18.1	7,592	18.3
Middle-Income	16	42.1	22,242	53.6	2,058	9.3	8,846	21.3
Upper-Income	9	23.7	11,164	26.9	525	4.7	16,486	39.7
Unknown-Income	1	2.6	0	0.0	0	0.0	0	0.0
Total AA	38	100.0	41,508	100.0	4,577	11.0	41,508	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	7,776	2,933	6.4	37.7	3,740	48.1	1,103	14.2
Moderate-Income	8,910	4,625	10.0	51.9	2,930	32.9	1,355	15.2
Middle-Income	35,507	25,197	54.7	71.0	6,044	17.0	4,266	12.0
Upper-Income	16,903	13,294	28.9	78.6	1,849	10.9	1,760	10.4
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	69,096	46,049	100.0	66.6	14,563	21.1	8,484	12.3
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	888	14.3	723	13.1	140	27.2	25	13.1
Moderate-Income	851	13.7	705	12.8	116	22.6	30	15.7
Middle-Income	2,900	46.5	2,623	47.5	184	35.8	93	48.7
Upper-Income	1,588	25.5	1,473	26.7	73	14.2	42	22.0
Unknown-Income	3	0.0	1	0.0	1	0.2	1	0.5
Total AA	6,230	100.0	5,525	100.0	514	100.0	191	100.0
	Percent of Total Businesses:			88.7	8.3		3.1	
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	3	1.0	3	1.0	0	0.0	0	0.0
Moderate-Income	2	0.7	2	0.7	0	0.0	0	0.0
Middle-Income	170	58.6	167	58.2	3	100.0	0	0.0
Upper-Income	115	39.7	115	40.1	0	0.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	290	100.0	287	100.0	3	100.0	0	0.0
	Percent of Total Farms:			99.0	1.0		0.0	
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Kalamazoo, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	7	12.3	4,086	6.8	1,657	40.6	12,955	21.6
Moderate-Income	11	19.3	6,928	11.5	1,266	18.3	9,592	16.0
Middle-Income	26	45.6	30,486	50.8	2,861	9.4	12,121	20.2
Upper-Income	13	22.8	18,486	30.8	945	5.1	25,318	42.2
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	57	100.0	59,986	100.0	6,729	11.2	59,986	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	9,471	3,192	4.9	33.7	4,941	52.2	1,338	14.1
Moderate-Income	18,534	6,684	10.3	36.1	9,551	51.5	2,299	12.4
Middle-Income	53,979	33,561	51.8	62.2	15,913	29.5	4,505	8.3
Upper-Income	27,249	21,375	33.0	78.4	4,239	15.6	1,635	6.0
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	109,233	64,812	100.0	59.3	34,644	31.7	9,777	9.0
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	760	7.0	639	6.6	99	11.1	22	6.8
Moderate-Income	1,934	17.8	1,643	17.0	221	24.8	70	21.7
Middle-Income	5,261	48.5	4,662	48.4	444	49.8	155	48.1
Upper-Income	2,895	26.7	2,693	27.9	127	14.3	75	23.3
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10,850	100.0	9,637	100.0	891	100.0	322	100.0
	Percent of Total Businesses:			88.8		8.2		3.0
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	1	0.4	1	0.4	0	0.0	0	0.0
Moderate-Income	25	9.6	19	7.8	6	40.0	0	0.0
Middle-Income	160	61.5	153	62.4	7	46.7	0	0.0
Upper-Income	74	28.5	72	29.4	2	13.3	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	260	100.0	245	100.0	15	100.0	0	0.0
	Percent of Total Farms:			94.2		5.8		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Lansing, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	8	7.8	5,794	7.0	1,782	30.8	18,012	21.8
Moderate-Income	25	24.5	15,626	18.9	3,176	20.3	14,138	17.1
Middle-Income	33	32.4	33,044	40.0	2,817	8.5	16,822	20.4
Upper-Income	26	25.5	28,197	34.1	1,200	4.3	33,689	40.8
Unknown-Income	10	9.8	0	0.0	0	0.0	0	0.0
Total AA	102	100.0	82,661	100.0	8,975	10.9	82,661	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	11,204	4,384	4.9	39.1	5,360	47.8	1,460	13.0
Moderate-Income	36,724	15,319	17.2	41.7	16,044	43.7	5,361	14.6
Middle-Income	61,704	37,453	42.1	60.7	19,344	31.3	4,907	8.0
Upper-Income	43,916	31,776	35.7	72.4	9,496	21.6	2,644	6.0
Unknown-Income	1,223	31	0.0	0.0	904	73.9	288	23.5
Total AA	154,771	88,963	100.0	57.5	51,148	33.0	14,660	9.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	772	5.0	687	5.0	70	6.0	15	2.8
Moderate-Income	3,907	25.4	3,329	24.4	393	33.6	185	33.9
Middle-Income	5,264	34.2	4,762	34.9	339	28.9	163	29.9
Upper-Income	5,171	33.6	4,668	34.2	338	28.9	165	30.3
Unknown-Income	265	1.7	217	1.6	31	2.6	17	3.1
Total AA	15,379	100.0	13,663	100.0	1,171	100.0	545	100.0
	Percent of Total Businesses:			88.8		7.6		3.5
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	4	1.5	4	1.5	0	0.0	0	0.0
Moderate-Income	17	6.2	17	6.3	0	0.0	0	0.0
Middle-Income	120	44.0	120	44.1	0	0.0	0	0.0
Upper-Income	129	47.3	129	47.4	0	0.0	0	0.0
Unknown-Income	3	1.1	2	0.7	1	100.0	0	0.0
Total AA	273	100.0	272	100.0	1	100.0	0	0.0
	Percent of Total Farms:			99.6		0.4		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Appendix E

Midland, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	1	5.3	668	2.9	58	8.7	4,771	20.7
Moderate-Income	3	15.8	2,892	12.5	344	11.9	4,076	17.7
Middle-Income	10	52.6	10,364	44.9	931	9.0	4,604	20.0
Upper-Income	5	26.3	9,138	39.6	416	4.6	9,611	41.7
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	19	100.0	23,062	100.0	1,749	7.6	23,062	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	1,154	513	2.0	44.5	525	45.5	116	10.1
Moderate-Income	5,886	3,218	12.5	54.7	2,221	37.7	447	7.6
Middle-Income	15,649	11,891	46.3	76.0	2,540	16.2	1,218	7.8
Upper-Income	13,176	10,088	39.2	76.6	2,566	19.5	522	4.0
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,865	25,710	100.0	71.7	7,852	21.9	2,303	6.4
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	199	5.5	142	4.4	50	21.8	7	6.0
Moderate-Income	636	17.7	571	17.6	44	19.2	21	18.1
Middle-Income	1,385	38.6	1,267	39.1	71	31.0	47	40.5
Upper-Income	1,367	38.1	1,262	38.9	64	27.9	41	35.3
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,587	100.0	3,242	100.0	229	100.0	116	100.0
	Percent of Total Businesses:			90.4		6.4		3.2
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	1	0.7	1	0.7	0	0.0	0	0.0
Moderate-Income	25	18.1	25	18.4	0	0.0	0	0.0
Middle-Income	87	63.0	85	62.5	2	100.0	0	0.0
Upper-Income	25	18.1	25	18.4	0	0.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	138	100.0	136	100.0	2	100.0	0	0.0
	Percent of Total Farms:			98.6		1.4		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Muskegon, MI								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	3	7.0	1,303	2.9	746	57.3	9,587	21.1
Moderate-Income	11	25.6	9,575	21.1	2,572	26.9	8,110	17.9
Middle-Income	19	44.2	21,632	47.7	2,251	10.4	9,638	21.2
Upper-Income	9	20.9	12,856	28.3	674	5.2	18,031	39.7
Unknown-Income	1	2.3	0	0.0	0	0.0	0	0.0
Total AA	43	100.0	45,366	100.0	6,243	13.8	45,366	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	2,189	806	1.6	36.8	1,032	47.1	351	16.0
Moderate-Income	19,219	8,501	17.1	44.2	8,120	42.2	2,598	13.5
Middle-Income	33,685	25,525	51.3	75.8	4,730	14.0	3,430	10.2
Upper-Income	18,434	14,966	30.1	81.2	2,098	11.4	1,370	7.4
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	73,527	49,798	100.0	67.7	15,980	21.7	7,749	10.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	320	5.0	239	4.2	72	14.7	9	4.4
Moderate-Income	1,367	21.4	1,151	20.3	152	31.0	64	31.2
Middle-Income	2,843	44.6	2,591	45.6	173	35.3	79	38.5
Upper-Income	1,844	28.9	1,698	29.9	93	19.0	53	25.9
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,374	100.0	5,679	100.0	490	100.0	205	100.0
	Percent of Total Businesses:			89.1	7.7		3.2	
	Total Businesses 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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-Income	137	81.1	134	81.2	3	75.0	0	0.0
Upper-Income	32	18.9	31	18.8	1	25.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	169	100.0	165	100.0	4	100.0	0	0.0
	Percent of Total Farms:			97.6	2.4		0.0	
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

Austin, TX								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	35	12.3	33,201	10.9	10,880	32.8	66,582	21.8
Moderate-Income	67	23.5	60,951	19.9	8,869	14.6	51,873	17.0
Middle-Income	90	31.6	95,909	31.4	5,398	5.6	58,906	19.3
Upper-Income	90	31.6	115,576	37.8	3,411	3.0	128,276	42.0
Unknown-Income	3	1.1	0	0.0	0	0.0	0	0.0
Total AA	285	100.0	305,637	100.0	28,558	9.3	305,637	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	68,485	15,543	5.5	22.7	44,286	64.7	8,656	12.6
Moderate-Income	122,336	48,429	17.2	39.6	62,832	51.4	11,075	9.1
Middle-Income	173,386	92,621	32.9	53.4	69,272	40.0	11,493	6.6
Upper-Income	183,536	124,664	44.3	67.9	46,007	25.1	12,865	7.0
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	547,743	281,257	100.0	51.3	222,397	40.6	44,089	8.0
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	5,711	6.9	4,961	6.6	490	10.3	260	8.3
Moderate-Income	14,074	17.0	12,419	16.6	1,021	21.5	634	20.2
Middle-Income	22,746	27.6	20,680	27.7	1,200	25.3	866	27.6
Upper-Income	39,977	48.4	36,576	49.0	2,027	42.7	1,374	43.8
Unknown-Income	53	0.1	45	0.1	4	0.1	4	0.1
Total AA	82,561	100.0	74,681	100.0	4,742	100.0	3,138	100.0
	Percent of Total Businesses:			90.5		5.7		3.8
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-Income	22	2.7	20	2.4	2	25.0	0	0.0
Moderate-Income	141	17.0	140	17.1	1	12.5	0	0.0
Middle-Income	229	27.6	226	27.5	3	37.5	0	0.0
Upper-Income	438	52.8	435	53.0	2	25.0	1	100.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	830	100.0	821	100.0	8	100.0	1	100.0
	Percent of Total Farms:			98.9		1.0		0.1
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix E

San Antonio, TX								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	36	9.7	28,260	7.0	10,543	37.3	95,848	23.7
Moderate-Income	115	30.9	118,686	29.4	24,922	21.0	69,486	17.2
Middle-Income	108	29.0	125,902	31.2	11,997	9.5	77,302	19.2
Upper-Income	109	29.3	130,769	32.4	5,113	3.9	160,981	39.9
Unknown-Income	4	1.1	0	0.0	0	0.0	0	0.0
Total AA	372	100.0	403,617	100.0	52,575	13.0	403,617	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	47,868	19,272	5.2	40.3	22,448	46.9	6,148	12.8
Moderate-Income	201,352	96,350	25.9	47.9	81,313	40.4	23,689	11.8
Middle-Income	209,277	120,029	32.3	57.4	69,399	33.2	19,849	9.5
Upper-Income	197,865	136,120	36.6	68.8	47,348	23.9	14,397	7.3
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	656,362	371,771	100.0	56.6	220,508	33.6	64,083	9.8
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	4,219	5.7	3,589	5.4	426	9.6	204	7.1
Moderate-Income	17,185	23.3	15,214	22.9	1,195	27.0	776	27.0
Middle-Income	22,566	30.5	20,235	30.4	1,425	32.2	906	31.5
Upper-Income	29,712	40.2	27,377	41.1	1,352	30.5	983	34.2
Unknown-Income	200	0.3	166	0.2	29	0.7	5	0.2
Total AA	73,882	100.0	66,581	100.0	4,427	100.0	2,874	100.0
	Percent of Total Businesses:			90.1		6.0		3.9
	Total Businesses by Tract		Farms By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	23	2.6	21	2.4	2	20.0	0	0.0
Moderate-Income	110	12.3	109	12.4	1	10.0	0	0.0
Middle-Income	294	32.9	291	33.0	3	30.0	0	0.0
Upper-Income	466	52.2	461	52.3	4	40.0	1	100.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	893	100.0	882	100.0	10	100.0	1	100.0
	Percent of Total Farms:			98.8		1.1		0.1
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix F

Appendix F – NonMetropolitan Limited Scope Assessment Areas Demographics

Gladwin County, MI (NonMSA)								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	1,802	22.8
Moderate-Income	3	33.3	2,467	31.2	474	19.2	1,734	21.9
Middle-Income	6	66.7	5,440	68.8	643	11.8	1,795	22.7
Upper-Income	0	0.0	0	0.0	0	0.0	2,576	32.6
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	7,907	100.0	1,117	14.1	7,907	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-Income	5,555	3,013	31.2	54.2	818	14.7	1,724	31.0
Middle-Income	12,270	6,656	68.8	54.2	834	6.8	4,780	39.0
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 AA	17,825	9,669	100.0	54.2	1,652	9.3	6,504	36.5
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-Income	475	33.1	428	32.5	32	50.0	15	26.3
Middle-Income	786	54.7	726	55.2	28	43.8	32	56.1
Upper-Income	175	12.2	161	12.2	4	6.3	10	17.5
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,436	100.0	1,315	100.0	64	100.0	57	100.0
	Percent of Total Businesses:			91.6		4.5		4.0
	Total Businesses 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	19	28.8	18	27.7	1	100.0	0	0.0
Middle-Income	47	71.2	47	72.3	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 AA	66	100.0	65	100.0	1	100.0	0	0.0
	Percent of Total Farms:			98.5		1.5		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Appendix F

Lenawee County, MI (NonMSA)								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	614	9.5
Moderate-Income	0	0.0	0	0.0	0	0.0	939	14.5
Middle-Income	2	40.0	1,994	30.8	112	5.6	1,286	19.9
Upper-Income	3	60.0	4,475	69.2	174	3.9	3,630	56.1
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	6,469	100.0	286	4.4	6,469	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-Income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-Income	4,023	2,525	32.4	62.8	687	17.1	811	20.2
Upper-Income	6,614	5,275	67.6	79.8	721	10.9	618	9.3
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	10,637	7,800	100.0	73.3	1,408	13.2	1,429	13.4
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-Income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-Income	385	38.9	350	38.4	24	52.2	11	34.4
Upper-Income	604	61.1	561	61.6	22	47.8	21	65.6
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	989	100.0	911	100.0	46	100.0	32	100.0
	Percent of Total Businesses:			92.1	4.7		3.2	
	Total Businesses 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	0	0.0	0	0.0	0	0.0	0	0.0
Middle-Income	9	17.0	9	17.3	0	0.0	0	0.0
Upper-Income	44	83.0	43	82.7	1	100.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	53	100.0	52	100.0	1	100.0	0	0.0
	Percent of Total Farms:			98.1	1.9		0.0	
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix F

Kerr County, TX (NonMSA)								
2014 Assessment Area Demographics								
Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	2,454	17.2
Moderate-Income	1	10.0	592	4.2	95	16.0	2,561	18.0
Middle-Income	6	60.0	9,981	70.1	1,219	12.2	2,738	19.2
Upper-Income	3	30.0	3,662	25.7	166	4.5	6,482	45.5
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	14,235	100.0	1,480	10.4	14,235	100.0
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low-Income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-Income	855	392	2.6	45.8	367	42.9	96	11.2
Middle-Income	16,648	10,258	68.7	61.6	4,224	25.4	2,166	13.0
Upper-Income	5,804	4,284	28.7	73.8	760	13.1	760	13.1
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	23,307	14,934	100.0	64.1	5,351	23.0	3,022	13.0
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-Income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-Income	53	1.6	47	1.5	5	3.7	1	1.1
Middle-Income	2,567	77.6	2,375	77.1	112	83.0	80	86.0
Upper-Income	687	20.8	657	21.3	18	13.3	12	12.9
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,307	100.0	3,079	100.0	135	100.0	93	100.0
	Percent of Total Businesses:			93.1		4.1		2.8
	Total Businesses 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	1	0.7	1	0.7	0	0.0	0	0.0
Middle-Income	100	70.4	100	70.9	0	0.0	0	0.0
Upper-Income	41	28.9	40	28.4	1	100.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	142	100.0	141	100.0	1	100.0	0	0.0
	Percent of Total Farms:			99.3		0.7		0.0
Based on 2014 Dun & Bradstreet information according to 2010 ACS.								

Based on 2014 Dun & Bradstreet information according to 2010 ACS.

Appendix G – Metropolitan Full Scope Assessment Areas Loan Tables

The assessment area loan tables appear in the following order:

1. Geographic distribution of Small Business and Small Farm Loans for the bank and aggregate
2. Borrower Profile of Small Business and Small Farm Loans for the bank and aggregate
3. Geographic Distribution of HMDA Loans for the bank and aggregate
4. Borrower Profile of HMDA Loans for the bank and aggregate
5. HELOC Loan Tables

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank		Dollar		Small Businesses	Count		Dollar			Agg	Count		Agg	Dollar		Agg
		#	%	\$ (000s)	\$ %		#	%	%	\$ 000s	\$ %		%	#		%	%	
SMALL BUSINESSES	Low	290	14.8%	\$67,154	14.9%	7.5%	134	16.0%	7.3%	\$33,067	17.0%	10.2%	156	13.9%	7.6%	\$34,087	13.3%	9.6%
	Moderate	454	23.2%	\$103,818	23.0%	19.7%	187	22.3%	18.1%	\$44,934	23.1%	21.5%	267	23.8%	18.0%	\$58,884	22.9%	21.4%
	Middle	496	25.3%	\$112,867	25.0%	28.4%	215	25.7%	25.0%	\$47,973	24.7%	23.3%	281	25.1%	24.6%	\$64,894	25.3%	23.5%
	Upper	711	36.3%	\$164,150	36.4%	44.3%	299	35.7%	47.1%	\$66,758	34.4%	43.8%	412	36.8%	48.3%	\$97,392	37.9%	44.5%
	Unknown	8	0.4%	\$2,980	0.7%	0.2%	3	0.4%	0.1%	\$1,400	0.7%	0.2%	5	0.4%	0.2%	\$1,580	0.6%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.4%	\$0	0.0%	1.1%	0	0.0%	1.3%	\$0	0.0%	0.7%
	Total	1,959	100.0%	\$450,969	100.0%	100.0%	838	100.0%	100.0%	\$194,132	100.0%	100.0%	1,121	100.0%	100.0%	\$256,837	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	3.4%	\$0	0.0%	8.5%	0	0.0%	2.1%	\$0	0.0%	3.0%
	Moderate	3	100.0%	\$534	100.0%	13.0%	3	100.0%	11.0%	\$534	100.0%	14.5%	0	0.0%	13.9%	\$0	0.0%	11.9%
	Middle	0	0.0%	\$0	0.0%	32.7%	0	0.0%	28.1%	\$0	0.0%	28.2%	0	0.0%	30.0%	\$0	0.0%	29.6%
	Upper	0	0.0%	\$0	0.0%	51.2%	0	0.0%	55.5%	\$0	0.0%	47.7%	0	0.0%	52.7%	\$0	0.0%	54.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	1.2%	0	0.0%	1.2%	\$0	0.0%	0.8%
Total	3	100.0%	\$534	100.0%	100.0%	3	100.0%	100.0%	\$534	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Small		Businesses	Count		Agg	Dollar		Agg
Count	Dollar	Dollar	%	Bank	%		Bank	%				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	161	14.9%	\$34,124	13.5%	7.2%	161	14.9%	7.6%	\$34,124	13.5%	9.3%
	Moderate	251	23.2%	\$61,244	24.3%	19.3%	251	23.2%	18.1%	\$61,244	24.3%	20.8%
	Middle	248	22.9%	\$55,040	21.8%	27.8%	248	22.9%	25.0%	\$55,040	21.8%	24.8%
	Upper	413	38.2%	\$99,406	39.4%	45.6%	413	38.2%	48.0%	\$99,406	39.4%	44.1%
	Unknown	9	0.8%	\$2,600	1.0%	0.1%	9	0.8%	0.2%	\$2,600	1.0%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	0.7%
	Total	1,082	100.0%	\$252,414	100.0%	100.0%	1,082	100.0%	100.0%	\$252,414	100.0%	100.0%
SMALL FARM	Low	1	100.0%	\$350	100.0%	3.1%	1	100.0%	3.0%	\$350	100.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	13.5%	\$0	0.0%	18.7%
	Middle	0	0.0%	\$0	0.0%	31.4%	0	0.0%	26.6%	\$0	0.0%	28.1%
	Upper	0	0.0%	\$0	0.0%	53.4%	0	0.0%	54.8%	\$0	0.0%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	0.9%
	Total	1	100.0%	\$350	100.0%	100.0%	1	100.0%	100.0%	\$350	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX - Dallas-Fort Worth Metroplex

Product Type		Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison												
							2012						2013						
		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	483	24.7%	\$70,898	15.7%	90.7%	188	22.4%	42.1%	\$26,173	13.5%	35.6%	295	26.3%	48.3%	\$44,725	17.4%	36.4%
		Over \$1 Million	971	49.6%	\$297,587	66.0%	5.7%	390	46.5%				581	51.8%					
		Total Rev. available	1,454	74.3%	\$368,485	81.7%	96.4%	578	68.9%				876	78.1%					
		Rev. Not Known	505	25.8%	\$82,484	18.3%	3.6%	260	31.0%				245	21.9%					
		Total	1,959	100.0%	\$450,969	100.0%	100.0%	838	100.0%				1,121	100.0%					
	Loan Size	\$100,000 or Less	966	49.3%	\$55,573	12.3%		414	49.4%	94.2%	\$24,434	12.6%	34.4%	552	49.2%	93.0%	\$31,139	12.1%	32.8%
		\$100,001 - \$250,000	424	21.6%	\$81,104	18.0%		184	22.0%	2.6%	\$35,814	18.4%	13.7%	240	21.4%	3.2%	\$45,290	17.6%	14.1%
		\$250,001 - \$1 Million	569	29.0%	\$314,292	69.7%		240	28.6%	3.2%	\$133,884	69.0%	51.9%	329	29.3%	3.9%	\$180,408	70.2%	53.1%
		Total	1,959	100.0%	\$450,969	100.0%		838	100.0%	100.0%	\$194,132	100.0%	100.0%	1,121	100.0%	100.0%	\$256,837	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	342	70.8%	\$18,932	26.7%													
		\$100,001 - \$250,000	64	13.3%	\$11,579	16.3%													
		\$250,001 - \$1 Million	77	15.9%	\$40,387	57.0%													
		Total	483	100.0%	\$70,898	100.0%													
	Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms	0	0.0%	47.6%	\$0	0.0%	51.8%	0	0.0%	53.0%	\$0	0.0%
Over \$1 Million			3	100.0%	\$534	100.0%	1.3%	3	100.0%				0	0.0%					
Total Rev. available			3	100.0%	\$534	100.0%	99.7%	3	100.0%				0	0.0%					
Not Known			0	0.0%	\$0	0.0%	0.3%	0	0.0%				0	0.0%					
Total			3	100.0%	\$534	100.0%	100.0%	3	100.0%				0	0.0%					
Loan Size		\$100,000 or Less	1	33.3%	\$34	6.4%		1	33.3%	91.1%	\$34	6.4%	42.5%	0	0.0%	85.8%	\$0	0.0%	36.0%
		\$100,001 - \$250,000	2	66.7%	\$500	93.6%		2	66.7%	4.1%	\$500	93.6%	15.0%	0	0.0%	7.9%	\$0	0.0%	22.6%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	42.5%	0	0.0%	6.4%	\$0	0.0%	41.4%
		Total	3	100.0%	\$534	100.0%		3	100.0%	100.0%	\$534	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2013 FFIEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX - Dallas-Fort Worth Metroplex

Product Type				Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison					
				2014						2014					
				Bank				Total Businesses	Count			Dollar			
				Count		Dollar			Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s					\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	256	23.7%	\$34,800	13.8%	90.3%	256	23.7%	46.4%	\$34,800	13.8%	34.7%		
		Over \$1 Million	560	51.8%	\$170,777	67.7%	6.2%	560	51.8%						
		Total Rev. available	816	75.5%	\$205,577	81.5%	96.5%	816	75.5%						
		Rev. Not Known	266	24.6%	\$46,837	18.6%	3.6%	266	24.6%						
		Total	1,082	100.0%	\$252,414	100.0%	100.0%	1,082	100.0%						
	Loan Size	\$100,000 or Less	534	49.4%	\$30,109	11.9%		534	49.4%	93.5%	\$30,109	11.9%	35.7%		
		\$100,001 - \$250,000	236	21.8%	\$46,341	18.4%		236	21.8%	3.2%	\$46,341	18.4%	14.9%		
		\$250,001 - \$1 Million	312	28.8%	\$175,964	69.7%		312	28.8%	3.3%	\$175,964	69.7%	49.4%		
		Total	1,082	100.0%	\$252,414	100.0%		1,082	100.0%	100.0%	\$252,414	100.0%	100.0%		
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	184	71.9%	\$10,138	29.1%									
		\$100,001 - \$250,000	39	15.2%	\$7,818	22.5%									
		\$250,001 - \$1 Million	33	12.9%	\$16,844	48.4%									
		Total	256	100.0%	\$34,800	100.0%									
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.1%	0	0.0%	51.5%	\$0	0.0%	53.5%		
		Over \$1 Million	1	100.0%	\$350	100.0%	1.7%	1	100.0%						
		Total Rev. available	1	100.0%	\$350	100.0%	99.8%	1	100.0%						
		Not Known	0	0.0%	\$0	0.0%	0.3%	0	0.0%						
		Total	1	100.0%	\$350	100.0%	100.0%	1	100.0%						
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	91.3%	\$0	0.0%	47.1%		
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.0%	\$0	0.0%	26.3%		
		\$250,001 - \$500,000	1	100.0%	\$350	100.0%		1	100.0%	2.7%	\$350	100.0%	26.6%		
		Total	1	100.0%	\$350	100.0%		1	100.0%	100.0%	\$350	100.0%	100.0%		
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	0	0.0%	\$0	0.0%									
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%									
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%									
		Total	0	0.0%	\$0	0.0%									

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Bank		Owner Occupied Units			Count		Dollar			Count		Dollar		
		Count	Dollar		%		Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	4	3.5%	\$459	0.9%	5.2%	3	5.5%	\$419	1.7%	1.0%	1	1.7%	\$40	0.2%	1.1%
	Moderate	13	11.5%	\$2,311	4.7%	19.9%	5	9.1%	\$1,209	5.0%	6.3%	8	13.8%	\$1,102	4.4%	6.6%
	Middle	23	20.4%	\$3,527	7.2%	30.5%	13	23.6%	\$2,072	8.6%	21.8%	10	17.2%	\$1,455	5.8%	22.0%
	Upper	73	64.6%	\$42,786	87.2%	44.4%	34	61.8%	\$20,330	84.6%	70.9%	39	67.2%	\$22,456	89.6%	70.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	113	100.0%	\$49,083	100.0%	100.0%	55	100.0%	\$24,030	100.0%	100.0%	58	100.0%	\$25,053	100.0%	100.0%
REFINANCE	Low	3	1.0%	\$258	0.3%	5.2%	1	0.6%	\$93	0.2%	0.7%	2	1.6%	\$165	0.4%	1.4%
	Moderate	33	11.0%	\$3,805	4.0%	19.9%	13	7.6%	\$1,705	3.2%	4.2%	20	15.6%	\$2,100	5.2%	8.1%
	Middle	46	15.3%	\$7,980	8.5%	30.5%	25	14.5%	\$3,180	5.9%	17.0%	21	16.4%	\$4,800	11.9%	28.9%
	Upper	218	72.7%	\$81,915	87.2%	44.4%	133	77.3%	\$48,780	90.7%	78.1%	85	66.4%	\$33,135	82.4%	61.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	300	100.0%	\$93,958	100.0%	100.0%	172	100.0%	\$53,758	100.0%	100.0%	128	100.0%	\$40,200	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	19.9%	0	0.0%	\$0	0.0%	4.5%	0	0.0%	\$0	0.0%	6.3%
	Middle	2	28.6%	\$150	11.2%	30.5%	0	0.0%	\$0	0.0%	18.9%	2	50.0%	\$150	38.9%	17.9%
	Upper	5	71.4%	\$1,189	88.8%	44.4%	3	100.0%	\$953	100.0%	75.6%	2	50.0%	\$236	61.1%	74.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$1,339	100.0%	100.0%	3	100.0%	\$953	100.0%	100.0%	4	100.0%	\$386	100.0%	100.0%
MULTI FAMILY	Multi-Family Units															
	Low	1	25.0%	\$2,085	20.5%	20.4%	1	100.0%	\$2,085	100.0%	17.0%	0	0.0%	\$0	0.0%	11.2%
	Moderate	1	25.0%	\$2,700	26.6%	29.6%	0	0.0%	\$0	0.0%	20.3%	1	33.3%	\$2,700	33.5%	24.4%
	Middle	1	25.0%	\$1,669	16.4%	30.5%	0	0.0%	\$0	0.0%	31.6%	1	33.3%	\$1,669	20.7%	41.0%
	Upper	1	25.0%	\$3,700	36.4%	19.6%	0	0.0%	\$0	0.0%	31.1%	1	33.3%	\$3,700	45.9%	23.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$10,154	100.0%	100.0%	1	100.0%	\$2,085	100.0%	100.0%	3	100.0%	\$8,069	100.0%	100.0%
HMDA TOTALS	Low	8	1.9%	\$2,802	1.8%	5.2%	5	2.2%	\$2,597	3.2%	1.5%	3	1.6%	\$205	0.3%	1.8%
	Moderate	47	11.1%	\$8,816	5.7%	19.9%	18	7.8%	\$2,914	3.6%	5.7%	29	15.0%	\$5,902	8.0%	8.2%
	Middle	72	17.0%	\$13,326	8.6%	30.5%	38	16.5%	\$5,252	6.5%	19.6%	34	17.6%	\$8,074	11.0%	26.3%
	Upper	297	70.0%	\$129,590	83.9%	44.4%	170	73.6%	\$70,063	86.7%	73.2%	127	65.8%	\$59,527	80.8%	63.7%
	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%
	Total	424	100.0%	\$154,534	100.0%	100.0%	231	100.0%	\$80,826	100.0%	100.0%	193	100.0%	\$73,708	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Agg	Dollar		
		Count		Dollar			Bank			Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	1.6%	\$91	0.4%	5.1%	1	1.6%	2.0%	\$91	0.4%	1.2%
	Moderate	7	11.1%	\$970	4.3%	19.8%	7	11.1%	10.8%	\$970	4.3%	6.6%
	Middle	12	19.0%	\$1,790	8.0%	30.3%	12	19.0%	29.6%	\$1,790	8.0%	22.6%
	Upper	43	68.3%	\$19,475	87.2%	44.7%	43	68.3%	57.6%	\$19,475	87.2%	69.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	63	100.0%	\$22,326	100.0%	100.0%	63	100.0%	100.0%	\$22,326	100.0%	100.0%
REFINANCE	Low	3	5.1%	\$237	1.5%	5.1%	3	5.1%	2.0%	\$237	1.5%	1.2%
	Moderate	12	20.3%	\$942	5.9%	19.8%	12	20.3%	11.8%	\$942	5.9%	6.9%
	Middle	13	22.0%	\$1,269	8.0%	30.3%	13	22.0%	28.6%	\$1,269	8.0%	20.9%
	Upper	31	52.5%	\$13,397	84.6%	44.7%	31	52.5%	57.6%	\$13,397	84.6%	71.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	59	100.0%	\$15,845	100.0%	100.0%	59	100.0%	100.0%	\$15,845	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	2.5%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	12.0%	\$0	0.0%	6.5%
	Middle	1	50.0%	\$5	0.9%	30.3%	1	50.0%	23.8%	\$5	0.9%	18.2%
	Upper	1	50.0%	\$530	99.1%	44.7%	1	50.0%	61.7%	\$530	99.1%	74.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$535	100.0%	100.0%	2	100.0%	100.0%	\$535	100.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	22.6%	\$0	0.0%	12.2%
	Moderate	0	0.0%	\$0	0.0%	29.7%	0	0.0%	33.9%	\$0	0.0%	21.1%
	Middle	0	0.0%	\$0	0.0%	30.3%	0	0.0%	25.2%	\$0	0.0%	34.9%
	Upper	0	0.0%	\$0	0.0%	19.9%	0	0.0%	18.3%	\$0	0.0%	31.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	3.2%	\$328	0.8%	5.1%	4	3.2%	2.1%	\$328	0.8%	2.2%
	Moderate	19	15.3%	\$1,912	4.9%	19.8%	19	15.3%	11.2%	\$1,912	4.9%	8.0%
	Middle	26	21.0%	\$3,064	7.9%	30.3%	26	21.0%	29.1%	\$3,064	7.9%	23.3%
	Upper	75	60.5%	\$33,402	86.3%	44.7%	75	60.5%	57.7%	\$33,402	86.3%	66.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	124	100.0%	\$38,706	100.0%	100.0%	124	100.0%	100.0%	\$38,706	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	6	5.3%	\$2,340	4.8%	23.0%	3	5.5%	7.0%	\$2,112	8.8%	3.3%	3	5.2%	4.7%	\$228	0.9%	2.0%
	Moderate	16	14.2%	\$2,391	4.9%	16.8%	10	18.2%	17.4%	\$1,683	7.0%	11.5%	6	10.3%	15.1%	\$708	2.8%	9.4%
	Middle	16	14.2%	\$2,280	4.6%	18.4%	5	9.1%	19.6%	\$638	2.7%	17.0%	11	19.0%	18.5%	\$1,642	6.6%	15.1%
	Upper	67	59.3%	\$39,566	80.6%	41.8%	32	58.2%	43.4%	\$19,217	80.0%	58.0%	35	60.3%	48.5%	\$20,349	81.2%	62.6%
	Unknown	8	7.1%	\$2,506	5.1%	0.0%	5	9.1%	12.7%	\$380	1.6%	10.1%	3	5.2%	13.3%	\$2,126	8.5%	10.8%
	Total	113	100.0%	\$49,083	100.0%	100.0%	55	100.0%	100.0%	\$24,030	100.0%	100.0%	58	100.0%	100.0%	\$25,053	100.0%	100.0%
REFINANCE	Low	19	6.3%	\$1,521	1.6%	23.0%	9	5.2%	3.2%	\$758	1.4%	1.6%	10	7.8%	3.7%	\$763	1.9%	1.4%
	Moderate	27	9.0%	\$2,919	3.1%	16.8%	14	8.1%	8.9%	\$1,841	3.4%	5.2%	13	10.2%	9.5%	\$1,078	2.7%	4.3%
	Middle	58	19.3%	\$8,871	9.4%	18.4%	32	18.6%	15.3%	\$4,500	8.4%	11.2%	26	20.3%	15.4%	\$4,371	10.9%	8.6%
	Upper	191	63.7%	\$73,758	78.5%	41.8%	113	65.7%	54.6%	\$42,170	78.4%	66.5%	78	60.9%	49.9%	\$31,588	78.6%	47.6%
	Unknown	5	1.7%	\$6,889	7.3%	0.0%	4	2.3%	18.0%	\$4,489	8.4%	15.6%	1	0.8%	21.6%	\$2,400	6.0%	38.0%
	Total	300	100.0%	\$93,958	100.0%	100.0%	172	100.0%	100.0%	\$53,758	100.0%	100.0%	128	100.0%	100.0%	\$40,200	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	3.7%	\$0	0.0%	1.5%	0	0.0%	5.1%	\$0	0.0%	1.4%
	Moderate	2	28.6%	\$150	11.2%	16.8%	0	0.0%	10.0%	\$0	0.0%	4.6%	2	50.0%	10.9%	\$150	38.9%	4.4%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	18.4%	\$0	0.0%	11.1%	0	0.0%	16.0%	\$0	0.0%	10.1%
	Upper	5	71.4%	\$1,189	88.8%	41.8%	3	100.0%	62.9%	\$953	100.0%	72.7%	2	50.0%	63.7%	\$236	61.1%	77.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.9%	\$0	0.0%	10.1%	0	0.0%	4.3%	\$0	0.0%	7.1%
	Total	7	100.0%	\$1,339	100.0%	100.0%	3	100.0%	100.0%	\$953	100.0%	100.0%	4	100.0%	100.0%	\$386	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$10,154	100.0%	0.0%	1	100.0%	100.0%	\$2,085	100.0%	100.0%	3	100.0%	100.0%	\$8,069	100.0%	100.0%
	Total	4	100.0%	\$10,154	100.0%	100.0%	1	100.0%	100.0%	\$2,085	100.0%	100.0%	3	100.0%	100.0%	\$8,069	100.0%	100.0%
HMDA TOTALS	Low	25	5.9%	\$3,861	2.5%	23.0%	12	5.2%	4.8%	\$2,870	3.6%	2.2%	13	6.7%	4.2%	\$991	1.3%	1.6%
	Moderate	45	10.6%	\$5,460	3.5%	16.8%	24	10.4%	12.5%	\$3,524	4.4%	7.5%	21	10.9%	12.3%	\$1,936	2.6%	6.4%
	Middle	74	17.5%	\$11,151	7.2%	18.4%	37	16.0%	17.2%	\$5,138	6.4%	13.1%	37	19.2%	16.9%	\$6,013	8.2%	11.1%
	Upper	263	62.0%	\$114,513	74.1%	41.8%	148	64.1%	50.0%	\$62,340	77.1%	60.4%	115	59.6%	49.4%	\$52,173	70.8%	52.2%
	Unknown	17	4.0%	\$19,549	12.7%	0.0%	10	4.3%	15.6%	\$6,954	8.6%	16.7%	7	3.6%	17.1%	\$12,595	17.1%	28.6%
	Total	424	100.0%	\$154,534	100.0%	100.0%	231	100.0%	100.0%	\$80,826	100.0%	100.0%	193	100.0%	100.0%	\$73,708	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	4	6.3%	\$300	1.3%	22.9%	4	6.3%	4.1%	\$300	1.3%	1.7%
	Moderate	4	6.3%	\$462	2.1%	16.7%	4	6.3%	13.0%	\$462	2.1%	7.9%
	Middle	16	25.4%	\$2,131	9.5%	18.3%	16	25.4%	17.5%	\$2,131	9.5%	14.0%
	Upper	36	57.1%	\$18,896	84.6%	42.0%	36	57.1%	46.4%	\$18,896	84.6%	59.7%
	Unknown	3	4.8%	\$537	2.4%	0.0%	3	4.8%	19.1%	\$537	2.4%	16.7%
	Total	63	100.0%	\$22,326	100.0%	100.0%	63	100.0%	100.0%	\$22,326	100.0%	100.0%
REFINANCE	Low	4	6.8%	\$298	1.9%	22.9%	4	6.8%	4.9%	\$298	1.9%	2.4%
	Moderate	14	23.7%	\$1,246	7.9%	16.7%	14	23.7%	10.8%	\$1,246	7.9%	6.3%
	Middle	15	25.4%	\$1,650	10.4%	18.3%	15	25.4%	15.7%	\$1,650	10.4%	11.4%
	Upper	25	42.4%	\$11,811	74.5%	42.0%	25	42.4%	43.8%	\$11,811	74.5%	57.5%
	Unknown	1	1.7%	\$840	5.3%	0.0%	1	1.7%	24.8%	\$840	5.3%	22.5%
	Total	59	100.0%	\$15,845	100.0%	100.0%	59	100.0%	100.0%	\$15,845	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	6.3%	\$0	0.0%	1.7%
	Moderate	1	50.0%	\$5	0.9%	16.7%	1	50.0%	9.2%	\$5	0.9%	4.4%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	14.2%	\$0	0.0%	9.9%
	Upper	1	50.0%	\$530	99.1%	42.0%	1	50.0%	58.1%	\$530	99.1%	75.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.2%	\$0	0.0%	8.5%
	Total	2	100.0%	\$535	100.0%	100.0%	2	100.0%	100.0%	\$535	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	6.5%	\$598	1.5%	22.9%	8	6.5%	4.4%	\$598	1.5%	1.7%
	Moderate	19	15.3%	\$1,713	4.4%	16.7%	19	15.3%	12.2%	\$1,713	4.4%	6.7%
	Middle	31	25.0%	\$3,781	9.8%	18.3%	31	25.0%	16.8%	\$3,781	9.8%	12.1%
	Upper	62	50.0%	\$31,237	80.7%	42.0%	62	50.0%	46.0%	\$31,237	80.7%	54.1%
	Unknown	4	3.2%	\$1,377	3.6%	0.0%	4	3.2%	20.7%	\$1,377	3.6%	25.3%
	Total	124	100.0%	\$38,706	100.0%	100.0%	124	100.0%	100.0%	\$38,706	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Consumer Loan Distribution Tables

TX - Dallas-Fort Worth Metroplex 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	14	4.0%	709	2.3%	50	14.2%	2,211	7.2%
Moderate	51	14.5%	2,410	7.8%	73	20.7%	4,226	13.8%
Low/Moderate Total	65	18.5%	3,119	10.2%	123	34.9%	6,437	21.0%
Middle	74	21.0%	4,731	15.4%	60	17.0%	3,763	12.2%
Upper	213	60.5%	22,871	74.4%	168	47.7%	20,271	66.0%
Unknown	0	0.0%	0	0.0%	1	0.3%	250	0.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	352	100.0%	30,721	100.0%	352	100.0%	30,721	100.0%

TX - Dallas-Fort Worth Metroplex 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	22	4.4%	931	1.7%	68	13.5%	3,303	6.1%
Moderate	80	15.8%	4,534	8.4%	92	18.2%	6,393	11.9%
Low/Moderate Total	102	20.2%	5,465	10.1%	160	31.7%	9,696	18.0%
Middle	102	20.2%	8,222	15.3%	85	16.8%	6,858	12.7%
Upper	301	59.6%	40,203	74.6%	258	51.1%	36,915	68.5%
Unknown	0	0.0%	0	0.0%	2	0.4%	421	0.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	505	100.0%	53,890	100.0%	505	100.0%	53,890	100.0%

TX - Dallas-Fort Worth Metroplex 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	25	4.4%	1,292	2.1%	73	12.9%	3,792	6.0%
Moderate	71	12.5%	3,368	5.4%	90	15.8%	5,833	9.3%
Low/Moderate Total	96	16.9%	4,660	7.4%	163	28.7%	9,625	15.3%
Middle	141	24.8%	10,241	16.3%	98	17.3%	8,683	13.8%
Upper	331	58.3%	47,856	76.3%	306	53.9%	44,199	70.4%
Unknown	0	0.0%	0	0.0%	1	0.2%	250	0.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	568	100.0%	62,757	100.0%	568	100.0%	62,757	100.0%

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison					
		2012, 2013					2012					2013					
		Count		Dollar		Small Businesses	Count		Dollar		Agg	Count		Dollar		Agg	
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		
SMALL BUSINESSES	Low	182	11.8%	\$51,326	13.2%	8.2%	77	11.6%	\$20,802	12.5%	9.6%	105	12.1%	\$30,524	13.7%	9.6%	
	Moderate	444	28.9%	\$108,597	27.9%	20.4%	198	29.7%	\$48,312	29.0%	19.6%	246	28.2%	\$60,285	27.0%	19.4%	
	Middle	393	25.6%	\$105,628	27.1%	25.2%	166	24.9%	\$45,895	27.6%	23.9%	227	26.1%	\$59,733	26.8%	22.8%	
	Upper	518	33.7%	\$124,076	31.8%	46.3%	225	33.8%	\$51,502	30.9%	45.6%	293	33.6%	\$72,574	32.5%	47.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.1%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	1.2%	0	0.0%	\$0	0.0%	1.0%	
	Total	1,537	100.0%	\$389,627	100.0%	100.0%	666	100.0%	\$166,511	100.0%	100.0%	871	100.0%	\$223,116	100.0%	100.0%	
SMALL FARM	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	\$0	0.0%	0.6%	0	0.0%	\$0	0.0%	2.2%	
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	\$0	0.0%	10.6%	0	0.0%	\$0	0.0%	8.6%	
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	\$0	0.0%	34.1%	0	0.0%	\$0	0.0%	38.7%	
	Upper	0	0.0%	\$0	0.0%	55.2%	0	0.0%	\$0	0.0%	53.7%	0	0.0%	\$0	0.0%	49.7%	
	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%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	1.1%	0	0.0%	\$0	0.0%	0.8%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2014					2014				
		Count		Dollar		Small Businesses	Count		Agg	Dollar	
		#	%	\$ (000s)	\$ %		#	%		\$ (000s)	\$ %
SMALL BUSINESSES	Low	113	12.9%	\$28,979	12.8%	7.9%	113	12.9%	7.7%	\$28,979	12.8%
	Moderate	210	24.0%	\$49,396	21.8%	19.4%	210	24.0%	17.7%	\$49,396	21.8%
	Middle	209	23.9%	\$59,123	26.1%	24.4%	209	23.9%	23.5%	\$59,123	26.1%
	Upper	344	39.3%	\$88,664	39.2%	48.3%	344	39.3%	49.7%	\$88,664	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%
	Total	876	100.0%	\$226,162	100.0%	100.0%	876	100.0%	100.0%	\$226,162	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.5%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	10.9%	0	0.0%	9.2%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	28.5%	0	0.0%	35.8%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	58.0%	0	0.0%	52.6%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX - Houston

Product Type		Bank Lending & Demographic Data Comparison 2012, 2013						Bank & Aggregate Lending Comparison											
								2012						2013					
								Count				Dollar		Count				Dollar	
		Bank		Dollar		Total Businesses	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
Count	Dollar	Bank	Agg	Bank	Agg		Bank	Agg		Bank	Agg								
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	382	24.9%	\$65,243	16.7%	90.3%	171	25.7%	37.8%	\$31,779	19.1%	32.7%	211	24.2%	45.8%	\$33,464	15.0%	32.8%
		Over \$1 Million	799	52.0%	\$267,510	68.7%	6.0%	332	49.8%				467	53.6%					
		Total Rev. available	1,181	76.9%	\$332,753	85.4%	96.3%	503	75.5%				678	77.8%					
		Rev. Not Known	356	23.2%	\$56,874	14.6%	3.7%	163	24.5%				193	22.2%					
		Total	1,537	100.0%	\$389,627	100.0%	100.0%	666	100.0%				871	100.0%					
	Loan Size	\$100,000 or Less	656	42.7%	\$37,916	9.7%		276	41.4%	94.0%	\$16,100	9.7%	33.5%	380	43.6%	93.3%	\$21,816	9.8%	33.3%
		\$100,001 - \$250,000	359	23.4%	\$67,099	17.2%		157	23.6%	2.7%	\$28,751	17.3%	13.6%	202	23.2%	2.9%	\$38,348	17.2%	13.0%
		\$250,001 - \$1 Million	522	34.0%	\$284,612	73.0%		233	35.0%	3.3%	\$121,660	73.1%	52.9%	289	33.2%	3.8%	\$162,952	73.0%	53.7%
		Total	1,537	100.0%	\$389,627	100.0%		666	100.0%	100.0%	\$166,511	100.0%	100.0%	871	100.0%	100.0%	\$223,116	100.0%	100.0%
	Loan Size & Rev \$1 Mil or Less	\$100,000 or Less	239	62.6%	\$12,874	19.7%													
		\$100,001 - \$250,000	69	18.1%	\$11,909	18.3%													
		\$250,001 - \$1 Million	74	19.4%	\$40,460	62.0%													
		Total	382	100.0%	\$65,243	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 98.5%	0	0.0%	43.9%	\$0	0.0%	64.5%	0	0.0%	56.6%	\$0	0.0%	60.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.1%	0	0.0%				0	0.0%					
		Total Rev. available	0	0.0%	\$0	0.0%	99.6%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.4%	0	0.0%				0	0.0%					
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.8%	\$0	0.0%	46.0%	0	0.0%	91.5%	\$0	0.0%	47.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	12.7%	0	0.0%	5.1%	\$0	0.0%	20.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.1%	\$0	0.0%	41.3%	0	0.0%	3.4%	\$0	0.0%	32.8%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mil or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRFEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX - Houston

Product Type			Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
			2014					2014					
			Bank				Total Businesses	Count			Dollar		
			Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%			\$ 000s	\$ %		\$ %
Small Business	Revenue	\$1 Million or Less	248	28.3%	\$43,993	19.5%	89.8%	248	28.3%	44.2%	\$43,993	19.5%	33.3%
		Over \$1 Million	432	49.3%	\$149,602	66.1%	6.5%	432	49.3%				
		Total Rev. available	680	77.6%	\$193,595	85.6%	96.3%	680	77.6%				
		Rev. Not Known	196	22.4%	\$32,567	14.4%	3.7%	196	22.4%				
		Total	876	100.0%	\$226,162	100.0%	100.0%	876	100.0%				
	Loan Size	\$100,000 or Less	368	42.0%	\$21,028	9.3%		368	42.0%	93.9%	\$21,028	9.3%	36.6%
		\$100,001 - \$250,000	229	26.1%	\$43,455	19.2%		229	26.1%	2.9%	\$43,455	19.2%	14.0%
		\$250,001 - \$1 Million	279	31.8%	\$161,679	71.5%		279	31.8%	3.2%	\$161,679	71.5%	49.4%
		Total	876	100.0%	\$226,162	100.0%		876	100.0%	100.0%	\$226,162	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	161	64.9%	\$9,629	21.9%							
		\$100,001 - \$250,000	42	16.9%	\$7,818	17.8%							
		\$250,001 - \$1 Million	45	18.1%	\$26,546	60.3%							
		Total	248	100.0%	\$43,993	100.0%							
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.5%	0	0.0%	48.4%	\$0	0.0%	60.9%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.2%	0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	99.7%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	89.7%	\$0	0.0%	39.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	16.9%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	43.4%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	0	0.0%	\$0	0.0%							
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%							
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%							
		Total	0	0.0%	\$0	0.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Count		Bank Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	\$0	0.0%	0.8%	0	0.0%	\$0	0.0%	0.9%
	Moderate	15	14.7%	\$1,121	4.0%	20.8%	5	10.4%	\$374	2.8%	5.3%	10	18.5%	\$747	5.1%	5.6%
	Middle	24	23.5%	\$3,206	11.5%	28.4%	10	20.8%	\$971	7.3%	19.5%	14	25.9%	\$2,235	15.3%	19.9%
	Upper	63	61.8%	\$23,566	84.5%	46.4%	33	68.8%	\$11,903	89.8%	74.4%	30	55.6%	\$11,663	79.6%	73.6%
	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	102	100.0%	\$27,893	100.0%	100.0%	48	100.0%	\$13,248	100.0%	100.0%	54	100.0%	\$14,645	100.0%	100.0%
REFINANCE	Low	4	1.7%	\$364	0.8%	4.4%	3	2.4%	\$298	1.3%	0.7%	1	1.0%	\$66	0.3%	1.5%
	Moderate	17	7.4%	\$1,322	2.9%	20.8%	10	7.9%	\$808	3.4%	4.0%	7	6.7%	\$514	2.3%	12.4%
	Middle	54	23.5%	\$7,934	17.2%	28.4%	26	20.6%	\$3,713	15.8%	14.6%	28	26.9%	\$4,221	18.7%	19.2%
	Upper	155	67.4%	\$36,448	79.1%	46.4%	87	69.0%	\$18,630	79.4%	80.7%	68	65.4%	\$17,818	78.8%	67.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	230	100.0%	\$46,068	100.0%	100.0%	126	100.0%	\$23,449	100.0%	100.0%	104	100.0%	\$22,619	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	\$0	0.0%	0.8%	0	0.0%	\$0	0.0%	1.3%
	Moderate	1	20.0%	\$10	0.7%	20.8%	1	33.3%	\$10	0.9%	5.9%	0	0.0%	\$0	0.0%	6.8%
	Middle	0	0.0%	\$0	0.0%	28.4%	0	0.0%	\$0	0.0%	17.7%	0	0.0%	\$0	0.0%	16.7%
	Upper	4	80.0%	\$1,382	99.3%	46.4%	2	66.7%	\$1,063	99.1%	75.5%	2	100.0%	\$319	100.0%	75.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$1,392	100.0%	100.0%	3	100.0%	\$1,073	100.0%	100.0%	2	100.0%	\$319	100.0%	100.0%
MULTI FAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	23.2%	0	0.0%	\$0	0.0%	12.3%	0	0.0%	\$0	0.0%	10.1%
	Moderate	1	16.7%	\$2,160	9.5%	30.5%	1	50.0%	\$2,160	15.8%	28.2%	0	0.0%	\$0	0.0%	17.3%
	Middle	3	50.0%	\$8,337	36.6%	21.5%	0	0.0%	\$0	0.0%	12.7%	3	75.0%	\$8,337	91.2%	25.6%
	Upper	2	33.3%	\$12,300	54.0%	24.8%	1	50.0%	\$11,500	84.2%	46.7%	1	25.0%	\$800	8.8%	47.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$22,797	100.0%	100.0%	2	100.0%	\$13,660	100.0%	100.0%	4	100.0%	\$9,137	100.0%	100.0%
HMDA TOTALS	Low	4	1.2%	\$364	0.4%	4.4%	3	1.7%	\$298	0.6%	1.3%	1	0.6%	\$66	0.1%	1.7%
	Moderate	34	9.9%	\$4,613	4.7%	20.8%	17	9.5%	\$3,352	6.5%	5.7%	17	10.4%	\$1,261	2.7%	9.2%
	Middle	81	23.6%	\$19,477	19.8%	28.4%	36	20.1%	\$4,684	9.1%	16.9%	45	27.4%	\$14,793	31.7%	19.9%
	Upper	224	65.3%	\$73,696	75.1%	46.4%	123	68.7%	\$43,096	83.8%	76.2%	101	61.6%	\$30,600	65.5%	69.2%
	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%
	Total	343	100.0%	\$98,150	100.0%	100.0%	179	100.0%	\$51,430	100.0%	100.0%	164	100.0%	\$46,720	100.0%	100.0%

Originations & Purchases
2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Agg	Dollar		Agg
		Count		Dollar			Bank			Bank		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	2	3.4%	\$291	1.6%	4.2%	2	3.4%	1.3%	\$291	1.6%	0.9%
	Moderate	7	12.1%	\$770	4.4%	20.6%	7	12.1%	9.9%	\$770	4.4%	6.3%
	Middle	13	22.4%	\$2,635	14.9%	28.4%	13	22.4%	27.4%	\$2,635	14.9%	21.2%
	Upper	36	62.1%	\$13,969	79.1%	46.8%	36	62.1%	61.4%	\$13,969	79.1%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>58</i>	<i>100.0%</i>	<i>\$17,665</i>	<i>100.0%</i>	<i>100.0%</i>	<i>58</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,665</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	2	3.8%	\$182	1.8%	4.2%	2	3.8%	1.5%	\$182	1.8%	1.0%
	Moderate	5	9.6%	\$536	5.2%	20.6%	5	9.6%	11.3%	\$536	5.2%	7.0%
	Middle	15	28.8%	\$1,503	14.5%	28.4%	15	28.8%	27.8%	\$1,503	14.5%	20.5%
	Upper	30	57.7%	\$8,113	78.5%	46.8%	30	57.7%	59.4%	\$8,113	78.5%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>52</i>	<i>100.0%</i>	<i>\$10,334</i>	<i>100.0%</i>	<i>100.0%</i>	<i>52</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,334</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	2.4%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	20.6%	0	0.0%	12.0%	\$0	0.0%	6.2%
	Middle	1	100.0%	\$10	100.0%	28.4%	1	100.0%	22.2%	\$10	100.0%	17.7%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	63.5%	\$0	0.0%	74.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	19.4%	\$0	0.0%	11.5%
	Moderate	0	0.0%	\$0	0.0%	30.7%	0	0.0%	32.0%	\$0	0.0%	24.8%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	26.0%	\$0	0.0%	30.3%
	Upper	1	100.0%	\$17,320	100.0%	25.6%	1	100.0%	22.4%	\$17,320	100.0%	33.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$17,320</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,320</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	4	3.6%	\$473	1.0%	4.2%	4	3.6%	1.5%	\$473	1.0%	1.7%
	Moderate	12	10.7%	\$1,306	2.9%	20.6%	12	10.7%	10.4%	\$1,306	2.9%	7.8%
	Middle	29	25.9%	\$4,148	9.2%	28.4%	29	25.9%	27.3%	\$4,148	9.2%	21.7%
	Upper	67	59.8%	\$39,402	86.9%	46.8%	67	59.8%	60.9%	\$39,402	86.9%	68.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>112</i>	<i>100.0%</i>	<i>\$45,329</i>	<i>100.0%</i>	<i>100.0%</i>	<i>112</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45,329</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2012, 2013					2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	7	6.9%	\$424	1.5%	23.8%	2	4.2%	4.9%	\$140	1.1%	2.2%	5	9.3%	3.6%	\$284	1.9%	1.6%
	Moderate	19	18.6%	\$1,819	6.5%	16.4%	9	18.8%	15.7%	\$851	6.4%	9.7%	10	18.5%	13.3%	\$968	6.6%	7.9%
	Middle	18	17.6%	\$2,469	8.9%	17.4%	8	16.7%	19.0%	\$903	6.8%	15.0%	10	18.5%	18.4%	\$1,566	10.7%	14.0%
	Upper	58	56.9%	\$23,181	83.1%	42.4%	29	60.4%	48.7%	\$11,354	85.7%	63.6%	29	53.7%	52.4%	\$11,827	80.8%	66.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.6%	\$0	0.0%	9.5%	0	0.0%	12.3%	\$0	0.0%	10.1%
	Total	102	100.0%	\$27,893	100.0%	100.0%	48	100.0%	100.0%	\$13,248	100.0%	100.0%	54	100.0%	100.0%	\$14,645	100.0%	100.0%
REFINANCE	Low	8	3.5%	\$674	1.5%	23.8%	3	2.4%	2.9%	\$220	0.9%	1.4%	5	4.8%	3.9%	\$454	2.0%	1.6%
	Moderate	33	14.3%	\$3,011	6.5%	16.4%	16	12.7%	7.7%	\$1,482	6.3%	4.2%	17	16.3%	8.9%	\$1,529	6.8%	4.1%
	Middle	51	22.2%	\$6,258	13.6%	17.4%	27	21.4%	14.4%	\$3,806	16.2%	9.8%	24	23.1%	15.5%	\$2,452	10.8%	8.7%
	Upper	137	59.6%	\$34,593	75.1%	42.4%	80	63.5%	59.4%	\$17,941	76.5%	70.8%	57	54.8%	54.6%	\$16,652	73.6%	53.1%
	Unknown	1	0.4%	\$1,532	3.3%	0.0%	0	0.0%	15.6%	\$0	0.0%	13.9%	1	1.0%	17.1%	\$1,532	6.8%	32.5%
	Total	230	100.0%	\$46,068	100.0%	100.0%	126	100.0%	100.0%	\$23,449	100.0%	100.0%	104	100.0%	100.0%	\$22,619	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	5.1%	\$0	0.0%	1.8%	0	0.0%	5.9%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	9.6%	\$0	0.0%	4.5%	0	0.0%	10.7%	\$0	0.0%	4.3%
	Middle	1	20.0%	\$10	0.7%	17.4%	1	33.3%	14.5%	\$10	0.9%	8.4%	0	0.0%	16.0%	\$0	0.0%	9.1%
	Upper	4	80.0%	\$1,382	99.3%	42.4%	2	66.7%	68.1%	\$1,063	99.1%	80.3%	2	100.0%	64.0%	\$319	100.0%	79.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	5.0%	0	0.0%	3.4%	\$0	0.0%	5.5%
	Total	5	100.0%	\$1,392	100.0%	100.0%	3	100.0%	100.0%	\$1,073	100.0%	100.0%	2	100.0%	100.0%	\$319	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	6	100.0%	\$22,797	100.0%	0.0%	2	100.0%	100.0%	\$13,660	100.0%	100.0%	4	100.0%	100.0%	\$9,137	100.0%	100.0%
	Total	6	100.0%	\$22,797	100.0%	100.0%	2	100.0%	100.0%	\$13,660	100.0%	100.0%	4	100.0%	100.0%	\$9,137	100.0%	100.0%
HMDA TOTALS	Low	15	4.4%	\$1,098	1.1%	23.8%	5	2.8%	3.9%	\$360	0.7%	1.8%	10	6.1%	3.8%	\$738	1.6%	1.5%
	Moderate	52	15.2%	\$4,830	4.9%	16.4%	25	14.0%	11.7%	\$2,333	4.5%	6.7%	27	16.5%	11.3%	\$2,497	5.3%	5.8%
	Middle	70	20.4%	\$8,737	8.9%	17.4%	36	20.1%	16.7%	\$4,719	9.2%	11.9%	34	20.7%	17.1%	\$4,018	8.6%	10.8%
	Upper	199	58.0%	\$59,156	60.3%	42.4%	111	62.0%	54.2%	\$30,358	59.0%	64.3%	88	53.7%	53.5%	\$28,798	61.6%	56.8%
	Unknown	7	2.0%	\$24,329	24.8%	0.0%	2	1.1%	13.4%	\$13,660	26.6%	15.3%	5	3.0%	14.2%	\$10,669	22.8%	25.1%
	Total	343	100.0%	\$98,150	100.0%	100.0%	179	100.0%	100.0%	\$51,430	100.0%	100.0%	164	100.0%	100.0%	\$46,720	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				#	%		\$ (000s)
HOME PURCHASE	Low	2	3.4%	\$139	0.8%	23.7%	2	3.4%	3.0%	\$139	0.8%	1.2%
	Moderate	8	13.8%	\$786	4.4%	16.4%	8	13.8%	11.8%	\$786	4.4%	6.8%
	Middle	9	15.5%	\$1,076	6.1%	17.3%	9	15.5%	18.3%	\$1,076	6.1%	13.6%
	Upper	38	65.5%	\$15,220	86.2%	42.6%	38	65.5%	50.6%	\$15,220	86.2%	64.4%
	Unknown	1	1.7%	\$444	2.5%	0.0%	1	1.7%	16.3%	\$444	2.5%	14.0%
	Total	58	100.0%	\$17,665	100.0%	100.0%	58	100.0%	100.0%	\$17,665	100.0%	100.0%
REFINANCE	Low	3	5.8%	\$179	1.7%	23.7%	3	5.8%	5.1%	\$179	1.7%	2.5%
	Moderate	9	17.3%	\$773	7.5%	16.4%	9	17.3%	10.4%	\$773	7.5%	5.9%
	Middle	12	23.1%	\$1,460	14.1%	17.3%	12	23.1%	16.8%	\$1,460	14.1%	11.7%
	Upper	27	51.9%	\$7,732	74.8%	42.6%	27	51.9%	47.2%	\$7,732	74.8%	61.0%
	Unknown	1	1.9%	\$190	1.8%	0.0%	1	1.9%	20.5%	\$190	1.8%	18.9%
	Total	52	100.0%	\$10,334	100.0%	100.0%	52	100.0%	100.0%	\$10,334	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	6.3%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	8.8%	\$0	0.0%	4.2%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	14.9%	\$0	0.0%	9.9%
	Upper	1	100.0%	\$10	100.0%	42.6%	1	100.0%	65.5%	\$10	100.0%	76.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.6%	\$0	0.0%	7.0%
	Total	1	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$17,320	100.0%	0.0%	1	100.0%	100.0%	\$17,320	100.0%	100.0%
	Total	1	100.0%	\$17,320	100.0%	100.0%	1	100.0%	100.0%	\$17,320	100.0%	100.0%
HMDA TOTALS	Low	5	4.5%	\$318	0.7%	23.7%	5	4.5%	3.6%	\$318	0.7%	1.4%
	Moderate	17	15.2%	\$1,559	3.4%	16.4%	17	15.2%	11.3%	\$1,559	3.4%	6.1%
	Middle	21	18.8%	\$2,536	5.6%	17.3%	21	18.8%	17.8%	\$2,536	5.6%	12.2%
	Upper	66	58.9%	\$22,962	50.7%	42.6%	66	58.9%	50.2%	\$22,962	50.7%	59.1%
	Unknown	3	2.7%	\$17,954	39.6%	0.0%	3	2.7%	17.2%	\$17,954	39.6%	21.2%
	Total	112	100.0%	\$45,329	100.0%	100.0%	112	100.0%	100.0%	\$45,329	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Consumer Loan Distribution Tables

TX - Houston 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	13	3.2%	825	2.4%	50	12.5%	2,168	6.2%
Moderate	58	14.5%	2,328	6.7%	84	20.9%	4,904	14.1%
Low/Moderate Total	71	17.7%	3,153	9.1%	134	33.4%	7,072	20.3%
Middle	99	24.7%	6,562	18.9%	78	19.5%	5,157	14.8%
Upper	231	57.6%	25,056	72.1%	189	47.1%	22,542	64.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	401	100.0%	34,771	100.0%	401	100.0%	34,771	100.0%

TX - Houston 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	23	3.4%	1,364	2.2%	100	14.9%	4,762	7.7%
Moderate	118	17.6%	5,421	8.8%	106	15.8%	6,142	10.0%
Low/Moderate Total	141	21.0%	6,785	11.0%	206	30.7%	10,904	17.7%
Middle	152	22.7%	9,679	15.7%	129	19.2%	8,368	13.6%
Upper	378	56.3%	45,178	73.3%	336	50.1%	42,370	68.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	671	100.0%	61,642	100.0%	671	100.0%	61,642	100.0%

TX - Houston 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	21	3.5%	1,224	2.0%	71	12.0%	3,718	6.0%
Moderate	86	14.5%	4,195	6.7%	92	15.5%	5,944	9.5%
Low/Moderate Total	107	18.1%	5,419	8.7%	163	27.5%	9,662	15.5%
Middle	128	21.6%	9,176	14.7%	124	20.9%	10,631	17.0%
Upper	357	60.3%	47,855	76.6%	305	51.5%	42,157	67.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	592	100.0%	62,450	100.0%	592	100.0%	62,450	100.0%

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MI - Grand Rapids

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Count		Bank Dollar		Small Businesses	Count		Dollar		Agg \$ %	Count		Dollar		Agg \$ %
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %		#	%	\$ 000s	\$ %	
SMALL BUSINESSES	Low	35	10.4%	\$10,184	11.6%	5.2%	11	8.1%	\$5,133	12.5%	6.8%	24	11.8%	\$5,051	10.9%	7.3%
	Moderate	57	16.9%	\$15,177	17.3%	16.3%	19	14.1%	\$4,946	12.0%	18.9%	38	18.7%	\$10,231	22.0%	19.2%
	Middle	115	34.0%	\$30,953	35.3%	40.0%	43	31.9%	\$14,603	35.4%	35.6%	72	35.5%	\$16,350	35.2%	34.6%
	Upper	131	38.8%	\$31,287	35.7%	38.5%	62	45.9%	\$16,514	40.1%	38.1%	69	34.0%	\$14,773	31.8%	38.6%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.5%	0	0.0%	\$0	0.0%	0.2%
	Total	338	100.0%	\$87,601	100.0%	100.0%	135	100.0%	\$41,196	100.0%	100.0%	203	100.0%	\$46,405	100.0%	100.0%
SMALL FARM	Small Farms															
	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	\$0	0.0%	1.8%	0	0.0%	\$0	0.0%	5.3%
	Middle	1	100.0%	\$117	100.0%	40.6%	0	0.0%	\$0	0.0%	42.8%	1	100.0%	\$117	100.0%	27.0%
	Upper	0	0.0%	\$0	0.0%	56.2%	0	0.0%	\$0	0.0%	55.4%	0	0.0%	\$0	0.0%	66.3%
	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	0.0%	0.0%	0	0.0%	\$0	0.0%	1.4%
	Total	1	100.0%	\$117	100.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	1	100.0%	\$117	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MI - Grand Rapids

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Count		Bank Dollar		Small Businesses	Count		Dollar		Agg \$ %	Agg \$ %
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	33	12.3%	\$10,271	14.0%	4.0%	33	12.3%	\$10,271	14.0%	6.6%	6.6%
	Moderate	42	15.6%	\$13,135	17.9%	15.4%	42	15.6%	\$13,135	17.9%	16.5%	16.5%
	Middle	100	37.2%	\$29,618	40.4%	49.0%	100	37.2%	\$29,618	40.4%	45.0%	45.0%
	Upper	94	34.9%	\$20,292	27.7%	31.6%	94	34.9%	\$20,292	27.7%	31.7%	31.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.2%	0.2%
	Total	269	100.0%	\$73,316	100.0%	100.0%	269	100.0%	\$73,316	100.0%	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	100.0%	\$40	100.0%	1.6%	1	100.0%	\$40	100.0%	1.9%	1.9%
	Middle	0	0.0%	\$0	0.0%	65.3%	0	0.0%	\$0	0.0%	69.8%	69.8%
	Upper	0	0.0%	\$0	0.0%	32.8%	0	0.0%	\$0	0.0%	28.3%	28.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.8%	0.0%
	Total	1	100.0%	\$40	100.0%	100.0%	1	100.0%	\$40	100.0%	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MI - Grand Rapids

Product Type		Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
		2012, 2013						2012						2013					
		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	72	21.3%	\$16,105	18.4%	87.7%	28	20.7%	29.7%	\$6,944	16.9%	33.8%	44	21.7%	39.6%	\$9,161	19.7%	31.2%
		Over \$1 Million	197	58.3%	\$62,515	71.4%	9.1%	72	53.3%				125	61.6%					
		Total Rev. available	269	79.6%	\$78,620	89.8%	96.8%	100	74.0%				169	83.3%					
		Rev. Not Known	69	20.4%	\$8,981	10.3%	3.2%	35	25.9%				34	16.7%					
		Total	338	100.0%	\$87,601	100.0%	100.0%	135	100.0%				203	100.0%					
	Loan Size	\$100,000 or Less	150	44.4%	\$7,925	9.0%		48	35.6%	84.8%	\$2,513	6.1%	17.0%	102	50.2%	80.9%	\$5,412	11.7%	16.4%
		\$100,001 - \$250,000	78	23.1%	\$15,333	17.5%		32	23.7%	6.5%	\$6,231	15.1%	16.2%	46	22.7%	8.1%	\$9,102	19.6%	16.4%
		\$250,001 - \$1 Million	110	32.5%	\$64,343	73.5%		55	40.7%	8.7%	\$32,452	78.8%	66.8%	55	27.1%	10.9%	\$31,891	68.7%	67.3%
		Total	338	100.0%	\$87,601	100.0%		135	100.0%	100.0%	\$41,196	100.0%	100.0%	203	100.0%	100.0%	\$46,405	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	41	56.9%	\$1,662	10.3%													
		\$100,001 - \$250,000	11	15.3%	\$2,151	13.4%													
		\$250,001 - \$1 Million	20	27.8%	\$12,292	76.3%													
		Total	72	100.0%	\$16,105	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 96.3%	0	0.0%	53.8%	\$0	0.0%	64.8%	0	0.0%	57.3%	\$0	0.0%	60.2%
		Over \$1 Million	0	0.0%	\$0	0.0%	3.7%	0	0.0%				0	0.0%					
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
		Not Known	1	100.0%	\$117	100.0%	0.0%	0	0.0%				1	100.0%					
		Total	1	100.0%	\$117	100.0%	100.0%	0	0.0%				1	100.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	75.8%	\$0	0.0%	22.5%	0	0.0%	73.3%	\$0	0.0%	25.2%
		\$100,001 - \$250,000	1	100.0%	\$117	100.0%		0	0.0%	12.1%	\$0	0.0%	23.9%	1	100.0%	16.0%	\$117	100.0%	29.3%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.1%	\$0	0.0%	53.6%	0	0.0%	10.7%	\$0	0.0%	45.5%
		Total	1	100.0%	\$117	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$117	100.0%	100.0%
	Loan Size & Rev/ \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRFEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MI - Grand Rapids

Product Type			Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
			2014					2014					
			Bank				Total Businesses	Count		Agg	Dollar		Agg
			Count	Dollar		Bank			Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	45	16.7%	\$9,187	12.5%	87.3%	45	16.7%	39.5%	\$9,187	12.5%	28.6%
		Over \$1 Million	161	59.9%	\$55,448	75.6%	9.9%	161	59.9%				
		Total Rev. available	206	76.6%	\$64,635	88.1%	97.2%	206	76.6%				
		Rev. Not Known	63	23.4%	\$8,681	11.8%	2.9%	63	23.4%				
		Total	269	100.0%	\$73,316	100.0%	100.0%	269	100.0%				
	Loan Size	\$100,000 or Less	121	45.0%	\$6,326	8.6%		121	45.0%	84.5%	\$6,326	8.6%	19.6%
		\$100,001 - \$250,000	58	21.6%	\$10,544	14.4%		58	21.6%	6.9%	\$10,544	14.4%	16.5%
		\$250,001 - \$1 Million	90	33.5%	\$56,446	77.0%		90	33.5%	8.6%	\$56,446	77.0%	63.9%
		Total	269	100.0%	\$73,316	100.0%		269	100.0%	100.0%	\$73,316	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	30	66.7%	\$1,355	14.7%							
		\$100,001 - \$250,000	5	11.1%	\$1,005	10.9%							
		\$250,001 - \$1 Million	10	22.2%	\$6,827	74.3%							
		Total	45	100.0%	\$9,187	100.0%							
Small Farm	Revenue	\$1 Million or Less	1	100.0%	\$40	100.0%	Total Farms 95.0%	1	100.0%	44.2%	\$40	100.0%	47.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.0%	0	0.0%				
		Total Rev. available	1	100.0%	\$40	100.0%	100.0%	1	100.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
		Total	1	100.0%	\$40	100.0%	100.0%	1	100.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$40	100.0%		1	100.0%	69.6%	\$40	100.0%	20.6%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.9%	\$0	0.0%	32.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.5%	\$0	0.0%	47.3%
		Total	1	100.0%	\$40	100.0%		1	100.0%	100.0%	\$40	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	1	100.0%	\$40	100.0%							
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%							
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%							
		Total	1	100.0%	\$40	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Grand Rapids

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Count		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg %
HOME PURCHASE	Low	1	1.7%	\$72	0.9%	3.1%	1	3.6%	\$72	2.2%	1.3%	0	0.0%	\$0	0.0%	1.2%
	Moderate	6	10.0%	\$378	4.7%	16.4%	3	10.7%	\$201	6.2%	8.2%	3	9.4%	\$177	3.7%	8.7%
	Middle	29	48.3%	\$2,986	37.0%	44.0%	14	50.0%	\$1,130	34.9%	34.0%	15	46.9%	\$1,856	38.3%	35.5%
	Upper	24	40.0%	\$4,644	57.5%	36.4%	10	35.7%	\$1,833	56.6%	56.4%	14	43.8%	\$2,811	58.0%	54.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	60	100.0%	\$8,080	100.0%	100.0%	28	100.0%	\$3,236	100.0%	100.0%	32	100.0%	\$4,844	100.0%	100.0%
REFINANCE	Low	1	0.8%	\$137	0.8%	3.1%	1	1.1%	\$137	1.2%	0.8%	0	0.0%	\$0	0.0%	1.2%
	Moderate	12	9.8%	\$1,622	9.5%	16.4%	9	9.9%	\$679	5.8%	5.7%	3	9.4%	\$943	17.9%	8.3%
	Middle	49	39.8%	\$4,714	27.7%	44.0%	35	38.5%	\$3,570	30.3%	32.0%	14	43.8%	\$1,144	21.7%	33.7%
	Upper	61	49.6%	\$10,556	62.0%	36.4%	46	50.5%	\$7,383	62.7%	61.5%	15	46.9%	\$3,173	60.3%	56.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	123	100.0%	\$17,029	100.0%	100.0%	91	100.0%	\$11,769	100.0%	100.0%	32	100.0%	\$5,260	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	\$0	0.0%	1.3%	0	0.0%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	\$0	0.0%	8.7%	0	0.0%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	44.0%	0	0.0%	\$0	0.0%	28.3%	0	0.0%	\$0	0.0%	29.6%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	\$0	0.0%	61.7%	0	0.0%	\$0	0.0%	61.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	7.0%	0	0.0%	\$0	0.0%	1.4%	0	0.0%	\$0	0.0%	8.2%
	Moderate	0	0.0%	\$0	0.0%	29.4%	0	0.0%	\$0	0.0%	32.9%	0	0.0%	\$0	0.0%	71.1%
	Middle	0	0.0%	\$0	0.0%	51.8%	0	0.0%	\$0	0.0%	39.8%	0	0.0%	\$0	0.0%	15.7%
	Upper	0	0.0%	\$0	0.0%	11.7%	0	0.0%	\$0	0.0%	25.9%	0	0.0%	\$0	0.0%	5.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	1.1%	\$209	0.8%	3.1%	2	1.7%	\$209	1.4%	1.0%	0	0.0%	\$0	0.0%	1.4%
	Moderate	18	9.8%	\$2,000	8.0%	16.4%	12	10.1%	\$880	5.9%	7.2%	6	9.4%	\$1,120	11.1%	10.2%
	Middle	78	42.6%	\$7,700	30.7%	44.0%	49	41.2%	\$4,700	31.3%	32.8%	29	45.3%	\$3,000	29.7%	34.0%
	Upper	85	46.4%	\$15,200	60.5%	36.4%	56	47.1%	\$9,216	61.4%	59.0%	29	45.3%	\$5,984	59.2%	54.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	183	100.0%	\$25,109	100.0%	100.0%	119	100.0%	\$15,005	100.0%	100.0%	64	100.0%	\$10,104	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Grand Rapids

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Agg	Dollar		Agg
		Count		Dollar			Bank			Bank		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.4%	\$0	0.0%	0.9%
	Moderate	6	18.8%	\$512	12.9%	13.2%	6	18.8%	12.8%	\$512	12.9%	8.1%
	Middle	18	56.3%	\$2,095	52.9%	53.7%	18	56.3%	53.5%	\$2,095	52.9%	47.5%
	Upper	8	25.0%	\$1,353	34.2%	30.7%	8	25.0%	32.3%	\$1,353	34.2%	43.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	32	100.0%	\$3,960	100.0%	100.0%	32	100.0%	100.0%	\$3,960	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.6%	\$0	0.0%	1.1%
	Moderate	2	11.8%	\$159	6.5%	13.2%	2	11.8%	11.4%	\$159	6.5%	7.9%
	Middle	7	41.2%	\$561	22.8%	53.7%	7	41.2%	51.2%	\$561	22.8%	44.8%
	Upper	8	47.1%	\$1,742	70.8%	30.7%	8	47.1%	35.8%	\$1,742	70.8%	46.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$2,462	100.0%	100.0%	17	100.0%	100.0%	\$2,462	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.3%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	13.2%	0	0.0%	12.4%	\$0	0.0%	8.5%
	Middle	0	0.0%	\$0	0.0%	53.7%	0	0.0%	51.4%	\$0	0.0%	42.7%
	Upper	0	0.0%	\$0	0.0%	30.7%	0	0.0%	34.9%	\$0	0.0%	48.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	9.5%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	30.6%	0	0.0%	40.5%	\$0	0.0%	12.8%
	Middle	0	0.0%	\$0	0.0%	54.0%	0	0.0%	41.9%	\$0	0.0%	64.8%
	Upper	0	0.0%	\$0	0.0%	9.9%	0	0.0%	8.1%	\$0	0.0%	8.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.5%	\$0	0.0%	1.9%
	Moderate	8	16.3%	\$671	10.4%	13.2%	8	16.3%	12.3%	\$671	10.4%	8.4%
	Middle	25	51.0%	\$2,656	41.4%	53.7%	25	51.0%	52.6%	\$2,656	41.4%	47.8%
	Upper	16	32.7%	\$3,095	48.2%	30.7%	16	32.7%	33.6%	\$3,095	48.2%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	49	100.0%	\$6,422	100.0%	100.0%	49	100.0%	100.0%	\$6,422	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Grand Rapids

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Bank		Families by Family Income			Count		Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	12	20.0%	\$780	9.7%	20.4%	8	28.6%	\$544	16.8%	7.0%	4	12.5%	\$236	4.9%	5.4%
	Moderate	12	20.0%	\$1,153	14.3%	17.2%	6	21.4%	\$498	15.4%	16.8%	6	18.8%	\$655	13.5%	16.8%
	Middle	11	18.3%	\$1,462	18.1%	20.9%	4	14.3%	\$470	14.5%	19.3%	7	21.9%	\$992	20.5%	18.2%
	Upper	25	41.7%	\$4,685	58.0%	41.4%	10	35.7%	\$1,724	53.3%	42.6%	15	46.9%	\$2,961	61.1%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	14.4%	0	0.0%	\$0	0.0%	15.2%
	Total	60	100.0%	\$8,080	100.0%	100.0%	28	100.0%	\$3,236	100.0%	100.0%	32	100.0%	\$4,844	100.0%	100.0%
REFINANCE	Low	16	13.0%	\$973	5.7%	20.4%	11	12.1%	\$675	5.7%	3.2%	5	15.6%	\$298	5.7%	3.7%
	Moderate	28	22.8%	\$2,501	14.7%	17.2%	14	15.4%	\$1,244	10.6%	9.5%	14	43.8%	\$1,257	23.9%	10.5%
	Middle	18	14.6%	\$1,942	11.4%	20.9%	17	18.7%	\$1,834	15.6%	16.6%	1	3.1%	\$108	2.1%	17.3%
	Upper	61	49.6%	\$11,613	68.2%	41.4%	49	53.8%	\$8,016	68.1%	51.4%	12	37.5%	\$3,597	68.4%	46.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	19.4%	0	0.0%	\$0	0.0%	21.8%
	Total	123	100.0%	\$17,029	100.0%	100.0%	91	100.0%	\$11,769	100.0%	100.0%	32	100.0%	\$5,260	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	\$0	0.0%	4.6%	0	0.0%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	\$0	0.0%	12.5%	0	0.0%	\$0	0.0%	11.6%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	\$0	0.0%	21.7%	0	0.0%	\$0	0.0%	18.2%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	\$0	0.0%	54.6%	0	0.0%	\$0	0.0%	60.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	6.6%	0	0.0%	\$0	0.0%	6.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	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%	20.9%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	28	15.3%	\$1,753	7.0%	20.4%	19	16.0%	\$1,219	8.1%	4.3%	9	14.1%	\$534	5.3%	4.4%
	Moderate	40	21.9%	\$3,654	14.6%	17.2%	20	16.8%	\$1,742	11.6%	11.5%	20	31.3%	\$1,912	18.9%	13.0%
	Middle	29	15.8%	\$3,404	13.6%	20.9%	21	17.6%	\$2,304	15.4%	17.1%	8	12.5%	\$1,100	10.9%	17.3%
	Upper	86	47.0%	\$16,298	64.9%	41.4%	59	49.6%	\$9,740	64.9%	47.3%	27	42.2%	\$6,558	64.9%	44.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	19.8%	0	0.0%	\$0	0.0%	20.8%
	Total	183	100.0%	\$25,109	100.0%	100.0%	119	100.0%	\$15,005	100.0%	100.0%	64	100.0%	\$10,104	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Grand Rapids

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	4	12.5%	\$272	6.9%	19.1%	4	12.5%	11.0%	\$272	6.9%	5.9%
	Moderate	12	37.5%	\$1,162	29.3%	17.9%	12	37.5%	21.5%	\$1,162	29.3%	15.7%
	Middle	10	31.3%	\$1,374	34.7%	22.3%	10	31.3%	21.8%	\$1,374	34.7%	20.4%
	Upper	6	18.8%	\$1,152	29.1%	40.7%	6	18.8%	29.3%	\$1,152	29.1%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.5%	\$0	0.0%	15.6%
	Total	32	100.0%	\$3,960	100.0%	100.0%	32	100.0%	100.0%	\$3,960	100.0%	100.0%
REFINANCE	Low	4	23.5%	\$249	10.1%	19.1%	4	23.5%	8.5%	\$249	10.1%	4.9%
	Moderate	4	23.5%	\$372	15.1%	17.9%	4	23.5%	17.6%	\$372	15.1%	12.2%
	Middle	5	29.4%	\$542	22.0%	22.3%	5	29.4%	21.4%	\$542	22.0%	18.0%
	Upper	4	23.5%	\$1,299	52.8%	40.7%	4	23.5%	33.0%	\$1,299	52.8%	44.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.5%	\$0	0.0%	20.3%
	Total	17	100.0%	\$2,462	100.0%	100.0%	17	100.0%	100.0%	\$2,462	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	10.6%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	21.1%	\$0	0.0%	14.4%
	Middle	0	0.0%	\$0	0.0%	22.3%	0	0.0%	27.4%	\$0	0.0%	23.3%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	36.5%	\$0	0.0%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	6.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	16.3%	\$521	8.1%	19.1%	8	16.3%	10.1%	\$521	8.1%	5.2%
	Moderate	16	32.7%	\$1,534	23.9%	17.9%	16	32.7%	20.1%	\$1,534	23.9%	13.5%
	Middle	15	30.6%	\$1,916	29.8%	22.3%	15	30.6%	21.9%	\$1,916	29.8%	18.3%
	Upper	10	20.4%	\$2,451	38.2%	40.7%	10	20.4%	30.8%	\$2,451	38.2%	40.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.1%	\$0	0.0%	22.8%
	Total	49	100.0%	\$6,422	100.0%	100.0%	49	100.0%	100.0%	\$6,422	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Consumer Loan Distribution Tables

MI - Grand Rapids-Wyoming (Kent) 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	6	10.2%	190	4.6%
Moderate	3	5.1%	133	3.2%	9	15.3%	504	12.2%
Low/Moderate Total	3	5.1%	133	3.2%	15	25.4%	694	16.9%
Middle	19	32.2%	1,336	32.4%	12	20.3%	702	17.0%
Upper	37	62.7%	2,649	64.3%	32	54.2%	2,722	66.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	4,118	100.0%	59	100.0%	4,118	100.0%

MI - Grand Rapids-Wyoming (Kent) 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	0.8%	24	0.2%	11	8.7%	432	3.0%
Moderate	6	4.8%	1,069	7.4%	20	15.9%	1,376	9.6%
Low/Moderate Total	7	5.6%	1,093	7.6%	31	24.6%	1,808	12.6%
Middle	50	39.7%	3,581	24.9%	25	19.8%	1,902	13.2%
Upper	69	54.8%	9,725	67.5%	69	54.8%	10,139	70.4%
Unknown	0	0.0%	0	0.0%	1	0.8%	550	3.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	126	100.0%	14,399	100.0%	126	100.0%	14,399	100.0%

MI - Grand Rapids-Wyoming (Kent-Ottawa) 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	5	2.7%	199	0.9%	23	12.6%	957	4.2%
Moderate	9	4.9%	1,146	5.0%	35	19.1%	2,128	9.4%
Low/Moderate Total	14	7.7%	1,345	5.9%	58	31.7%	3,085	13.6%
Middle	90	49.2%	9,132	40.2%	50	27.3%	4,141	18.2%
Upper	79	43.2%	12,222	53.8%	74	40.4%	14,923	65.7%
Unknown	0	0.0%	0	0.0%	1	0.5%	550	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	183	100.0%	22,699	100.0%	183	100.0%	22,699	100.0%

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MI - Southeast Michigan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison									
		2012, 2013						2012					2013				
		Count		Bank Dollar		Small Businesses		Count		Dollar		Agg \$ %	Count		Dollar		Agg \$ %
		#	%	\$ (000s)	\$ %	%		#	%	\$ 000s	\$ %		#	%	\$ 000s	\$ %	
SMALL BUSINESSES	Low	567	9.2%	\$159,172	10.0%	6.1%		254	9.4%	\$75,734	10.2%	7.1%	313	9.0%	\$83,438	9.8%	6.7%
	Moderate	1,371	22.2%	\$380,758	23.9%	18.6%		590	21.8%	\$174,913	23.5%	20.8%	781	22.5%	\$205,845	24.3%	21.2%
	Middle	1,870	30.3%	\$489,905	30.8%	36.5%		810	30.0%	\$229,807	30.9%	33.2%	1,060	30.6%	\$260,098	30.7%	33.1%
	Upper	2,262	36.7%	\$535,157	33.6%	38.5%		1,005	37.2%	\$251,244	33.7%	37.0%	1,257	36.3%	\$283,913	33.5%	37.1%
	Unknown	96	1.6%	\$26,831	1.7%	0.3%		42	1.6%	\$12,937	1.7%	1.3%	54	1.6%	\$13,894	1.6%	1.3%
	Tr Unknown	0	0.0%	\$0	0.0%			0	0.0%	\$0	0.0%	0.6%	0	0.0%	\$0	0.0%	0.6%
	Total	6,166	100.0%	\$1,591,823	100.0%	100.0%		2,701	100.0%	\$744,635	100.0%	100.0%	3,465	100.0%	\$847,188	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	1.6%		0	0.0%	\$0	0.0%	0.9%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	7.9%		0	0.0%	\$0	0.0%	14.3%	0	0.0%	\$0	0.0%	10.8%
	Middle	0	0.0%	\$0	0.0%	55.5%		0	0.0%	\$0	0.0%	50.7%	0	0.0%	\$0	0.0%	70.8%
	Upper	0	0.0%	\$0	0.0%	35.0%		0	0.0%	\$0	0.0%	34.0%	0	0.0%	\$0	0.0%	18.4%
	Unknown	2	100.0%	\$300	100.0%	0.0%		1	100.0%	\$100	100.0%	0.0%	1	100.0%	\$200	100.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%			0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$300	100.0%	100.0%		1	100.0%	\$100	100.0%	100.0%	1	100.0%	\$200	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MI - Southeast Michigan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2014					2014				
		Count		Bank Dollar		Small Businesses %	Count		Agg %	Dollar	
		#	%	\$ (000s)	\$ %		#	%		\$ 000s	\$ %
SMALL BUSINESSES	Low	282	8.4%	\$69,668	8.8%	5.7%	282	8.4%	4.8%	\$69,668	8.8%
	Moderate	729	21.7%	\$186,813	23.6%	18.1%	729	21.7%	16.8%	\$186,813	23.6%
	Middle	1,090	32.4%	\$257,458	32.5%	36.5%	1,090	32.4%	34.6%	\$257,458	32.5%
	Upper	1,211	36.0%	\$265,048	33.4%	39.3%	1,211	36.0%	42.3%	\$265,048	33.4%
	Unknown	48	1.4%	\$13,400	1.7%	0.2%	48	1.4%	0.5%	\$13,400	1.7%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%
	Total	3,360	100.0%	\$792,387	100.0%	100.0%	3,360	100.0%	100.0%	\$792,387	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.9%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.3%	0	0.0%	11.8%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	54.4%	0	0.0%	56.4%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	35.3%	0	0.0%	28.2%	\$0	0.0%
	Unknown	1	100.0%	\$100	100.0%	0.0%	1	100.0%	0.9%	\$100	100.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%
	Total	1	100.0%	\$100	100.0%	100.0%	1	100.0%	100.0%	\$100	100.0%

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MI - Southeast Michigan

Product Type		Bank Lending & Demographic Data Comparison 2012, 2013						Bank & Aggregate Lending Comparison											
								2012						2013					
								Count				Dollar		Count		Dollar			
		Count		Dollar		Total Businesses	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#		%	%		\$ 000s	\$ %		\$ %	#		%	%		\$ 000s
Small Business	Revenue	\$1 Million or Less	1,479	24.0%	\$265,150	16.7%	89.7%	658	24.4%	36.0%	\$124,194	16.7%	33.6%	821	23.7%	43.9%	\$140,956	16.6%	30.9%
		Over \$1 Million	3,032	49.2%	\$1,064,505	66.9%	6.9%	1,277	47.3%				1,755	50.6%					
		Total Rev. available	4,511	73.2%	\$1,329,655	83.6%	96.6%	1,935	71.7%				2,576	74.3%					
		Rev. Not Known	1,655	26.8%	\$262,168	16.5%	3.3%	766	28.4%				889	25.7%					
		Total	6,166	100.0%	\$1,591,823	100.0%	100.0%	2,701	100.0%				3,465	100.0%					
	Loan Size	\$100,000 or Less	2,776	45.0%	\$158,127	9.9%		1,125	41.7%	92.9%	\$68,547	9.2%	27.2%	1,651	47.6%	92.4%	\$89,580	10.6%	28.3%
		\$100,001 - \$250,000	1,314	21.3%	\$245,101	15.4%		601	22.3%	3.1%	\$112,250	15.1%	15.0%	713	20.6%	3.4%	\$132,851	15.7%	15.0%
		\$250,001 - \$1 Million	2,076	33.7%	\$1,188,595	74.7%		975	36.1%	4.0%	\$563,838	75.7%	57.8%	1,101	31.8%	4.2%	\$624,757	73.7%	56.8%
		Total	6,166	100.0%	\$1,591,823	100.0%		2,701	100.0%	100.0%	\$744,635	100.0%	100.0%	3,465	100.0%	100.0%	\$847,188	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	911	61.6%	\$48,943	18.5%													
		\$100,001 - \$250,000	231	15.6%	\$41,396	15.6%													
		\$250,001 - \$1 Million	337	22.8%	\$174,811	65.9%													
		Total	1,479	100.0%	\$265,150	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.3%	0	0.0%	26.8%	\$0	0.0%	46.8%	0	0.0%	42.3%	\$0	0.0%	41.5%
		Over \$1 Million	2	100.0%	\$300	100.0%	1.7%	1	100.0%				1	100.0%					
		Total Rev. available	2	100.0%	\$300	100.0%	100.0%	1	100.0%				1	100.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	2	100.0%	\$300	100.0%	100.0%	1	100.0%				1	100.0%					
	Loan Size	\$100,000 or Less	1	50.0%	\$100	33.3%		1	100.0%	95.9%	\$100	100.0%	64.8%	0	0.0%	95.9%	\$0	0.0%	58.0%
		\$100,001 - \$250,000	1	50.0%	\$200	66.7%		0	0.0%	4.1%	\$0	0.0%	35.2%	1	100.0%	3.1%	\$200	100.0%	25.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	16.8%
		Total	2	100.0%	\$300	100.0%		1	100.0%	100.0%	\$100	100.0%	100.0%	1	100.0%	100.0%	\$200	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FFIEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MI - Southeast Michigan

Product Type		Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison					
		2014						2014					
		Bank				Total Businesses	Count			Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%			%	\$ 000s		\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	759	22.6%	\$118,405	14.9%	89.1%	759	22.6%	41.7%	\$118,405	14.9%	28.8%
		Over \$1 Million	1,734	51.6%	\$545,505	68.8%	7.8%	1,734	51.6%				
		Total Rev. available	2,493	74.2%	\$663,910	83.7%	96.9%	2,493	74.2%				
		Rev. Not Known	867	25.8%	\$128,477	16.2%	3.1%	867	25.8%				
		Total	3,360	100.0%	\$792,387	100.0%	100.0%	3,360	100.0%				
	Loan Size	\$100,000 or Less	1,658	49.3%	\$86,616	10.9%		1,658	49.3%	93.6%	\$86,616	10.9%	32.0%
		\$100,001 - \$250,000	687	20.4%	\$129,974	16.4%		687	20.4%	2.9%	\$129,974	16.4%	14.4%
		\$250,001 - \$1 Million	1,015	30.2%	\$575,797	72.7%		1,015	30.2%	3.5%	\$575,797	72.7%	53.5%
		Total	3,360	100.0%	\$792,387	100.0%		3,360	100.0%	100.0%	\$792,387	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	502	66.1%	\$26,010	22.0%							
		\$100,001 - \$250,000	119	15.7%	\$21,768	18.4%							
		\$250,001 - \$1 Million	138	18.2%	\$70,627	59.6%							
		Total	759	100.0%	\$118,405	100.0%							
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms	0	0.0%	37.3%	\$0	0.0%	58.3%
		Over \$1 Million	1	100.0%	\$100	100.0%	2.0%	1	100.0%				
		Total Rev. available	1	100.0%	\$100	100.0%	99.9%	1	100.0%				
		Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%				
		Total	1	100.0%	\$100	100.0%	100.0%	1	100.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$100	100.0%		1	100.0%	93.6%	\$100	100.0%	50.8%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.5%	\$0	0.0%	39.3%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	9.9%
		Total	1	100.0%	\$100	100.0%		1	100.0%	100.0%	\$100	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	0	0.0%	\$0	0.0%							
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%							
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%							
		Total	0	0.0%	\$0	0.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Southeast Michigan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Bank		Owner Occupied Units		#	Count		Dollar		#	Count		Dollar		#
		Count	Dollar		%		Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	
HOME PURCHASE	Low	4	0.7%	\$241	0.3%	4.4%	1	0.4%	\$88	0.2%	0.4%	3	1.0%	\$153	0.3%	0.4%
	Moderate	64	10.9%	\$4,728	5.4%	19.1%	29	10.3%	\$2,107	5.6%	5.5%	35	11.6%	\$2,621	5.2%	5.8%
	Middle	207	35.4%	\$23,389	26.6%	39.7%	104	36.9%	\$10,491	28.1%	32.6%	103	34.0%	\$12,898	25.5%	33.4%
	Upper	310	53.0%	\$59,537	67.7%	36.8%	148	52.5%	\$24,660	66.0%	61.5%	162	53.5%	\$34,877	69.0%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	585	100.0%	\$87,895	100.0%	100.0%	282	100.0%	\$37,346	100.0%	100.0%	303	100.0%	\$50,549	100.0%	100.0%
REFINANCE	Low	4	0.3%	\$276	0.1%	4.4%	3	0.4%	\$187	0.1%	0.5%	1	0.2%	\$89	0.1%	0.6%
	Moderate	62	4.8%	\$6,892	3.0%	19.1%	36	4.5%	\$3,366	2.5%	5.1%	26	5.2%	\$3,526	3.5%	7.7%
	Middle	425	32.9%	\$53,749	23.1%	39.7%	251	31.6%	\$31,238	23.5%	31.9%	174	35.0%	\$22,511	22.6%	34.1%
	Upper	801	62.0%	\$171,570	73.8%	36.8%	505	63.5%	\$97,876	73.8%	62.6%	296	59.6%	\$73,694	73.8%	57.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	1,292	100.0%	\$232,487	100.0%	100.0%	795	100.0%	\$132,667	100.0%	100.0%	497	100.0%	\$99,820	100.0%	100.0%
HOME IMPROVEMENT	Low	6	12.8%	\$27	0.8%	4.4%	3	11.1%	\$11	0.4%	0.7%	3	15.0%	\$16	1.8%	0.4%
	Moderate	4	8.5%	\$79	2.2%	19.1%	2	7.4%	\$9	0.3%	4.7%	2	10.0%	\$70	7.8%	5.0%
	Middle	13	27.7%	\$612	17.0%	39.7%	9	33.3%	\$293	10.9%	27.1%	4	20.0%	\$319	35.3%	32.3%
	Upper	24	51.1%	\$2,882	80.1%	36.8%	13	48.1%	\$2,384	88.4%	67.5%	11	55.0%	\$498	55.1%	62.3%
	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	47	100.0%	\$3,600	100.0%	100.0%	27	100.0%	\$2,697	100.0%	100.0%	20	100.0%	\$903	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	\$0	0.0%	6.9%	0	0.0%	\$0	0.0%	12.2%
	Moderate	3	50.0%	\$7,024	42.5%	27.5%	0	0.0%	\$0	0.0%	18.1%	3	60.0%	\$7,024	92.2%	18.4%
	Middle	1	16.7%	\$8,900	53.9%	36.8%	1	100.0%	\$8,900	100.0%	48.5%	0	0.0%	\$0	0.0%	43.4%
	Upper	2	33.3%	\$594	3.6%	18.5%	0	0.0%	\$0	0.0%	26.5%	2	40.0%	\$594	7.8%	26.0%
	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%
	Total	6	100.0%	\$16,518	100.0%	100.0%	1	100.0%	\$8,900	100.0%	100.0%	5	100.0%	\$7,618	100.0%	100.0%
HMDA TOTALS	Low	14	0.7%	\$544	0.2%	4.4%	7	0.6%	\$286	0.2%	0.5%	7	0.8%	\$258	0.2%	0.8%
	Moderate	133	6.9%	\$18,723	5.5%	19.1%	67	6.1%	\$5,482	3.0%	5.4%	66	8.0%	\$13,241	8.3%	7.3%
	Middle	646	33.5%	\$86,650	25.4%	39.7%	365	33.0%	\$50,922	28.0%	32.3%	281	34.1%	\$35,728	22.5%	34.1%
	Upper	1,137	58.9%	\$234,583	68.9%	36.8%	666	60.3%	\$124,920	68.8%	61.8%	471	57.1%	\$109,663	69.0%	57.8%
	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%
	Total	1,930	100.0%	\$340,500	100.0%	100.0%	1,105	100.0%	\$181,610	100.0%	100.0%	825	100.0%	\$158,890	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Southeast Michigan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Agg	Dollar		Agg
		Count		Dollar			Bank			Bank		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	5	2.2%	\$502	1.4%	4.4%	5	2.2%	1.1%	\$502	1.4%	0.6%
	Moderate	29	12.8%	\$2,259	6.1%	19.1%	29	12.8%	10.7%	\$2,259	6.1%	6.3%
	Middle	106	46.9%	\$10,524	28.5%	39.7%	106	46.9%	42.2%	\$10,524	28.5%	34.9%
	Upper	86	38.1%	\$23,610	64.0%	36.8%	86	38.1%	46.0%	\$23,610	64.0%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	226	100.0%	\$36,895	100.0%	100.0%	226	100.0%	100.0%	\$36,895	100.0%	100.0%
REFINANCE	Low	2	1.4%	\$164	0.6%	4.4%	2	1.4%	1.1%	\$164	0.6%	0.6%
	Moderate	18	12.3%	\$2,698	10.1%	19.1%	18	12.3%	9.8%	\$2,698	10.1%	5.8%
	Middle	55	37.7%	\$6,279	23.6%	39.7%	55	37.7%	39.8%	\$6,279	23.6%	33.0%
	Upper	71	48.6%	\$17,520	65.7%	36.8%	71	48.6%	49.3%	\$17,520	65.7%	60.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	146	100.0%	\$26,661	100.0%	100.0%	146	100.0%	100.0%	\$26,661	100.0%	100.0%
HOME IMPROVEMENT	Low	1	6.7%	\$5	0.8%	4.4%	1	6.7%	2.4%	\$5	0.8%	0.8%
	Moderate	2	13.3%	\$38	6.4%	19.1%	2	13.3%	14.8%	\$38	6.4%	5.8%
	Middle	4	26.7%	\$34	5.7%	39.7%	4	26.7%	39.9%	\$34	5.7%	31.2%
	Upper	8	53.3%	\$517	87.0%	36.8%	8	53.3%	42.9%	\$517	87.0%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$594	100.0%	100.0%	15	100.0%	100.0%	\$594	100.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	11.1%	\$0	0.0%	8.6%
	Moderate	3	37.5%	\$3,035	14.2%	27.5%	3	37.5%	22.9%	\$3,035	14.2%	18.1%
	Middle	5	62.5%	\$18,384	85.8%	36.8%	5	62.5%	42.4%	\$18,384	85.8%	47.6%
	Upper	0	0.0%	\$0	0.0%	18.5%	0	0.0%	23.6%	\$0	0.0%	25.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$21,419	100.0%	100.0%	8	100.0%	100.0%	\$21,419	100.0%	100.0%
HMDA TOTALS	Low	8	2.0%	\$671	0.8%	4.4%	8	2.0%	1.2%	\$671	0.8%	0.9%
	Moderate	52	13.2%	\$8,030	9.4%	19.1%	52	13.2%	10.5%	\$8,030	9.4%	6.5%
	Middle	170	43.0%	\$35,221	41.2%	39.7%	170	43.0%	41.0%	\$35,221	41.2%	34.5%
	Upper	165	41.8%	\$41,647	48.7%	36.8%	165	41.8%	47.3%	\$41,647	48.7%	58.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	395	100.0%	\$85,569	100.0%	100.0%	395	100.0%	100.0%	\$85,569	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Southeast Michigan

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2012, 2013					2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	111	19.0%	\$7,388	8.4%	21.7%	53	18.8%	12.4%	\$3,427	9.2%	6.1%	58	19.1%	10.3%	\$3,961	7.8%	4.9%
	Moderate	141	24.1%	\$13,203	15.0%	17.0%	67	23.8%	20.8%	\$6,426	17.2%	14.7%	74	24.4%	19.6%	\$6,777	13.4%	13.3%
	Middle	125	21.4%	\$15,931	18.1%	19.7%	68	24.1%	21.9%	\$8,550	22.9%	20.4%	57	18.8%	22.7%	\$7,381	14.6%	20.4%
	Upper	207	35.4%	\$51,098	58.1%	41.5%	94	33.3%	32.4%	\$18,943	50.7%	47.4%	113	37.3%	34.9%	\$32,155	63.6%	50.1%
	Unknown	1	0.2%	\$275	0.3%	0.0%	0	0.0%	12.4%	\$0	0.0%	11.4%	1	0.3%	12.5%	\$275	0.5%	11.3%
	Total	585	100.0%	\$87,895	100.0%	100.0%	282	100.0%	100.0%	\$37,346	100.0%	100.0%	303	100.0%	100.0%	\$50,549	100.0%	100.0%
REFINANCE	Low	98	7.6%	\$7,800	3.4%	21.7%	59	7.4%	7.1%	\$4,108	3.1%	4.4%	39	7.8%	7.8%	\$3,692	3.7%	4.4%
	Moderate	216	16.7%	\$21,533	9.3%	17.0%	120	15.1%	12.2%	\$11,535	8.7%	8.7%	96	19.3%	13.1%	\$9,998	10.0%	8.7%
	Middle	269	20.8%	\$33,587	14.4%	19.7%	170	21.4%	20.9%	\$21,138	15.9%	17.7%	99	19.9%	20.9%	\$12,449	12.5%	16.6%
	Upper	705	54.6%	\$163,702	70.4%	41.5%	444	55.8%	46.8%	\$94,689	71.4%	56.1%	261	52.5%	45.3%	\$69,013	69.1%	52.4%
	Unknown	4	0.3%	\$5,865	2.5%	0.0%	2	0.3%	13.0%	\$1,197	0.9%	13.1%	2	0.4%	12.9%	\$4,668	4.7%	17.9%
	Total	1,292	100.0%	\$232,487	100.0%	100.0%	795	100.0%	100.0%	\$132,667	100.0%	100.0%	497	100.0%	100.0%	\$99,820	100.0%	100.0%
HOME IMPROVEMENT	Low	13	27.7%	\$83	2.3%	21.7%	9	33.3%	14.2%	\$61	2.3%	5.0%	4	20.0%	12.5%	\$22	2.4%	6.4%
	Moderate	4	8.5%	\$263	7.3%	17.0%	0	0.0%	20.6%	\$0	0.0%	11.1%	4	20.0%	20.8%	\$263	29.1%	9.8%
	Middle	9	19.1%	\$679	18.9%	19.7%	6	22.2%	23.4%	\$448	16.6%	18.5%	3	15.0%	23.4%	\$231	25.6%	19.0%
	Upper	21	44.7%	\$2,575	71.5%	41.5%	12	44.4%	39.5%	\$2,188	81.1%	60.3%	9	45.0%	41.0%	\$387	42.9%	60.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	5.1%	0	0.0%	2.3%	\$0	0.0%	4.6%
	Total	47	100.0%	\$3,600	100.0%	100.0%	27	100.0%	100.0%	\$2,697	100.0%	100.0%	20	100.0%	100.0%	\$903	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	6	100.0%	\$16,518	100.0%	0.0%	1	100.0%	100.0%	\$8,900	100.0%	100.0%	5	100.0%	100.0%	\$7,618	100.0%	100.0%
	Total	6	100.0%	\$16,518	100.0%	100.0%	1	100.0%	100.0%	\$8,900	100.0%	100.0%	5	100.0%	100.0%	\$7,618	100.0%	100.0%
HMDA TOTALS	Low	222	11.5%	\$15,271	4.5%	21.7%	121	11.0%	8.6%	\$7,596	4.2%	4.7%	101	12.2%	8.8%	\$7,675	4.8%	4.5%
	Moderate	361	18.7%	\$34,999	10.3%	17.0%	187	16.9%	14.6%	\$17,961	9.9%	10.0%	174	21.1%	15.5%	\$17,038	10.7%	10.1%
	Middle	403	20.9%	\$50,197	14.7%	19.7%	244	22.1%	21.2%	\$30,136	16.6%	18.1%	159	19.3%	21.6%	\$20,061	12.6%	17.5%
	Upper	933	48.3%	\$217,375	63.8%	41.5%	550	49.8%	42.9%	\$115,820	63.8%	53.1%	383	46.4%	41.5%	\$101,555	63.9%	50.3%
	Unknown	11	0.6%	\$22,658	6.7%	0.0%	3	0.3%	12.7%	\$10,097	5.6%	14.0%	8	1.0%	12.6%	\$12,561	7.9%	17.7%
	Total	1,930	100.0%	\$340,500	100.0%	100.0%	1,105	100.0%	100.0%	\$181,610	100.0%	100.0%	825	100.0%	100.0%	\$158,890	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Southeast Michigan

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				#	%		\$ %
HOME PURCHASE	Low	44	19.5%	\$3,151	8.5%	21.7%	44	19.5%	8.6%	\$3,151	8.5%	4.1%
	Moderate	72	31.9%	\$6,772	18.4%	17.0%	72	31.9%	20.2%	\$6,772	18.4%	13.6%
	Middle	41	18.1%	\$4,791	13.0%	19.7%	41	18.1%	21.8%	\$4,791	13.0%	19.5%
	Upper	65	28.8%	\$21,146	57.3%	41.5%	65	28.8%	35.4%	\$21,146	57.3%	50.0%
	Unknown	4	1.8%	\$1,035	2.8%	0.0%	4	1.8%	13.9%	\$1,035	2.8%	12.8%
	Total	226	100.0%	\$36,895	100.0%	100.0%	226	100.0%	100.0%	\$36,895	100.0%	100.0%
REFINANCE	Low	16	11.0%	\$1,094	4.1%	21.7%	16	11.0%	7.4%	\$1,094	4.1%	3.9%
	Moderate	33	22.6%	\$4,318	16.2%	17.0%	33	22.6%	14.6%	\$4,318	16.2%	9.8%
	Middle	35	24.0%	\$4,891	18.3%	19.7%	35	24.0%	19.9%	\$4,891	18.3%	16.5%
	Upper	61	41.8%	\$15,588	58.5%	41.5%	61	41.8%	43.1%	\$15,588	58.5%	55.4%
	Unknown	1	0.7%	\$770	2.9%	0.0%	1	0.7%	15.0%	\$770	2.9%	14.3%
	Total	146	100.0%	\$26,661	100.0%	100.0%	146	100.0%	100.0%	\$26,661	100.0%	100.0%
HOME IMPROVEMENT	Low	3	20.0%	\$18	3.0%	21.7%	3	20.0%	10.8%	\$18	3.0%	3.8%
	Moderate	1	6.7%	\$6	1.0%	17.0%	1	6.7%	19.1%	\$6	1.0%	12.4%
	Middle	4	26.7%	\$30	5.1%	19.7%	4	26.7%	23.2%	\$30	5.1%	20.8%
	Upper	5	33.3%	\$459	77.3%	41.5%	5	33.3%	41.2%	\$459	77.3%	58.0%
	Unknown	2	13.3%	\$81	13.6%	0.0%	2	13.3%	5.7%	\$81	13.6%	5.0%
	Total	15	100.0%	\$594	100.0%	100.0%	15	100.0%	100.0%	\$594	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	8	100.0%	\$21,419	100.0%	0.0%	8	100.0%	100.0%	\$21,419	100.0%	100.0%
	Total	8	100.0%	\$21,419	100.0%	100.0%	8	100.0%	100.0%	\$21,419	100.0%	100.0%
HMDA TOTALS	Low	63	15.9%	\$4,263	5.0%	21.7%	63	15.9%	8.2%	\$4,263	5.0%	3.9%
	Moderate	106	26.8%	\$11,096	13.0%	17.0%	106	26.8%	17.7%	\$11,096	13.0%	11.6%
	Middle	80	20.3%	\$9,712	11.3%	19.7%	80	20.3%	21.1%	\$9,712	11.3%	17.6%
	Upper	131	33.2%	\$37,193	43.5%	41.5%	131	33.2%	38.9%	\$37,193	43.5%	50.6%
	Unknown	15	3.8%	\$23,305	27.2%	0.0%	15	3.8%	14.1%	\$23,305	27.2%	16.2%
	Total	395	100.0%	\$85,569	100.0%	100.0%	395	100.0%	100.0%	\$85,569	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Consumer Loan Distribution Tables

MI - Southeast Michigan 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	9	1.0%	161	0.2%	143	16.6%	6,093	7.4%
Moderate	69	8.0%	2,437	3.0%	182	21.1%	10,967	13.4%
Low/Moderate Total	78	9.0%	2,598	3.2%	325	37.7%	17,060	20.8%
Middle	275	31.9%	19,810	24.2%	163	18.9%	11,032	13.5%
Upper	509	59.0%	59,478	72.6%	364	42.2%	46,719	57.1%
Unknown	0	0.0%	0	0.0%	10	1.2%	7,075	8.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	862	100.0%	81,886	100.0%	862	100.0%	81,886	100.0%

MI - Southeast Michigan 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	19	1.0%	542	0.3%	249	12.9%	12,899	6.9%
Moderate	153	7.9%	7,640	4.1%	350	18.1%	22,277	11.9%
Low/Moderate Total	172	8.9%	8,182	4.4%	599	31.0%	35,176	18.8%
Middle	628	32.5%	47,844	25.5%	425	22.0%	32,647	17.4%
Upper	1,130	58.5%	131,280	70.1%	897	46.5%	116,479	62.2%
Unknown	0	0.0%	0	0.0%	9	0.5%	3,004	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,930	100.0%	187,306	100.0%	1,930	100.0%	187,306	100.0%

MI - Southeast Michigan 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	25	1.1%	938	0.4%	266	11.6%	13,810	5.7%
Moderate	193	8.4%	11,589	4.8%	430	18.8%	29,622	12.3%
Low/Moderate Total	218	9.5%	12,527	5.2%	696	30.4%	43,432	18.1%
Middle	742	32.4%	58,988	24.5%	457	19.9%	38,628	16.1%
Upper	1,333	58.1%	169,023	70.3%	1,132	49.4%	153,959	64.0%
Unknown	0	0.0%	0	0.0%	8	0.3%	4,519	1.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,293	100.0%	240,538	100.0%	2,293	100.0%	240,538	100.0%

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Count		Dollar		Small Businesses	Count		Dollar		Agg	Count		Dollar		Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %	%	#	%	\$ 000s	\$ %	%
SMALL BUSINESSES	Low	71	6.6%	\$25,610	7.9%	6.2%	32	7.5%	\$12,572	8.0%	8.3%	39	6.1%	\$13,038	7.8%	8.1%
	Moderate	209	19.6%	\$63,459	19.6%	21.4%	88	20.7%	\$30,887	19.6%	21.4%	121	18.8%	\$32,572	19.6%	22.1%
	Middle	229	21.4%	\$66,033	20.4%	28.0%	87	20.5%	\$31,701	20.1%	27.9%	142	22.1%	\$34,332	20.6%	28.2%
	Upper	528	49.4%	\$161,594	49.9%	43.5%	211	49.6%	\$80,267	50.9%	40.0%	317	49.3%	\$81,327	48.9%	39.3%
	Unknown	31	2.9%	\$7,386	2.3%	1.0%	7	1.6%	\$2,283	1.4%	2.1%	24	3.7%	\$5,103	3.1%	2.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.3%	0	0.0%	\$0	0.0%	0.3%
	Total	1,068	100.0%	\$324,082	100.0%	100.0%	425	100.0%	\$157,710	100.0%	100.0%	643	100.0%	\$166,372	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	\$0	0.0%	3.4%	0	0.0%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	\$0	0.0%	9.7%	0	0.0%	\$0	0.0%	11.2%
	Middle	0	0.0%	\$0	0.0%	24.0%	0	0.0%	\$0	0.0%	30.0%	0	0.0%	\$0	0.0%	28.7%
	Upper	0	0.0%	\$0	0.0%	55.3%	0	0.0%	\$0	0.0%	55.7%	0	0.0%	\$0	0.0%	56.1%
	Unknown	0	0.0%	\$0	0.0%	1.0%	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%	1.1%	0	0.0%	\$0	0.0%	1.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Count		Dollar		Small Businesses	Count		Dollar		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %	%	
SMALL BUSINESSES	Low	35	5.1%	\$13,562	7.2%	5.8%	35	5.1%	\$13,562	7.2%	7.7%	
	Moderate	131	19.2%	\$37,925	20.0%	20.8%	131	19.2%	\$37,925	20.0%	21.9%	
	Middle	166	24.4%	\$44,235	23.4%	27.8%	166	24.4%	\$44,235	23.4%	28.4%	
	Upper	321	47.1%	\$88,097	46.6%	44.6%	321	47.1%	\$88,097	46.6%	39.5%	
	Unknown	28	4.1%	\$5,425	2.9%	0.9%	28	4.1%	\$5,425	2.9%	2.2%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.3%	
	Total	681	100.0%	\$189,244	100.0%	100.0%	681	100.0%	\$189,244	100.0%	100.0%	
SMALL FARM	Low	1	100.0%	\$250	100.0%	3.9%	1	100.0%	\$250	100.0%	6.2%	
	Moderate	0	0.0%	\$0	0.0%	14.8%	0	0.0%	\$0	0.0%	9.3%	
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	\$0	0.0%	31.1%	
	Upper	0	0.0%	\$0	0.0%	55.8%	0	0.0%	\$0	0.0%	52.3%	
	Unknown	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	0.2%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	1.0%	
	Total	1	100.0%	\$250	100.0%	100.0%	1	100.0%	\$250	100.0%	100.0%	

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: CA - Greater Los Angeles

Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2012, 2013					2012						2013						
		Bank				Total Businesses	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank	Agg	%	\$ 000s	\$ %	%	Bank	Agg	%	\$ 000s	\$ %	%	
#	%	\$ (000s)	\$ %	#	%	%													#
Small Business	Revenue	\$1 Million or Less	174	16.3%	\$32,133	9.9%	89.2%	68	16.0%	45.7%	\$18,256	11.6%	32.4%	106	16.5%	51.4%	\$13,877	8.3%	32.6%
		Over \$1 Million	546	51.1%	\$207,772	64.1%	7.3%	221	52.0%				325	50.5%					
		Total Rev. available	720	67.4%	\$239,905	74.0%	96.5%	289	68.0%				431	67.0%					
		Rev. Not Known	348	32.6%	\$84,177	26.0%	3.5%	136	32.0%				212	33.0%					
		Total	1,068	100.0%	\$324,082	100.0%	100.0%	425	100.0%				643	100.0%					
	Loan Size	\$100,000 or Less	407	38.1%	\$23,979	7.4%		105	24.7%	95.2%	\$7,440	4.7%	39.4%	302	47.0%	94.8%	\$16,539	9.9%	38.7%
		\$100,001 - \$250,000	219	20.5%	\$42,623	13.2%		99	23.3%	2.2%	\$19,627	12.4%	12.3%	120	18.7%	2.4%	\$22,996	13.8%	12.0%
		\$250,001 - \$1 Million	442	41.4%	\$257,480	79.4%		221	52.0%	2.6%	\$130,643	82.8%	48.3%	221	34.4%	2.9%	\$126,837	76.2%	49.3%
		Total	1,068	100.0%	\$324,082	100.0%		425	100.0%	100.0%	\$157,710	100.0%	100.0%	643	100.0%	100.0%	\$166,372	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	112	64.4%	\$6,308	19.6%													
		\$100,001 - \$250,000	27	15.5%	\$5,048	15.7%													
		\$250,001 - \$1 Million	35	20.1%	\$20,777	64.7%													
		Total	174	100.0%	\$32,133	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 95.4%	0	0.0%	37.6%	\$0	0.0%	29.2%	0	0.0%	48.2%	\$0	0.0%	36.1%
		Over \$1 Million	0	0.0%	\$0	0.0%	4.0%	0	0.0%				0	0.0%					
		Total Rev. available	0	0.0%	\$0	0.0%	99.4%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.6%	0	0.0%				0	0.0%					
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	89.5%	\$0	0.0%	47.1%	0	0.0%	91.0%	\$0	0.0%	50.4%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.8%	\$0	0.0%	22.5%	0	0.0%	6.2%	\$0	0.0%	23.8%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.7%	\$0	0.0%	30.4%	0	0.0%	2.8%	\$0	0.0%	25.8%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRFEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: CA - Greater Los Angeles

Product Type			Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
			2014					2014					
			Bank				Total Businesses	Count			Dollar		
			Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%			\$ 000s	\$ %		\$ %
Small Business	Revenue	\$1 Million or Less	138	20.3%	\$20,594	10.9%	89.1%	138	20.3%	48.3%	\$20,594	10.9%	31.4%
		Over \$1 Million	369	54.2%	\$123,477	65.2%	7.6%	369	54.2%				
		Total Rev. available	507	74.5%	\$144,071	76.1%	96.7%	507	74.5%				
		Rev. Not Known	174	25.6%	\$45,173	23.9%	3.3%	174	25.6%				
		Total	681	100.0%	\$189,244	100.0%	100.0%	681	100.0%				
	Loan Size	\$100,000 or Less	313	46.0%	\$16,940	9.0%		313	46.0%	95.1%	\$16,940	9.0%	41.3%
		\$100,001 - \$250,000	132	19.4%	\$25,474	13.5%		132	19.4%	2.2%	\$25,474	13.5%	12.0%
		\$250,001 - \$1 Million	236	34.7%	\$146,830	77.6%		236	34.7%	2.6%	\$146,830	77.6%	46.7%
		Total	681	100.0%	\$189,244	100.0%		681	100.0%	100.0%	\$189,244	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	103	74.6%	\$5,372	26.1%							
		\$100,001 - \$250,000	16	11.6%	\$3,069	14.9%							
		\$250,001 - \$1 Million	19	13.8%	\$12,153	59.0%							
		Total	138	100.0%	\$20,594	100.0%							
Small Farm	Revenue	\$1 Million or Less	1	100.0%	\$250	100.0%	95.0%	1	100.0%	46.9%	\$250	100.0%	31.5%
		Over \$1 Million	0	0.0%	\$0	0.0%	4.4%	0	0.0%				
		Total Rev. available	1	100.0%	\$250	100.0%	99.4%	1	100.0%				
		Not Known	0	0.0%	\$0	0.0%	0.6%	0	0.0%				
		Total	1	100.0%	\$250	100.0%	100.0%	1	100.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.9%	\$0	0.0%	57.1%
		\$100,001 - \$250,000	1	100.0%	\$250	100.0%		1	100.0%	5.3%	\$250	100.0%	23.6%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%	19.3%
		Total	1	100.0%	\$250	100.0%		1	100.0%	100.0%	\$250	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	0	0.0%	\$0	0.0%							
		\$100,001 - \$250,000	1	100.0%	\$250	100.0%							
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%							
		Total	1	100.0%	\$250	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Bank		Owner Occupied Units			Count		Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	1.4%	\$683	0.6%	2.5%	0	0.0%	\$0	0.0%	1.8%	1	2.5%	\$683	0.8%	1.7%
	Moderate	2	2.9%	\$1,373	1.2%	17.6%	1	3.4%	\$360	1.2%	12.8%	1	2.5%	\$1,013	1.2%	12.2%
	Middle	12	17.4%	\$10,711	9.1%	30.2%	5	17.2%	\$2,696	8.6%	24.2%	7	17.5%	\$8,015	9.3%	23.1%
	Upper	54	78.3%	\$105,020	89.2%	49.7%	23	79.3%	\$28,179	90.2%	60.9%	31	77.5%	\$76,841	88.8%	62.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.3%
	Total	69	100.0%	\$117,787	100.0%	100.0%	29	100.0%	\$31,235	100.0%	100.0%	40	100.0%	\$86,552	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	\$0	0.0%	0.9%	0	0.0%	\$0	0.0%	1.3%
	Moderate	8	5.1%	\$1,434	0.8%	17.6%	4	4.5%	\$523	0.6%	8.4%	4	5.8%	\$911	1.0%	10.0%
	Middle	26	16.6%	\$13,103	7.5%	30.2%	19	21.6%	\$7,150	8.7%	21.4%	7	10.1%	\$5,953	6.4%	22.6%
	Upper	123	78.3%	\$159,808	91.7%	49.7%	65	73.9%	\$74,377	90.6%	69.3%	58	84.1%	\$85,431	92.6%	66.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	157	100.0%	\$174,345	100.0%	100.0%	88	100.0%	\$82,050	100.0%	100.0%	69	100.0%	\$92,295	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	\$0	0.0%	1.1%	0	0.0%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	8.7%	0	0.0%	\$0	0.0%	10.0%
	Middle	0	0.0%	\$0	0.0%	30.2%	0	0.0%	\$0	0.0%	21.9%	0	0.0%	\$0	0.0%	21.0%
	Upper	0	0.0%	\$0	0.0%	49.7%	0	0.0%	\$0	0.0%	68.3%	0	0.0%	\$0	0.0%	67.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	12.7%	0	0.0%	\$0	0.0%	14.2%	0	0.0%	\$0	0.0%	12.0%
	Moderate	2	66.7%	\$17,715	26.2%	32.4%	1	100.0%	\$13,740	100.0%	33.5%	1	50.0%	\$3,975	7.4%	34.0%
	Middle	1	33.3%	\$50,000	73.8%	26.5%	0	0.0%	\$0	0.0%	24.4%	1	50.0%	\$50,000	92.6%	25.2%
	Upper	0	0.0%	\$0	0.0%	28.3%	0	0.0%	\$0	0.0%	27.9%	0	0.0%	\$0	0.0%	28.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$67,715	100.0%	100.0%	1	100.0%	\$13,740	100.0%	100.0%	2	100.0%	\$53,975	100.0%	100.0%
HMDA TOTALS	Low	1	0.4%	\$683	0.2%	2.5%	0	0.0%	\$0	0.0%	1.8%	1	0.9%	\$683	0.3%	2.1%
	Moderate	12	5.2%	\$20,522	5.7%	17.6%	6	5.1%	\$14,623	11.5%	10.7%	6	5.4%	\$5,899	2.5%	12.1%
	Middle	39	17.0%	\$73,814	20.5%	30.2%	24	20.3%	\$9,846	7.8%	22.2%	15	13.5%	\$63,968	27.5%	22.9%
	Upper	177	77.3%	\$264,828	73.6%	49.7%	88	74.6%	\$102,556	80.7%	65.3%	89	80.2%	\$162,272	69.7%	62.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.1%
	Total	229	100.0%	\$359,847	100.0%	100.0%	118	100.0%	\$127,025	100.0%	100.0%	111	100.0%	\$232,822	100.0%	100.0%

Originations & Purchases
2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank			Owner Occupied Units		Count			Dollar		
		Count		Dollar		%	Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %		#	%		\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	2.8%	\$2,000	2.6%	2.5%	1	2.8%	2.8%	\$2,000	2.6%	1.9%
	Moderate	3	8.3%	\$3,114	4.1%	17.6%	3	8.3%	18.5%	\$3,114	4.1%	12.4%
	Middle	2	5.6%	\$2,328	3.1%	30.2%	2	5.6%	29.4%	\$2,328	3.1%	23.1%
	Upper	30	83.3%	\$68,282	90.2%	49.7%	30	83.3%	49.3%	\$68,282	90.2%	62.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Total	36	100.0%	\$75,724	100.0%	100.0%	36	100.0%	100.0%	\$75,724	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	2.1%	\$0	0.0%	1.4%
	Moderate	2	7.7%	\$467	0.7%	17.6%	2	7.7%	16.6%	\$467	0.7%	11.1%
	Middle	4	15.4%	\$1,252	2.0%	30.2%	4	15.4%	30.2%	\$1,252	2.0%	23.4%
	Upper	20	76.9%	\$61,781	97.3%	49.7%	20	76.9%	51.0%	\$61,781	97.3%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$63,500	100.0%	100.0%	26	100.0%	100.0%	\$63,500	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.7%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	16.5%	\$0	0.0%	11.2%
	Middle	0	0.0%	\$0	0.0%	30.2%	0	0.0%	29.9%	\$0	0.0%	21.0%
	Upper	0	0.0%	\$0	0.0%	49.7%	0	0.0%	51.9%	\$0	0.0%	66.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	2	100.0%	\$22,213	100.0%	12.7%	2	100.0%	14.8%	\$22,213	100.0%	13.6%
	Moderate	0	0.0%	\$0	0.0%	32.4%	0	0.0%	41.8%	\$0	0.0%	32.7%
	Middle	0	0.0%	\$0	0.0%	26.5%	0	0.0%	23.6%	\$0	0.0%	28.9%
	Upper	0	0.0%	\$0	0.0%	28.3%	0	0.0%	19.8%	\$0	0.0%	24.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$22,213	100.0%	100.0%	2	100.0%	100.0%	\$22,213	100.0%	100.0%
HMDA TOTALS	Low	3	4.7%	\$24,213	15.0%	2.5%	3	4.7%	2.7%	\$24,213	15.0%	2.7%
	Moderate	5	7.8%	\$3,581	2.2%	17.6%	5	7.8%	17.9%	\$3,581	2.2%	13.7%
	Middle	6	9.4%	\$3,580	2.2%	30.2%	6	9.4%	29.7%	\$3,580	2.2%	23.7%
	Upper	50	78.1%	\$130,063	80.6%	49.7%	50	78.1%	49.7%	\$130,063	80.6%	59.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	64	100.0%	\$161,437	100.0%	100.0%	64	100.0%	100.0%	\$161,437	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank		Families by Family Income		Count			Dollar			Count			Dollar			
		Count	Dollar							Bank	Agg				Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	1.4%	\$792	0.7%	23.9%	0	0.0%	2.6%	\$0	0.0%	1.1%	1	2.5%	1.3%	\$792	0.9%	0.5%
	Moderate	2	2.9%	\$505	0.4%	16.8%	1	3.4%	13.5%	\$230	0.7%	7.3%	1	2.5%	8.1%	\$275	0.3%	3.9%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	23.4%	\$0	0.0%	17.0%	0	0.0%	19.5%	\$0	0.0%	12.7%
	Upper	65	94.2%	\$113,290	96.2%	41.2%	28	96.6%	52.0%	\$31,005	99.3%	65.9%	37	92.5%	61.1%	\$82,285	95.1%	71.3%
	Unknown	1	1.4%	\$3,200	2.7%	0.0%	0	0.0%	8.6%	\$0	0.0%	8.8%	1	2.5%	10.0%	\$3,200	3.7%	11.7%
	Total	69	100.0%	\$117,787	100.0%	100.0%	29	100.0%	100.0%	\$31,235	100.0%	100.0%	40	100.0%	100.0%	\$86,552	100.0%	100.0%
REFINANCE	Low	5	3.2%	\$574	0.3%	23.9%	5	5.7%	3.9%	\$574	0.7%	1.9%	0	0.0%	4.7%	\$0	0.0%	2.0%
	Moderate	19	12.1%	\$5,278	3.0%	16.8%	14	15.9%	9.4%	\$3,029	3.7%	5.6%	5	7.2%	10.0%	\$2,249	2.4%	5.0%
	Middle	9	5.7%	\$1,549	0.9%	18.1%	6	6.8%	18.1%	\$893	1.1%	13.5%	3	4.3%	17.6%	\$656	0.7%	11.1%
	Upper	120	76.4%	\$161,170	92.4%	41.2%	63	71.6%	58.8%	\$77,554	94.5%	68.8%	57	82.6%	57.8%	\$83,616	90.6%	62.2%
	Unknown	4	2.5%	\$5,774	3.3%	0.0%	0	0.0%	9.9%	\$0	0.0%	10.2%	4	5.8%	9.9%	\$5,774	6.3%	19.7%
	Total	157	100.0%	\$174,345	100.0%	100.0%	88	100.0%	100.0%	\$82,050	100.0%	100.0%	69	100.0%	100.0%	\$92,295	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	4.7%	\$0	0.0%	2.0%	0	0.0%	4.0%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	12.8%	\$0	0.0%	8.1%	0	0.0%	12.0%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	22.6%	\$0	0.0%	18.2%	0	0.0%	20.4%	\$0	0.0%	14.5%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	56.8%	\$0	0.0%	68.6%	0	0.0%	58.7%	\$0	0.0%	69.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	3.2%	0	0.0%	4.8%	\$0	0.0%	7.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$67,715	100.0%	0.0%	1	100.0%	100.0%	\$13,740	100.0%	100.0%	2	100.0%	100.0%	\$53,975	100.0%	100.0%
	Total	3	100.0%	\$67,715	100.0%	100.0%	1	100.0%	100.0%	\$13,740	100.0%	100.0%	2	100.0%	100.0%	\$53,975	100.0%	100.0%
HMDA TOTALS	Low	6	2.6%	\$1,366	0.4%	23.9%	5	4.2%	3.6%	\$574	0.5%	1.6%	1	0.9%	3.7%	\$792	0.3%	1.4%
	Moderate	21	9.2%	\$5,783	1.6%	16.8%	15	12.7%	10.2%	\$3,259	2.6%	5.7%	6	5.4%	9.4%	\$2,524	1.1%	4.4%
	Middle	9	3.9%	\$1,549	0.4%	18.1%	6	5.1%	19.0%	\$893	0.7%	13.6%	3	2.7%	17.9%	\$656	0.3%	10.9%
	Upper	185	80.8%	\$274,460	76.3%	41.2%	91	77.1%	56.7%	\$108,559	85.5%	64.4%	94	84.7%	57.8%	\$165,901	71.3%	60.8%
	Unknown	8	3.5%	\$76,689	21.3%	0.0%	1	0.8%	10.5%	\$13,740	10.8%	14.7%	7	6.3%	11.1%	\$62,949	27.0%	22.4%
	Total	229	100.0%	\$359,847	100.0%	100.0%	118	100.0%	100.0%	\$127,025	100.0%	100.0%	111	100.0%	100.0%	\$232,822	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.9%	\$0	0.0%	0.4%
	Moderate	1	2.8%	\$920	1.2%	16.8%	1	2.8%	5.7%	\$920	1.2%	2.6%
	Middle	2	5.6%	\$1,635	2.2%	18.1%	2	5.6%	16.0%	\$1,635	2.2%	10.0%
	Upper	32	88.9%	\$62,879	83.0%	41.2%	32	88.9%	63.8%	\$62,879	83.0%	73.2%
	Unknown	1	2.8%	\$10,290	13.6%	0.0%	1	2.8%	13.6%	\$10,290	13.6%	13.7%
	Total	36	100.0%	\$75,724	100.0%	100.0%	36	100.0%	100.0%	\$75,724	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	3.5%	\$0	0.0%	1.5%
	Moderate	2	7.7%	\$1,607	2.5%	16.8%	2	7.7%	8.4%	\$1,607	2.5%	4.3%
	Middle	2	7.7%	\$490	0.8%	18.1%	2	7.7%	16.3%	\$490	0.8%	11.0%
	Upper	20	76.9%	\$29,593	46.6%	41.2%	20	76.9%	58.2%	\$29,593	46.6%	69.6%
	Unknown	2	7.7%	\$31,810	50.1%	0.0%	2	7.7%	13.6%	\$31,810	50.1%	13.6%
	Total	26	100.0%	\$63,500	100.0%	100.0%	26	100.0%	100.0%	\$63,500	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	3.7%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	9.1%	\$0	0.0%	5.0%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	17.3%	\$0	0.0%	12.1%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	61.2%	\$0	0.0%	72.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.6%	\$0	0.0%	9.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$22,213	100.0%	0.0%	2	100.0%	100.0%	\$22,213	100.0%	100.0%
	Total	2	100.0%	\$22,213	100.0%	100.0%	2	100.0%	100.0%	\$22,213	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	2.5%	\$0	0.0%	0.9%
	Moderate	3	4.7%	\$2,527	1.6%	16.8%	3	4.7%	7.2%	\$2,527	1.6%	3.2%
	Middle	4	6.3%	\$2,125	1.3%	18.1%	4	6.3%	15.9%	\$2,125	1.3%	9.6%
	Upper	52	81.3%	\$92,472	57.3%	41.2%	52	81.3%	59.1%	\$92,472	57.3%	64.5%
	Unknown	5	7.8%	\$64,313	39.8%	0.0%	5	7.8%	15.4%	\$64,313	39.8%	21.8%
	Total	64	100.0%	\$161,437	100.0%	100.0%	64	100.0%	100.0%	\$161,437	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Consumer Loan Distribution Tables

CA - Greater Los Angeles 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	0.5%	45	0.1%	9	4.2%	705	1.1%
Moderate	10	4.7%	1,305	2.1%	14	6.6%	2,087	3.3%
Low/Moderate Total	11	5.2%	1,350	2.2%	23	10.8%	2,792	4.5%
Middle	33	15.6%	3,200	5.1%	19	9.0%	2,229	3.6%
Upper	168	79.2%	58,048	92.7%	169	79.7%	57,277	91.5%
Unknown	0	0.0%	0	0.0%	1	0.5%	300	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	212	100.0%	62,598	100.0%	212	100.0%	62,598	100.0%

CA - Greater Los Angeles 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	0.4%	50	0.0%	14	3.1%	857	0.8%
Moderate	27	6.1%	3,495	3.4%	18	4.0%	1,576	1.5%
Low/Moderate Total	29	6.5%	3,545	3.4%	32	7.2%	2,433	2.4%
Middle	81	18.2%	10,776	10.4%	43	9.7%	4,591	4.4%
Upper	334	75.1%	88,969	86.0%	366	82.2%	94,446	91.3%
Unknown	1	0.2%	200	0.2%	4	0.9%	2,020	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	445	100.0%	103,490	100.0%	445	100.0%	103,490	100.0%

CA - Greater Los Angeles 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	5	0.7%	524	0.3%	10	1.4%	705	0.4%
Moderate	43	5.8%	5,907	3.0%	25	3.4%	2,864	1.5%
Low/Moderate Total	48	6.5%	6,431	3.3%	35	4.7%	3,569	1.8%
Middle	137	18.6%	27,519	14.0%	63	8.5%	6,843	3.5%
Upper	553	74.9%	162,801	82.7%	631	85.5%	171,792	87.3%
Unknown	0	0.0%	0	0.0%	9	1.2%	14,547	7.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	738	100.0%	196,751	100.0%	738	100.0%	196,751	100.0%

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: CA - San Jose (Santa Clara)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison									
		2012, 2013						2012						2013			
		Count		Bank Dollar		Small Businesses %		Count		Dollar		Agg		Count		Dollar	
		#	%	\$ (000s)	\$ %			#	%	\$ 000s	\$ %			#	%	\$ 000s	\$ %
SMALL BUSINESSES	Low	62	9.5%	\$15,847	8.5%	6.6%		28	11.4%	\$8,380	9.6%	6.1%		34	8.3%	\$7,467	7.4%
	Moderate	205	31.3%	\$62,621	33.4%	21.8%		71	29.0%	\$27,764	31.9%	26.8%		134	32.7%	\$34,857	34.7%
	Middle	211	32.2%	\$63,034	33.6%	35.5%		83	33.9%	\$29,614	34.0%	33.7%		128	31.2%	\$33,420	33.2%
	Upper	177	27.0%	\$46,030	24.5%	36.1%		63	25.7%	\$21,259	24.4%	33.4%		114	27.8%	\$24,771	24.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%		0	0.0%	\$0	0.0%	0.0%		0	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%			0	0.0%	\$0	0.0%	0.0%		0	0.0%	\$0	0.0%
	Total	655	100.0%	\$187,532	100.0%	100.0%		245	100.0%	\$87,017	100.0%	100.0%		410	100.0%	\$100,515	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	2.0%		0	0.0%	\$0	0.0%	0.3%		0	0.0%	\$0	0.0%
	Moderate	1	100.0%	\$175	100.0%	17.4%		1	100.0%	\$175	100.0%	25.4%		0	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	32.0%		0	0.0%	\$0	0.0%	49.8%		0	0.0%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	48.5%		0	0.0%	\$0	0.0%	24.5%		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%
	Tr Unknown	0	0.0%	\$0	0.0%			0	0.0%	\$0	0.0%	0.0%		0	0.0%	\$0	0.0%
	Total	1	100.0%	\$175	100.0%	100.0%		1	100.0%	\$175	100.0%	100.0%		0	0.0%	\$0	0.0%

Originations & Purchases
2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: CA - San Jose (Santa Clara)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison					
		2014						2014					
		Count		Bank Dollar		Small Businesses %		Count		Dollar		Agg	
		#	%	\$ (000s)	\$ %			#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	36	9.5%	\$8,173	9.6%	6.2%		36	9.5%	\$8,173	9.6%	6.0%	
	Moderate	110	29.2%	\$26,725	31.4%	21.1%		110	29.2%	\$26,725	31.4%	26.3%	
	Middle	117	31.0%	\$30,919	36.3%	35.6%		117	31.0%	\$30,919	36.3%	34.2%	
	Upper	114	30.2%	\$19,426	22.8%	37.0%		114	30.2%	\$19,426	22.8%	33.5%	
	Unknown	0	0.0%	\$0	0.0%	0.1%		0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%			0	0.0%	\$0	0.0%	0.0%	
	Total	377	100.0%	\$85,243	100.0%	100.0%		377	100.0%	\$85,243	100.0%	100.0%	
SMALL FARM	Low	0	0.0%	\$0	0.0%	1.6%		0	0.0%	\$0	0.0%	0.3%	
	Moderate	0	0.0%	\$0	0.0%	16.5%		0	0.0%	\$0	0.0%	26.9%	
	Middle	0	0.0%	\$0	0.0%	32.5%		0	0.0%	\$0	0.0%	28.0%	
	Upper	0	0.0%	\$0	0.0%	49.4%		0	0.0%	\$0	0.0%	44.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%		0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%			0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%		0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases
2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: CA - San Jose (Santa Clara)

Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2012, 2013					2012						2013						
		Bank				Total Businesses	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%									%	\$ 000s	\$ %	\$ %	#
Small Business	Revenue	\$1 Million or Less	104	15.9%	\$24,880	13.3%	88.9%	37	15.1%	46.1%	\$12,649	14.5%	36.0%	67	16.3%	52.1%	\$12,231	12.2%	34.7%
		Over \$1 Million	351	53.6%	\$127,811	68.2%	7.6%	130	53.1%				221	53.9%					
		Total Rev. available	455	69.5%	\$152,691	81.5%	96.5%	167	68.2%				288	70.2%					
		Rev. Not Known	200	30.5%	\$34,841	18.6%	3.5%	78	31.8%				122	29.8%					
		Total	655	100.0%	\$187,532	100.0%	100.0%	245	100.0%				410	100.0%					
	Loan Size	\$100,000 or Less	277	42.3%	\$16,358	8.7%		70	28.6%	95.8%	\$4,853	5.6%	42.6%	207	50.5%	95.5%	\$11,505	11.4%	43.4%
		\$100,001 - \$250,000	142	21.7%	\$26,993	14.4%		62	25.3%	1.9%	\$11,945	13.7%	11.2%	80	19.5%	2.1%	\$15,048	15.0%	11.6%
		\$250,001 - \$1 Million	236	36.0%	\$144,181	76.9%		113	46.1%	2.3%	\$70,219	80.7%	46.1%	123	30.0%	2.4%	\$73,962	73.6%	45.0%
		Total	655	100.0%	\$187,532	100.0%		245	100.0%	100.0%	\$87,017	100.0%	100.0%	410	100.0%	100.0%	\$100,515	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	63	60.6%	\$3,370	13.5%													
		\$100,001 - \$250,000	13	12.5%	\$2,172	8.7%													
		\$250,001 - \$1 Million	28	26.9%	\$19,338	77.7%													
		Total	104	100.0%	\$24,880	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms	0	0.0%	50.0%	\$0	0.0%	23.3%	0	0.0%	45.4%	\$0	0.0%	32.7%
		Over \$1 Million	1	100.0%	\$175	100.0%	6.3%	1	100.0%				0	0.0%					
		Total Rev. available	1	100.0%	\$175	100.0%	99.6%	1	100.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.4%	0	0.0%				0	0.0%					
		Total	1	100.0%	\$175	100.0%	100.0%	1	100.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	90.3%	\$0	0.0%	53.1%	0	0.0%	88.7%	\$0	0.0%	41.8%
		\$100,001 - \$250,000	1	100.0%	\$175	100.0%		1	100.0%	5.6%	\$175	100.0%	13.2%	0	0.0%	6.2%	\$0	0.0%	18.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.2%	\$0	0.0%	33.8%	0	0.0%	5.2%	\$0	0.0%	40.1%
		Total	1	100.0%	\$175	100.0%		1	100.0%	100.0%	\$175	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FFIEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: CA - San Jose (Santa Clara)

Product Type		Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison					
		2014						2014					
		Bank				Total Businesses	Count			Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%			%	\$ 000s		\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	74	19.6%	\$9,175	10.8%	88.9%	74	19.6%	45.7%	\$9,175	10.8%	33.0%
		Over \$1 Million	197	52.3%	\$54,075	63.4%	7.8%	197	52.3%				
		Total Rev. available	271	71.9%	\$63,250	74.2%	96.7%	271	71.9%				
		Rev. Not Known	106	28.1%	\$21,993	25.8%	3.4%	106	28.1%				
		Total	377	100.0%	\$85,243	100.0%	100.0%	377	100.0%				
	Loan Size	\$100,000 or Less	196	52.0%	\$11,070	13.0%		196	52.0%	95.9%	\$11,070	13.0%	46.2%
		\$100,001 - \$250,000	79	21.0%	\$15,124	17.7%		79	21.0%	2.0%	\$15,124	17.7%	11.6%
		\$250,001 - \$1 Million	102	27.1%	\$59,049	69.3%		102	27.1%	2.2%	\$59,049	69.3%	42.2%
		Total	377	100.0%	\$85,243	100.0%		377	100.0%	100.0%	\$85,243	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	56	75.7%	\$2,749	30.0%							
		\$100,001 - \$250,000	9	12.2%	\$1,675	18.3%							
		\$250,001 - \$1 Million	9	12.2%	\$4,751	51.8%							
		Total	74	100.0%	\$9,175	100.0%							
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 93.4%	0	0.0%	35.0%	\$0	0.0%	18.3%
		Over \$1 Million	0	0.0%	\$0	0.0%	6.2%	0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	99.6%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.4%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	91.3%	\$0	0.0%	49.9%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.9%	\$0	0.0%	14.9%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.9%	\$0	0.0%	35.2%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	0	0.0%	\$0	0.0%							
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%							
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%							
		Total	0	0.0%	\$0	0.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - San Jose (Santa Clara)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	5.0%	\$0	0.0%	3.0%	0	0.0%	5.1%	\$0	0.0%	3.2%
	Moderate	2	20.0%	\$433	3.8%	17.9%	1	50.0%	20.6%	\$244	15.0%	14.2%	1	12.5%	20.4%	\$189	1.9%	14.7%
	Middle	1	10.0%	\$450	3.9%	39.0%	0	0.0%	39.7%	\$0	0.0%	33.8%	1	12.5%	41.1%	\$450	4.6%	36.0%
	Upper	7	70.0%	\$10,578	92.3%	38.6%	1	50.0%	34.7%	\$1,388	85.0%	49.1%	6	75.0%	33.4%	\$9,190	93.5%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$11,461	100.0%	100.0%	2	100.0%	100.0%	\$1,632	100.0%	100.0%	8	100.0%	100.0%	\$9,829	100.0%	100.0%
REFINANCE	Low	1	2.0%	\$86	0.3%	4.5%	1	3.8%	3.0%	\$86	0.5%	1.9%	0	0.0%	4.0%	\$0	0.0%	2.7%
	Moderate	7	14.3%	\$2,301	7.0%	17.9%	6	23.1%	13.8%	\$2,161	13.5%	10.5%	1	4.3%	16.9%	\$140	0.8%	12.4%
	Middle	15	30.6%	\$4,923	15.0%	39.0%	7	26.9%	37.9%	\$2,187	13.6%	33.4%	8	34.8%	38.2%	\$2,736	16.3%	34.0%
	Upper	26	53.1%	\$25,535	77.7%	38.6%	12	46.2%	45.3%	\$11,614	72.4%	54.2%	14	60.9%	40.9%	\$13,921	82.9%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	49	100.0%	\$32,845	100.0%	100.0%	26	100.0%	100.0%	\$16,048	100.0%	100.0%	23	100.0%	100.0%	\$16,797	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	2.5%	\$0	0.0%	1.5%	0	0.0%	4.4%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	12.4%	\$0	0.0%	9.1%	0	0.0%	14.7%	\$0	0.0%	10.0%
	Middle	0	0.0%	\$0	0.0%	39.0%	0	0.0%	37.9%	\$0	0.0%	32.1%	0	0.0%	36.0%	\$0	0.0%	29.0%
	Upper	1	100.0%	\$5,000	100.0%	38.6%	1	100.0%	47.2%	\$5,000	100.0%	57.2%	0	0.0%	44.9%	\$0	0.0%	58.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$5,000	100.0%	100.0%	1	100.0%	100.0%	\$5,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	10.2%	0	0.0%	18.8%	\$0	0.0%	12.6%	0	0.0%	22.2%	\$0	0.0%	8.0%
	Moderate	0	0.0%	\$0	0.0%	31.9%	0	0.0%	36.6%	\$0	0.0%	31.7%	0	0.0%	33.3%	\$0	0.0%	28.5%
	Middle	0	0.0%	\$0	0.0%	39.7%	0	0.0%	29.8%	\$0	0.0%	39.6%	0	0.0%	29.8%	\$0	0.0%	52.0%
	Upper	0	0.0%	\$0	0.0%	18.1%	0	0.0%	14.8%	\$0	0.0%	16.1%	0	0.0%	14.6%	\$0	0.0%	11.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	1.7%	\$86	0.2%	4.5%	1	3.4%	3.3%	\$86	0.4%	2.4%	0	0.0%	4.4%	\$0	0.0%	3.0%
	Moderate	9	15.0%	\$2,734	5.5%	17.9%	7	24.1%	14.9%	\$2,405	10.6%	11.7%	2	6.5%	17.7%	\$329	1.2%	13.5%
	Middle	16	26.7%	\$5,373	10.9%	39.0%	7	24.1%	38.2%	\$2,187	9.6%	33.6%	9	29.0%	38.7%	\$3,186	12.0%	34.9%
	Upper	34	56.7%	\$41,113	83.4%	38.6%	14	48.3%	43.6%	\$18,002	79.4%	52.3%	20	64.5%	39.2%	\$23,111	86.8%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	60	100.0%	\$49,306	100.0%	100.0%	29	100.0%	100.0%	\$22,680	100.0%	100.0%	31	100.0%	100.0%	\$26,626	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - San Jose (Santa Clara)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	5.5%	\$0	0.0%	3.7%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	22.6%	\$0	0.0%	16.6%
	Middle	0	0.0%	\$0	0.0%	39.0%	0	0.0%	40.6%	\$0	0.0%	35.6%
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	31.3%	\$0	0.0%	44.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	4.8%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	19.1%	\$0	0.0%	14.0%
	Middle	2	40.0%	\$820	19.6%	39.0%	2	40.0%	39.3%	\$820	19.6%	34.8%
	Upper	3	60.0%	\$3,355	80.4%	38.6%	3	60.0%	36.8%	\$3,355	80.4%	48.0%
	Unknown	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>100.0%</i>	<i>\$4,175</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,175</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	4.5%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	17.0%	\$0	0.0%	11.9%
	Middle	0	0.0%	\$0	0.0%	39.0%	0	0.0%	40.7%	\$0	0.0%	31.7%
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	37.8%	\$0	0.0%	53.8%
	Unknown	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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY		Multi-Family Units										
	Low	0	0.0%	\$0	0.0%	10.2%	0	0.0%	19.0%	\$0	0.0%	7.4%
	Moderate	1	50.0%	\$2,600	59.1%	31.9%	1	50.0%	32.8%	\$2,600	59.1%	24.3%
	Middle	1	50.0%	\$1,800	40.9%	39.7%	1	50.0%	31.2%	\$1,800	40.9%	34.3%
	Upper	0	0.0%	\$0	0.0%	18.1%	0	0.0%	17.0%	\$0	0.0%	34.0%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$4,400</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,400</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	5.2%	\$0	0.0%	3.6%
	Moderate	1	14.3%	\$2,600	30.3%	17.9%	1	14.3%	20.4%	\$2,600	30.3%	15.7%
	Middle	3	42.9%	\$2,620	30.6%	39.0%	3	42.9%	39.8%	\$2,620	30.6%	35.0%
	Upper	3	42.9%	\$3,355	39.1%	38.6%	3	42.9%	34.6%	\$3,355	39.1%	45.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$8,575</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,575</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: CA - San Jose (Santa Clara)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2012, 2013					2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	4.1%	\$0	0.0%	1.7%	0	0.0%	1.7%	\$0	0.0%	0.6%
	Moderate	1	10.0%	\$244	2.1%	16.2%	1	50.0%	13.1%	\$244	15.0%	7.7%	0	0.0%	9.3%	\$0	0.0%	4.8%
	Middle	1	10.0%	\$475	4.1%	19.4%	0	0.0%	22.9%	\$0	0.0%	18.0%	1	12.5%	21.3%	\$475	4.8%	15.8%
	Upper	6	60.0%	\$10,103	88.2%	41.1%	1	50.0%	52.9%	\$1,388	85.0%	66.8%	5	62.5%	61.4%	\$8,715	88.7%	73.0%
	Unknown	2	20.0%	\$639	5.6%	0.0%	0	0.0%	7.0%	\$0	0.0%	5.7%	2	25.0%	6.3%	\$639	6.5%	5.8%
	Total	10	100.0%	\$11,461	100.0%	100.0%	2	100.0%	100.0%	\$1,632	100.0%	100.0%	8	100.0%	100.0%	\$9,829	100.0%	100.0%
REFINANCE	Low	2	4.1%	\$323	1.0%	23.4%	2	7.7%	4.4%	\$323	2.0%	2.2%	0	0.0%	5.3%	\$0	0.0%	2.4%
	Moderate	9	18.4%	\$2,243	6.8%	16.2%	7	26.9%	11.3%	\$1,880	11.7%	7.5%	2	8.7%	12.2%	\$363	2.2%	7.3%
	Middle	3	6.1%	\$892	2.7%	19.4%	2	7.7%	21.9%	\$542	3.4%	18.4%	1	4.3%	20.1%	\$350	2.1%	15.5%
	Upper	35	71.4%	\$29,387	89.5%	41.1%	15	57.7%	56.7%	\$13,303	82.9%	66.2%	20	87.0%	56.8%	\$16,084	95.8%	65.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	5.7%	0	0.0%	5.6%	\$0	0.0%	9.1%
	Total	49	100.0%	\$32,845	100.0%	100.0%	26	100.0%	100.0%	\$16,048	100.0%	100.0%	23	100.0%	100.0%	\$16,797	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	6.8%	\$0	0.0%	3.2%	0	0.0%	6.4%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	17.4%	\$0	0.0%	12.7%	0	0.0%	13.5%	\$0	0.0%	8.6%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	22.9%	\$0	0.0%	19.8%	0	0.0%	20.4%	\$0	0.0%	15.1%
	Upper	1	100.0%	\$5,000	100.0%	41.1%	1	100.0%	50.9%	\$5,000	100.0%	61.1%	0	0.0%	55.8%	\$0	0.0%	69.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	3.2%	0	0.0%	3.9%	\$0	0.0%	4.5%
	Total	1	100.0%	\$5,000	100.0%	100.0%	1	100.0%	100.0%	\$5,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	3.3%	\$323	0.7%	23.4%	2	6.9%	4.4%	\$323	1.4%	2.1%	0	0.0%	4.5%	\$0	0.0%	1.9%
	Moderate	10	16.7%	\$2,487	5.0%	16.2%	8	27.6%	11.6%	\$2,124	9.4%	7.4%	2	6.5%	11.5%	\$363	1.4%	6.5%
	Middle	4	6.7%	\$1,367	2.8%	19.4%	2	6.9%	22.0%	\$542	2.4%	17.9%	2	6.5%	20.3%	\$825	3.1%	15.1%
	Upper	42	70.0%	\$44,490	90.2%	41.1%	17	58.6%	55.9%	\$19,691	86.8%	64.4%	25	80.6%	57.6%	\$24,799	93.1%	65.8%
	Unknown	2	3.3%	\$639	1.3%	0.0%	0	0.0%	6.1%	\$0	0.0%	8.3%	2	6.5%	6.1%	\$639	2.4%	10.8%
	Total	60	100.0%	\$49,306	100.0%	100.0%	29	100.0%	100.0%	\$22,680	100.0%	100.0%	31	100.0%	100.0%	\$26,626	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: CA - San Jose (Santa Clara)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	1.3%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	6.7%	\$0	0.0%	3.2%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.8%	\$0	0.0%	13.2%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	63.0%	\$0	0.0%	73.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.2%	\$0	0.0%	9.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	3.8%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	9.5%	\$0	0.0%	5.3%
	Middle	2	40.0%	\$2,000	47.9%	19.4%	2	40.0%	19.4%	\$2,000	47.9%	14.7%
	Upper	3	60.0%	\$2,175	52.1%	41.1%	3	60.0%	56.7%	\$2,175	52.1%	68.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.7%	\$0	0.0%	10.5%
	Total	5	100.0%	\$4,175	100.0%	100.0%	5	100.0%	100.0%	\$4,175	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	5.0%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	9.8%	\$0	0.0%	5.7%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	20.3%	\$0	0.0%	14.5%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	55.4%	\$0	0.0%	69.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.4%	\$0	0.0%	8.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$4,400	100.0%	0.0%	2	100.0%	100.0%	\$4,400	100.0%	100.0%
	Total	2	100.0%	\$4,400	100.0%	100.0%	2	100.0%	100.0%	\$4,400	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	2.9%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	8.4%	\$0	0.0%	4.1%
	Middle	2	28.6%	\$2,000	23.3%	19.4%	2	28.6%	19.1%	\$2,000	23.3%	13.2%
	Upper	3	42.9%	\$2,175	25.4%	41.1%	3	42.9%	58.7%	\$2,175	25.4%	66.3%
	Unknown	2	28.6%	\$4,400	51.3%	0.0%	2	28.6%	11.0%	\$4,400	51.3%	15.4%
	Total	7	100.0%	\$8,575	100.0%	100.0%	7	100.0%	100.0%	\$8,575	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Consumer Loan Distribution Tables

CA - San Jose (Santa Clara) 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	2.6%	275	1.3%	2	2.6%	200	1.0%
Moderate	5	6.5%	914	4.5%	6	7.8%	1,067	5.2%
Low/Moderate Total	7	9.1%	1,189	5.8%	8	10.4%	1,267	6.2%
Middle	18	23.4%	3,652	17.8%	12	15.6%	2,930	14.3%
Upper	52	67.5%	15,678	76.4%	53	68.8%	14,597	71.1%
Unknown	0	0.0%	0	0.0%	4	5.2%	1,725	8.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	77	100.0%	20,519	100.0%	77	100.0%	20,519	100.0%

CA - San Jose (Santa Clara) 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	3	1.4%	550	1.0%	9	4.2%	784	1.5%
Moderate	19	8.9%	2,870	5.5%	11	5.2%	1,762	3.4%
Low/Moderate Total	22	10.3%	3,420	6.5%	20	9.4%	2,546	4.9%
Middle	66	31.0%	12,870	24.6%	39	18.3%	6,230	11.9%
Upper	125	58.7%	36,130	68.9%	150	70.4%	39,114	74.6%
Unknown	0	0.0%	0	0.0%	4	1.9%	4,530	8.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	213	100.0%	52,420	100.0%	213	100.0%	52,420	100.0%

CA - San Jose (Santa Clara) 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	0.4%	80	0.1%	5	2.1%	594	0.8%
Moderate	25	10.3%	4,401	6.3%	22	9.1%	2,762	3.9%
Low/Moderate Total	26	10.7%	4,481	6.4%	27	11.2%	3,356	4.8%
Middle	77	31.8%	17,361	24.7%	34	14.0%	6,454	9.2%
Upper	139	57.4%	48,334	68.9%	172	71.1%	50,259	71.6%
Unknown	0	0.0%	0	0.0%	9	3.7%	10,107	14.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	242	100.0%	70,176	100.0%	242	100.0%	70,176	100.0%

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: AZ - Phoenix (Maricopa)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2012, 2013					2012					2013				
		Bank		Dollar		Small Businesses	Count		Dollar		Agg \$ %	Count		Dollar		Agg \$ %
		Count #	%	\$ (000s)	\$ %	%	Bank #	%	Bank \$ 000s	\$ %		Bank #	%	Bank \$ 000s	\$ %	
SMALL BUSINESSES	Low	30	14.1%	\$8,149	15.0%	6.8%	8	9.9%	\$2,812	12.2%	14.3%	22	16.7%	\$5,337	17.0%	13.6%
	Moderate	36	16.9%	\$11,061	20.3%	16.8%	13	16.0%	\$4,028	17.5%	16.5%	23	17.4%	\$7,033	22.3%	17.7%
	Middle	54	25.4%	\$10,340	19.0%	30.3%	23	28.4%	\$3,710	16.1%	25.9%	31	23.5%	\$6,630	21.1%	25.2%
	Upper	93	43.7%	\$24,958	45.8%	45.7%	37	45.7%	\$12,472	54.2%	42.3%	56	42.4%	\$12,486	39.7%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	1.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	213	100.0%	\$54,508	100.0%	100.0%	81	100.0%	\$23,022	100.0%	100.0%	132	100.0%	\$31,486	100.0%	100.0%
SMALL FARM	Small Farms															
	Low	0	0.0%	\$0	0.0%	3.2%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	13.4%	0	0.0%	\$0	0.0%	17.8%	0	0.0%	\$0	0.0%	12.5%
	Middle	0	0.0%	\$0	0.0%	29.1%	0	0.0%	\$0	0.0%	34.1%	0	0.0%	\$0	0.0%	40.6%
	Upper	0	0.0%	\$0	0.0%	53.9%	0	0.0%	\$0	0.0%	48.1%	0	0.0%	\$0	0.0%	46.3%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases
2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: AZ - Phoenix (Maricopa)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2014					2014				
		Bank		Dollar		Small Businesses	Count		Dollar		Agg \$ %
		Count #	%	\$ (000s)	\$ %	%	Bank #	%	Bank \$ 000s	\$ %	
SMALL BUSINESSES	Low	24	16.7%	\$6,736	21.2%	6.3%	24	16.7%	\$6,736	21.2%	13.6%
	Moderate	23	16.0%	\$5,213	16.4%	16.0%	23	16.0%	\$5,213	16.4%	17.4%
	Middle	36	25.0%	\$7,971	25.1%	29.9%	36	25.0%	\$7,971	25.1%	25.2%
	Upper	61	42.4%	\$11,861	37.3%	47.4%	61	42.4%	\$11,861	37.3%	42.5%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	\$0	0.0%	1.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%
	Total	144	100.0%	\$31,781	100.0%	100.0%	144	100.0%	\$31,781	100.0%	100.0%
SMALL FARM	Small Farms										
	Low	0	0.0%	\$0	0.0%	3.2%	0	0.0%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	\$0	0.0%	7.6%
	Middle	0	0.0%	\$0	0.0%	28.6%	0	0.0%	\$0	0.0%	33.8%
	Upper	0	0.0%	\$0	0.0%	55.5%	0	0.0%	\$0	0.0%	57.1%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: AZ - Phoenix (Maricopa)

Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2012, 2013					2012						2013						
		Bank				Total Businesses	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%												%	\$ 000s
Small Business	Revenue	\$1 Million or Less	52	24.4%	\$7,111	13.0%	90.6%	20	24.7%	39.6%	\$3,719	16.2%	29.7%	32	24.2%	48.5%	\$3,392	10.8%	31.7%
		Over \$1 Million	109	51.2%	\$34,985	64.2%	6.0%	43	53.1%				66	50.0%					
		Total Rev. available	161	75.6%	\$42,096	77.2%	96.6%	63	77.8%				98	74.2%					
		Rev. Not Known	52	24.4%	\$12,412	22.8%	3.5%	18	22.2%				34	25.8%					
		Total	213	100.0%	\$54,508	100.0%	100.0%	81	100.0%				132	100.0%					
	Loan Size	\$100,000 or Less	93	43.7%	\$4,699	8.6%		27	33.3%	94.7%	\$1,419	6.2%	38.0%	66	50.0%	94.3%	\$3,280	10.4%	37.2%
		\$100,001 - \$250,000	41	19.2%	\$7,761	14.2%		20	24.7%	2.4%	\$3,675	16.0%	13.8%	21	15.9%	2.5%	\$4,086	13.0%	12.9%
		\$250,001 - \$1 Million	79	37.1%	\$42,048	77.1%		34	42.0%	2.8%	\$17,928	77.9%	48.3%	45	34.1%	3.2%	\$24,120	76.6%	50.0%
		Total	213	100.0%	\$54,508	100.0%		81	100.0%	100.0%	\$23,022	100.0%	100.0%	132	100.0%	100.0%	\$31,486	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	37	71.2%	\$1,550	21.8%													
		\$100,001 - \$250,000	6	11.5%	\$1,172	16.5%													
		\$250,001 - \$1 Million	9	17.3%	\$4,389	61.7%													
		Total	52	100.0%	\$7,111	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FFIEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: AZ - Phoenix (Maricopa)

Product Type			Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
			2014					2014					
			Bank				Total Businesses	Count		Agg	Dollar		Agg
			Count	Dollar		Bank			Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	50	34.7%	\$5,963	18.8%	90.7%	50	34.7%	46.1%	\$5,963	18.8%	31.0%
		Over \$1 Million	66	45.8%	\$17,432	54.9%	6.1%	66	45.8%				
		Total Rev. available	116	80.5%	\$23,395	73.7%	96.8%	116	80.5%				
		Rev. Not Known	28	19.4%	\$8,386	26.4%	3.2%	28	19.4%				
		Total	144	100.0%	\$31,781	100.0%	100.0%	144	100.0%				
	Loan Size	\$100,000 or Less	75	52.1%	\$4,521	14.2%		75	52.1%	94.8%	\$4,521	14.2%	38.8%
		\$100,001 - \$250,000	30	20.8%	\$5,496	17.3%		30	20.8%	2.4%	\$5,496	17.3%	12.8%
		\$250,001 - \$1 Million	39	27.1%	\$21,764	68.5%		39	27.1%	2.9%	\$21,764	68.5%	48.3%
		Total	144	100.0%	\$31,781	100.0%		144	100.0%	100.0%	\$31,781	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	36	72.0%	\$1,724	28.9%							
		\$100,001 - \$250,000	11	22.0%	\$2,043	34.3%							
		\$250,001 - \$1 Million	3	6.0%	\$2,196	36.8%							
		Total	50	100.0%	\$5,963	100.0%							
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 94.0%	0	0.0%	41.4%	\$0	0.0%	33.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.8%	0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	99.8%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	84.5%	\$0	0.0%	26.8%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.4%	\$0	0.0%	23.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.1%	\$0	0.0%	49.9%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	0	0.0%	\$0	0.0%							
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%							
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%							
		Total	0	0.0%	\$0	0.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans
Assessment Area: AZ - Phoenix (Maricopa)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	%	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	%	%
#	%	\$ (000s)	\$ %	%	#	%												
HOME PURCHASE	Low	1	3.6%	\$109	1.5%	3.7%	0	0.0%	1.3%	\$0	0.0%	0.7%	1	7.7%	1.7%	\$109	2.5%	1.0%
	Moderate	5	17.9%	\$474	6.6%	21.3%	3	20.0%	12.6%	\$293	10.6%	7.1%	2	15.4%	14.2%	\$181	4.1%	8.9%
	Middle	9	32.1%	\$3,131	43.6%	35.0%	5	33.3%	35.5%	\$540	19.6%	26.8%	4	30.8%	35.6%	\$2,591	58.6%	27.4%
	Upper	13	46.4%	\$3,471	48.3%	40.1%	7	46.7%	50.6%	\$1,929	69.8%	65.3%	6	46.2%	48.4%	\$1,542	34.9%	62.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	28	100.0%	\$7,185	100.0%	100.0%	15	100.0%	100.0%	\$2,762	100.0%	100.0%	13	100.0%	100.0%	\$4,423	100.0%	100.0%
REFINANCE	Low	2	3.2%	\$1,115	6.4%	3.7%	2	5.6%	1.1%	\$1,115	11.2%	0.7%	0	0.0%	1.4%	\$0	0.0%	0.7%
	Moderate	1	1.6%	\$46	0.3%	21.3%	0	0.0%	9.4%	\$0	0.0%	6.0%	1	3.8%	11.6%	\$46	0.6%	9.0%
	Middle	23	37.1%	\$6,368	36.7%	35.0%	13	36.1%	32.9%	\$4,428	44.7%	25.8%	10	38.5%	34.3%	\$1,940	26.1%	29.0%
	Upper	36	58.1%	\$9,812	56.6%	40.1%	21	58.3%	56.6%	\$4,370	44.1%	67.5%	15	57.7%	52.7%	\$5,442	73.3%	61.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	62	100.0%	\$17,341	100.0%	100.0%	36	100.0%	100.0%	\$9,913	100.0%	100.0%	26	100.0%	100.0%	\$7,428	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	1.5%	\$0	0.0%	0.5%	0	0.0%	1.5%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	11.9%	\$0	0.0%	4.8%	0	0.0%	11.5%	\$0	0.0%	6.8%
	Middle	0	0.0%	\$0	0.0%	35.0%	0	0.0%	31.9%	\$0	0.0%	20.3%	0	0.0%	31.4%	\$0	0.0%	22.6%
	Upper	1	100.0%	\$2,560	100.0%	40.1%	0	0.0%	54.6%	\$0	0.0%	74.2%	1	100.0%	55.6%	\$2,560	100.0%	69.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$2,560	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,560	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	15.3%	0	0.0%	21.8%	\$0	0.0%	14.9%	0	0.0%	20.9%	\$0	0.0%	9.1%
	Moderate	0	0.0%	\$0	0.0%	37.1%	0	0.0%	44.4%	\$0	0.0%	22.8%	0	0.0%	42.7%	\$0	0.0%	38.0%
	Middle	0	0.0%	\$0	0.0%	28.6%	0	0.0%	25.0%	\$0	0.0%	42.0%	0	0.0%	27.2%	\$0	0.0%	34.2%
	Upper	0	0.0%	\$0	0.0%	18.8%	0	0.0%	8.1%	\$0	0.0%	13.1%	0	0.0%	9.2%	\$0	0.0%	18.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.8%	\$0	0.0%	7.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	3.3%	\$1,224	4.5%	3.7%	2	3.9%	1.2%	\$1,115	8.8%	0.9%	1	2.5%	1.6%	\$109	0.8%	1.1%
	Moderate	6	6.6%	\$520	1.9%	21.3%	3	5.9%	10.6%	\$293	2.3%	6.7%	3	7.5%	12.7%	\$227	1.6%	10.0%
	Middle	32	35.2%	\$9,499	35.1%	35.0%	18	35.3%	33.9%	\$4,968	39.2%	26.3%	14	35.0%	34.8%	\$4,531	31.4%	28.4%
	Upper	50	54.9%	\$15,843	58.5%	40.1%	28	54.9%	54.3%	\$6,299	49.7%	65.9%	22	55.0%	50.8%	\$9,544	66.2%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Total	91	100.0%	\$27,086	100.0%	100.0%	51	100.0%	100.0%	\$12,675	100.0%	100.0%	40	100.0%	100.0%	\$14,411	100.0%	100.0%

Originations & Purchases
2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: AZ - Phoenix (Maricopa)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	2.1%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	16.4%	\$0	0.0%	10.1%
	Middle	6	66.7%	\$1,070	55.2%	35.0%	6	66.7%	38.2%	\$1,070	55.2%	31.6%
	Upper	3	33.3%	\$867	44.8%	40.1%	3	33.3%	42.9%	\$867	44.8%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$1,937	100.0%	100.0%	9	100.0%	100.0%	\$1,937	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	1.6%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	13.2%	\$0	0.0%	7.7%
	Middle	5	26.3%	\$1,238	13.4%	35.0%	5	26.3%	35.6%	\$1,238	13.4%	27.1%
	Upper	14	73.7%	\$8,028	86.6%	40.1%	14	73.7%	49.5%	\$8,028	86.6%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	19	100.0%	\$9,266	100.0%	100.0%	19	100.0%	100.0%	\$9,266	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	1.5%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	12.3%	\$0	0.0%	8.2%
	Middle	0	0.0%	\$0	0.0%	35.0%	0	0.0%	34.9%	\$0	0.0%	28.0%
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	51.2%	\$0	0.0%	62.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	15.3%	0	0.0%	24.9%	\$0	0.0%	13.8%
	Moderate	0	0.0%	\$0	0.0%	37.1%	0	0.0%	43.9%	\$0	0.0%	34.6%
	Middle	0	0.0%	\$0	0.0%	28.6%	0	0.0%	23.9%	\$0	0.0%	33.8%
	Upper	0	0.0%	\$0	0.0%	18.8%	0	0.0%	7.3%	\$0	0.0%	17.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	2.0%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	15.2%	\$0	0.0%	10.5%
	Middle	11	39.3%	\$2,308	20.6%	35.0%	11	39.3%	37.2%	\$2,308	20.6%	30.2%
	Upper	17	60.7%	\$8,895	79.4%	40.1%	17	60.7%	45.5%	\$8,895	79.4%	57.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$11,203	100.0%	100.0%	28	100.0%	100.0%	\$11,203	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans
Assessment Area: AZ - Phoenix (Maricopa)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison												
		2012, 2013					2012					2013							
		Bank				Families by Family Income	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %			
HOME PURCHASE	Low	5	17.9%	\$403	5.6%	21.0%	2	13.3%	10.8%	\$152	5.5%	5.7%	3	23.1%	7.1%	\$251	5.7%	3.4%	
	Moderate	7	25.0%	\$680	9.5%	17.5%	4	26.7%	19.2%	\$400	14.5%	13.9%	3	23.1%	17.0%	\$280	6.3%	11.0%	
	Middle	5	17.9%	\$621	8.6%	20.1%	5	33.3%	19.4%	\$621	22.5%	17.8%	0	0.0%	20.9%	\$0	0.0%	17.7%	
	Upper	11	39.3%	\$5,481	76.3%	41.4%	4	26.7%	40.0%	\$1,589	57.5%	52.6%	7	53.8%	44.0%	\$3,892	88.0%	55.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.7%	\$0	0.0%	9.9%	0	0.0%	11.1%	\$0	0.0%	12.4%	
	Total	28	100.0%	\$7,185	100.0%	100.0%	15	100.0%	100.0%	\$2,762	100.0%	100.0%	13	100.0%	100.0%	\$4,423	100.0%	100.0%	
REFINANCE	Low	7	11.3%	\$668	3.9%	21.0%	4	11.1%	6.4%	\$449	4.5%	3.8%	3	11.5%	6.7%	\$219	2.9%	3.3%	
	Moderate	9	14.5%	\$1,285	7.4%	17.5%	6	16.7%	12.6%	\$944	9.5%	8.8%	3	11.5%	13.0%	\$341	4.6%	7.6%	
	Middle	19	30.6%	\$3,673	21.2%	20.1%	11	30.6%	17.9%	\$1,846	18.6%	15.2%	8	30.8%	19.3%	\$1,827	24.6%	13.9%	
	Upper	27	43.5%	\$11,715	67.6%	41.4%	15	41.7%	45.9%	\$6,674	67.3%	55.5%	12	46.2%	46.5%	\$5,041	67.9%	50.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	16.7%	0	0.0%	14.4%	\$0	0.0%	25.0%	
	Total	62	100.0%	\$17,341	100.0%	100.0%	36	100.0%	100.0%	\$9,913	100.0%	100.0%	26	100.0%	100.0%	\$7,428	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	9.0%	\$0	0.0%	4.1%	0	0.0%	6.5%	\$0	0.0%	3.0%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	16.5%	\$0	0.0%	8.9%	0	0.0%	14.7%	\$0	0.0%	10.6%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	21.2%	\$0	0.0%	16.6%	0	0.0%	21.7%	\$0	0.0%	17.5%	
	Upper	1	100.0%	\$2,560	100.0%	41.4%	0	0.0%	49.6%	\$0	0.0%	66.0%	1	100.0%	53.5%	\$2,560	100.0%	60.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.8%	\$0	0.0%	4.4%	0	0.0%	3.8%	\$0	0.0%	8.2%	
	Total	1	100.0%	\$2,560	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,560	100.0%	100.0%	
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	12	13.2%	\$1,071	4.0%	21.0%	6	11.8%	8.0%	\$601	4.7%	4.4%	6	15.0%	6.8%	\$470	3.3%	3.2%	
	Moderate	16	17.6%	\$1,965	7.3%	17.5%	10	19.6%	15.0%	\$1,344	10.6%	10.4%	6	15.0%	14.7%	\$621	4.3%	8.7%	
	Middle	24	26.4%	\$4,294	15.9%	20.1%	16	31.4%	18.5%	\$2,467	19.5%	15.8%	8	20.0%	20.0%	\$1,827	12.7%	15.0%	
	Upper	39	42.9%	\$19,756	72.9%	41.4%	19	37.3%	43.7%	\$8,263	65.2%	53.7%	20	50.0%	45.5%	\$11,493	79.8%	50.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.8%	\$0	0.0%	15.7%	0	0.0%	12.9%	\$0	0.0%	22.3%	
	Total	91	100.0%	\$27,086	100.0%	100.0%	51	100.0%	100.0%	\$12,675	100.0%	100.0%	40	100.0%	100.0%	\$14,411	100.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: AZ - Phoenix (Maricopa)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	5.6%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	16.6%	\$0	0.0%	10.9%
	Middle	2	22.2%	\$268	13.8%	20.1%	2	22.2%	20.6%	\$268	13.8%	17.7%
	Upper	7	77.8%	\$1,669	86.2%	41.4%	7	77.8%	39.6%	\$1,669	86.2%	52.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.6%	\$0	0.0%	16.3%
	Total	9	100.0%	\$1,937	100.0%	100.0%	9	100.0%	100.0%	\$1,937	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	6.1%	\$0	0.0%	3.1%
	Moderate	6	31.6%	\$1,549	16.7%	17.5%	6	31.6%	14.1%	\$1,549	16.7%	8.8%
	Middle	3	15.8%	\$957	10.3%	20.1%	3	15.8%	18.8%	\$957	10.3%	14.9%
	Upper	10	52.6%	\$6,760	73.0%	41.4%	10	52.6%	41.9%	\$6,760	73.0%	53.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.1%	\$0	0.0%	19.3%
	Total	19	100.0%	\$9,266	100.0%	100.0%	19	100.0%	100.0%	\$9,266	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	6.4%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	12.9%	\$0	0.0%	10.7%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	19.3%	\$0	0.0%	18.5%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	51.1%	\$0	0.0%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.3%	\$0	0.0%	8.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	5.8%	\$0	0.0%	2.7%
	Moderate	6	21.4%	\$1,549	13.8%	17.5%	6	21.4%	15.6%	\$1,549	13.8%	9.6%
	Middle	5	17.9%	\$1,225	10.9%	20.1%	5	17.9%	19.9%	\$1,225	10.9%	15.9%
	Upper	17	60.7%	\$8,429	75.2%	41.4%	17	60.7%	40.7%	\$8,429	75.2%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.1%	\$0	0.0%	21.4%
	Total	28	100.0%	\$11,203	100.0%	100.0%	28	100.0%	100.0%	\$11,203	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Consumer Loan Distribution Tables

AZ - Phoenix (Maricopa) 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	3	5.0%	376	4.6%	11	18.3%	849	10.3%
Moderate	8	13.3%	412	5.0%	9	15.0%	573	7.0%
Low/Moderate Total	11	18.3%	788	9.6%	20	33.3%	1,422	17.3%
Middle	16	26.7%	1,503	18.2%	10	16.7%	727	8.8%
Upper	33	55.0%	5,946	72.2%	30	50.0%	6,088	73.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	60	100.0%	8,237	100.0%	60	100.0%	8,237	100.0%

AZ - Phoenix (Maricopa) 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	1.4%	262	1.3%	7	4.8%	361	1.8%
Moderate	7	4.8%	403	2.0%	13	8.9%	578	2.9%
Low/Moderate Total	9	6.2%	665	3.3%	20	13.7%	939	4.7%
Middle	42	28.8%	3,282	16.3%	24	16.4%	2,093	10.4%
Upper	95	65.1%	16,211	80.4%	100	68.5%	14,776	73.3%
Unknown	0	0.0%	0	0.0%	2	1.4%	2,350	11.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	146	100.0%	20,158	100.0%	146	100.0%	20,158	100.0%

AZ - Phoenix (Maricopa) 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	0.6%	50	0.2%	11	6.4%	605	2.8%
Moderate	16	9.3%	1,000	4.7%	25	14.5%	1,791	8.4%
Low/Moderate Total	17	9.9%	1,050	4.9%	36	20.9%	2,396	11.3%
Middle	54	31.4%	4,285	20.2%	19	11.0%	1,841	8.7%
Upper	101	58.7%	15,909	74.9%	115	66.9%	16,035	75.5%
Unknown	0	0.0%	0	0.0%	2	1.2%	972	4.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	172	100.0%	21,244	100.0%	172	100.0%	21,244	100.0%

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank &											
		2012, 2013					2012						2013					
		Count		Bank Dollar		Small Businesses	Count		Dollar		Agg	Agg	Count		Dollar		Agg	Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %			#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	1	0.8%	\$248	0.6%	3.5%	1	1.5%	\$248	1.0%	5.1%	0	0.0%	3.6%	\$0	0.0%	5.6%	
	Moderate	29	23.4%	\$10,489	24.9%	22.9%	18	27.3%	\$6,754	27.6%	23.8%	11	19.0%	20.4%	\$3,735	21.2%	24.7%	
	Middle	54	43.5%	\$21,397	50.8%	34.1%	24	36.4%	\$11,525	47.1%	31.6%	30	51.7%	31.4%	\$9,872	56.1%	30.5%	
	Upper	40	32.3%	\$9,946	23.6%	39.4%	23	34.8%	\$5,946	24.3%	38.8%	17	29.3%	44.0%	\$4,000	22.7%	38.8%	
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.1%	\$0	0.0%	0.1%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.3%	
	Total	124	100.0%	\$42,080	100.0%	100.0%	66	100.0%	\$24,473	100.0%	100.0%	58	100.0%	100.0%	\$17,607	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.8%	\$0	0.0%	0.1%	
	Moderate	0	0.0%	\$0	0.0%	12.7%	0	0.0%	\$0	0.0%	13.5%	0	0.0%	7.0%	\$0	0.0%	1.9%	
	Middle	0	0.0%	\$0	0.0%	29.2%	0	0.0%	\$0	0.0%	9.5%	0	0.0%	33.3%	\$0	0.0%	39.5%	
	Upper	0	0.0%	\$0	0.0%	55.8%	0	0.0%	\$0	0.0%	75.9%	0	0.0%	58.9%	\$0	0.0%	58.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Appendix G

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Small Businesses	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	#	%	%			\$ 000s	\$ %		\$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	3.4%	0	0.0%	3.8%	\$0	0.0%	5.7%
	Moderate	20	27.0%	\$6,934	31.7%	22.6%	20	27.0%	20.9%	\$6,934	31.7%	24.4%
	Middle	29	39.2%	\$10,163	46.5%	34.2%	29	39.2%	32.0%	\$10,163	46.5%	30.9%
	Upper	21	28.4%	\$4,551	20.8%	39.7%	21	28.4%	42.9%	\$4,551	20.8%	38.6%
	Unknown	4	5.4%	\$210	1.0%	0.1%	4	5.4%	0.1%	\$210	1.0%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.4%	\$0	0.0%	0.3%
	Total	74	100.0%	\$21,858	100.0%	100.0%	74	100.0%	100.0%	\$21,858	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	0.7%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	13.5%	0	0.0%	7.6%	\$0	0.0%	3.3%
	Middle	0	0.0%	\$0	0.0%	28.8%	0	0.0%	31.0%	\$0	0.0%	33.6%
	Upper	0	0.0%	\$0	0.0%	55.2%	0	0.0%	60.7%	\$0	0.0%	63.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

Product Type		Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
		2012, 2013						2012						2013					
		Bank				Total Businesses	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%									%	\$ 000s	\$ %	\$ %	#
Small Business	Revenue	\$1 Million or Less	33	26.6%	\$10,370	24.6%	91.9%	18	27.3%	42.9%	\$5,685	23.2%	30.5%	15	25.9%	52.6%	\$4,685	26.6%	33.8%
		Over \$1 Million	51	41.1%	\$20,097	47.8%	4.9%	29	43.9%				22	37.9%					
		Total Rev. available	84	67.7%	\$30,467	72.4%	96.8%	47	71.2%				37	63.8%					
		Rev. Not Known	40	32.3%	\$11,613	27.6%	3.2%	19	28.8%				21	36.2%					
		Total	124	100.0%	\$42,080	100.0%	100.0%	66	100.0%				58	100.0%					
	Loan Size	\$100,000 or Less	32	25.8%	\$2,024	4.8%		16	24.2%	96.3%	\$1,117	4.6%	44.2%	16	27.6%	95.4%	\$907	5.2%	41.8%
		\$100,001 - \$250,000	34	27.4%	\$7,650	18.2%		17	25.8%	1.8%	\$3,835	15.7%	13.0%	17	29.3%	2.2%	\$3,815	21.7%	13.4%
		\$250,001 - \$1 Million	58	46.8%	\$32,406	77.0%		33	50.0%	1.9%	\$19,521	79.8%	42.8%	25	43.1%	2.4%	\$12,885	73.2%	44.8%
		Total	124	100.0%	\$42,080	100.0%		66	100.0%	100.0%	\$24,473	100.0%	100.0%	58	100.0%	100.0%	\$17,607	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	36.4%	\$740	7.1%													
		\$100,001 - \$250,000	6	18.2%	\$1,322	12.7%													
		\$250,001 - \$1 Million	15	45.5%	\$8,308	80.1%													
		Total	33	100.0%	\$10,370	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 96.1%	0	0.0%	49.6%	\$0	0.0%	46.9%	0	0.0%	52.7%	\$0	0.0%	42.1%
		Over \$1 Million	0	0.0%	\$0	0.0%	3.8%	0	0.0%				0	0.0%					
		Total Rev. available	0	0.0%	\$0	0.0%	99.9%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%				0	0.0%					
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.7%	\$0	0.0%	37.8%	0	0.0%	94.6%	\$0	0.0%	46.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.3%	\$0	0.0%	11.4%	0	0.0%	3.1%	\$0	0.0%	19.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.1%	\$0	0.0%	50.8%	0	0.0%	2.3%	\$0	0.0%	34.1%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FFIEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

Product Type			Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
			2014					2014					
			Bank				Total	Count			Dollar		
			Count		Dollar		Businesses	Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	17	23.0%	\$2,690	12.3%	91.8%	17	23.0%	51.8%	\$2,690	12.3%	32.4%
		Over \$1 Million	32	43.2%	\$15,034	68.8%	5.0%	32	43.2%				
		Total Rev. available	49	66.2%	\$17,724	81.1%	96.8%	49	66.2%				
		Rev. Not Known	25	33.8%	\$4,134	18.9%	3.1%	25	33.8%				
		Total	74	100.0%	\$21,858	100.0%	100.0%	74	100.0%				
	Loan Size	\$100,000 or Less	36	48.6%	\$1,574	7.2%		36	48.6%	96.1%	\$1,574	7.2%	45.9%
		\$100,001 - \$250,000	7	9.5%	\$1,395	6.4%		7	9.5%	2.0%	\$1,395	6.4%	13.2%
		\$250,001 - \$1 Million	31	41.9%	\$18,889	86.4%		31	41.9%	2.0%	\$18,889	86.4%	40.9%
		Total	74	100.0%	\$21,858	100.0%		74	100.0%	100.0%	\$21,858	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	13	76.5%	\$685	25.5%							
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%							
		\$250,001 - \$1 Million	4	23.5%	\$2,005	74.5%							
		Total	17	100.0%	\$2,690	100.0%							
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 95.9%	0	0.0%	50.3%	\$0	0.0%	59.6%
		Over \$1 Million	0	0.0%	\$0	0.0%	4.0%	0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	99.9%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	94.5%	\$0	0.0%	49.3%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	18.4%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	32.3%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	0	0.0%	\$0	0.0%							
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%							
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%							
		Total	0	0.0%	\$0	0.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	%	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	%	%
#	%	\$ (000s)	\$ %	%	#	%												
HOME PURCHASE	Low	1	1.0%	\$272	1.2%	2.1%	1	1.9%	0.9%	\$272	3.0%	0.6%	0	0.0%	1.0%	\$0	0.0%	0.7%
	Moderate	47	47.0%	\$5,799	25.6%	25.5%	20	38.5%	16.6%	\$2,223	24.2%	10.1%	27	56.3%	16.0%	\$3,576	26.6%	9.2%
	Middle	26	26.0%	\$4,018	17.7%	37.8%	15	28.8%	38.4%	\$2,552	27.7%	31.1%	11	22.9%	39.1%	\$1,466	10.9%	31.4%
	Upper	26	26.0%	\$12,560	55.5%	34.6%	16	30.8%	44.1%	\$4,155	45.2%	58.2%	10	20.8%	43.9%	\$8,405	62.5%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	100	100.0%	\$22,649	100.0%	100.0%	52	100.0%	100.0%	\$9,202	100.0%	100.0%	48	100.0%	100.0%	\$13,447	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	0.7%	\$0	0.0%	0.5%	0	0.0%	0.9%	\$0	0.0%	0.7%
	Moderate	14	17.7%	\$1,876	4.0%	25.5%	5	10.9%	13.0%	\$527	1.7%	8.8%	9	27.3%	15.7%	\$1,349	8.4%	12.8%
	Middle	23	29.1%	\$7,823	16.6%	37.8%	13	28.3%	35.1%	\$3,125	10.0%	29.3%	10	30.3%	36.4%	\$4,698	29.2%	31.3%
	Upper	42	53.2%	\$37,530	79.5%	34.6%	28	60.9%	51.1%	\$27,468	88.3%	61.3%	14	42.4%	47.0%	\$10,062	62.5%	55.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	79	100.0%	\$47,229	100.0%	100.0%	46	100.0%	100.0%	\$31,120	100.0%	100.0%	33	100.0%	100.0%	\$16,109	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.6%	\$0	0.0%	0.3%	0	0.0%	1.2%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	25.5%	0	0.0%	17.5%	\$0	0.0%	7.0%	0	0.0%	19.7%	\$0	0.0%	6.5%
	Middle	0	0.0%	\$0	0.0%	37.8%	0	0.0%	35.1%	\$0	0.0%	23.8%	0	0.0%	35.3%	\$0	0.0%	21.7%
	Upper	1	100.0%	\$350	100.0%	34.6%	1	100.0%	45.9%	\$350	100.0%	68.9%	0	0.0%	43.8%	\$0	0.0%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$350	100.0%	100.0%	1	100.0%	100.0%	\$350	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	5.1%	\$0	0.0%	2.1%	0	0.0%	10.4%	\$0	0.0%	7.8%
	Moderate	0	0.0%	\$0	0.0%	34.5%	0	0.0%	37.3%	\$0	0.0%	31.9%	0	0.0%	29.7%	\$0	0.0%	35.6%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	33.5%	\$0	0.0%	28.1%	0	0.0%	38.1%	\$0	0.0%	30.5%
	Upper	0	0.0%	\$0	0.0%	21.8%	0	0.0%	24.1%	\$0	0.0%	37.8%	0	0.0%	21.8%	\$0	0.0%	26.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	0.6%	\$272	0.4%	2.1%	1	1.0%	0.8%	\$272	0.7%	0.6%	0	0.0%	1.0%	\$0	0.0%	0.9%
	Moderate	61	33.9%	\$7,675	10.9%	25.5%	25	25.3%	14.6%	\$2,750	6.8%	10.1%	36	44.4%	15.9%	\$4,925	16.7%	12.1%
	Middle	49	27.2%	\$11,841	16.9%	37.8%	28	28.3%	36.4%	\$5,677	14.0%	30.0%	21	25.9%	37.6%	\$6,164	20.9%	31.2%
	Upper	69	38.3%	\$50,440	71.8%	34.6%	45	45.5%	48.2%	\$31,973	78.6%	59.3%	24	29.6%	45.5%	\$18,467	62.5%	55.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	180	100.0%	\$70,228	100.0%	100.0%	99	100.0%	100.0%	\$40,672	100.0%	100.0%	81	100.0%	100.0%	\$29,556	100.0%	100.0%

Originations & Purchases
2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Agg	Dollar		
		Count		Dollar			Bank			Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	2.1%	\$78	0.6%	2.1%	1	2.1%	1.2%	\$78	0.6%	0.8%
	Moderate	19	39.6%	\$2,229	16.4%	25.5%	19	39.6%	17.8%	\$2,229	16.4%	10.7%
	Middle	18	37.5%	\$3,322	24.5%	37.8%	18	37.5%	39.3%	\$3,322	24.5%	31.7%
	Upper	10	20.8%	\$7,951	58.5%	34.6%	10	20.8%	41.6%	\$7,951	58.5%	56.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	48	100.0%	\$13,580	100.0%	100.0%	48	100.0%	100.0%	\$13,580	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	0.9%	\$0	0.0%	0.6%
	Moderate	9	47.4%	\$1,008	11.5%	25.5%	9	47.4%	15.8%	\$1,008	11.5%	9.7%
	Middle	3	15.8%	\$380	4.3%	37.8%	3	15.8%	36.8%	\$380	4.3%	29.0%
	Upper	7	36.8%	\$7,407	84.2%	34.6%	7	36.8%	46.5%	\$7,407	84.2%	60.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	19	100.0%	\$8,795	100.0%	100.0%	19	100.0%	100.0%	\$8,795	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.6%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	25.5%	0	0.0%	19.6%	\$0	0.0%	8.9%
	Middle	0	0.0%	\$0	0.0%	37.8%	0	0.0%	35.6%	\$0	0.0%	28.6%
	Upper	0	0.0%	\$0	0.0%	34.6%	0	0.0%	43.2%	\$0	0.0%	62.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	8.3%	\$0	0.0%	4.5%
	Moderate	0	0.0%	\$0	0.0%	34.5%	0	0.0%	40.4%	\$0	0.0%	28.2%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	30.4%	\$0	0.0%	43.7%
	Upper	0	0.0%	\$0	0.0%	21.8%	0	0.0%	20.8%	\$0	0.0%	23.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	1.5%	\$78	0.3%	2.1%	1	1.5%	1.1%	\$78	0.3%	1.0%
	Moderate	28	41.8%	\$3,237	14.5%	25.5%	28	41.8%	17.3%	\$3,237	14.5%	11.5%
	Middle	21	31.3%	\$3,702	16.5%	37.8%	21	31.3%	38.4%	\$3,702	16.5%	31.6%
	Upper	17	25.4%	\$15,358	68.6%	34.6%	17	25.4%	43.2%	\$15,358	68.6%	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	67	100.0%	\$22,375	100.0%	100.0%	67	100.0%	100.0%	\$22,375	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2012, 2013					2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	14	14.0%	\$1,118	4.9%	21.9%	6	11.5%	6.5%	\$393	4.3%	2.7%	8	16.7%	4.2%	\$725	5.4%	1.5%
	Moderate	41	41.0%	\$4,915	21.7%	17.8%	21	40.4%	17.4%	\$2,265	24.6%	9.9%	20	41.7%	15.0%	\$2,650	19.7%	7.6%
	Middle	12	12.0%	\$1,705	7.5%	19.5%	6	11.5%	19.1%	\$791	8.6%	15.0%	6	12.5%	19.2%	\$914	6.8%	13.6%
	Upper	33	33.0%	\$14,911	65.8%	40.8%	19	36.5%	45.4%	\$5,753	62.5%	61.8%	14	29.2%	49.9%	\$9,158	68.1%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.6%	\$0	0.0%	10.7%	0	0.0%	11.8%	\$0	0.0%	14.0%
	Total	100	100.0%	\$22,649	100.0%	100.0%	52	100.0%	100.0%	\$9,202	100.0%	100.0%	48	100.0%	100.0%	\$13,447	100.0%	100.0%
REFINANCE	Low	4	5.1%	\$281	0.6%	21.9%	3	6.5%	6.3%	\$193	0.6%	3.5%	1	3.0%	7.5%	\$88	0.5%	3.1%
	Moderate	26	32.9%	\$2,690	5.7%	17.8%	15	32.6%	11.0%	\$1,523	4.9%	6.8%	11	33.3%	11.8%	\$1,167	7.2%	5.5%
	Middle	5	6.3%	\$644	1.4%	19.5%	1	2.2%	16.6%	\$171	0.5%	12.6%	4	12.1%	18.0%	\$473	2.9%	10.6%
	Upper	42	53.2%	\$41,894	88.7%	40.8%	27	58.7%	53.6%	\$29,233	93.9%	64.3%	15	45.5%	51.1%	\$12,661	78.6%	50.7%
	Unknown	2	2.5%	\$1,720	3.6%	0.0%	0	0.0%	12.4%	\$0	0.0%	12.9%	2	6.1%	11.6%	\$1,720	10.7%	30.1%
	Total	79	100.0%	\$47,229	100.0%	100.0%	46	100.0%	100.0%	\$31,120	100.0%	100.0%	33	100.0%	100.0%	\$16,109	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	9.0%	\$0	0.0%	1.6%	0	0.0%	7.7%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	16.5%	\$0	0.0%	5.8%	0	0.0%	13.4%	\$0	0.0%	4.3%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	21.7%	\$0	0.0%	13.2%	0	0.0%	22.1%	\$0	0.0%	12.3%
	Upper	1	100.0%	\$350	100.0%	40.8%	1	100.0%	49.7%	\$350	100.0%	75.2%	0	0.0%	52.4%	\$0	0.0%	71.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	4.2%	0	0.0%	4.3%	\$0	0.0%	10.5%
	Total	1	100.0%	\$350	100.0%	100.0%	1	100.0%	100.0%	\$350	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	18	10.0%	\$1,399	2.0%	21.9%	9	9.1%	6.5%	\$586	1.4%	3.0%	9	11.1%	6.0%	\$813	2.8%	2.3%
	Moderate	67	37.2%	\$7,605	10.8%	17.8%	36	36.4%	13.6%	\$3,788	9.3%	7.8%	31	38.3%	13.2%	\$3,817	12.9%	6.2%
	Middle	17	9.4%	\$2,349	3.3%	19.5%	7	7.1%	17.7%	\$962	2.4%	13.1%	10	12.3%	18.6%	\$1,387	4.7%	11.5%
	Upper	76	42.2%	\$57,155	81.4%	40.8%	47	47.5%	50.2%	\$35,336	86.9%	61.2%	29	35.8%	50.5%	\$21,819	73.8%	54.4%
	Unknown	2	1.1%	\$1,720	2.4%	0.0%	0	0.0%	12.1%	\$0	0.0%	15.0%	2	2.5%	11.8%	\$1,720	5.8%	25.6%
	Total	180	100.0%	\$70,228	100.0%	100.0%	99	100.0%	100.0%	\$40,672	100.0%	100.0%	81	100.0%	100.0%	\$29,556	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: FL - Ft. Lauderdale-West Palm Beach

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	7	14.6%	\$652	4.8%	21.9%	7	14.6%	3.1%	\$652	4.8%	1.1%
	Moderate	24	50.0%	\$2,907	21.4%	17.8%	24	50.0%	14.4%	\$2,907	21.4%	7.4%
	Middle	5	10.4%	\$556	4.1%	19.5%	5	10.4%	18.6%	\$556	4.1%	13.4%
	Upper	12	25.0%	\$9,465	69.7%	40.8%	12	25.0%	49.0%	\$9,465	69.7%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	14.0%
	Total	48	100.0%	\$13,580	100.0%	100.0%	48	100.0%	100.0%	\$13,580	100.0%	100.0%
REFINANCE	Low	1	5.3%	\$120	1.4%	21.9%	1	5.3%	5.9%	\$120	1.4%	2.8%
	Moderate	7	36.8%	\$666	7.6%	17.8%	7	36.8%	11.0%	\$666	7.6%	5.9%
	Middle	3	15.8%	\$306	3.5%	19.5%	3	15.8%	17.5%	\$306	3.5%	12.1%
	Upper	8	42.1%	\$7,703	87.6%	40.8%	8	42.1%	49.1%	\$7,703	87.6%	62.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.5%	\$0	0.0%	16.8%
	Total	19	100.0%	\$8,795	100.0%	100.0%	19	100.0%	100.0%	\$8,795	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	9.0%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	14.9%	\$0	0.0%	6.3%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	18.0%	\$0	0.0%	11.5%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	49.2%	\$0	0.0%	67.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.0%	\$0	0.0%	13.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	11.9%	\$772	3.5%	21.9%	8	11.9%	4.1%	\$772	3.5%	1.5%
	Moderate	31	46.3%	\$3,573	16.0%	17.8%	31	46.3%	13.2%	\$3,573	16.0%	6.5%
	Middle	8	11.9%	\$862	3.9%	19.5%	8	11.9%	18.2%	\$862	3.9%	12.2%
	Upper	20	29.9%	\$17,168	76.7%	40.8%	20	29.9%	48.9%	\$17,168	76.7%	59.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.6%	\$0	0.0%	20.1%
	Total	67	100.0%	\$22,375	100.0%	100.0%	67	100.0%	100.0%	\$22,375	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Consumer Loan Distribution Tables

FL - Ft. Lauderdale-West Palm Beach 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	12.5%	205	9.7%	0	0.0%	0	0.0%
Upper	7	87.5%	1,907	90.3%	8	100.0%	2,112	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>2,112</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>2,112</i>	<i>100.0%</i>

FL - Ft. Lauderdale-West Palm Beach 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	30.0%	175	7.8%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>3</i>	<i>30.0%</i>	<i>175</i>	<i>7.8%</i>
Middle	1	10.0%	50	2.2%	0	0.0%	0	0.0%
Upper	9	90.0%	2,195	97.8%	7	70.0%	2,070	92.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>2,245</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>2,245</i>	<i>100.0%</i>

FL - Ft. Lauderdale-West Palm Beach 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.7%	50	2.2%	1	6.7%	130	5.7%
<i>Low/Moderate Total</i>	<i>1</i>	<i>6.7%</i>	<i>50</i>	<i>2.2%</i>	<i>1</i>	<i>6.7%</i>	<i>130</i>	<i>5.7%</i>
Middle	6	40.0%	997	43.6%	1	6.7%	222	9.7%
Upper	8	53.3%	1,242	54.3%	13	86.7%	1,937	84.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>2,289</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>2,289</i>	<i>100.0%</i>

Appendix H – Metropolitan Limited Scope Assessment Areas Loan Tables

The assessment area loan tables appear in the following order:

1. Geographic Distribution of HMDA Loans for the bank and aggregate
2. Geographic distribution of Small Business and Small Farm Loans for the bank and aggregate
3. Borrower Profile of HMDA Loans for the bank and aggregate
4. Borrower Profile of Small Business and Small Farm Loans for the bank and aggregate

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Fresno MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		Comparison 2012, 2013					2012						2013					
		Bank		Owner Occupied Units		Count		Dollar			Count		Dollar					
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.9%	\$0	0.0%	1.7%	0	0.0%	2.7%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	14.9%	\$0	0.0%	9.6%	0	0.0%	16.2%	\$0	0.0%	10.8%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	25.3%	\$0	0.0%	19.9%	0	0.0%	25.2%	\$0	0.0%	19.9%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	56.8%	\$0	0.0%	68.8%	0	0.0%	55.9%	\$0	0.0%	67.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	1.9%	\$0	0.0%	1.1%	0	0.0%	3.0%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	11.3%	\$0	0.0%	8.1%	0	0.0%	14.6%	\$0	0.0%	11.3%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	21.2%	\$0	0.0%	17.6%	0	0.0%	23.2%	\$0	0.0%	23.9%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	65.7%	\$0	0.0%	73.2%	0	0.0%	59.2%	\$0	0.0%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.4%	\$0	0.0%	1.7%	0	0.0%	2.5%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	12.3%	\$0	0.0%	7.3%	0	0.0%	13.8%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	21.7%	\$0	0.0%	15.3%	0	0.0%	23.4%	\$0	0.0%	16.1%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	63.6%	\$0	0.0%	75.7%	0	0.0%	60.3%	\$0	0.0%	71.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	14.0%	\$0	0.0%	12.1%	0	0.0%	15.9%	\$0	0.0%	11.4%
	Moderate	0	0.0%	\$0	0.0%	32.7%	0	0.0%	46.0%	\$0	0.0%	23.6%	0	0.0%	33.3%	\$0	0.0%	26.4%
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	20.0%	\$0	0.0%	19.7%	0	0.0%	31.7%	\$0	0.0%	26.2%
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	20.0%	\$0	0.0%	44.6%	0	0.0%	19.0%	\$0	0.0%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.3%	\$0	0.0%	1.5%	0	0.0%	2.9%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	12.7%	\$0	0.0%	8.9%	0	0.0%	15.3%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	22.8%	\$0	0.0%	18.4%	0	0.0%	24.1%	\$0	0.0%	22.4%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	62.2%	\$0	0.0%	71.2%	0	0.0%	57.7%	\$0	0.0%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	7.7%	\$2,280	16.6%	9.8%	1	10.0%	7.1%	\$580	14.9%	8.0%	2	6.9%	7.1%	\$1,700	17.3%	6.8%
	Moderate	7	17.9%	\$1,800	13.1%	23.6%	2	20.0%	21.0%	\$350	9.0%	24.9%	5	17.2%	21.0%	\$1,450	14.8%	23.7%
	Middle	12	30.8%	\$4,304	31.4%	26.2%	2	20.0%	24.7%	\$750	19.2%	22.2%	10	34.5%	25.5%	\$3,554	36.2%	24.4%
	Upper	17	43.6%	\$5,335	38.9%	40.3%	5	50.0%	42.9%	\$2,225	57.0%	42.9%	12	41.4%	43.8%	\$3,110	31.7%	43.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.2%	\$0	0.0%	2.0%	0	0.0%	2.6%	\$0	0.0%	1.6%
Total	39	100.0%	\$13,719	100.0%	100.0%	10	100.0%	100.0%	\$3,905	100.0%	100.0%	29	100.0%	100.0%	\$9,814	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	1	33.3%	\$300	37.5%	3.5%	0	0.0%	4.7%	\$0	0.0%	10.8%	1	50.0%	3.1%	\$300	54.5%	3.9%
	Moderate	0	0.0%	\$0	0.0%	30.4%	0	0.0%	30.5%	\$0	0.0%	32.2%	0	0.0%	33.0%	\$0	0.0%	39.4%
	Middle	0	0.0%	\$0	0.0%	37.1%	0	0.0%	35.0%	\$0	0.0%	32.6%	0	0.0%	33.2%	\$0	0.0%	31.2%
	Upper	2	66.7%	\$500	62.5%	29.0%	1	100.0%	26.8%	\$250	100.0%	23.4%	1	50.0%	26.6%	\$250	45.5%	23.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.0%	\$0	0.0%	1.1%	0	0.0%	4.1%	\$0	0.0%	1.6%
Total	3	100.0%	\$800	100.0%	100.0%	1	100.0%	100.0%	\$250	100.0%	100.0%	2	100.0%	100.0%	\$550	100.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Fresno MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	\$ (000s)	\$ %									\$ %	#	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.9%	\$0	0.0%	1.7%	0	0.0%	2.7%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	14.9%	\$0	0.0%	9.6%	0	0.0%	16.2%	\$0	0.0%	10.8%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	25.3%	\$0	0.0%	19.9%	0	0.0%	25.2%	\$0	0.0%	19.9%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	56.8%	\$0	0.0%	68.8%	0	0.0%	55.9%	\$0	0.0%	67.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	1.9%	\$0	0.0%	1.1%	0	0.0%	3.0%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	11.3%	\$0	0.0%	8.1%	0	0.0%	14.6%	\$0	0.0%	11.3%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	21.2%	\$0	0.0%	17.6%	0	0.0%	23.2%	\$0	0.0%	23.9%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	65.7%	\$0	0.0%	73.2%	0	0.0%	59.2%	\$0	0.0%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.4%	\$0	0.0%	1.7%	0	0.0%	2.5%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	12.3%	\$0	0.0%	7.3%	0	0.0%	13.8%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	21.7%	\$0	0.0%	15.3%	0	0.0%	23.4%	\$0	0.0%	16.1%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	63.6%	\$0	0.0%	75.7%	0	0.0%	60.3%	\$0	0.0%	71.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	14.0%	\$0	0.0%	12.1%	0	0.0%	15.9%	\$0	0.0%	11.4%
	Moderate	0	0.0%	\$0	0.0%	32.7%	0	0.0%	46.0%	\$0	0.0%	23.6%	0	0.0%	33.3%	\$0	0.0%	26.4%
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	20.0%	\$0	0.0%	19.7%	0	0.0%	31.7%	\$0	0.0%	26.2%
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	20.0%	\$0	0.0%	44.6%	0	0.0%	19.0%	\$0	0.0%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.3%	\$0	0.0%	1.5%	0	0.0%	2.9%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	12.7%	\$0	0.0%	8.9%	0	0.0%	15.3%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	22.8%	\$0	0.0%	18.4%	0	0.0%	24.1%	\$0	0.0%	22.4%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	62.2%	\$0	0.0%	71.2%	0	0.0%	57.7%	\$0	0.0%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	7.7%	\$2,280	16.6%	9.8%	1	10.0%	7.1%	\$580	14.9%	8.0%	2	6.9%	7.1%	\$1,700	17.3%	6.8%
	Moderate	7	17.9%	\$1,800	13.1%	23.6%	2	20.0%	21.0%	\$350	9.0%	24.9%	5	17.2%	21.0%	\$1,450	14.8%	23.7%
	Middle	12	30.8%	\$4,304	31.4%	26.2%	2	20.0%	24.7%	\$750	19.2%	22.2%	10	34.5%	25.5%	\$3,554	36.2%	24.4%
	Upper	17	43.6%	\$5,335	38.9%	40.3%	5	50.0%	42.9%	\$2,225	57.0%	42.9%	12	41.4%	43.8%	\$3,110	31.7%	43.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.2%	\$0	0.0%	2.0%	0	0.0%	2.6%	\$0	0.0%	1.6%
Total	39	100.0%	\$13,719	100.0%	100.0%	10	100.0%	100.0%	\$3,905	100.0%	100.0%	29	100.0%	100.0%	\$9,814	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	1	33.3%	\$300	37.5%	3.5%	0	0.0%	4.7%	\$0	0.0%	10.8%	1	50.0%	3.1%	\$300	54.5%	3.9%
	Moderate	0	0.0%	\$0	0.0%	30.4%	0	0.0%	30.5%	\$0	0.0%	32.2%	0	0.0%	33.0%	\$0	0.0%	39.4%
	Middle	0	0.0%	\$0	0.0%	37.1%	0	0.0%	35.0%	\$0	0.0%	32.6%	0	0.0%	33.2%	\$0	0.0%	31.2%
	Upper	2	66.7%	\$500	62.5%	29.0%	1	100.0%	26.8%	\$250	100.0%	23.4%	1	50.0%	26.6%	\$250	45.5%	23.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.0%	\$0	0.0%	1.1%	0	0.0%	4.1%	\$0	0.0%	1.6%
Total	3	100.0%	\$800	100.0%	100.0%	1	100.0%	100.0%	\$250	100.0%	100.0%	2	100.0%	100.0%	\$550	100.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Fresno MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Count		Bank Dollar		Owner Occupied Units	Count			Dollar		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	3.0%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	16.6%	\$0	0.0%	11.3%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	25.6%	\$0	0.0%	20.6%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	54.9%	\$0	0.0%	66.4%
	Unknown	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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	3.1%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	14.7%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	23.7%	\$0	0.0%	18.8%
	Upper	1	100.0%	\$377	100.0%	46.5%	1	100.0%	58.5%	\$377	100.0%	70.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$377</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$377</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.3%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	13.4%	\$0	0.0%	9.2%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	25.5%	\$0	0.0%	21.8%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	58.9%	\$0	0.0%	67.9%
	Unknown	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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	22.2%	\$0	0.0%	12.7%
	Moderate	0	0.0%	\$0	0.0%	32.7%	0	0.0%	37.0%	\$0	0.0%	24.8%
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	27.2%	\$0	0.0%	33.8%
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	13.6%	\$0	0.0%	28.6%
	Unknown	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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	3.1%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	15.8%	\$0	0.0%	11.5%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	24.8%	\$0	0.0%	20.8%
	Upper	1	100.0%	\$377	100.0%	46.5%	1	100.0%	56.3%	\$377	100.0%	65.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$377</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$377</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses											
	Low	4	12.5%	\$2,400	18.6%	9.5%	4	12.5%	7.0%	\$2,400	18.6%	7.1%
	Moderate	3	9.4%	\$1,150	8.9%	23.3%	3	9.4%	20.4%	\$1,150	8.9%	23.5%
	Middle	14	43.8%	\$5,303	41.2%	26.2%	14	43.8%	25.9%	\$5,303	41.2%	26.7%
	Upper	11	34.4%	\$4,020	31.2%	40.9%	11	34.4%	44.5%	\$4,020	31.2%	41.2%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.2%	\$0	0.0%	1.5%
	<i>Total</i>	<i>32</i>	<i>100.0%</i>	<i>\$12,873</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,873</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL FARM	Small Farms											
	Low	1	50.0%	\$100	28.6%	3.3%	1	50.0%	3.3%	\$100	28.6%	4.4%
	Moderate	0	0.0%	\$0	0.0%	30.6%	0	0.0%	33.0%	\$0	0.0%	39.4%
	Middle	0	0.0%	\$0	0.0%	37.1%	0	0.0%	35.6%	\$0	0.0%	34.9%
	Upper	1	50.0%	\$250	71.4%	29.0%	1	50.0%	24.1%	\$250	71.4%	20.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.9%	\$0	0.0%	1.4%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$350</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$350</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Fresno MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	Agg	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	8.2%	\$0	0.0%	4.3%	0	0.0%	5.8%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	21.0%	\$0	0.0%	15.7%	0	0.0%	16.8%	\$0	0.0%	11.6%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	22.2%	\$0	0.0%	21.5%	0	0.0%	21.5%	\$0	0.0%	19.8%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	37.6%	\$0	0.0%	47.0%	0	0.0%	42.2%	\$0	0.0%	52.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.0%	\$0	0.0%	11.4%	0	0.0%	13.8%	\$0	0.0%	13.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	4.1%	\$0	0.0%	2.4%	0	0.0%	5.4%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	8.7%	\$0	0.0%	6.0%	0	0.0%	9.9%	\$0	0.0%	5.8%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	15.4%	\$0	0.0%	12.5%	0	0.0%	16.9%	\$0	0.0%	11.7%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	53.8%	\$0	0.0%	60.1%	0	0.0%	51.4%	\$0	0.0%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.0%	\$0	0.0%	19.0%	0	0.0%	16.3%	\$0	0.0%	30.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	6.9%	\$0	0.0%	2.8%	0	0.0%	3.3%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	13.6%	\$0	0.0%	7.5%	0	0.0%	13.1%	\$0	0.0%	8.6%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	22.0%	\$0	0.0%	17.7%	0	0.0%	19.1%	\$0	0.0%	14.3%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	54.8%	\$0	0.0%	68.6%	0	0.0%	60.1%	\$0	0.0%	63.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	3.4%	0	0.0%	4.5%	\$0	0.0%	11.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	5.6%	\$0	0.0%	3.0%	0	0.0%	5.5%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	13.5%	\$0	0.0%	9.3%	0	0.0%	12.8%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	18.1%	\$0	0.0%	15.5%	0	0.0%	18.8%	\$0	0.0%	14.3%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	47.5%	\$0	0.0%	54.4%	0	0.0%	47.6%	\$0	0.0%	48.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.3%	\$0	0.0%	17.8%	0	0.0%	15.2%	\$0	0.0%	26.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	4	10.3%	\$1,350	9.8%	89.7%	1	10.0%	37.5%	\$1,000	25.6%	31.8%	3	10.3%	45.5%	\$350	3.6%	31.9%
	Over \$1 Million	25	64.1%	\$10,054	73.3%	6.7%	7	70.0%				18	62.1%					
	Total Rev. available	29	74.4%	\$11,404	83.1%	96.4%	8	80.0%				21	72.4%					
	Rev. Not Known	10	25.6%	\$2,315	16.9%	3.7%	2	20.0%				8	27.6%					
	Total	39	100.0%	\$13,719	100.0%	100.0%	10	100.0%				29	100.0%					
	\$100,000 or Less	15	38.5%	\$825	6.0%		2	20.0%	93.8%	\$175	4.5%	34.6%	13	44.8%	93.4%	\$650	6.6%	37.5%
	\$100,001 - \$250,000	8	20.5%	\$1,690	12.3%		3	30.0%	3.2%	\$700	17.9%	17.3%	5	17.2%	3.4%	\$990	10.1%	15.8%
	\$250,001 - \$1 Million	16	41.0%	\$11,204	81.7%		5	50.0%	3.0%	\$3,030	77.6%	48.1%	11	37.9%	3.2%	\$8,174	83.3%	46.7%
	Total	39	100.0%	\$13,719	100.0%		10	100.0%	100.0%	\$3,905	100.0%	100.0%	29	100.0%	100.0%	\$9,814	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	2	66.7%	\$500	62.5%	90.5%	1	100.0%	52.4%	\$250	100.0%	44.3%	1	50.0%	53.5%	\$250	45.5%	49.3%
	Over \$1 Million	1	33.3%	\$300	37.5%	9.4%	0	0.0%				1	50.0%					
	Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%				0	0.0%					
	Total	3	100.0%	\$800	100.0%	100.0%	1	100.0%				2	100.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	67.5%	\$0	0.0%	17.8%	0	0.0%	72.7%	\$0	0.0%	19.5%
	\$100,001 - \$250,000	2	66.7%	\$500	62.5%		1	100.0%	16.9%	\$250	100.0%	27.2%	1	50.0%	13.3%	\$250	45.5%	24.1%
	\$250,001 - \$500,000	1	33.3%	\$300	37.5%		0	0.0%	15.6%	\$0	0.0%	55.0%	1	50.0%	14.0%	\$300	54.5%	56.4%
	Total	3	100.0%	\$800	100.0%		1	100.0%	100.0%	\$250	100.0%	100.0%	2	100.0%	100.0%	\$550	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - Fresno MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014				
		Bank			Families by Family Income %		Count		Dollar		
		Count	%	Dollar \$ (000s)			Bank #	%	Agg %	Bank \$ (000s)	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	2.2%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	10.8%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	19.8%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	49.9%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.2%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	4.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	7.6%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	15.6%	\$0	0.0%
	Upper	1	100.0%	\$377	100.0%	42.1%	1	100.0%	54.2%	\$377	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.7%	\$0	0.0%
	Total	1	100.0%	\$377	100.0%	100.0%	1	100.0%	100.0%	\$377	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	4.8%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	6.9%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	13.1%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	66.8%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.4%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	3.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	9.4%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	17.8%	\$0	0.0%
	Upper	1	100.0%	\$377	100.0%	42.1%	1	100.0%	52.0%	\$377	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.8%	\$0	0.0%
	Total	1	100.0%	\$377	100.0%	100.0%	1	100.0%	100.0%	\$377	100.0%
Small Business	Total Businesses										
	Revenue										
	\$1 Million or Less	6	18.8%	\$2,850	22.1%	89.4%	6	18.8%	43.3%	\$2,850	22.1%
	Over \$1 Million	19	59.4%	\$7,025	54.6%	7.1%	19	59.4%			
	Total Rev. available	25	78.2%	\$9,875	76.7%	96.5%	25	78.2%			
	Rev. Not Known	7	21.9%	\$2,998	23.3%	3.5%	7	21.9%			
	Total	32	100.0%	\$12,873	100.0%	100.0%	32	100.0%			
	Loan Size										
	\$100,000 or Less	10	31.3%	\$460	3.6%		10	31.3%	92.8%	\$460	3.6%
	\$100,001 - \$250,000	5	15.6%	\$890	6.9%		5	15.6%	4.4%	\$890	6.9%
	\$250,001 - \$1 Million	17	53.1%	\$11,523	89.5%		17	53.1%	2.9%	\$11,523	89.5%
	Total	32	100.0%	\$12,873	100.0%		32	100.0%	100.0%	\$12,873	100.0%
Small Farm	Total Farms										
	Revenue										
	\$1 Million or Less	1	50.0%	\$250	71.4%	89.9%	1	50.0%	49.2%	\$250	71.4%
	Over \$1 Million	1	50.0%	\$100	28.6%	10.0%	1	50.0%			
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%			
	Total	2	100.0%	\$350	100.0%	100.0%	2	100.0%			
	Loan Size										
	\$100,000 or Less	1	50.0%	\$100	28.6%		1	50.0%	72.9%	\$100	28.6%
	\$100,001 - \$250,000	1	50.0%	\$250	71.4%		1	50.0%	13.4%	\$250	71.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	13.7%	\$0	0.0%
	Total	2	100.0%	\$350	100.0%		2	100.0%	100.0%	\$350	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

CA - Fresno MSA 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

CA - Fresno MSA 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	250	100.0%	1	100.0%	250	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>250</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>250</i>	<i>100.0%</i>

CA - Fresno MSA 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	105	100.0%	1	100.0%	105	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>105</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>105</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison									
							2012					2013				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	\$0	0.0%	1.4%	0	0.0%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	\$0	0.0%	11.8%	0	0.0%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	31.0%	0	0.0%	\$0	0.0%	27.2%	0	0.0%	\$0	0.0%	26.0%
	Upper	1	100.0%	\$288	100.0%	47.5%	0	0.0%	\$0	0.0%	59.7%	1	100.0%	\$288	100.0%	63.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$288	100.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	1	100.0%	\$288	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	\$0	0.0%	0.7%	0	0.0%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	\$0	0.0%	8.2%	0	0.0%	\$0	0.0%	10.4%
	Middle	1	25.0%	\$167	6.9%	31.0%	0	0.0%	\$0	0.0%	23.5%	1	50.0%	\$167	8.1%	23.8%
	Upper	3	75.0%	\$2,255	93.1%	47.5%	2	100.0%	\$355	100.0%	67.7%	1	50.0%	\$1,900	91.9%	65.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$2,422	100.0%	100.0%	2	100.0%	\$355	100.0%	100.0%	2	100.0%	\$2,067	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	\$0	0.0%	1.1%	0	0.0%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	\$0	0.0%	5.9%	0	0.0%	\$0	0.0%	7.4%
	Middle	0	0.0%	\$0	0.0%	31.0%	0	0.0%	\$0	0.0%	23.9%	0	0.0%	\$0	0.0%	25.0%
	Upper	0	0.0%	\$0	0.0%	47.5%	0	0.0%	\$0	0.0%	69.1%	0	0.0%	\$0	0.0%	66.8%
	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%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTIFAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	11.7%	0	0.0%	\$0	0.0%	4.6%	0	0.0%	\$0	0.0%	3.9%
	Moderate	2	50.0%	\$25,231	42.5%	35.3%	1	100.0%	\$11,331	100.0%	24.7%	1	33.3%	\$13,900	28.9%	33.9%
	Middle	2	50.0%	\$34,200	57.5%	34.8%	0	0.0%	\$0	0.0%	52.3%	2	66.7%	\$34,200	71.1%	31.3%
	Upper	0	0.0%	\$0	0.0%	18.2%	0	0.0%	\$0	0.0%	18.5%	0	0.0%	\$0	0.0%	30.8%
	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%
	Total	4	100.0%	\$59,431	100.0%	100.0%	1	100.0%	\$11,331	100.0%	100.0%	3	100.0%	\$48,100	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	0.9%
	Moderate	2	22.2%	\$25,231	40.6%	19.0%	1	33.3%	\$11,331	97.0%	9.7%	1	16.7%	\$13,900	27.5%	10.8%
	Middle	3	33.3%	\$34,367	55.3%	31.0%	0	0.0%	\$0	0.0%	25.5%	3	50.0%	\$34,367	68.1%	24.9%
	Upper	4	44.4%	\$2,543	4.1%	47.5%	2	66.7%	\$355	3.0%	63.7%	2	33.3%	\$2,188	4.3%	63.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$62,141	100.0%	100.0%	3	100.0%	\$11,686	100.0%	100.0%	6	100.0%	\$50,455	100.0%	100.0%
SMALL BUSINESSES	Small Businesses															
	Low	0	0.0%	\$0	0.0%	4.1%	0	0.0%	\$0	0.0%	3.0%	0	0.0%	\$0	0.0%	2.6%
	Moderate	14	17.9%	\$3,785	17.5%	23.3%	3	14.3%	\$653	9.1%	28.2%	11	19.3%	\$3,132	21.7%	27.6%
	Middle	19	24.4%	\$4,828	22.3%	31.7%	6	28.6%	\$2,393	33.5%	35.2%	13	22.8%	\$2,435	16.8%	33.0%
	Upper	45	57.7%	\$12,995	60.1%	40.8%	12	57.1%	\$4,101	57.4%	33.5%	33	57.9%	\$8,894	61.5%	36.7%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	78	100.0%	\$21,608	100.0%	100.0%	21	100.0%	\$7,147	100.0%	100.0%	57	100.0%	\$14,461	100.0%	100.0%
SMALL FARM	Small Farms															
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.3%	0	0.0%	\$0	0.0%	3.9%	0	0.0%	\$0	0.0%	16.3%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	\$0	0.0%	7.7%	0	0.0%	\$0	0.0%	18.5%
	Upper	0	0.0%	\$0	0.0%	55.3%	0	0.0%	\$0	0.0%	88.4%	0	0.0%	\$0	0.0%	65.2%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	5.8%	\$0	0.0%	2.9%	0	0.0%	3.3%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	21.1%	\$0	0.0%	15.2%	0	0.0%	13.9%	\$0	0.0%	8.9%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	25.1%	\$0	0.0%	23.9%	0	0.0%	25.1%	\$0	0.0%	22.2%
	Upper	1	100.0%	\$288	100.0%	43.2%	0	0.0%	36.6%	\$0	0.0%	46.4%	1	100.0%	45.0%	\$288	100.0%	53.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.5%	\$0	0.0%	11.6%	0	0.0%	12.7%	\$0	0.0%	13.8%
	Total	1	100.0%	\$288	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$288	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	4.2%	\$0	0.0%	2.6%	0	0.0%	5.2%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	10.1%	\$0	0.0%	7.3%	0	0.0%	11.7%	\$0	0.0%	7.5%
	Middle	1	25.0%	\$107	4.4%	19.6%	1	50.0%	18.1%	\$107	30.1%	15.9%	0	0.0%	18.8%	\$0	0.0%	15.0%
	Upper	3	75.0%	\$2,315	95.6%	43.2%	1	50.0%	46.5%	\$248	69.9%	51.8%	2	100.0%	45.7%	\$2,067	100.0%	47.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.0%	\$0	0.0%	22.4%	0	0.0%	18.6%	\$0	0.0%	27.2%
	Total	4	100.0%	\$2,422	100.0%	100.0%	2	100.0%	100.0%	\$355	100.0%	100.0%	2	100.0%	100.0%	\$2,067	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	6.6%	\$0	0.0%	3.4%	0	0.0%	4.3%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	15.1%	\$0	0.0%	10.6%	0	0.0%	13.3%	\$0	0.0%	10.7%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	22.9%	\$0	0.0%	21.1%	0	0.0%	22.6%	\$0	0.0%	20.7%
	Upper	0	0.0%	\$0	0.0%	43.2%	0	0.0%	52.7%	\$0	0.0%	61.6%	0	0.0%	53.7%	\$0	0.0%	57.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	3.2%	0	0.0%	6.0%	\$0	0.0%	9.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$59,431	100.0%	0.0%	1	100.0%	100.0%	\$11,331	100.0%	100.0%	3	100.0%	100.0%	\$48,100	100.0%	100.0%
	Total	4	100.0%	\$59,431	100.0%	100.0%	1	100.0%	100.0%	\$11,331	100.0%	100.0%	3	100.0%	100.0%	\$48,100	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	4.7%	\$0	0.0%	2.6%	0	0.0%	4.5%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	13.7%	\$0	0.0%	9.4%	0	0.0%	12.5%	\$0	0.0%	7.8%
	Middle	1	11.1%	\$107	0.2%	19.6%	1	33.3%	20.4%	\$107	0.9%	17.9%	0	0.0%	21.1%	\$0	0.0%	17.2%
	Upper	4	44.4%	\$2,603	4.2%	43.2%	1	33.3%	43.3%	\$248	2.1%	48.6%	3	50.0%	45.5%	\$2,355	4.7%	48.2%
	Unknown	4	44.4%	\$59,431	95.6%	0.0%	1	33.3%	17.9%	\$11,331	97.0%	21.4%	3	50.0%	16.4%	\$48,100	95.3%	24.5%
	Total	9	100.0%	\$62,141	100.0%	100.0%	3	100.0%	100.0%	\$11,686	100.0%	100.0%	6	100.0%	100.0%	\$50,455	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	4	5.1%	\$920	4.3%	90.2%	1	4.8%	40.6%	\$508	7.1%	26.7%	3	5.3%	47.2%	\$412	2.8%	29.7%
	Over \$1 Million	53	67.9%	\$15,219	70.4%	6.4%	14	66.7%					39	68.4%				
	Total Rev. available	57	73.0%	\$16,139	74.7%	96.6%	15	71.5%					42	73.7%				
	Rev. Not Known	21	26.9%	\$5,469	25.3%	3.4%	6	28.6%					15	26.3%				
	Total	78	100.0%	\$21,608	100.0%	100.0%	21	100.0%					57	100.0%				
Small Business Loan Size	\$100,000 or Less	24	30.8%	\$1,426	6.6%		2	9.5%	94.2%	\$153	2.1%	32.1%	22	38.6%	94.8%	\$1,273	8.8%	36.5%
	\$100,001 - \$250,000	18	23.1%	\$3,327	15.4%		5	23.8%	2.5%	\$850	11.9%	12.8%	13	22.8%	2.2%	\$2,477	17.1%	11.6%
	\$250,001 - \$1 Million	36	46.2%	\$16,855	78.0%		14	66.7%	3.3%	\$6,144	86.0%	55.1%	22	38.6%	3.1%	\$10,711	74.1%	51.9%
	Total	78	100.0%	\$21,608	100.0%		21	100.0%	100.0%	\$7,147	100.0%	100.0%	57	100.0%	100.0%	\$14,461	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	92.2%	0	0.0%	38.6%	\$0	0.0%	19.8%	0	0.0%	52.4%	\$0	0.0%	46.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	7.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	61.4%	\$0	0.0%	11.9%	0	0.0%	85.4%	\$0	0.0%	27.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	12.3%	\$0	0.0%	14.9%	0	0.0%	5.8%	\$0	0.0%	15.2%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	26.3%	\$0	0.0%	73.2%	0	0.0%	8.7%	\$0	0.0%	57.7%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Count		Bank Dollar		Owner Occupied Units %	Count		Dollar		Agg	Agg
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	2.4%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	16.5%	\$0	0.0%	12.1%
	Middle	1	100.0%	\$340	100.0%	31.6%	1	100.0%	31.3%	\$340	100.0%	27.9%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	49.7%	\$0	0.0%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$340	100.0%	100.0%	1	100.0%	100.0%	\$340	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.2%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	11.5%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	31.6%	0	0.0%	30.2%	\$0	0.0%	25.2%
	Upper	2	100.0%	\$1,398	100.0%	47.2%	2	100.0%	57.1%	\$1,398	100.0%	66.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$1,398	100.0%	100.0%	2	100.0%	100.0%	\$1,398	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.5%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	11.6%	\$0	0.0%	8.9%
	Middle	0	0.0%	\$0	0.0%	31.6%	0	0.0%	30.6%	\$0	0.0%	26.9%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	56.3%	\$0	0.0%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	10.0%	0	0.0%	11.2%	\$0	0.0%	8.8%
	Moderate	0	0.0%	\$0	0.0%	35.5%	0	0.0%	48.7%	\$0	0.0%	31.9%
	Middle	1	100.0%	\$12,600	100.0%	36.2%	1	100.0%	33.5%	\$12,600	100.0%	41.6%
	Upper	0	0.0%	\$0	0.0%	18.3%	0	0.0%	6.7%	\$0	0.0%	17.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$12,600	100.0%	100.0%	1	100.0%	100.0%	\$12,600	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.8%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	13.9%	\$0	0.0%	10.6%
	Middle	2	50.0%	\$12,940	90.2%	31.6%	2	50.0%	30.7%	\$12,940	90.2%	27.0%
	Upper	2	50.0%	\$1,398	9.8%	47.2%	2	50.0%	53.6%	\$1,398	9.8%	61.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$14,338	100.0%	100.0%	4	100.0%	100.0%	\$14,338	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	2.4%	\$0	0.0%	2.9%
	Moderate	10	20.0%	\$3,759	24.6%	22.6%	10	20.0%	20.3%	\$3,759	24.6%	26.2%
	Middle	13	26.0%	\$2,990	19.6%	32.1%	13	26.0%	32.0%	\$2,990	19.6%	36.0%
	Upper	27	54.0%	\$8,527	55.8%	41.5%	27	54.0%	45.3%	\$8,527	55.8%	34.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	50	100.0%	\$15,276	100.0%	100.0%	50	100.0%	100.0%	\$15,276	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	10.9%	0	0.0%	15.6%	\$0	0.0%	5.9%
	Middle	0	0.0%	\$0	0.0%	34.3%	0	0.0%	37.4%	\$0	0.0%	29.7%
	Upper	0	0.0%	\$0	0.0%	54.2%	0	0.0%	46.9%	\$0	0.0%	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	1.7%	\$0	0.0%	0.8%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	10.1%	\$0	0.0%	6.2%	
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	22.4%	\$0	0.0%	19.1%	
	Upper	1	100.0%	\$340	100.0%	43.3%	1	100.0%	48.7%	\$340	100.0%	57.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.1%	\$0	0.0%	16.8%	
	Total	1	100.0%	\$340	100.0%	100.0%	1	100.0%	100.0%	\$340	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	3.4%	\$0	0.0%	1.8%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	10.2%	\$0	0.0%	6.6%	
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	18.7%	\$0	0.0%	15.7%	
	Upper	2	100.0%	\$1,398	100.0%	43.3%	2	100.0%	48.9%	\$1,398	100.0%	55.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	20.2%	
	Total	2	100.0%	\$1,398	100.0%	100.0%	2	100.0%	100.0%	\$1,398	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	9.2%	\$0	0.0%	2.3%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	10.4%	\$0	0.0%	8.9%	
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	19.1%	\$0	0.0%	19.7%	
	Upper	0	0.0%	\$0	0.0%	43.3%	0	0.0%	52.2%	\$0	0.0%	59.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.2%	\$0	0.0%	9.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	43.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$12,600	100.0%	0.0%	1	100.0%	100.0%	\$12,600	100.0%	100.0%	
	Total	1	100.0%	\$12,600	100.0%	100.0%	1	100.0%	100.0%	\$12,600	100.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	2.9%	\$0	0.0%	1.3%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	10.2%	\$0	0.0%	6.2%	
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	20.3%	\$0	0.0%	16.9%	
	Upper	3	75.0%	\$1,738	12.1%	43.3%	3	75.0%	48.8%	\$1,738	12.1%	54.8%	
	Unknown	1	25.0%	\$12,600	87.9%	0.0%	1	25.0%	17.8%	\$12,600	87.9%	20.8%	
	Total	4	100.0%	\$14,338	100.0%	100.0%	4	100.0%	100.0%	\$14,338	100.0%	100.0%	
Small Business	Revenue	Total Businesses					5	10.0%	46.8%	\$1,489	9.7%	28.4%	
		\$1 Million or Less	5	10.0%	\$1,489	9.7%							89.7%
		Over \$1 Million	33	66.0%	\$9,367	61.3%							6.9%
		Total Rev. available	38	76.0%	\$10,856	71.0%							96.6%
		Rev. Not Known	12	24.0%	\$4,420	28.9%							3.4%
		Total	50	100.0%	\$15,276	100.0%							100.0%
	Loan Size	\$100,000 or Less	17	34.0%	\$1,041	6.8%		17	34.0%	95.1%	\$1,041	6.8%	39.1%
		\$100,001 - \$250,000	10	20.0%	\$1,940	12.7%		10	20.0%	2.1%	\$1,940	12.7%	11.6%
		\$250,001 - \$1 Million	23	46.0%	\$12,295	80.5%		23	46.0%	2.7%	\$12,295	80.5%	49.3%
		Total	50	100.0%	\$15,276	100.0%		50	100.0%	100.0%	\$15,276	100.0%	100.0%
Small Farm	Revenue	Total Farms					0	0.0%	43.5%	\$0	0.0%	21.9%	
		\$1 Million or Less	0	0.0%	\$0	0.0%							92.0%
		Over \$1 Million	0	0.0%	\$0	0.0%							7.9%
		Not Known	0	0.0%	\$0	0.0%							0.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	89.1%	\$0	0.0%	36.8%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.1%	\$0	0.0%	25.3%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	37.9%
Total		0	0.0%	\$0	0.0%	0		0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

CA - Inland Empire 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	20.0%	75	22.5%	2	40.0%	110	32.9%
Upper	4	80.0%	259	77.5%	3	60.0%	224	67.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>334</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>334</i>	<i>100.0%</i>

CA - Inland Empire 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	3.3%	68	1.8%
Moderate	1	3.3%	25	0.6%	2	6.7%	75	1.9%
<i>Low/Moderate Total</i>	<i>1</i>	<i>3.3%</i>	<i>25</i>	<i>0.6%</i>	<i>3</i>	<i>10.0%</i>	<i>143</i>	<i>3.7%</i>
Middle	5	16.7%	517	13.3%	4	13.3%	362	9.3%
Upper	24	80.0%	3,331	86.0%	23	76.7%	3,368	87.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>3,873</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>3,873</i>	<i>100.0%</i>

CA - Inland Empire 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	2.4%	100	2.3%
Moderate	3	7.3%	231	5.2%	5	12.2%	229	5.2%
<i>Low/Moderate Total</i>	<i>3</i>	<i>7.3%</i>	<i>231</i>	<i>5.2%</i>	<i>6</i>	<i>14.6%</i>	<i>329</i>	<i>7.4%</i>
Middle	10	24.4%	737	16.7%	7	17.1%	647	14.6%
Upper	28	68.3%	3,449	78.1%	28	68.3%	3,441	77.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>4,417</i>	<i>100.0%</i>	<i>41</i>	<i>100.0%</i>	<i>4,417</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Oxnard (Ventura)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2012					2013						
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	#	%	\$ (000s)	\$ %				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	2.0%	\$0	0.0%	1.1%	0	0.0%	1.9%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	17.3%	\$0	0.0%	11.6%	0	0.0%	15.4%	\$0	0.0%	10.8%
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	38.3%	\$0	0.0%	32.1%	0	0.0%	38.2%	\$0	0.0%	31.9%
	Upper	2	100.0%	\$654	100.0%	45.0%	1	100.0%	42.3%	\$414	100.0%	55.2%	1	100.0%	44.5%	\$240	100.0%	56.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$654	100.0%	100.0%	1	100.0%	100.0%	\$414	100.0%	100.0%	1	100.0%	100.0%	\$240	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.9%	\$0	0.0%	0.6%	0	0.0%	1.5%	\$0	0.0%	0.9%
	Moderate	1	12.5%	\$120	2.1%	16.9%	1	16.7%	10.3%	\$120	4.6%	7.6%	0	0.0%	13.3%	\$0	0.0%	9.0%
	Middle	2	25.0%	\$359	6.2%	36.3%	2	33.3%	32.5%	\$359	13.6%	28.0%	0	0.0%	35.6%	\$0	0.0%	31.6%
	Upper	5	62.5%	\$5,356	91.8%	45.0%	3	50.0%	56.3%	\$2,158	81.8%	63.8%	2	100.0%	49.6%	\$3,198	100.0%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$5,835	100.0%	100.0%	6	100.0%	100.0%	\$2,637	100.0%	100.0%	2	100.0%	100.0%	\$3,198	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.6%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.7%
	Moderate	1	100.0%	\$122	100.0%	16.9%	1	100.0%	10.1%	\$122	100.0%	6.4%	0	0.0%	12.3%	\$0	0.0%	7.6%
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	29.6%	\$0	0.0%	25.1%	0	0.0%	33.8%	\$0	0.0%	27.0%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	59.8%	\$0	0.0%	68.1%	0	0.0%	53.1%	\$0	0.0%	64.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$122	100.0%	100.0%	1	100.0%	100.0%	\$122	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	9.0%	0	0.0%	18.8%	\$0	0.0%	21.2%	0	0.0%	22.5%	\$0	0.0%	8.1%
	Moderate	2	100.0%	\$6,787	100.0%	37.5%	0	0.0%	54.2%	\$0	0.0%	41.0%	2	100.0%	35.0%	\$6,787	100.0%	24.7%
	Middle	0	0.0%	\$0	0.0%	39.4%	0	0.0%	12.5%	\$0	0.0%	21.4%	0	0.0%	37.5%	\$0	0.0%	66.0%
	Upper	0	0.0%	\$0	0.0%	14.2%	0	0.0%	14.6%	\$0	0.0%	16.5%	0	0.0%	5.0%	\$0	0.0%	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	0.0%	0.0%
Total	2	100.0%	\$6,787	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$6,787	100.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.2%	\$0	0.0%	0.9%	0	0.0%	1.6%	\$0	0.0%	1.2%
	Moderate	4	30.8%	\$7,029	52.5%	16.9%	2	25.0%	11.9%	\$242	7.6%	8.8%	2	40.0%	13.9%	\$6,787	66.4%	9.9%
	Middle	2	15.4%	\$359	2.7%	36.3%	2	25.0%	33.7%	\$359	11.3%	28.9%	0	0.0%	36.3%	\$0	0.0%	32.5%
	Upper	7	53.8%	\$6,010	44.9%	45.0%	4	50.0%	53.2%	\$2,572	81.1%	61.4%	3	60.0%	48.2%	\$3,438	33.6%	56.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	13	100.0%	\$13,398	100.0%	100.0%	8	100.0%	100.0%	\$3,173	100.0%	100.0%	5	100.0%	100.0%	\$10,225	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	4.1%	0	0.0%	3.2%	\$0	0.0%	5.0%	0	0.0%	3.5%	\$0	0.0%	6.8%
	Moderate	2	6.7%	\$650	6.4%	20.3%	1	11.1%	16.5%	\$250	9.7%	21.2%	1	4.8%	16.5%	\$400	5.3%	21.5%
	Middle	11	36.7%	\$3,822	37.8%	36.2%	3	33.3%	33.6%	\$1,365	52.9%	34.4%	8	38.1%	33.6%	\$2,457	32.6%	36.0%
	Upper	17	56.7%	\$5,636	55.8%	39.3%	5	55.6%	46.7%	\$966	37.4%	39.3%	12	57.1%	46.3%	\$4,670	62.0%	35.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	30	100.0%	\$10,108	100.0%	100.0%	9	100.0%	100.0%	\$2,581	100.0%	100.0%	21	100.0%	100.0%	\$7,527	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	7.8%	0	0.0%	5.4%	\$0	0.0%	10.6%	0	0.0%	19.7%	\$0	0.0%	20.8%
	Moderate	0	0.0%	\$0	0.0%	25.4%	0	0.0%	19.6%	\$0	0.0%	21.3%	0	0.0%	19.0%	\$0	0.0%	23.4%
	Middle	0	0.0%	\$0	0.0%	39.9%	0	0.0%	40.2%	\$0	0.0%	38.5%	0	0.0%	29.2%	\$0	0.0%	38.1%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	34.8%	\$0	0.0%	29.6%	0	0.0%	32.1%	\$0	0.0%	17.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Oxnard (Ventura)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison												
							2012						2013						
		Bank				Families by Family Income	Count			Dollar			Count			Dollar			
		Count	Dollar				Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	5.4%	\$0	0.0%	2.6%	0	0.0%	2.8%	\$0	0.0%	1.1%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	19.8%	\$0	0.0%	13.5%	0	0.0%	13.0%	\$0	0.0%	7.7%	
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	24.6%	\$0	0.0%	22.1%	0	0.0%	23.3%	\$0	0.0%	18.8%	
	Upper	2	100.0%	\$654	100.0%	42.1%	1	100.0%	42.2%	\$414	100.0%	53.9%	1	100.0%	49.3%	\$240	100.0%	59.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.0%	\$0	0.0%	7.9%	0	0.0%	11.6%	\$0	0.0%	12.7%	
	Total	2	100.0%	\$654	100.0%	100.0%	1	100.0%	100.0%	\$414	100.0%	100.0%	1	100.0%	100.0%	\$240	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	5.4%	\$0	0.0%	3.0%	0	0.0%	6.6%	\$0	0.0%	3.2%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	13.1%	\$0	0.0%	9.2%	0	0.0%	13.7%	\$0	0.0%	8.4%	
	Middle	3	37.5%	\$484	8.3%	20.2%	2	33.3%	22.2%	\$236	8.9%	19.5%	1	50.0%	21.9%	\$248	7.8%	16.9%	
	Upper	5	62.5%	\$5,351	91.7%	42.1%	4	66.7%	46.7%	\$2,401	91.1%	55.0%	1	50.0%	45.1%	\$2,950	92.2%	50.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.6%	\$0	0.0%	13.3%	0	0.0%	12.7%	\$0	0.0%	20.7%	
	Total	8	100.0%	\$5,835	100.0%	100.0%	6	100.0%	100.0%	\$2,637	100.0%	100.0%	2	100.0%	100.0%	\$3,198	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	100.0%	\$122	100.0%	21.0%	1	100.0%	6.4%	\$122	100.0%	3.3%	0	0.0%	6.8%	\$0	0.0%	3.8%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	19.5%	\$0	0.0%	14.5%	0	0.0%	15.9%	\$0	0.0%	11.1%	
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	26.3%	\$0	0.0%	24.9%	0	0.0%	26.0%	\$0	0.0%	21.4%	
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	43.9%	\$0	0.0%	53.2%	0	0.0%	44.8%	\$0	0.0%	54.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	4.1%	0	0.0%	6.5%	\$0	0.0%	9.6%	
	Total	1	100.0%	\$122	100.0%	100.0%	1	100.0%	100.0%	\$122	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	2	100.0%	\$6,787	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$6,787	100.0%	100.0%	
	Total	2	100.0%	\$6,787	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$6,787	100.0%	100.0%	
HMDA TOTALS	Low	1	7.7%	\$122	0.9%	21.0%	1	12.5%	5.4%	\$122	3.8%	2.9%	0	0.0%	5.6%	\$0	0.0%	2.5%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	14.6%	\$0	0.0%	10.2%	0	0.0%	13.5%	\$0	0.0%	8.0%	
	Middle	3	23.1%	\$484	3.6%	20.2%	2	25.0%	22.7%	\$236	7.4%	20.0%	1	20.0%	22.3%	\$248	2.4%	17.1%	
	Upper	7	53.8%	\$6,005	44.8%	42.1%	5	62.5%	45.6%	\$2,815	88.7%	54.2%	2	40.0%	46.1%	\$3,190	31.2%	52.0%	
	Unknown	2	15.4%	\$6,787	50.7%	0.0%	0	0.0%	11.6%	\$0	0.0%	12.7%	2	40.0%	12.4%	\$6,787	66.4%	20.4%	
	Total	13	100.0%	\$13,398	100.0%	100.0%	8	100.0%	100.0%	\$3,173	100.0%	100.0%	5	100.0%	100.0%	\$10,225	100.0%	100.0%	
Small Business	Revenue	Total Businesses					0	0.0%	47.6%	\$0	0.0%	35.9%	2	9.5%	53.3%	\$150	2.0%	35.7%	
		\$1 Million or Less	2	6.7%	\$150	1.5%													90.9%
		Over \$1 Million	12	40.0%	\$4,200	41.6%													6.3%
		Total Rev. available	14	46.7%	\$4,350	43.1%													97.2%
		Rev. Not Known	16	53.3%	\$5,758	57.0%													2.9%
	Total	30	100.0%	\$10,108	100.0%	100.0%	9	100.0%					21	100.0%					
	Loan Size	\$100,000 or Less	6	20.0%	\$430	4.3%		2	22.2%	96.4%	\$165	6.4%	47.0%	4	19.0%	95.8%	\$265	3.5%	45.9%
		\$100,001 - \$250,000	11	36.7%	\$2,166	21.4%		5	55.6%	1.7%	\$1,116	43.2%	11.5%	6	28.6%	2.1%	\$1,050	13.9%	12.4%
		\$250,001 - \$1 Million	13	43.3%	\$7,512	74.3%		2	22.2%	1.9%	\$1,300	50.4%	41.5%	11	52.4%	2.2%	\$6,212	82.5%	41.7%
		Total	30	100.0%	\$10,108	100.0%		9	100.0%	100.0%	\$2,581	100.0%	100.0%	21	100.0%	100.0%	\$7,527	100.0%	100.0%
Small Farm		Revenue	Total Farms					0	0.0%	36.6%	\$0	0.0%	31.4%	0	0.0%	44.5%	\$0	0.0%	23.4%
	\$1 Million or Less		0	0.0%	\$0	0.0%	86.8%												
	Over \$1 Million		0	0.0%	\$0	0.0%	13.0%												
	Not Known		0	0.0%	\$0	0.0%	0.2%												
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%						
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	82.1%	\$0	0.0%	21.5%	0	0.0%	88.3%	\$0	0.0%	32.3%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.4%	\$0	0.0%	13.2%	0	0.0%	5.1%	\$0	0.0%	17.9%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.5%	\$0	0.0%	65.3%	0	0.0%	6.6%	\$0	0.0%	49.9%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRFEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Oxnard (Ventura)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%					%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	2.3%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	17.8%	\$0	0.0%	13.0%
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	37.8%	\$0	0.0%	32.3%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	42.0%	\$0	0.0%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.4%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	15.2%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	38.9%	\$0	0.0%	33.8%
	Upper	1	100.0%	\$5,000	100.0%	45.0%	1	100.0%	44.5%	\$5,000	100.0%	54.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$5,000	100.0%	100.0%	1	100.0%	100.0%	\$5,000	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	2.9%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	12.4%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	41.6%	\$0	0.0%	33.9%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	43.2%	\$0	0.0%	54.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	9.0%	0	0.0%	14.8%	\$0	0.0%	4.3%
	Moderate	0	0.0%	\$0	0.0%	37.5%	0	0.0%	66.7%	\$0	0.0%	29.7%
	Middle	0	0.0%	\$0	0.0%	39.4%	0	0.0%	3.7%	\$0	0.0%	40.2%
	Upper	0	0.0%	\$0	0.0%	14.2%	0	0.0%	14.8%	\$0	0.0%	25.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
		Multi-Family Units										
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.9%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	16.2%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	38.5%	\$0	0.0%	33.3%
	Upper	1	100.0%	\$5,000	100.0%	45.0%	1	100.0%	43.4%	\$5,000	100.0%	53.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$5,000	100.0%	100.0%	1	100.0%	100.0%	\$5,000	100.0%	100.0%
		Small Businesses										
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	3.7%	\$0	0.0%	5.6%
	Moderate	1	5.9%	\$400	8.5%	19.4%	1	5.9%	17.4%	\$400	8.5%	21.1%
	Middle	8	47.1%	\$1,475	31.3%	35.8%	8	47.1%	34.1%	\$1,475	31.3%	38.3%
	Upper	8	47.1%	\$2,835	60.2%	40.9%	8	47.1%	44.7%	\$2,835	60.2%	34.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$4,710	100.0%	100.0%	17	100.0%	100.0%	\$4,710	100.0%	100.0%
SMALL FARM		Small Farms										
	Low	0	0.0%	\$0	0.0%	7.6%	0	0.0%	13.5%	\$0	0.0%	21.7%
	Moderate	0	0.0%	\$0	0.0%	25.3%	0	0.0%	19.1%	\$0	0.0%	19.6%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	41.1%	\$0	0.0%	40.0%
	Upper	0	0.0%	\$0	0.0%	28.3%	0	0.0%	26.2%	\$0	0.0%	18.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - Oxnard (Ventura)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2014					2014				
		Bank			Families by Family Income %		Count		Dollar		
		Count #	%	Dollar \$ (000s)			Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	7.6%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	\$0	0.0%	20.2%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	\$0	0.0%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	12.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	\$0	0.0%	19.0%
	Upper	1	100.0%	\$5,000	100.0%	42.1%	1	100.0%	\$5,000	100.0%	54.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	15.3%
	Total	1	100.0%	\$5,000	100.0%	100.0%	1	100.0%	\$5,000	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	9.9%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	\$0	0.0%	27.8%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	\$0	0.0%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	6.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	8.2%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	\$0	0.0%	19.4%
	Upper	1	100.0%	\$5,000	100.0%	42.1%	1	100.0%	\$5,000	100.0%	55.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	15.0%
	Total	1	100.0%	\$5,000	100.0%	100.0%	1	100.0%	\$5,000	100.0%	100.0%
Small Business	Total Businesses										
	Revenue										
	\$1 Million or Less	4	23.5%	\$450	9.6%	90.5%	4	23.5%	\$450	9.6%	34.8%
	Over \$1 Million	10	58.8%	\$3,400	72.2%	6.7%	10	58.8%			
	Total Rev. available	14	82.3%	\$3,850	81.8%	97.2%	14	82.3%			
	Rev. Not Known	3	17.6%	\$860	18.3%	2.8%	3	17.6%			
	Total	17	100.0%	\$4,710	100.0%	100.0%	17	100.0%			
	Loan Size										
	\$100,000 or Less	7	41.2%	\$465	9.9%		7	41.2%	\$465	9.9%	47.2%
	\$100,001 - \$250,000	5	29.4%	\$900	19.1%		5	29.4%	\$900	19.1%	12.0%
	\$250,001 - \$1 Million	5	29.4%	\$3,345	71.0%		5	29.4%	\$3,345	71.0%	40.7%
	Total	17	100.0%	\$4,710	100.0%		17	100.0%	\$4,710	100.0%	100.0%
Small Farm	Total Farms										
	Revenue										
	\$1 Million or Less	0	0.0%	\$0	0.0%	85.9%	0	0.0%	\$0	0.0%	25.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	13.9%	0	0.0%			
	Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%			
	Loan Size										
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	32.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	15.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	51.8%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

CA - Oxnard (Ventura) 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	12.5%	100	6.6%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>12.5%</i>	<i>100</i>	<i>6.6%</i>
Middle	0	0.0%	0	0.0%	1	12.5%	100	6.6%
Upper	8	100.0%	1,513	100.0%	6	75.0%	1,313	86.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>1,513</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>1,513</i>	<i>100.0%</i>

CA - Oxnard (Ventura) 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	3.3%	48	0.8%
Moderate	2	6.7%	66	1.1%	1	3.3%	20	0.3%
<i>Low/Moderate Total</i>	<i>2</i>	<i>6.7%</i>	<i>66</i>	<i>1.1%</i>	<i>2</i>	<i>6.7%</i>	<i>68</i>	<i>1.1%</i>
Middle	11	36.7%	1,622	26.3%	8	26.7%	1,288	20.9%
Upper	17	56.7%	4,472	72.6%	20	66.7%	4,804	78.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>6,160</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>6,160</i>	<i>100.0%</i>

CA - Oxnard (Ventura) 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	5.1%	155	2.0%	1	2.6%	40	0.5%
<i>Low/Moderate Total</i>	<i>2</i>	<i>5.1%</i>	<i>155</i>	<i>2.0%</i>	<i>1</i>	<i>2.6%</i>	<i>40</i>	<i>0.5%</i>
Middle	8	20.5%	885	11.2%	10	25.6%	1,044	13.2%
Upper	29	74.4%	6,845	86.8%	28	71.8%	6,801	86.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>7,885</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>7,885</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Sacramento

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		Comparison 2012, 2013					2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	4.5%	\$0	0.0%	3.1%	0	0.0%	4.1%	\$0	0.0%	2.5%
	Moderate	2	33.3%	\$296	7.4%	20.1%	1	33.3%	20.6%	\$92	23.3%	13.4%	1	33.3%	17.0%	\$204	5.6%	10.9%
	Middle	2	33.3%	\$255	6.3%	38.7%	1	33.3%	43.1%	\$85	21.5%	41.8%	1	33.3%	38.4%	\$170	4.7%	36.2%
	Upper	2	33.3%	\$3,473	86.3%	36.6%	1	33.3%	31.8%	\$218	55.2%	41.7%	1	33.3%	40.5%	\$3,255	89.7%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$4,024	100.0%	100.0%	3	100.0%	100.0%	\$395	100.0%	100.0%	3	100.0%	100.0%	\$3,629	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.4%	\$0	0.0%	2.5%	0	0.0%	2.9%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	15.3%	\$0	0.0%	11.2%	0	0.0%	14.8%	\$0	0.0%	11.2%
	Middle	2	33.3%	\$633	19.3%	38.7%	1	50.0%	39.9%	\$73	31.6%	37.4%	1	25.0%	37.2%	\$560	18.4%	34.9%
	Upper	4	66.7%	\$2,644	80.7%	36.6%	1	50.0%	41.4%	\$158	68.4%	49.0%	3	75.0%	45.2%	\$2,486	81.6%	51.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$3,277	100.0%	100.0%	2	100.0%	100.0%	\$231	100.0%	100.0%	4	100.0%	100.0%	\$3,046	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	4.0%	\$0	0.0%	4.0%	0	0.0%	3.3%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	15.1%	\$0	0.0%	8.5%	0	0.0%	13.4%	\$0	0.0%	8.6%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	38.1%	\$0	0.0%	32.1%	0	0.0%	38.6%	\$0	0.0%	33.7%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	42.8%	\$0	0.0%	55.4%	0	0.0%	44.7%	\$0	0.0%	55.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	17.6%	\$0	0.0%	11.0%	0	0.0%	16.8%	\$0	0.0%	5.3%
	Moderate	0	0.0%	\$0	0.0%	36.4%	0	0.0%	40.0%	\$0	0.0%	35.6%	0	0.0%	38.0%	\$0	0.0%	36.9%
	Middle	0	0.0%	\$0	0.0%	35.0%	0	0.0%	30.5%	\$0	0.0%	41.3%	0	0.0%	33.2%	\$0	0.0%	30.2%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	11.9%	\$0	0.0%	12.1%	0	0.0%	12.0%	\$0	0.0%	27.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.8%	\$0	0.0%	3.0%	0	0.0%	3.3%	\$0	0.0%	2.4%
	Moderate	2	16.7%	\$296	4.1%	20.1%	1	20.0%	17.1%	\$92	14.7%	12.7%	1	14.3%	15.5%	\$204	3.1%	11.8%
	Middle	4	33.3%	\$888	12.2%	38.7%	2	40.0%	40.9%	\$158	25.2%	38.7%	2	28.6%	37.6%	\$730	10.9%	35.2%
	Upper	6	50.0%	\$6,117	83.8%	36.6%	2	40.0%	38.2%	\$376	60.1%	45.6%	4	57.1%	43.5%	\$5,741	86.0%	50.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$7,301	100.0%	100.0%	5	100.0%	100.0%	\$626	100.0%	100.0%	7	100.0%	100.0%	\$6,675	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	6	17.6%	\$2,485	23.1%	7.7%	0	0.0%	9.9%	\$0	0.0%	15.7%	6	18.8%	7.9%	\$2,485	23.5%	11.7%
	Moderate	5	14.7%	\$2,424	22.6%	22.5%	0	0.0%	22.0%	\$0	0.0%	24.0%	5	15.6%	19.4%	\$2,424	22.9%	21.1%
	Middle	9	26.5%	\$2,761	25.7%	38.3%	2	100.0%	36.0%	\$164	100.0%	34.8%	7	21.9%	35.3%	\$2,597	24.6%	36.0%
	Upper	14	41.2%	\$3,068	28.6%	31.5%	0	0.0%	29.4%	\$0	0.0%	23.9%	14	43.8%	36.0%	\$3,068	29.0%	29.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	1.6%	0	0.0%	1.3%	\$0	0.0%	1.3%
Total	34	100.0%	\$10,738	100.0%	100.0%	2	100.0%	100.0%	\$164	100.0%	100.0%	32	100.0%	100.0%	\$10,574	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	2.1%	\$0	0.0%	2.4%	0	0.0%	2.1%	\$0	0.0%	4.0%
	Moderate	0	0.0%	\$0	0.0%	14.0%	0	0.0%	5.5%	\$0	0.0%	0.9%	0	0.0%	11.0%	\$0	0.0%	6.4%
	Middle	0	0.0%	\$0	0.0%	46.0%	0	0.0%	40.4%	\$0	0.0%	46.6%	0	0.0%	49.2%	\$0	0.0%	58.2%
	Upper	0	0.0%	\$0	0.0%	38.0%	0	0.0%	50.0%	\$0	0.0%	49.5%	0	0.0%	36.6%	\$0	0.0%	30.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	0.6%	0	0.0%	1.0%	\$0	0.0%	0.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Sacramento

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison												
		Bank Count # % \$ (000s) \$ % %					2012						2013						
							Count			Dollar			Count			Dollar			
		Bank		Agg		Bank		Agg		Bank		Agg		Bank		Agg			
# %		\$ (000s) \$ %		# % %		\$ (000s) \$ % \$ %		# % %		\$ (000s) \$ % \$ %									
HOME PURCHASE	Low	2	33.3%	\$262	6.5%	23.0%	1	33.3%	15.4%	\$92	23.3%	9.4%	1	33.3%	5.8%	\$170	4.7%	2.7%	
	Moderate	1	16.7%	\$85	2.1%	17.2%	1	33.3%	23.9%	\$85	21.5%	20.0%	0	0.0%	18.7%	\$0	0.0%	12.4%	
	Middle	1	16.7%	\$204	5.1%	20.1%	0	0.0%	21.4%	\$0	0.0%	22.6%	1	33.3%	23.9%	\$204	5.6%	21.3%	
	Upper	2	33.3%	\$3,473	86.3%	39.8%	1	33.3%	29.1%	\$218	55.2%	37.6%	1	33.3%	42.3%	\$3,255	89.7%	51.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.2%	\$0	0.0%	10.3%	0	0.0%	9.4%	\$0	0.0%	11.6%	
	Total	6	100.0%	\$4,024	100.0%	100.0%	3	100.0%	100.0%	\$395	100.0%	100.0%	3	100.0%	100.0%	\$3,629	100.0%	100.0%	
REFINANCE	Low	1	16.7%	\$73	2.2%	23.0%	1	50.0%	6.9%	\$73	31.6%	4.4%	0	0.0%	6.0%	\$0	0.0%	3.1%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	13.3%	\$0	0.0%	10.2%	0	0.0%	13.6%	\$0	0.0%	8.7%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	21.8%	\$0	0.0%	20.3%	0	0.0%	22.0%	\$0	0.0%	17.0%	
	Upper	4	66.7%	\$1,804	55.1%	39.8%	1	50.0%	40.9%	\$158	68.4%	47.2%	3	75.0%	45.1%	\$1,646	54.0%	46.1%	
	Unknown	1	16.7%	\$1,400	42.7%	0.0%	0	0.0%	17.1%	\$0	0.0%	18.0%	1	25.0%	13.4%	\$1,400	46.0%	25.0%	
	Total	6	100.0%	\$3,277	100.0%	100.0%	2	100.0%	100.0%	\$231	100.0%	100.0%	4	100.0%	100.0%	\$3,046	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	9.3%	\$0	0.0%	5.1%	0	0.0%	6.0%	\$0	0.0%	3.5%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	17.6%	\$0	0.0%	12.1%	0	0.0%	14.7%	\$0	0.0%	11.0%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	26.1%	\$0	0.0%	22.0%	0	0.0%	24.4%	\$0	0.0%	21.2%	
	Upper	0	0.0%	\$0	0.0%	39.8%	0	0.0%	43.7%	\$0	0.0%	56.7%	0	0.0%	50.3%	\$0	0.0%	57.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	4.0%	0	0.0%	4.6%	\$0	0.0%	6.5%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	25.0%	\$335	4.6%	23.0%	2	40.0%	9.7%	\$165	26.4%	5.6%	1	14.3%	5.9%	\$170	2.5%	2.9%	
	Moderate	1	8.3%	\$85	1.2%	17.2%	1	20.0%	16.7%	\$85	13.6%	12.6%	0	0.0%	15.3%	\$0	0.0%	9.7%	
	Middle	1	8.3%	\$204	2.8%	20.1%	0	0.0%	21.7%	\$0	0.0%	20.2%	1	14.3%	22.6%	\$204	3.1%	18.0%	
	Upper	6	50.0%	\$5,277	72.3%	39.8%	2	40.0%	37.0%	\$376	60.1%	42.7%	4	57.1%	44.2%	\$4,901	73.4%	46.9%	
	Unknown	1	8.3%	\$1,400	19.2%	0.0%	0	0.0%	14.9%	\$0	0.0%	18.8%	1	14.3%	12.0%	\$1,400	21.0%	22.5%	
	Total	12	100.0%	\$7,301	100.0%	100.0%	5	100.0%	100.0%	\$626	100.0%	100.0%	7	100.0%	100.0%	\$6,675	100.0%	100.0%	
Small Business	Total Businesses																		
	\$1 Million or Less	6	17.6%	\$809	7.5%	91.6%	1	50.0%	43.0%	\$100	61.0%	34.6%	5	15.6%	50.2%	\$709	6.7%	35.2%	
	Over \$1 Million	19	55.9%	\$6,120	57.0%	5.2%	0	0.0%					19	59.4%					
	Total Rev. available	25	73.5%	\$6,929	64.5%	96.8%	1	50.0%					24	75.0%					
	Rev. Not Known	9	26.5%	\$3,809	35.5%	3.2%	1	50.0%					8	25.0%					
	Total	34	100.0%	\$10,738	100.0%	100.0%	2	100.0%					32	100.0%					
	\$100,000 or Less	16	47.1%	\$846	7.9%		2	100.0%	94.9%	\$164	100.0%	39.4%	14	43.8%	94.5%	\$682	6.4%	38.9%	
	\$100,001 - \$250,000	6	17.6%	\$1,400	13.0%		0	0.0%	2.6%	\$0	0.0%	14.8%	6	18.8%	2.6%	\$1,400	13.2%	13.1%	
\$250,001 - \$1 Million	12	35.3%	\$8,492	79.1%		0	0.0%	2.5%	\$0	0.0%	45.8%	12	37.5%	2.9%	\$8,492	80.3%	48.1%		
Total	34	100.0%	\$10,738	100.0%		2	100.0%	100.0%	\$164	100.0%	100.0%	32	100.0%	100.0%	\$10,574	100.0%	100.0%		
Small Farm	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.7%	0	0.0%	55.5%	\$0	0.0%	61.2%	0	0.0%	53.9%	\$0	0.0%	55.8%	
	Over \$1 Million	0	0.0%	\$0	0.0%	2.3%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	58.9%	\$0	0.0%	11.9%	0	0.0%	71.2%	\$0	0.0%	16.9%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	24.0%	\$0	0.0%	33.4%	0	0.0%	14.7%	\$0	0.0%	27.9%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	17.1%	\$0	0.0%	54.7%	0	0.0%	14.1%	\$0	0.0%	55.2%	
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Sacramento

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Count		Bank Dollar		Owner Occupied Units	Count		Dollar		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	4.9%	\$0	0.0%	3.1%
	Moderate	1	50.0%	\$190	12.0%	20.1%	1	50.0%	18.8%	\$190	12.0%	12.4%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	37.7%	\$0	0.0%	35.7%
	Upper	1	50.0%	\$1,388	88.0%	36.6%	1	50.0%	38.6%	\$1,388	88.0%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$1,578	100.0%	100.0%	2	100.0%	100.0%	\$1,578	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.2%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	15.3%	\$0	0.0%	10.3%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	37.8%	\$0	0.0%	34.2%
	Upper	1	100.0%	\$550	100.0%	36.6%	1	100.0%	43.7%	\$550	100.0%	53.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$550	100.0%	100.0%	1	100.0%	100.0%	\$550	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.2%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	16.8%	\$0	0.0%	12.6%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	38.6%	\$0	0.0%	37.1%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	41.4%	\$0	0.0%	48.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	18.4%	\$0	0.0%	9.9%
	Moderate	0	0.0%	\$0	0.0%	36.4%	0	0.0%	34.6%	\$0	0.0%	28.0%
	Middle	0	0.0%	\$0	0.0%	35.0%	0	0.0%	32.1%	\$0	0.0%	27.1%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	15.0%	\$0	0.0%	35.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	4.0%	\$0	0.0%	3.0%
	Moderate	1	33.3%	\$190	8.9%	20.1%	1	33.3%	17.1%	\$190	8.9%	12.4%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	37.8%	\$0	0.0%	34.5%
	Upper	2	66.7%	\$1,938	91.1%	36.6%	2	66.7%	41.1%	\$1,938	91.1%	50.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$2,128	100.0%	100.0%	3	100.0%	100.0%	\$2,128	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	6	22.2%	\$1,490	26.8%	7.6%	6	22.2%	7.7%	\$1,490	26.8%	11.1%
	Moderate	3	11.1%	\$1,026	18.5%	22.1%	3	11.1%	19.4%	\$1,026	18.5%	20.7%
	Middle	4	14.8%	\$170	3.1%	38.4%	4	14.8%	36.5%	\$170	3.1%	35.1%
	Upper	14	51.9%	\$2,867	51.6%	32.0%	14	51.9%	35.3%	\$2,867	51.6%	32.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	1.1%
	Total	27	100.0%	\$5,553	100.0%	100.0%	27	100.0%	100.0%	\$5,553	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	3.3%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	9.3%	\$0	0.0%	6.5%
	Middle	0	0.0%	\$0	0.0%	45.6%	0	0.0%	42.5%	\$0	0.0%	50.9%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	42.5%	\$0	0.0%	39.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.3%	\$0	0.0%	0.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - Sacramento

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Families by Family Income		%	Count		Dollar			%
		Count	Dollar				Bank	Agg	Bank	Agg	Agg	
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	\$0	0.0%	\$0	1.6%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	\$0	0.0%	\$0	9.5%
	Middle	1	50.0%	\$190	12.0%	20.1%	1	50.0%	\$190	12.0%	\$190	19.4%
	Upper	1	50.0%	\$1,388	88.0%	39.8%	1	50.0%	\$1,388	88.0%	\$1,388	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	13.6%
	Total	2	100.0%	\$1,578	100.0%	100.0%	2	100.0%	\$1,578	100.0%	\$1,578	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	\$0	0.0%	\$0	2.9%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	\$0	0.0%	\$0	8.7%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	\$0	0.0%	\$0	17.1%
	Upper	1	100.0%	\$550	100.0%	39.8%	1	100.0%	\$550	100.0%	\$550	52.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	18.6%
	Total	1	100.0%	\$550	100.0%	100.0%	1	100.0%	\$550	100.0%	\$550	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	\$0	0.0%	\$0	2.4%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	\$0	0.0%	\$0	11.8%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	\$0	0.0%	\$0	22.1%
	Upper	0	0.0%	\$0	0.0%	39.8%	0	0.0%	\$0	0.0%	\$0	57.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	6.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	\$0	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	\$0	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	\$0	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	\$0	0.0%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	39.8%	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	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	\$0	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	\$0	0.0%	\$0	2.1%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	\$0	0.0%	\$0	8.6%
	Middle	1	33.3%	\$190	8.9%	20.1%	1	33.3%	\$190	8.9%	\$190	17.3%
	Upper	2	66.7%	\$1,938	91.1%	39.8%	2	66.7%	\$1,938	91.1%	\$1,938	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	20.6%
	Total	3	100.0%	\$2,128	100.0%	100.0%	3	100.0%	\$2,128	100.0%	\$2,128	100.0%
Small Business Loan Size	Total Businesses											
	\$1 Million or Less	3	11.1%	\$52	0.9%	91.1%	3	11.1%	\$52	0.9%	\$52	35.3%
	Over \$1 Million	17	63.0%	\$4,486	80.8%	5.7%	17	63.0%	\$4,486	80.8%	\$4,486	
	Total Rev. available	20	74.1%	\$4,538	81.7%	96.8%	20	74.1%	\$4,538	81.7%	\$4,538	
	Rev. Not Known	7	25.9%	\$1,015	18.3%	3.2%	7	25.9%	\$1,015	18.3%	\$1,015	
	Total	27	100.0%	\$5,553	100.0%	100.0%	27	100.0%	\$5,553	100.0%	\$5,553	
	\$100,000 or Less	15	55.6%	\$623	11.2%		15	55.6%	\$623	11.2%	\$623	43.1%
	\$100,001 - \$250,000	5	18.5%	\$1,150	20.7%		5	18.5%	\$1,150	20.7%	\$1,150	14.8%
	\$250,001 - \$1 Million	7	25.9%	\$3,780	68.1%		7	25.9%	\$3,780	68.1%	\$3,780	42.0%
	Total	27	100.0%	\$5,553	100.0%		27	100.0%	\$5,553	100.0%	\$5,553	100.0%
Small Farm Loan Size	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.5%	0	0.0%	\$0	0.0%	\$0	45.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.5%	0	0.0%	\$0	0.0%	\$0	
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	\$0	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	\$0	22.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	\$0	27.2%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	\$0	50.7%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	\$0	100.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	\$0	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

CA - Sacramento 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

CA - Sacramento 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	2	20.0%	146	11.3%	0	0.0%	0	0.0%
Upper	8	80.0%	1,145	88.7%	10	100.0%	1,291	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>1,291</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>1,291</i>	<i>100.0%</i>

CA - Sacramento 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	12.5%	49	1.3%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>12.5%</i>	<i>49</i>	<i>1.3%</i>
Middle	4	50.0%	3,207	87.3%	0	0.0%	0	0.0%
Upper	4	50.0%	467	12.7%	7	87.5%	3,625	98.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>3,674</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>3,674</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Salinas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar			Agg	
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	2.0%	\$0	0.0%	1.0%	0	0.0%	1.9%	\$0	0.0%	0.9%
	Moderate	1	20.0%	\$150	4.4%	11.9%	1	25.0%	13.1%	\$150	5.2%	7.8%	0	0.0%	11.7%	\$0	0.0%	7.0%
	Middle	0	0.0%	\$0	0.0%	37.8%	0	0.0%	41.3%	\$0	0.0%	32.2%	0	0.0%	37.6%	\$0	0.0%	28.8%
	Upper	4	80.0%	\$3,284	95.6%	48.2%	3	75.0%	43.5%	\$2,759	94.8%	59.0%	1	100.0%	48.8%	\$525	100.0%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$3,434	100.0%	100.0%	4	100.0%	100.0%	\$2,909	100.0%	100.0%	1	100.0%	100.0%	\$525	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.0%	\$0	0.0%	0.5%	0	0.0%	1.4%	\$0	0.0%	0.7%
	Moderate	5	15.2%	\$674	4.1%	11.9%	4	17.4%	8.2%	\$522	5.1%	5.5%	1	10.0%	9.1%	\$152	2.5%	5.6%
	Middle	5	15.2%	\$750	4.6%	37.8%	4	17.4%	34.9%	\$620	6.0%	27.6%	1	10.0%	37.0%	\$130	2.1%	28.2%
	Upper	23	69.7%	\$14,985	91.3%	48.2%	15	65.2%	55.9%	\$9,113	88.9%	66.4%	8	80.0%	52.4%	\$5,872	95.4%	65.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	33	100.0%	\$16,409	100.0%	100.0%	23	100.0%	100.0%	\$10,255	100.0%	100.0%	10	100.0%	100.0%	\$6,154	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.4%	\$0	0.0%	1.2%	0	0.0%	2.0%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	7.0%	\$0	0.0%	3.8%	0	0.0%	7.1%	\$0	0.0%	4.6%
	Middle	1	100.0%	\$99	100.0%	37.8%	0	0.0%	33.2%	\$0	0.0%	23.3%	1	100.0%	38.8%	\$99	100.0%	27.3%
	Upper	0	0.0%	\$0	0.0%	48.2%	0	0.0%	58.4%	\$0	0.0%	71.6%	0	0.0%	52.0%	\$0	0.0%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$99	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$99	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	8.9%	0	0.0%	6.1%	\$0	0.0%	3.7%	0	0.0%	11.1%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	30.4%	0	0.0%	18.4%	\$0	0.0%	12.2%	0	0.0%	33.3%	\$0	0.0%	35.6%
	Middle	0	0.0%	\$0	0.0%	42.7%	0	0.0%	57.1%	\$0	0.0%	54.1%	0	0.0%	44.4%	\$0	0.0%	56.5%
	Upper	0	0.0%	\$0	0.0%	17.9%	0	0.0%	18.4%	\$0	0.0%	30.1%	0	0.0%	11.1%	\$0	0.0%	4.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.3%	\$0	0.0%	0.8%	0	0.0%	1.6%	\$0	0.0%	0.8%
	Moderate	6	15.4%	\$824	4.1%	11.9%	5	18.5%	9.6%	\$672	5.1%	6.3%	1	8.3%	10.0%	\$152	2.2%	6.9%
	Middle	6	15.4%	\$849	4.3%	37.8%	4	14.8%	36.7%	\$620	4.7%	29.5%	2	16.7%	37.3%	\$229	3.4%	29.1%
	Upper	27	69.2%	\$18,269	91.6%	48.2%	18	66.7%	52.4%	\$11,872	90.2%	63.5%	9	75.0%	51.1%	\$6,397	94.4%	63.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	39	100.0%	\$19,942	100.0%	100.0%	27	100.0%	100.0%	\$13,164	100.0%	100.0%	12	100.0%	100.0%	\$6,778	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.0%	\$0	0.0%	1.0%	0	0.0%	1.4%	\$0	0.0%	0.8%
	Moderate	9	12.3%	\$1,076	5.3%	17.0%	3	10.0%	14.8%	\$345	4.1%	13.9%	6	14.0%	15.0%	\$731	6.2%	13.0%
	Middle	28	38.4%	\$10,045	49.6%	40.1%	12	40.0%	39.3%	\$4,345	51.6%	41.2%	16	37.2%	40.2%	\$5,700	48.2%	43.7%
	Upper	36	49.3%	\$9,118	45.1%	40.7%	15	50.0%	44.4%	\$3,733	44.3%	43.0%	21	48.8%	43.0%	\$5,385	45.6%	42.2%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.4%	\$0	0.0%	0.9%	0	0.0%	0.4%	\$0	0.0%	0.4%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	73	100.0%	\$20,239	100.0%	100.0%	30	100.0%	100.0%	\$8,423	100.0%	100.0%	43	100.0%	100.0%	\$11,816	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	22.2%	\$990	29.2%	7.1%	1	20.0%	13.8%	\$495	25.4%	6.4%	1	25.0%	7.1%	\$495	34.3%	5.9%
	Middle	1	11.1%	\$500	14.7%	48.6%	1	20.0%	47.5%	\$500	25.7%	74.5%	0	0.0%	48.5%	\$0	0.0%	55.0%
	Upper	6	66.7%	\$1,900	56.0%	43.3%	3	60.0%	37.5%	\$950	48.8%	17.9%	3	75.0%	44.4%	\$950	65.7%	39.1%
	Unknown	0	0.0%	\$0	0.0%	0.6%	0	0.0%	1.3%	\$0	0.0%	1.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	9	100.0%	\$3,390	100.0%	100.0%	5	100.0%	100.0%	\$1,945	100.0%	100.0%	4	100.0%	100.0%	\$1,445	100.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Salinas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	20.0%	\$150	4.4%	21.7%	1	25.0%	4.4%	\$150	5.2%	2.1%	0	0.0%	1.3%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	19.6%	\$0	0.0%	11.8%	0	0.0%	9.5%	\$0	0.0%	4.9%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	25.0%	\$0	0.0%	19.4%	0	0.0%	21.1%	\$0	0.0%	14.2%
	Upper	4	80.0%	\$3,284	95.6%	43.1%	3	75.0%	44.0%	\$2,759	94.8%	60.1%	1	100.0%	60.2%	\$525	100.0%	71.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.0%	\$0	0.0%	6.6%	0	0.0%	7.8%	\$0	0.0%	8.6%
	Total	5	100.0%	\$3,434	100.0%	100.0%	4	100.0%	100.0%	\$2,909	100.0%	100.0%	1	100.0%	100.0%	\$525	100.0%	100.0%
REFINANCE	Low	2	6.1%	\$280	1.7%	21.7%	1	4.3%	4.4%	\$130	1.3%	2.4%	1	10.0%	4.4%	\$150	2.4%	2.1%
	Moderate	5	15.2%	\$862	5.3%	15.8%	5	21.7%	9.4%	\$862	8.4%	5.4%	0	0.0%	9.2%	\$0	0.0%	4.9%
	Middle	12	36.4%	\$2,164	13.2%	19.4%	7	30.4%	18.9%	\$1,208	11.8%	14.0%	5	50.0%	16.8%	\$956	15.5%	10.9%
	Upper	11	33.3%	\$7,473	45.5%	43.1%	8	34.8%	54.2%	\$6,055	59.0%	64.9%	3	30.0%	58.2%	\$1,418	23.0%	65.7%
	Unknown	3	9.1%	\$5,630	34.3%	0.0%	2	8.7%	13.1%	\$2,000	19.5%	13.3%	1	10.0%	11.4%	\$3,630	59.0%	16.3%
	Total	33	100.0%	\$16,409	100.0%	100.0%	23	100.0%	100.0%	\$10,255	100.0%	100.0%	10	100.0%	100.0%	\$6,154	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	3.7%	\$0	0.0%	1.5%	0	0.0%	2.6%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	10.7%	\$0	0.0%	5.7%	0	0.0%	12.2%	\$0	0.0%	4.9%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	21.5%	\$0	0.0%	14.1%	0	0.0%	20.9%	\$0	0.0%	15.6%
	Upper	1	100.0%	\$99	100.0%	43.1%	0	0.0%	63.6%	\$0	0.0%	78.0%	1	100.0%	55.6%	\$99	100.0%	58.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.7%	0	0.0%	8.7%	\$0	0.0%	20.3%
	Total	1	100.0%	\$99	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$99	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	7.7%	\$430	2.2%	21.7%	2	7.4%	4.3%	\$280	2.1%	2.2%	1	8.3%	3.4%	\$150	2.2%	1.6%
	Moderate	5	12.8%	\$862	4.3%	15.8%	5	18.5%	12.2%	\$862	6.5%	7.0%	0	0.0%	9.3%	\$0	0.0%	4.8%
	Middle	12	30.8%	\$2,164	10.9%	19.4%	7	25.9%	20.5%	\$1,208	9.2%	15.1%	5	41.7%	18.1%	\$956	14.1%	11.7%
	Upper	16	41.0%	\$10,856	54.4%	43.1%	11	40.7%	51.4%	\$8,814	67.0%	62.0%	5	41.7%	58.5%	\$2,042	30.1%	65.7%
	Unknown	3	7.7%	\$5,630	28.2%	0.0%	2	7.4%	11.6%	\$2,000	15.2%	13.6%	1	8.3%	10.7%	\$3,630	53.6%	16.2%
	Total	39	100.0%	\$19,942	100.0%	100.0%	27	100.0%	100.0%	\$13,164	100.0%	100.0%	12	100.0%	100.0%	\$6,778	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	19	26.0%	\$2,295	11.3%	90.8%	4	13.3%	43.9%	\$640	7.6%	31.5%	15	34.9%	51.2%	\$1,655	14.0%	36.1%
	Over \$1 Million	42	57.5%	\$16,804	83.0%	6.1%	18	60.0%					24	55.8%				
	Total Rev. available	61	83.5%	\$19,099	94.3%	96.9%	22	73.3%					39	90.7%				
	Rev. Not Known	12	16.4%	\$1,140	5.6%	3.1%	8	26.7%					4	9.3%				
	Total	73	100.0%	\$20,239	100.0%	100.0%	30	100.0%					43	100.0%				
	\$100,000 or Less	31	42.5%	\$1,860	9.2%		13	43.3%	94.5%	\$685	8.1%	34.1%	18	41.9%	95.5%	\$1,175	9.9%	42.5%
	\$100,001 - \$250,000	17	23.3%	\$4,000	19.8%		7	23.3%	2.4%	\$1,750	20.8%	12.6%	10	23.3%	2.2%	\$2,250	19.0%	12.5%
Small Farm	\$250,001 - \$1 Million	25	34.2%	\$14,379	71.0%		10	33.3%	3.1%	\$5,988	71.1%	53.3%	15	34.9%	2.2%	\$8,391	71.0%	45.0%
	Total	73	100.0%	\$20,239	100.0%		30	100.0%	100.0%	\$8,423	100.0%	100.0%	43	100.0%	100.0%	\$11,816	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	77.6%	0	0.0%	38.8%	\$0	0.0%	17.8%	0	0.0%	39.4%	\$0	0.0%	29.7%
	Over \$1 Million	7	77.8%	\$2,990	88.2%	21.9%	4	80.0%					3	75.0%				
	Not Known	2	22.2%	\$400	11.8%	0.5%	1	20.0%					1	25.0%				
	Total	9	100.0%	\$3,390	100.0%	100.0%	5	100.0%					4	100.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	65.0%	\$0	0.0%	12.8%	0	0.0%	82.8%	\$0	0.0%	23.5%
\$100,001 - \$250,000	2	22.2%	\$400	11.8%		1	20.0%	8.8%	\$200	10.3%	10.9%	1	25.0%	7.1%	\$200	13.8%	16.9%	
\$250,001 - \$500,000	7	77.8%	\$2,990	88.2%		4	80.0%	26.3%	\$1,745	89.7%	76.3%	3	75.0%	10.1%	\$1,245	86.2%	59.6%	
Total	9	100.0%	\$3,390	100.0%		5	100.0%	100.0%	\$1,945	100.0%	100.0%	4	100.0%	100.0%	\$1,445	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Salinas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.6%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	10.3%	\$0	0.0%	6.5%
	Middle	0	0.0%	\$0	0.0%	37.8%	0	0.0%	44.3%	\$0	0.0%	34.4%
	Upper	3	100.0%	\$3,863	100.0%	48.2%	3	100.0%	43.8%	\$3,863	100.0%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$3,863	100.0%	100.0%	3	100.0%	100.0%	\$3,863	100.0%	100.0%
REFINANCE	Low	1	33.3%	\$155	5.8%	2.1%	1	33.3%	1.6%	\$155	5.8%	0.7%
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	11.3%	\$0	0.0%	7.2%
	Middle	1	33.3%	\$248	9.3%	37.8%	1	33.3%	41.2%	\$248	9.3%	32.5%
	Upper	1	33.3%	\$2,275	85.0%	48.2%	1	33.3%	45.9%	\$2,275	85.0%	59.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$2,678	100.0%	100.0%	3	100.0%	100.0%	\$2,678	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	0.5%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	10.7%	\$0	0.0%	6.3%
	Middle	0	0.0%	\$0	0.0%	37.8%	0	0.0%	40.1%	\$0	0.0%	29.1%
	Upper	0	0.0%	\$0	0.0%	48.2%	0	0.0%	48.7%	\$0	0.0%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	8.9%	0	0.0%	11.1%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	30.4%	0	0.0%	30.6%	\$0	0.0%	12.8%
	Middle	0	0.0%	\$0	0.0%	42.7%	0	0.0%	30.6%	\$0	0.0%	51.8%
	Upper	0	0.0%	\$0	0.0%	17.9%	0	0.0%	27.8%	\$0	0.0%	31.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	16.7%	\$155	2.4%	2.1%	1	16.7%	1.6%	\$155	2.4%	1.0%
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	11.0%	\$0	0.0%	7.4%
	Middle	1	16.7%	\$248	3.8%	37.8%	1	16.7%	42.4%	\$248	3.8%	35.0%
	Upper	4	66.7%	\$6,138	93.8%	48.2%	4	66.7%	45.0%	\$6,138	93.8%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$6,541	100.0%	100.0%	6	100.0%	100.0%	\$6,541	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.3%	\$0	0.0%	0.6%
	Moderate	3	9.1%	\$310	3.5%	16.8%	3	9.1%	15.5%	\$310	3.5%	15.4%
	Middle	11	33.3%	\$3,245	37.0%	40.3%	11	33.3%	41.2%	\$3,245	37.0%	42.6%
	Upper	19	57.6%	\$5,215	59.5%	40.7%	19	57.6%	41.5%	\$5,215	59.5%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.9%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	33	100.0%	\$8,770	100.0%	100.0%	33	100.0%	100.0%	\$8,770	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	33.3%	\$495	47.4%	7.9%	1	33.3%	10.4%	\$495	47.4%	3.0%
	Middle	0	0.0%	\$0	0.0%	45.1%	0	0.0%	54.7%	\$0	0.0%	74.9%
	Upper	2	66.7%	\$550	52.6%	46.1%	2	66.7%	34.0%	\$550	52.6%	20.8%
	Unknown	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.9%	\$0	0.0%	1.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$1,045	100.0%	100.0%	3	100.0%	100.0%	\$1,045	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - Salinas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014				Families by Family Income	2014						
		Bank		Dollar			Count		Dollar				
		Count		Dollar	%		Bank	Agg	Bank	%	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.6%	\$0	0.0%	0.3%	
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	4.1%	\$0	0.0%	1.8%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	13.8%	\$0	0.0%	8.7%	
	Upper	3	100.0%	\$3,863	100.0%	43.1%	3	100.0%	65.9%	\$3,863	100.0%	73.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.6%	\$0	0.0%	15.5%	
	Total	3	100.0%	\$3,863	100.0%	100.0%	3	100.0%	100.0%	\$3,863	100.0%	100.0%	
REFINANCE	Low	1	33.3%	\$2,275	85.0%	21.7%	1	33.3%	2.7%	\$2,275	85.0%	1.4%	
	Moderate	1	33.3%	\$155	5.8%	15.8%	1	33.3%	9.0%	\$155	5.8%	4.8%	
	Middle	1	33.3%	\$248	9.3%	19.4%	1	33.3%	15.7%	\$248	9.3%	10.2%	
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	56.1%	\$0	0.0%	66.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.5%	\$0	0.0%	17.4%	
	Total	3	100.0%	\$2,678	100.0%	100.0%	3	100.0%	100.0%	\$2,678	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	4.8%	\$0	0.0%	1.3%	
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	7.5%	\$0	0.0%	5.0%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.7%	\$0	0.0%	12.3%	
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	59.9%	\$0	0.0%	75.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	6.4%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	16.7%	\$2,275	34.8%	21.7%	1	16.7%	1.9%	\$2,275	34.8%	0.8%	
	Moderate	1	16.7%	\$155	2.4%	15.8%	1	16.7%	6.9%	\$155	2.4%	3.1%	
	Middle	1	16.7%	\$248	3.8%	19.4%	1	16.7%	14.9%	\$248	3.8%	8.7%	
	Upper	3	50.0%	\$3,863	59.1%	43.1%	3	50.0%	59.9%	\$3,863	59.1%	63.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.4%	\$0	0.0%	23.9%	
	Total	6	100.0%	\$6,541	100.0%	100.0%	6	100.0%	100.0%	\$6,541	100.0%	100.0%	
Small Business	Revenue	Total Businesses											
		\$1 Million or Less	12	36.4%	\$1,410	16.1%	90.3%	12	36.4%	47.5%	\$1,410	16.1%	33.3%
		Over \$1 Million	18	54.5%	\$7,000	79.8%	6.4%	18	54.5%				
		Total Rev. available	30	90.9%	\$8,410	95.9%	96.7%	30	90.9%				
		Rev. Not Known	3	9.1%	\$360	4.1%	3.2%	3	9.1%				
	Total	33	100.0%	\$8,770	100.0%	100.0%	33	100.0%					
	Loan Size	\$100,000 or Less	14	42.4%	\$870	9.9%		14	42.4%	95.6%	\$870	9.9%	41.6%
		\$100,001 - \$250,000	9	27.3%	\$1,900	21.7%		9	27.3%	2.1%	\$1,900	21.7%	10.9%
		\$250,001 - \$1 Million	10	30.3%	\$6,000	68.4%		10	30.3%	2.4%	\$6,000	68.4%	47.5%
		Total	33	100.0%	\$8,770	100.0%		33	100.0%	100.0%	\$8,770	100.0%	100.0%
Small Farm	Revenue	Total Farms											
		\$1 Million or Less	0	0.0%	\$0	0.0%	77.2%	0	0.0%	38.7%	\$0	0.0%	33.7%
		Over \$1 Million	2	66.7%	\$845	80.9%	22.1%	2	66.7%				
		Not Known	1	33.3%	\$200	19.1%	0.8%	1	33.3%				
		Total	3	100.0%	\$1,045	100.0%	100.0%	3	100.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	84.9%	\$0	0.0%	19.5%
		\$100,001 - \$250,000	1	33.3%	\$200	19.1%		1	33.3%	0.9%	\$200	19.1%	1.6%
		\$250,001 - \$500,000	2	66.7%	\$845	80.9%		2	66.7%	14.2%	\$845	80.9%	78.9%
		Total	3	100.0%	\$1,045	100.0%		3	100.0%	100.0%	\$1,045	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

CA - Salinas 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	2	11.8%	93	6.6%
Moderate	2	11.8%	170	12.0%	2	11.8%	207	14.6%
<i>Low/Moderate Total</i>	2	11.8%	170	12.0%	4	23.5%	300	21.2%
Middle	6	35.3%	507	35.8%	7	41.2%	567	40.0%
Upper	9	52.9%	740	52.2%	6	35.3%	550	38.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	17	100.0%	1,417	100.0%	17	100.0%	1,417	100.0%

CA - Salinas 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	3.0%	200	3.3%	1	3.0%	110	1.8%
<i>Low/Moderate Total</i>	1	3.0%	200	3.3%	1	3.0%	110	1.8%
Middle	7	21.2%	767	12.8%	8	24.2%	1,042	17.3%
Upper	25	75.8%	5,041	83.9%	24	72.7%	4,856	80.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	33	100.0%	6,008	100.0%	33	100.0%	6,008	100.0%

CA - Salinas 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	3	7.0%	177	2.3%
Moderate	5	11.6%	353	4.7%	2	4.7%	150	2.0%
<i>Low/Moderate Total</i>	5	11.6%	353	4.7%	5	11.6%	327	4.3%
Middle	12	27.9%	2,233	29.6%	14	32.6%	2,119	28.1%
Upper	26	60.5%	4,964	65.7%	23	53.5%	4,579	60.6%
Unknown	0	0.0%	0	0.0%	1	2.3%	525	7.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	43	100.0%	7,550	100.0%	43	100.0%	7,550	100.0%

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Diego

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2012					2013						
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.5%	\$0	0.0%	2.3%	0	0.0%	3.7%	\$0	0.0%	2.3%
	Moderate	2	13.3%	\$614	4.8%	14.0%	1	16.7%	14.2%	\$414	11.7%	9.9%	1	11.1%	13.6%	\$200	2.1%	10.0%
	Middle	2	13.3%	\$970	7.5%	37.3%	0	0.0%	36.8%	\$0	0.0%	30.1%	2	22.2%	35.8%	\$970	10.4%	29.5%
	Upper	11	73.3%	\$11,311	87.7%	45.2%	5	83.3%	45.5%	\$3,114	88.3%	57.7%	6	66.7%	46.9%	\$8,197	87.5%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$12,895	100.0%	100.0%	6	100.0%	100.0%	\$3,528	100.0%	100.0%	9	100.0%	100.0%	\$9,367	100.0%	100.0%
REFINANCE	Low	2	3.9%	\$299	0.7%	3.5%	2	5.9%	2.1%	\$299	1.0%	1.4%	0	0.0%	2.9%	\$0	0.0%	1.9%
	Moderate	4	7.8%	\$724	1.6%	14.0%	2	5.9%	9.7%	\$350	1.1%	7.0%	2	11.8%	12.0%	\$374	2.9%	8.2%
	Middle	11	21.6%	\$3,736	8.5%	37.3%	9	26.5%	32.1%	\$3,276	10.6%	26.5%	2	11.8%	34.6%	\$460	3.5%	29.8%
	Upper	34	66.7%	\$39,187	89.2%	45.2%	21	61.8%	56.1%	\$26,979	87.3%	65.1%	13	76.5%	50.5%	\$12,208	93.6%	60.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	51	100.0%	\$43,946	100.0%	100.0%	34	100.0%	100.0%	\$30,904	100.0%	100.0%	17	100.0%	100.0%	\$13,042	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	2.3%	\$0	0.0%	1.2%	0	0.0%	3.2%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	14.0%	0	0.0%	11.4%	\$0	0.0%	7.5%	0	0.0%	11.3%	\$0	0.0%	7.3%
	Middle	0	0.0%	\$0	0.0%	37.3%	0	0.0%	34.8%	\$0	0.0%	26.0%	0	0.0%	38.1%	\$0	0.0%	30.7%
	Upper	0	0.0%	\$0	0.0%	45.2%	0	0.0%	51.5%	\$0	0.0%	65.2%	0	0.0%	47.4%	\$0	0.0%	60.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	14.7%	0	0.0%	30.5%	\$0	0.0%	16.3%	0	0.0%	32.9%	\$0	0.0%	23.4%
	Moderate	0	0.0%	\$0	0.0%	24.5%	0	0.0%	28.3%	\$0	0.0%	29.0%	0	0.0%	32.9%	\$0	0.0%	25.6%
	Middle	1	100.0%	\$17,650	100.0%	33.1%	1	100.0%	25.8%	\$17,650	100.0%	33.3%	0	0.0%	22.9%	\$0	0.0%	36.4%
	Upper	0	0.0%	\$0	0.0%	27.7%	0	0.0%	15.3%	\$0	0.0%	21.3%	0	0.0%	11.3%	\$0	0.0%	14.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$17,650	100.0%	100.0%	1	100.0%	100.0%	\$17,650	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	3.0%	\$299	0.4%	3.5%	2	4.9%	2.6%	\$299	0.6%	2.2%	0	0.0%	3.3%	\$0	0.0%	2.7%
	Moderate	6	9.0%	\$1,338	1.8%	14.0%	3	7.3%	10.9%	\$764	1.5%	8.5%	3	11.5%	12.6%	\$574	2.6%	9.3%
	Middle	14	20.9%	\$22,356	30.0%	37.3%	10	24.4%	33.2%	\$20,926	40.2%	27.6%	4	15.4%	35.0%	\$1,430	6.4%	29.9%
	Upper	45	67.2%	\$50,498	67.8%	45.2%	26	63.4%	53.4%	\$30,093	57.8%	61.8%	19	73.1%	49.1%	\$20,405	91.1%	58.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	67	100.0%	\$74,491	100.0%	100.0%	41	100.0%	100.0%	\$52,082	100.0%	100.0%	26	100.0%	100.0%	\$22,409	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	11	6.6%	\$2,775	5.1%	6.5%	4	7.3%	4.7%	\$1,732	7.2%	5.3%	7	6.3%	4.7%	\$1,043	3.4%	5.9%
	Moderate	7	4.2%	\$2,915	5.3%	15.6%	3	5.5%	13.5%	\$2,150	9.0%	14.9%	4	3.6%	13.8%	\$765	2.5%	14.8%
	Middle	33	19.9%	\$10,292	18.8%	34.8%	9	16.4%	32.7%	\$3,200	13.3%	32.0%	24	21.6%	32.4%	\$7,092	23.0%	31.6%
	Upper	115	69.3%	\$38,895	70.9%	43.0%	39	70.9%	49.1%	\$16,898	70.5%	47.8%	76	68.5%	49.0%	\$21,997	71.2%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	166	100.0%	\$54,877	100.0%	100.0%	55	100.0%	100.0%	\$23,980	100.0%	100.0%	111	100.0%	100.0%	\$30,897	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	4.8%	\$0	0.0%	4.3%	0	0.0%	2.5%	\$0	0.0%	6.4%
	Moderate	0	0.0%	\$0	0.0%	12.9%	0	0.0%	22.1%	\$0	0.0%	11.6%	0	0.0%	8.2%	\$0	0.0%	6.7%
	Middle	0	0.0%	\$0	0.0%	32.1%	0	0.0%	26.0%	\$0	0.0%	20.4%	0	0.0%	25.4%	\$0	0.0%	14.6%
	Upper	0	0.0%	\$0	0.0%	53.2%	0	0.0%	47.1%	\$0	0.0%	63.7%	0	0.0%	63.9%	\$0	0.0%	72.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - San Diego

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	6.7%	\$110	0.9%	22.4%	0	0.0%	2.7%	\$0	0.0%	1.1%	1	11.1%	1.5%	\$110	1.2%	0.5%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	13.6%	\$0	0.0%	7.9%	0	0.0%	8.3%	\$0	0.0%	4.2%
	Middle	1	6.7%	\$200	1.6%	18.2%	0	0.0%	23.1%	\$0	0.0%	18.3%	1	11.1%	20.2%	\$200	2.1%	14.3%
	Upper	13	86.7%	\$12,585	97.6%	42.0%	6	100.0%	53.7%	\$3,528	100.0%	66.2%	7	77.8%	62.2%	\$9,057	96.7%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.8%	\$0	0.0%	6.5%	0	0.0%	7.8%	\$0	0.0%	9.5%
	Total	15	100.0%	\$12,895	100.0%	100.0%	6	100.0%	100.0%	\$3,528	100.0%	100.0%	9	100.0%	100.0%	\$9,367	100.0%	100.0%
REFINANCE	Low	1	2.0%	\$57	0.1%	22.4%	1	2.9%	3.5%	\$57	0.2%	1.8%	0	0.0%	4.2%	\$0	0.0%	1.9%
	Moderate	4	7.8%	\$539	1.2%	17.3%	3	8.8%	9.4%	\$443	1.4%	5.7%	1	5.9%	9.3%	\$96	0.7%	4.8%
	Middle	7	13.7%	\$1,537	3.5%	18.2%	4	11.8%	18.1%	\$821	2.7%	14.2%	3	17.6%	17.8%	\$716	5.5%	11.8%
	Upper	32	62.7%	\$27,977	63.7%	42.0%	20	58.8%	55.2%	\$16,257	52.6%	64.1%	12	70.6%	56.6%	\$11,720	89.9%	60.0%
	Unknown	7	13.7%	\$13,836	31.5%	0.0%	6	17.6%	13.9%	\$13,326	43.1%	14.2%	1	5.9%	12.1%	\$510	3.9%	21.5%
	Total	51	100.0%	\$43,946	100.0%	100.0%	34	100.0%	100.0%	\$30,904	100.0%	100.0%	17	100.0%	100.0%	\$13,042	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.4%	0	0.0%	5.3%	\$0	0.0%	2.2%	0	0.0%	3.9%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	13.5%	\$0	0.0%	7.5%	0	0.0%	12.2%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	24.1%	\$0	0.0%	18.9%	0	0.0%	22.5%	\$0	0.0%	17.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	53.1%	\$0	0.0%	65.8%	0	0.0%	56.6%	\$0	0.0%	66.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	5.6%	0	0.0%	4.8%	\$0	0.0%	7.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$17,650	100.0%	0.0%	1	100.0%	100.0%	\$17,650	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	1	100.0%	\$17,650	100.0%	100.0%	1	100.0%	100.0%	\$17,650	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	3.0%	\$167	0.2%	22.4%	1	2.4%	3.3%	\$57	0.1%	1.6%	1	3.8%	3.4%	\$110	0.5%	1.4%
	Moderate	4	6.0%	\$539	0.7%	17.3%	3	7.3%	10.4%	\$443	0.9%	6.0%	1	3.8%	9.0%	\$96	0.4%	4.5%
	Middle	8	11.9%	\$1,737	2.3%	18.2%	4	9.8%	19.2%	\$821	1.6%	14.7%	4	15.4%	18.5%	\$916	4.1%	12.3%
	Upper	45	67.2%	\$40,562	54.5%	42.0%	26	63.4%	54.5%	\$19,785	38.0%	62.3%	19	73.1%	57.9%	\$20,777	92.7%	61.8%
	Unknown	8	11.9%	\$31,486	42.3%	0.0%	7	17.1%	12.6%	\$30,976	59.5%	15.4%	1	3.8%	11.2%	\$510	2.3%	20.0%
	Total	67	100.0%	\$74,491	100.0%	100.0%	41	100.0%	100.0%	\$52,082	100.0%	100.0%	26	100.0%	100.0%	\$22,409	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	28	16.9%	\$4,115	7.5%	90.4%	5	9.1%	44.5%	\$910	3.8%	32.5%	23	20.7%	50.1%	\$3,205	10.4%	32.5%
	Over \$1 Million	96	57.8%	\$37,178	67.7%	6.3%	31	56.4%				65	58.6%					
	Total Rev. available	124	74.7%	\$41,293	75.2%	96.7%	36	65.5%				88	79.3%					
	Rev. Not Known	42	25.3%	\$13,584	24.8%	3.3%	19	34.5%				23	20.7%					
	Total	166	100.0%	\$54,877	100.0%	100.0%	55	100.0%				111	100.0%					
Small Business Loan Size	\$100,000 or Less	67	40.4%	\$3,520	6.4%		11	20.0%	95.2%	\$720	3.0%	41.4%	56	50.5%	94.6%	\$2,800	9.1%	39.5%
	\$100,001 - \$250,000	24	14.5%	\$4,661	8.5%		11	20.0%	2.4%	\$2,103	8.8%	13.4%	13	11.7%	2.6%	\$2,558	8.3%	13.5%
	\$250,001 - \$1 Million	75	45.2%	\$46,696	85.1%		33	60.0%	2.5%	\$21,157	88.2%	45.1%	42	37.8%	2.8%	\$25,539	82.7%	47.0%
	Total	166	100.0%	\$54,877	100.0%		55	100.0%	100.0%	\$23,980	100.0%	100.0%	111	100.0%	100.0%	\$30,897	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	93.4%	0	0.0%	41.3%	\$0	0.0%	20.1%	0	0.0%	56.6%	\$0	0.0%	51.1%
Over \$1 Million		0	0.0%	\$0	0.0%	6.3%	0	0.0%				0	0.0%					
Not Known		0	0.0%	\$0	0.0%	0.3%	0	0.0%				0	0.0%					
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
\$100,000 or Less		0	0.0%	\$0	0.0%		0	0.0%	90.4%	\$0	0.0%	47.8%	0	0.0%	93.4%	\$0	0.0%	60.1%
\$100,001 - \$250,000		0	0.0%	\$0	0.0%		0	0.0%	5.8%	\$0	0.0%	19.8%	0	0.0%	5.7%	\$0	0.0%	31.6%
\$250,001 - \$500,000		0	0.0%	\$0	0.0%		0	0.0%	3.8%	\$0	0.0%	32.4%	0	0.0%	0.8%	\$0	0.0%	8.3%
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Diego

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%					%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	4.1%	\$0	0.0%	2.7%
	Moderate	1	16.7%	\$100	1.2%	14.0%	1	16.7%	13.9%	\$100	1.2%	9.8%
	Middle	1	16.7%	\$175	2.1%	37.3%	1	16.7%	37.1%	\$175	2.1%	31.1%
	Upper	4	66.7%	\$8,052	96.7%	45.1%	4	66.7%	44.8%	\$8,052	96.7%	56.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$8,327	100.0%	100.0%	6	100.0%	100.0%	\$8,327	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.5%	\$0	0.0%	2.3%
	Moderate	1	20.0%	\$260	20.9%	14.0%	1	20.0%	13.6%	\$260	20.9%	9.8%
	Middle	1	20.0%	\$184	14.8%	37.3%	1	20.0%	37.3%	\$184	14.8%	30.9%
	Upper	3	60.0%	\$803	64.4%	45.1%	3	60.0%	45.6%	\$803	64.4%	57.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$1,247	100.0%	100.0%	5	100.0%	100.0%	\$1,247	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.3%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	14.0%	0	0.0%	13.0%	\$0	0.0%	9.1%
	Middle	0	0.0%	\$0	0.0%	37.3%	0	0.0%	40.4%	\$0	0.0%	32.6%
	Upper	1	100.0%	\$2,277	100.0%	45.1%	1	100.0%	43.4%	\$2,277	100.0%	56.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$2,277	100.0%	100.0%	1	100.0%	100.0%	\$2,277	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	14.7%	0	0.0%	35.4%	\$0	0.0%	19.4%
	Moderate	0	0.0%	\$0	0.0%	24.5%	0	0.0%	29.5%	\$0	0.0%	25.6%
	Middle	0	0.0%	\$0	0.0%	33.1%	0	0.0%	23.6%	\$0	0.0%	40.2%
	Upper	0	0.0%	\$0	0.0%	27.7%	0	0.0%	11.5%	\$0	0.0%	14.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	4.1%	\$0	0.0%	3.7%
	Moderate	2	16.7%	\$360	3.0%	14.0%	2	16.7%	13.9%	\$360	3.0%	10.9%
	Middle	2	16.7%	\$359	3.0%	37.3%	2	16.7%	37.2%	\$359	3.0%	31.7%
	Upper	8	66.7%	\$11,132	93.9%	45.1%	8	66.7%	44.8%	\$11,132	93.9%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$11,851	100.0%	100.0%	12	100.0%	100.0%	\$11,851	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	9	7.6%	\$1,736	5.3%	6.4%	9	7.6%	4.9%	\$1,736	5.3%	5.7%
	Moderate	7	5.9%	\$1,637	5.0%	15.3%	7	5.9%	14.0%	\$1,637	5.0%	15.3%
	Middle	27	22.9%	\$5,925	18.2%	34.7%	27	22.9%	32.4%	\$5,925	18.2%	30.9%
	Upper	75	63.6%	\$23,177	71.4%	43.6%	75	63.6%	48.6%	\$23,177	71.4%	48.0%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	118	100.0%	\$32,475	100.0%	100.0%	118	100.0%	100.0%	\$32,475	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	2.3%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	14.6%	\$0	0.0%	12.4%
	Middle	0	0.0%	\$0	0.0%	30.5%	0	0.0%	22.8%	\$0	0.0%	10.9%
	Upper	0	0.0%	\$0	0.0%	55.5%	0	0.0%	60.2%	\$0	0.0%	74.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - San Diego

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	1	16.7%	\$100	1.2%	22.5%	1	16.7%	1.2%	\$100	1.2%	0.4%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	7.2%	\$0	0.0%	3.6%
	Middle	1	16.7%	\$175	2.1%	18.2%	1	16.7%	18.6%	\$175	2.1%	13.1%
	Upper	4	66.7%	\$8,052	96.7%	42.0%	4	66.7%	60.2%	\$8,052	96.7%	70.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	12.1%
	Total	6	100.0%	\$8,327	100.0%	100.0%	6	100.0%	100.0%	\$8,327	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	22.5%	0	0.0%	3.5%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	8.6%	\$0	0.0%	4.8%
	Middle	1	20.0%	\$184	14.8%	18.2%	1	20.0%	16.9%	\$184	14.8%	12.2%
	Upper	4	80.0%	\$1,063	85.2%	42.0%	4	80.0%	54.2%	\$1,063	85.2%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.8%	\$0	0.0%	17.3%
	Total	5	100.0%	\$1,247	100.0%	100.0%	5	100.0%	100.0%	\$1,247	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.5%	0	0.0%	13.7%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	8.3%	\$0	0.0%	5.9%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	17.1%	\$0	0.0%	14.9%
	Upper	1	100.0%	\$2,277	100.0%	42.0%	1	100.0%	51.9%	\$2,277	100.0%	68.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.9%	\$0	0.0%	8.7%
	Total	1	100.0%	\$2,277	100.0%	100.0%	1	100.0%	100.0%	\$2,277	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	8.3%	\$100	0.8%	22.5%	1	8.3%	2.8%	\$100	0.8%	1.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	7.9%	\$0	0.0%	4.0%
	Middle	2	16.7%	\$359	3.0%	18.2%	2	16.7%	17.5%	\$359	3.0%	11.8%
	Upper	9	75.0%	\$11,392	96.1%	42.0%	9	75.0%	56.1%	\$11,392	96.1%	62.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.7%	\$0	0.0%	20.5%
	Total	12	100.0%	\$11,851	100.0%	100.0%	12	100.0%	100.0%	\$11,851	100.0%	100.0%
Small Business	Total Businesses											
	Revenue	\$1 Million or Less	30	25.4%	\$5,195	16.0%	30	25.4%	47.5%	\$5,195	16.0%	33.2%
		Over \$1 Million	64	54.2%	\$19,815	61.0%	64	54.2%				
		Total Rev. available	94	79.6%	\$25,010	77.0%	94	79.6%				
		Rev. Not Known	24	20.3%	\$7,465	23.0%	24	20.3%				
		Total	118	100.0%	\$32,475	100.0%	118	100.0%				
	Loan Size	\$100,000 or Less	57	48.3%	\$3,256	10.0%	57	48.3%	95.2%	\$3,256	10.0%	43.4%
		\$100,001 - \$250,000	16	13.6%	\$3,276	10.1%	16	13.6%	2.3%	\$3,276	10.1%	12.8%
		\$250,001 - \$1 Million	45	38.1%	\$25,943	79.9%	45	38.1%	2.5%	\$25,943	79.9%	43.7%
		Total	118	100.0%	\$32,475	100.0%	118	100.0%	100.0%	\$32,475	100.0%	100.0%
Small Farm	Total Farms											
	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	0	0.0%	53.2%	\$0	0.0%	59.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%	0	0.0%	94.7%	\$0	0.0%	55.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%	0	0.0%	2.9%	\$0	0.0%	17.8%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%	0	0.0%	2.3%	\$0	0.0%	27.2%
		Total	0	0.0%	\$0	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

CA - San Diego 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	0	0.0%	0	0.0%	4	9.5%	343	5.3%
Moderate	2	4.8%	150	2.3%	7	16.7%	787	12.2%
<i>Low/Moderate Total</i>	<i>2</i>	<i>4.8%</i>	<i>150</i>	<i>2.3%</i>	<i>11</i>	<i>26.2%</i>	<i>1,130</i>	<i>17.6%</i>
Middle	13	31.0%	1,717	26.7%	3	7.1%	461	7.2%
Upper	27	64.3%	4,558	70.9%	28	66.7%	4,834	75.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>6,425</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>6,425</i>	<i>100.0%</i>

CA - San Diego 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	5	4.5%	620	2.2%	6	5.4%	800	2.8%
Moderate	8	7.1%	1,529	5.4%	14	12.5%	1,171	4.1%
<i>Low/Moderate Total</i>	<i>13</i>	<i>11.6%</i>	<i>2,149</i>	<i>7.6%</i>	<i>20</i>	<i>17.9%</i>	<i>1,971</i>	<i>7.0%</i>
Middle	25	22.3%	3,035	10.7%	8	7.1%	1,978	7.0%
Upper	74	66.1%	23,126	81.7%	82	73.2%	22,061	77.9%
Unknown	0	0.0%	0	0.0%	2	1.8%	2,300	8.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>112</i>	<i>100.0%</i>	<i>28,310</i>	<i>100.0%</i>	<i>112</i>	<i>100.0%</i>	<i>28,310</i>	<i>100.0%</i>

CA - San Diego 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	1	0.6%	66	0.2%	5	3.0%	359	1.3%
Moderate	12	7.1%	1,527	5.7%	11	6.5%	818	3.1%
<i>Low/Moderate Total</i>	<i>13</i>	<i>7.7%</i>	<i>1,593</i>	<i>6.0%</i>	<i>16</i>	<i>9.5%</i>	<i>1,177</i>	<i>4.4%</i>
Middle	36	21.3%	2,968	11.1%	24	14.2%	1,569	5.9%
Upper	120	71.0%	22,138	82.9%	129	76.3%	23,953	89.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>169</i>	<i>100.0%</i>	<i>26,699</i>	<i>100.0%</i>	<i>169</i>	<i>100.0%</i>	<i>26,699</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Santa Cruz

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank		Agg			
#	%	\$ (000s)	\$ %	#	%	\$ (000s)							\$ %	#	%	\$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	3	75.0%	\$495	61.8%	26.3%	3	75.0%	27.0%	\$495	61.8%	19.5%	0	0.0%	26.3%	\$0	0.0%	19.6%
	Middle	1	25.0%	\$306	38.2%	40.0%	1	25.0%	39.8%	\$306	38.2%	41.6%	0	0.0%	39.8%	\$0	0.0%	40.8%
	Upper	0	0.0%	\$0	0.0%	33.1%	0	0.0%	32.7%	\$0	0.0%	38.6%	0	0.0%	33.5%	\$0	0.0%	39.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$801	100.0%	100.0%	4	100.0%	100.0%	\$801	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	13	36.1%	\$3,001	20.8%	26.3%	9	37.5%	18.8%	\$1,981	21.3%	14.6%	4	33.3%	21.5%	\$1,020	19.8%	17.9%
	Middle	17	47.2%	\$8,025	55.5%	40.0%	11	45.8%	42.8%	\$4,626	49.8%	42.8%	6	50.0%	42.7%	\$3,399	65.8%	43.8%
	Upper	6	16.7%	\$3,431	23.7%	33.1%	4	16.7%	38.1%	\$2,687	28.9%	42.4%	2	16.7%	35.2%	\$744	14.4%	38.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	36	100.0%	\$14,457	100.0%	100.0%	24	100.0%	100.0%	\$9,294	100.0%	100.0%	12	100.0%	100.0%	\$5,163	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.5%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	26.3%	0	0.0%	14.9%	\$0	0.0%	11.3%	0	0.0%	18.2%	\$0	0.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	40.0%	0	0.0%	42.8%	\$0	0.0%	42.3%	0	0.0%	43.3%	\$0	0.0%	48.8%
	Upper	2	100.0%	\$257	100.0%	33.1%	2	100.0%	41.8%	\$257	100.0%	46.0%	0	0.0%	38.5%	\$0	0.0%	40.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$257	100.0%	100.0%	2	100.0%	100.0%	\$257	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.6%	0	0.0%	5.6%	\$0	0.0%	3.3%	0	0.0%	3.0%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	39.7%	0	0.0%	27.8%	\$0	0.0%	28.6%	0	0.0%	42.4%	\$0	0.0%	36.5%
	Middle	0	0.0%	\$0	0.0%	43.4%	0	0.0%	61.1%	\$0	0.0%	51.8%	0	0.0%	48.5%	\$0	0.0%	61.5%
	Upper	0	0.0%	\$0	0.0%	11.4%	0	0.0%	5.6%	\$0	0.0%	16.3%	0	0.0%	6.1%	\$0	0.0%	1.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.4%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	16	38.1%	\$3,496	22.5%	26.3%	12	40.0%	20.5%	\$2,476	23.9%	15.9%	4	33.3%	22.8%	\$1,020	19.8%	18.6%
	Middle	18	42.9%	\$8,331	53.7%	40.0%	12	40.0%	42.2%	\$4,932	47.6%	42.6%	6	50.0%	42.0%	\$3,399	65.8%	43.4%
	Upper	8	19.0%	\$3,688	23.8%	33.1%	6	20.0%	36.9%	\$2,944	28.4%	41.2%	2	16.7%	34.7%	\$744	14.4%	37.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	42	100.0%	\$15,515	100.0%	100.0%	30	100.0%	100.0%	\$10,352	100.0%	100.0%	12	100.0%	100.0%	\$5,163	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.4%	\$0	0.0%	2.6%	0	0.0%	1.1%	\$0	0.0%	0.7%
	Moderate	63	29.7%	\$11,545	25.5%	22.3%	28	28.9%	23.7%	\$5,100	23.6%	26.6%	35	30.4%	23.3%	\$6,445	27.3%	28.1%
	Middle	114	53.8%	\$24,157	53.4%	47.8%	56	57.7%	45.2%	\$13,123	60.7%	43.3%	58	50.4%	46.6%	\$11,034	46.7%	47.4%
	Upper	35	16.5%	\$9,525	21.1%	27.7%	13	13.4%	29.7%	\$3,385	15.7%	27.4%	22	19.1%	28.9%	\$6,140	26.0%	23.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL FARM	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	212	100.0%	\$45,227	100.0%	100.0%	97	100.0%	100.0%	\$21,608	100.0%	100.0%	115	100.0%	100.0%	\$23,619	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.1%	\$0	0.0%	0.2%
	Moderate	1	100.0%	\$400	100.0%	34.4%	0	0.0%	66.7%	\$0	0.0%	88.3%	1	100.0%	65.9%	\$400	100.0%	84.8%
	Middle	0	0.0%	\$0	0.0%	37.5%	0	0.0%	24.1%	\$0	0.0%	7.1%	0	0.0%	25.3%	\$0	0.0%	12.4%
SMALL FARM	Upper	0	0.0%	\$0	0.0%	25.0%	0	0.0%	9.3%	\$0	0.0%	4.6%	0	0.0%	7.7%	\$0	0.0%	2.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$400	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$400	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Santa Cruz

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	25.0%	\$173	21.6%	25.2%	1	25.0%	4.2%	\$173	21.6%	1.7%	0	0.0%	1.4%	\$0	0.0%	0.5%
	Moderate	1	25.0%	\$280	35.0%	17.6%	1	25.0%	15.8%	\$280	35.0%	10.1%	0	0.0%	9.0%	\$0	0.0%	4.8%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	20.0%	\$0	0.0%	17.3%	0	0.0%	17.0%	\$0	0.0%	12.1%
	Upper	2	50.0%	\$348	43.4%	39.0%	2	50.0%	51.5%	\$348	43.4%	61.6%	0	0.0%	65.4%	\$0	0.0%	74.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.5%	\$0	0.0%	9.3%	0	0.0%	7.2%	\$0	0.0%	7.8%
	Total	4	100.0%	\$801	100.0%	100.0%	4	100.0%	100.0%	\$801	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	2	5.6%	\$303	2.1%	25.2%	1	4.2%	5.2%	\$243	2.6%	2.8%	1	8.3%	4.3%	\$60	1.2%	2.1%
	Moderate	8	22.2%	\$1,717	11.9%	17.6%	8	33.3%	12.5%	\$1,717	18.5%	8.5%	0	0.0%	9.5%	\$0	0.0%	5.4%
	Middle	9	25.0%	\$4,001	27.7%	18.2%	9	37.5%	22.2%	\$4,001	43.0%	19.3%	0	0.0%	17.4%	\$0	0.0%	13.0%
	Upper	16	44.4%	\$7,151	49.5%	39.0%	5	20.8%	52.5%	\$2,048	22.0%	61.0%	11	91.7%	61.7%	\$5,103	98.8%	65.6%
	Unknown	1	2.8%	\$1,285	8.9%	0.0%	1	4.2%	7.7%	\$1,285	13.8%	8.4%	0	0.0%	7.0%	\$0	0.0%	13.8%
	Total	36	100.0%	\$14,457	100.0%	100.0%	24	100.0%	100.0%	\$9,294	100.0%	100.0%	12	100.0%	100.0%	\$5,163	100.0%	100.0%
HOME IMPROVEMENT	Low	1	50.0%	\$80	31.1%	25.2%	1	50.0%	5.2%	\$80	31.1%	3.0%	0	0.0%	3.2%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	13.9%	\$0	0.0%	9.8%	0	0.0%	11.8%	\$0	0.0%	7.3%
	Middle	1	50.0%	\$177	68.9%	18.2%	1	50.0%	27.3%	\$177	68.9%	24.5%	0	0.0%	23.0%	\$0	0.0%	18.7%
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	51.5%	\$0	0.0%	59.6%	0	0.0%	59.9%	\$0	0.0%	69.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	3.2%	0	0.0%	2.1%	\$0	0.0%	3.1%
	Total	2	100.0%	\$257	100.0%	100.0%	2	100.0%	100.0%	\$257	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	9.5%	\$556	3.6%	25.2%	3	10.0%	5.0%	\$496	4.8%	2.5%	1	8.3%	3.5%	\$60	1.2%	1.6%
	Moderate	9	21.4%	\$1,997	12.9%	17.6%	9	30.0%	13.2%	\$1,997	19.3%	8.8%	0	0.0%	9.4%	\$0	0.0%	5.2%
	Middle	10	23.8%	\$4,178	26.9%	18.2%	10	33.3%	21.7%	\$4,178	40.4%	18.7%	0	0.0%	17.4%	\$0	0.0%	12.6%
	Upper	18	42.9%	\$7,499	48.3%	39.0%	7	23.3%	52.1%	\$2,396	23.1%	60.4%	11	91.7%	62.4%	\$5,103	98.8%	67.0%
	Unknown	1	2.4%	\$1,285	8.3%	0.0%	1	3.3%	8.0%	\$1,285	12.4%	9.7%	0	0.0%	7.3%	\$0	0.0%	13.7%
	Total	42	100.0%	\$15,515	100.0%	100.0%	30	100.0%	100.0%	\$10,352	100.0%	100.0%	12	100.0%	100.0%	\$5,163	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	69	32.5%	\$9,384	20.7%	91.6%	31	32.0%	40.6%	\$5,289	24.5%	36.9%	38	33.0%	52.3%	\$4,095	17.3%	41.3%
	Over \$1 Million	90	42.5%	\$29,742	65.8%	5.3%	36	37.1%				54	47.0%					
	Total Rev. available	159	75.0%	\$39,126	86.5%	96.9%	67	69.1%				92	80.0%					
	Rev. Not Known	53	25.0%	\$6,101	13.5%	3.0%	30	30.9%				23	20.0%					
	Total	212	100.0%	\$45,227	100.0%	100.0%	97	100.0%				115	100.0%					
	Loan Size	\$100,000 or Less	125	59.0%	\$7,927	17.5%		57	58.8%	96.8%	\$3,702	17.1%	46.9%	68	59.1%	96.4%	\$4,225	17.9%
\$100,001 - \$250,000		32	15.1%	\$6,317	14.0%		13	13.4%	1.4%	\$2,497	11.6%	10.6%	19	16.5%	1.7%	\$3,820	16.2%	10.5%
\$250,001 - \$1 Million		55	25.9%	\$30,983	68.5%		27	27.8%	1.7%	\$15,409	71.3%	42.4%	28	24.3%	2.0%	\$15,574	65.9%	41.0%
Total		212	100.0%	\$45,227	100.0%		97	100.0%	100.0%	\$21,608	100.0%	100.0%	115	100.0%	100.0%	\$23,619	100.0%	100.0%
Small Farm Loan Size		Total Farms																
	\$1 Million or Less	0	0.0%	\$0	0.0%	89.4%	0	0.0%	42.6%	\$0	0.0%	28.7%	0	0.0%	47.3%	\$0	0.0%	18.9%
	Over \$1 Million	1	100.0%	\$400	100.0%	10.6%	0	0.0%				1	100.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	1	100.0%	\$400	100.0%	100.0%	0	0.0%				1	100.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	77.8%	\$0	0.0%	28.2%	0	0.0%	86.8%	\$0	0.0%	26.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	14.8%	\$0	0.0%	34.5%	0	0.0%	7.7%	\$0	0.0%	29.1%
\$250,001 - \$500,000	1	100.0%	\$400	100.0%		0	0.0%	7.4%	\$0	0.0%	37.3%	1	100.0%	5.5%	\$400	100.0%	44.3%	
Total	1	100.0%	\$400	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$400	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Santa Cruz

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner		Occupied Units	Count		Dollar		Agg	Agg
		Count	Dollar	Dollar	%		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	26.3%	0	0.0%	25.4%	\$0	0.0%	18.7%
	Middle	0	0.0%	\$0	0.0%	40.0%	0	0.0%	40.7%	\$0	0.0%	42.1%
	Upper	1	100.0%	\$460	100.0%	33.1%	1	100.0%	33.5%	\$460	100.0%	39.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$460	100.0%	100.0%	1	100.0%	100.0%	\$460	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.7%	\$0	0.0%	0.4%
	Moderate	3	60.0%	\$716	62.6%	26.3%	3	60.0%	26.4%	\$716	62.6%	19.7%
	Middle	2	40.0%	\$428	37.4%	40.0%	2	40.0%	40.9%	\$428	37.4%	42.8%
	Upper	0	0.0%	\$0	0.0%	33.1%	0	0.0%	32.1%	\$0	0.0%	37.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$1,144	100.0%	100.0%	5	100.0%	100.0%	\$1,144	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	1.0%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	26.3%	0	0.0%	25.8%	\$0	0.0%	20.9%
	Middle	0	0.0%	\$0	0.0%	40.0%	0	0.0%	43.4%	\$0	0.0%	47.4%
	Upper	0	0.0%	\$0	0.0%	33.1%	0	0.0%	29.8%	\$0	0.0%	30.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	5.6%	0	0.0%	3.6%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	39.7%	0	0.0%	32.1%	\$0	0.0%	43.6%
	Middle	0	0.0%	\$0	0.0%	43.4%	0	0.0%	50.0%	\$0	0.0%	32.8%
	Upper	0	0.0%	\$0	0.0%	11.4%	0	0.0%	14.3%	\$0	0.0%	22.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	3	50.0%	\$716	44.6%	26.3%	3	50.0%	26.0%	\$716	44.6%	19.7%
	Middle	2	33.3%	\$428	26.7%	40.0%	2	33.3%	41.0%	\$428	26.7%	42.4%
	Upper	1	16.7%	\$460	28.7%	33.1%	1	16.7%	32.5%	\$460	28.7%	37.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$1,604	100.0%	100.0%	6	100.0%	100.0%	\$1,604	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	1	1.0%	\$750	3.5%	2.1%	1	1.0%	1.4%	\$750	3.5%	1.5%
	Moderate	36	34.3%	\$6,145	28.9%	22.3%	36	34.3%	24.8%	\$6,145	28.9%	25.6%
	Middle	47	44.8%	\$9,220	43.3%	48.1%	47	44.8%	45.6%	\$9,220	43.3%	46.1%
	Upper	21	20.0%	\$5,175	24.3%	27.6%	21	20.0%	28.2%	\$5,175	24.3%	26.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	105	100.0%	\$21,290	100.0%	100.0%	105	100.0%	100.0%	\$21,290	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	1.2%	\$0	0.0%	0.5%
	Moderate	1	100.0%	\$400	100.0%	33.9%	1	100.0%	48.8%	\$400	100.0%	64.1%
	Middle	0	0.0%	\$0	0.0%	38.0%	0	0.0%	35.4%	\$0	0.0%	25.5%
	Upper	0	0.0%	\$0	0.0%	25.1%	0	0.0%	14.6%	\$0	0.0%	9.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$400	100.0%	100.0%	1	100.0%	100.0%	\$400	100.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - Santa Cruz

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	0.8%	\$0	0.0%	0.4%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	6.0%	\$0	0.0%	2.7%	
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	15.8%	\$0	0.0%	10.6%	
	Upper	1	100.0%	\$460	100.0%	39.0%	1	100.0%	61.3%	\$460	100.0%	69.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.1%	\$0	0.0%	16.8%	
	Total	1	100.0%	\$460	100.0%	100.0%	1	100.0%	100.0%	\$460	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	3.8%	\$0	0.0%	1.7%	
	Moderate	2	40.0%	\$428	37.4%	17.6%	2	40.0%	9.1%	\$428	37.4%	4.7%	
	Middle	3	60.0%	\$716	62.6%	18.2%	3	60.0%	15.9%	\$716	62.6%	11.6%	
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	57.0%	\$0	0.0%	66.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.2%	\$0	0.0%	15.3%	
	Total	5	100.0%	\$1,144	100.0%	100.0%	5	100.0%	100.0%	\$1,144	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	3.0%	\$0	0.0%	1.3%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	12.6%	\$0	0.0%	6.4%	
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	18.7%	\$0	0.0%	14.2%	
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	59.6%	\$0	0.0%	70.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	8.1%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	2.5%	\$0	0.0%	1.1%	
	Moderate	2	33.3%	\$428	26.7%	17.6%	2	33.3%	7.9%	\$428	26.7%	3.7%	
	Middle	3	50.0%	\$716	44.6%	18.2%	3	50.0%	15.9%	\$716	44.6%	11.0%	
	Upper	1	16.7%	\$460	28.7%	39.0%	1	16.7%	58.6%	\$460	28.7%	66.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.1%	\$0	0.0%	17.5%	
	Total	6	100.0%	\$1,604	100.0%	100.0%	6	100.0%	100.0%	\$1,604	100.0%	100.0%	
Small Business	Revenue	Total Businesses											
		\$1 Million or Less	37	35.2%	\$4,750	22.3%	37	35.2%	47.6%	\$4,750	22.3%	38.4%	
		Over \$1 Million	45	42.9%	\$13,185	61.9%	45	42.9%					
		Total Rev. available	82	78.1%	\$17,935	84.2%	82	78.1%					
		Rev. Not Known	23	21.9%	\$3,355	15.8%	23	21.9%					
	Total	105	100.0%	\$21,290	100.0%	100.0%	105	100.0%					
	Loan Size	\$100,000 or Less	64	61.0%	\$3,705	17.4%	64	61.0%	96.8%	\$3,705	17.4%	53.7%	
		\$100,001 - \$250,000	19	18.1%	\$3,710	17.4%	19	18.1%	1.7%	\$3,710	17.4%	11.8%	
		\$250,001 - \$1 Million	22	21.0%	\$13,875	65.2%	22	21.0%	1.5%	\$13,875	65.2%	34.5%	
		Total	105	100.0%	\$21,290	100.0%	100.0%	105	100.0%	100.0%	\$21,290	100.0%	100.0%
Small Farm	Revenue	Total Farms											
		\$1 Million or Less	0	0.0%	\$0	0.0%	87.7%	0	0.0%	47.6%	\$0	0.0%	41.9%
		Over \$1 Million	1	100.0%	\$400	100.0%	11.7%	1	100.0%				
		Not Known	0	0.0%	\$0	0.0%	0.6%	0	0.0%				
	Total	1	100.0%	\$400	100.0%	100.0%	1	100.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	93.9%	\$0	0.0%	61.4%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.1%	\$0	0.0%	38.6%
		\$250,001 - \$500,000	1	100.0%	\$400	100.0%		1	100.0%	0.0%	\$400	100.0%	0.0%
Total		1	100.0%	\$400	100.0%	100.0%	1	100.0%	100.0%	\$400	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

CA - Santa Cruz 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	3	7.7%	231	4.1%
Moderate	7	17.9%	541	9.5%	5	12.8%	693	12.2%
<i>Low/Moderate Total</i>	<i>7</i>	<i>17.9%</i>	<i>541</i>	<i>9.5%</i>	<i>8</i>	<i>20.5%</i>	<i>924</i>	<i>16.3%</i>
Middle	18	46.2%	2,847	50.2%	10	25.6%	809	14.3%
Upper	14	35.9%	2,284	40.3%	21	53.8%	3,939	69.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>5,672</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>5,672</i>	<i>100.0%</i>

CA - Santa Cruz 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	3	2.8%	251	1.6%
Moderate	18	16.7%	2,141	13.3%	15	13.9%	1,558	9.7%
<i>Low/Moderate Total</i>	<i>18</i>	<i>16.7%</i>	<i>2,141</i>	<i>13.3%</i>	<i>18</i>	<i>16.7%</i>	<i>1,809</i>	<i>11.2%</i>
Middle	44	40.7%	6,455	40.0%	23	21.3%	2,555	15.8%
Upper	46	42.6%	7,545	46.7%	66	61.1%	11,069	68.6%
Unknown	0	0.0%	0	0.0%	1	0.9%	708	4.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>108</i>	<i>100.0%</i>	<i>16,141</i>	<i>100.0%</i>	<i>108</i>	<i>100.0%</i>	<i>16,141</i>	<i>100.0%</i>

CA - Santa Cruz 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	6	4.9%	437	2.3%
Moderate	25	20.5%	2,959	15.6%	15	12.3%	1,382	7.3%
<i>Low/Moderate Total</i>	<i>25</i>	<i>20.5%</i>	<i>2,959</i>	<i>15.6%</i>	<i>21</i>	<i>17.2%</i>	<i>1,819</i>	<i>9.6%</i>
Middle	57	46.7%	7,759	41.0%	35	28.7%	4,171	22.1%
Upper	40	32.8%	8,195	43.3%	66	54.1%	12,923	68.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>122</i>	<i>100.0%</i>	<i>18,913</i>	<i>100.0%</i>	<i>122</i>	<i>100.0%</i>	<i>18,913</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2012					2013						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	5.8%	\$0	0.0%	3.4%	0	0.0%	6.4%	\$0	0.0%	4.0%
	Moderate	3	21.4%	\$656	5.4%	16.2%	2	25.0%	15.8%	\$479	14.1%	10.4%	1	16.7%	15.2%	\$177	2.0%	10.5%
	Middle	4	28.6%	\$1,523	12.6%	37.1%	3	37.5%	36.5%	\$1,248	36.8%	30.4%	1	16.7%	36.5%	\$275	3.2%	31.9%
	Upper	7	50.0%	\$9,892	81.9%	41.3%	3	37.5%	42.0%	\$1,668	49.1%	55.8%	4	66.7%	41.8%	\$8,224	94.8%	53.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$12,071	100.0%	100.0%	8	100.0%	100.0%	\$3,395	100.0%	100.0%	6	100.0%	100.0%	\$8,676	100.0%	100.0%
REFINANCE	Low	2	2.9%	\$459	0.9%	5.4%	1	2.8%	2.9%	\$160	0.7%	2.2%	1	3.1%	4.1%	\$299	1.0%	3.0%
	Moderate	3	4.4%	\$1,329	2.5%	16.2%	2	5.6%	11.0%	\$399	1.7%	8.2%	1	3.1%	13.5%	\$930	3.1%	10.3%
	Middle	27	39.7%	\$16,454	30.9%	37.1%	16	44.4%	33.1%	\$7,616	32.5%	28.3%	11	34.4%	35.1%	\$8,838	29.7%	30.9%
	Upper	36	52.9%	\$34,986	65.7%	41.3%	17	47.2%	52.9%	\$15,291	65.2%	61.4%	19	59.4%	47.4%	\$19,695	66.2%	55.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	68	100.0%	\$53,228	100.0%	100.0%	36	100.0%	100.0%	\$23,466	100.0%	100.0%	32	100.0%	100.0%	\$29,762	100.0%	100.0%
HOME IMPROVEMENT	Low	1	100.0%	\$216	100.0%	5.4%	1	100.0%	4.7%	\$216	100.0%	2.8%	0	0.0%	5.2%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	13.3%	\$0	0.0%	9.5%	0	0.0%	14.6%	\$0	0.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	37.1%	0	0.0%	32.4%	\$0	0.0%	27.4%	0	0.0%	35.5%	\$0	0.0%	29.9%
	Upper	0	0.0%	\$0	0.0%	41.3%	0	0.0%	49.6%	\$0	0.0%	60.3%	0	0.0%	44.7%	\$0	0.0%	56.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$216	100.0%	100.0%	1	100.0%	100.0%	\$216	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	24.2%	0	0.0%	21.2%	\$0	0.0%	25.1%	0	0.0%	24.3%	\$0	0.0%	23.1%
	Moderate	0	0.0%	\$0	0.0%	23.3%	0	0.0%	27.6%	\$0	0.0%	20.2%	0	0.0%	28.3%	\$0	0.0%	23.1%
	Middle	3	75.0%	\$3,026	81.5%	31.0%	0	0.0%	28.8%	\$0	0.0%	31.1%	3	75.0%	25.6%	\$3,026	81.5%	24.9%
	Upper	1	25.0%	\$687	18.5%	21.5%	0	0.0%	22.4%	\$0	0.0%	23.6%	1	25.0%	21.8%	\$687	18.5%	29.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Total	4	100.0%	\$3,713	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	4	100.0%	100.0%	\$3,713	100.0%	100.0%
	Low	3	3.4%	\$675	1.0%	5.4%	2	4.4%	3.7%	\$376	1.4%	3.4%	1	2.4%	4.8%	\$299	0.7%	4.3%
	Moderate	6	6.9%	\$1,985	2.9%	16.2%	4	8.9%	12.1%	\$878	3.2%	9.2%	2	4.8%	14.0%	\$1,107	2.6%	11.0%
	Middle	34	39.1%	\$21,003	30.3%	37.1%	19	42.2%	33.7%	\$8,864	32.7%	28.8%	15	35.7%	35.3%	\$12,139	28.8%	30.8%
	Upper	44	50.6%	\$45,565	65.8%	41.3%	20	44.4%	50.5%	\$16,959	62.6%	58.6%	24	57.1%	45.8%	\$28,606	67.9%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Total	87	100.0%	\$69,228	100.0%	100.0%	45	100.0%	100.0%	\$27,077	100.0%	100.0%	42	100.0%	100.0%	\$42,151	100.0%	100.0%
	Small Businesses																	
	Low	69	13.7%	\$16,872	12.5%	14.2%	19	13.3%	12.2%	\$6,718	12.9%	16.2%	50	13.9%	12.3%	\$10,154	12.2%	15.9%
	Moderate	68	13.5%	\$17,032	12.6%	16.9%	18	12.6%	16.8%	\$6,867	13.2%	16.5%	50	13.9%	16.2%	\$10,165	12.2%	16.2%
	Middle	122	24.3%	\$33,839	25.0%	31.0%	35	24.5%	31.0%	\$11,306	21.7%	27.0%	87	24.2%	31.1%	\$22,533	27.1%	27.0%
	Upper	243	48.4%	\$67,443	49.9%	37.7%	71	49.7%	39.7%	\$27,244	52.3%	39.9%	172	47.9%	40.2%	\$40,199	48.4%	40.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.2%	\$0	0.0%	0.2%
SMALL FARM	Total	502	100.0%	\$135,186	100.0%	100.0%	143	100.0%	100.0%	\$52,135	100.0%	100.0%	359	100.0%	100.0%	\$83,051	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	5.6%	0	0.0%	6.9%	\$0	0.0%	12.8%	0	0.0%	5.3%	\$0	0.0%	6.7%
	Moderate	0	0.0%	\$0	0.0%	13.4%	0	0.0%	14.6%	\$0	0.0%	7.4%	0	0.0%	10.0%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	26.0%	0	0.0%	27.7%	\$0	0.0%	25.8%	0	0.0%	23.3%	\$0	0.0%	23.6%
	Upper	1	100.0%	\$300	100.0%	55.0%	1	100.0%	50.8%	\$300	100.0%	54.0%	0	0.0%	61.3%	\$0	0.0%	60.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$300	100.0%	100.0%	1	100.0%	100.0%	\$300	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.2%	0	0.0%	6.1%	\$0	0.0%	2.3%	0	0.0%	2.9%	\$0	0.0%	1.0%
	Moderate	3	21.4%	\$728	6.0%	16.6%	1	12.5%	14.9%	\$276	8.1%	8.4%	2	33.3%	11.1%	\$452	5.2%	5.5%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	20.0%	\$0	0.0%	15.7%	0	0.0%	19.1%	\$0	0.0%	13.6%
	Upper	9	64.3%	\$5,477	45.4%	40.4%	7	87.5%	49.9%	\$3,119	91.9%	65.2%	2	33.3%	58.5%	\$2,358	27.2%	70.9%
	Unknown	2	14.3%	\$5,866	48.6%	0.0%	0	0.0%	9.2%	\$0	0.0%	8.4%	2	33.3%	8.4%	\$5,866	67.6%	9.0%
	Total	14	100.0%	\$12,071	100.0%	100.0%	8	100.0%	100.0%	\$3,395	100.0%	100.0%	6	100.0%	100.0%	\$8,676	100.0%	100.0%
REFINANCE	Low	2	2.9%	\$262	0.5%	24.2%	0	0.0%	4.9%	\$0	0.0%	2.4%	2	6.3%	5.6%	\$262	0.9%	2.4%
	Moderate	10	14.7%	\$4,071	7.6%	16.6%	6	16.7%	12.5%	\$1,950	8.3%	8.0%	4	12.5%	12.6%	\$2,121	7.1%	7.1%
	Middle	14	20.6%	\$4,552	8.6%	18.9%	10	27.8%	21.1%	\$3,098	13.2%	17.2%	4	12.5%	19.9%	\$1,454	4.9%	14.5%
	Upper	42	61.8%	\$44,343	83.3%	40.4%	20	55.6%	53.8%	\$18,418	78.5%	64.6%	22	68.8%	54.1%	\$25,925	87.1%	62.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.8%	\$0	0.0%	7.9%	0	0.0%	7.8%	\$0	0.0%	13.8%
	Total	68	100.0%	\$53,228	100.0%	100.0%	36	100.0%	100.0%	\$23,466	100.0%	100.0%	32	100.0%	100.0%	\$29,762	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.2%	0	0.0%	7.7%	\$0	0.0%	3.3%	0	0.0%	6.6%	\$0	0.0%	2.8%
	Moderate	1	100.0%	\$216	100.0%	16.6%	1	100.0%	18.2%	\$216	100.0%	12.8%	0	0.0%	14.7%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	22.6%	\$0	0.0%	19.9%	0	0.0%	21.7%	\$0	0.0%	16.9%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	44.3%	\$0	0.0%	56.9%	0	0.0%	48.9%	\$0	0.0%	60.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.1%	\$0	0.0%	7.1%	0	0.0%	8.1%	\$0	0.0%	10.8%
	Total	1	100.0%	\$216	100.0%	100.0%	1	100.0%	100.0%	\$216	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$3,713	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	4	100.0%	100.0%	\$3,713	100.0%	100.0%
	Total	4	100.0%	\$3,713	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	4	100.0%	100.0%	\$3,713	100.0%	100.0%
HMDA TOTALS	Low	2	2.3%	\$262	0.4%	24.2%	0	0.0%	5.1%	\$0	0.0%	2.3%	2	4.8%	4.9%	\$262	0.6%	1.9%
	Moderate	14	16.1%	\$5,015	7.2%	16.6%	8	17.8%	12.9%	\$2,442	9.0%	7.8%	6	14.3%	12.2%	\$2,573	6.1%	6.4%
	Middle	14	16.1%	\$4,552	6.6%	18.9%	10	22.2%	20.7%	\$3,098	11.4%	16.2%	4	9.5%	19.6%	\$1,454	3.4%	13.6%
	Upper	51	58.6%	\$49,820	72.0%	40.4%	27	60.0%	52.4%	\$21,537	79.5%	61.8%	24	57.1%	54.5%	\$28,283	67.1%	61.1%
	Unknown	6	6.9%	\$9,579	13.8%	0.0%	0	0.0%	8.8%	\$0	0.0%	12.0%	6	14.3%	8.8%	\$9,579	22.7%	17.1%
	Total	87	100.0%	\$69,228	100.0%	100.0%	45	100.0%	100.0%	\$27,077	100.0%	100.0%	42	100.0%	100.0%	\$42,151	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	76	15.1%	\$14,106	10.4%	89.1%	22	15.4%	43.9%	\$6,726	12.9%	34.6%	54	15.0%	51.7%	\$7,380	8.9%	36.0%
	Over \$1 Million	288	57.4%	\$98,843	73.1%	7.3%	86	60.1%				202	56.3%					
	Total Rev. available	364	72.5%	\$112,949	83.5%	96.4%	108	75.5%				256	71.3%					
	Rev. Not Known	138	27.5%	\$22,237	16.4%	3.7%	35	24.5%				103	28.7%					
	Total	502	100.0%	\$135,186	100.0%	100.0%	143	100.0%				359	100.0%					
	Loan Size																	
	\$100,000 or Less	232	46.2%	\$12,773	9.4%		43	30.1%	95.3%	\$2,982	5.7%	41.6%	189	52.6%	95.0%	\$9,791	11.8%	41.3%
	\$100,001 - \$250,000	102	20.3%	\$19,226	14.2%		30	21.0%	2.2%	\$6,253	12.0%	12.2%	72	20.1%	2.3%	\$12,973	15.6%	11.7%
	\$250,001 - \$1 Million	168	33.5%	\$103,187	76.3%		70	49.0%	2.5%	\$42,900	82.3%	46.2%	98	27.3%	2.8%	\$60,287	72.6%	47.1%
Total	502	100.0%	\$135,186	100.0%		143	100.0%	100.0%	\$52,135	100.0%	100.0%	359	100.0%	100.0%	\$83,051	100.0%	100.0%	
Small Farm	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.9%	0	0.0%	51.5%	\$0	0.0%	44.8%	0	0.0%	58.7%	\$0	0.0%	48.3%
	Over \$1 Million	1	100.0%	\$300	100.0%	3.3%	1	100.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.8%	0	0.0%				0	0.0%					
	Total	1	100.0%	\$300	100.0%	100.0%	1	100.0%				0	0.0%					
	Loan Size																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.3%	\$0	0.0%	50.7%	0	0.0%	89.3%	\$0	0.0%	38.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.2%	\$0	0.0%	28.1%	0	0.0%	5.3%	\$0	0.0%	18.7%
	\$250,001 - \$500,000	1	100.0%	\$300	100.0%		1	100.0%	1.5%	\$300	100.0%	21.2%	0	0.0%	5.3%	\$0	0.0%	42.8%
	Total	1	100.0%	\$300	100.0%		1	100.0%	100.0%	\$300	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Origination & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Owner Occupied Units	Count			Dollar			
		Count		Dollar			Bank	Agg	%	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%				%	\$ (000s)		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	6.7%	\$0	0.0%	4.4%	
	Moderate	0	0.0%	\$0	0.0%	14.8%	0	0.0%	14.9%	\$0	0.0%	10.5%	
	Middle	1	20.0%	\$120	4.1%	37.6%	1	20.0%	36.2%	\$120	4.1%	30.7%	
	Upper	4	80.0%	\$2,838	95.9%	42.5%	4	80.0%	42.2%	\$2,838	95.9%	54.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	5	100.0%	\$2,958	100.0%	100.0%	5	100.0%	100.0%	\$2,958	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	4.5%	\$0	0.0%	2.9%	
	Moderate	0	0.0%	\$0	0.0%	14.8%	0	0.0%	14.3%	\$0	0.0%	10.2%	
	Middle	0	0.0%	\$0	0.0%	37.6%	0	0.0%	37.3%	\$0	0.0%	31.7%	
	Upper	5	100.0%	\$3,511	100.0%	42.5%	5	100.0%	43.8%	\$3,511	100.0%	55.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	5	100.0%	\$3,511	100.0%	100.0%	5	100.0%	100.0%	\$3,511	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	6.5%	\$0	0.0%	4.2%	
	Moderate	0	0.0%	\$0	0.0%	14.8%	0	0.0%	15.9%	\$0	0.0%	10.7%	
	Middle	0	0.0%	\$0	0.0%	37.6%	0	0.0%	36.1%	\$0	0.0%	28.9%	
	Upper	0	0.0%	\$0	0.0%	42.5%	0	0.0%	41.5%	\$0	0.0%	56.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTI FAMILY	Low	0		0.0%	\$0	0.0%	23.4%	0	0.0%	22.2%	\$0	0.0%	23.1%
	Moderate	0		0.0%	\$0	0.0%	21.9%	0	0.0%	29.1%	\$0	0.0%	20.4%
	Middle	0		0.0%	\$0	0.0%	31.7%	0	0.0%	27.9%	\$0	0.0%	28.7%
	Upper	0		0.0%	\$0	0.0%	23.0%	0	0.0%	20.8%	\$0	0.0%	27.8%
	Unknown	0		0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0		0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Multi-Family Units												
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	5.7%	\$0	0.0%	5.1%	
	Moderate	0	0.0%	\$0	0.0%	14.8%	0	0.0%	14.8%	\$0	0.0%	11.1%	
	Middle	1	10.0%	\$120	1.9%	37.6%	1	10.0%	36.7%	\$120	1.9%	31.0%	
	Upper	9	90.0%	\$6,349	98.1%	42.5%	9	90.0%	42.8%	\$6,349	98.1%	52.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	10	100.0%	\$6,469	100.0%	100.0%	10	100.0%	100.0%	\$6,469	100.0%	100.0%	
SMALL BUSINESSES	Low	41		12.9%	\$10,449	14.3%	13.1%	41	12.9%	12.0%	\$10,449	14.3%	14.9%
	Moderate	37		11.6%	\$9,041	12.4%	15.4%	37	11.6%	15.2%	\$9,041	12.4%	14.6%
	Middle	85		26.6%	\$19,682	27.0%	32.1%	85	26.6%	32.5%	\$19,682	27.0%	28.5%
	Upper	156		48.9%	\$33,756	46.3%	39.3%	156	48.9%	40.2%	\$33,756	46.3%	41.7%
	Unknown	0		0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Tr Unknown	0		0.0%	\$0	0.0%		0	0.0%	0.2%	\$0	0.0%	0.2%
	Total	319	100.0%	\$72,928	100.0%	100.0%	319	100.0%	100.0%	\$72,928	100.0%	100.0%	
SMALL FARM	Low	0		0.0%	\$0	0.0%	5.8%	0	0.0%	5.5%	\$0	0.0%	3.3%
	Moderate	0		0.0%	\$0	0.0%	12.4%	0	0.0%	6.7%	\$0	0.0%	2.2%
	Middle	0		0.0%	\$0	0.0%	26.5%	0	0.0%	28.7%	\$0	0.0%	28.1%
	Upper	0		0.0%	\$0	0.0%	55.3%	0	0.0%	59.1%	\$0	0.0%	66.4%
	Unknown	0		0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0		0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0		0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Small Farms												

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2014					2014				
		Bank			Families by Family Income %		Count		Dollar		
		Count #	%	Dollar \$ (000s)			Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	1	20.0%	\$120	4.1%	23.8%	1	20.0%	\$120	4.1%	0.6%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	\$0	0.0%	3.6%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	\$0	0.0%	10.1%
	Upper	4	80.0%	\$2,838	95.9%	41.1%	4	80.0%	\$2,838	95.9%	73.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	12.4%
	Total	5	100.0%	\$2,958	100.0%	100.0%	5	100.0%	\$2,958	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	\$0	0.0%	5.7%
	Middle	2	40.0%	\$939	26.7%	18.7%	2	40.0%	\$939	26.7%	13.3%
	Upper	3	60.0%	\$2,572	73.3%	41.1%	3	60.0%	\$2,572	73.3%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	12.3%
	Total	5	100.0%	\$3,511	100.0%	100.0%	5	100.0%	\$3,511	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	\$0	0.0%	6.4%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	\$0	0.0%	14.4%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	\$0	0.0%	67.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	9.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	10.0%	\$120	1.9%	23.8%	1	10.0%	\$120	1.9%	1.1%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	\$0	0.0%	4.4%
	Middle	2	20.0%	\$939	14.5%	18.7%	2	20.0%	\$939	14.5%	10.9%
	Upper	7	70.0%	\$5,410	83.6%	41.1%	7	70.0%	\$5,410	83.6%	64.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	19.0%
	Total	10	100.0%	\$6,469	100.0%	100.0%	10	100.0%	\$6,469	100.0%	100.0%
Small Business	Total Businesses										
	Revenue										
	\$1 Million or Less	63	19.7%	\$6,180	8.5%		63	19.7%	\$6,180	8.5%	32.3%
	Over \$1 Million	190	59.6%	\$55,957	76.7%		190	59.6%			
	Total Rev. available	253	79.3%	\$62,137	85.2%		253	79.3%			
	Rev. Not Known	66	20.7%	\$10,791	14.8%	3.6%	66	20.7%			
	Total	319	100.0%	\$72,928	100.0%	100.0%	319	100.0%			
	Loan Size										
	\$100,000 or Less	178	55.8%	\$8,824	12.1%		178	55.8%	\$8,824	12.1%	43.3%
	\$100,001 - \$250,000	54	16.9%	\$9,925	13.6%		54	16.9%	\$9,925	13.6%	11.7%
	\$250,001 - \$1 Million	87	27.3%	\$54,179	74.3%		87	27.3%	\$54,179	74.3%	45.0%
	Total	319	100.0%	\$72,928	100.0%	100.0%	319	100.0%	\$72,928	100.0%	100.0%
Small Farm	Total Farms										
	Revenue										
	\$1 Million or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	56.0%
	Over \$1 Million	0	0.0%	\$0	0.0%		0	0.0%			
	Not Known	0	0.0%	\$0	0.0%	0.6%	0	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%			
	Loan Size										
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	56.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	15.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	28.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

CA - San Francisco Bay 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	2	2.0%	250	0.9%	6	5.9%	1,216	4.1%
Moderate	6	5.9%	754	2.6%	13	12.7%	1,875	6.4%
<i>Low/Moderate Total</i>	8	7.8%	1,004	3.4%	19	18.6%	3,091	10.5%
Middle	19	18.6%	3,732	12.7%	16	15.7%	2,465	8.4%
Upper	75	73.5%	24,644	83.9%	60	58.8%	15,099	51.4%
Unknown	0	0.0%	0	0.0%	7	6.9%	8,725	29.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	102	100.0%	29,380	100.0%	102	100.0%	29,380	100.0%

CA - San Francisco Bay 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	5	1.8%	722	1.3%	7	2.6%	522	1.0%
Moderate	15	5.5%	1,975	3.6%	26	9.6%	2,086	3.8%
<i>Low/Moderate Total</i>	20	7.4%	2,697	4.9%	33	12.1%	2,608	4.8%
Middle	88	32.4%	12,232	22.4%	48	17.6%	6,058	11.1%
Upper	164	60.3%	39,727	72.7%	188	69.1%	44,090	80.7%
Unknown	0	0.0%	0	0.0%	3	1.1%	1,900	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	272	100.0%	54,656	100.0%	272	100.0%	54,656	100.0%

CA - San Francisco Bay 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	11	2.5%	2,398	2.4%	14	3.2%	1,070	1.1%
Moderate	31	7.2%	3,801	3.8%	26	6.0%	2,342	2.3%
<i>Low/Moderate Total</i>	42	9.7%	6,199	6.2%	40	9.2%	3,412	3.4%
Middle	137	31.6%	24,272	24.1%	58	13.4%	7,265	7.2%
Upper	254	58.7%	70,214	69.7%	333	76.9%	87,258	86.7%
Unknown	0	0.0%	0	0.0%	2	0.5%	2,750	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	433	100.0%	100,685	100.0%	433	100.0%	100,685	100.0%

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Naples-Marco Island MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison												
							2012					2013							
		Bank			Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	2.7%	\$0	0.0%	1.0%	0	0.0%	2.0%	\$0	0.0%	0.9%	
	Moderate	3	25.0%	\$599	21.4%	16.4%	1	25.0%	13.7%	\$364	35.2%	8.7%	2	25.0%	13.8%	\$235	13.4%	8.7%	
	Middle	7	58.3%	\$1,621	58.0%	46.0%	3	75.0%	49.9%	\$669	64.8%	39.6%	4	50.0%	48.5%	\$952	54.1%	37.1%	
	Upper	2	16.7%	\$573	20.5%	35.2%	0	0.0%	33.7%	\$0	0.0%	50.7%	2	25.0%	35.6%	\$573	32.6%	53.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total		12	100.0%	\$2,793	100.0%	100.0%	4	100.0%	100.0%	\$1,033	100.0%	100.0%	8	100.0%	100.0%	\$1,760	100.0%	100.0%
	REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	0.7%	\$0	0.0%	0.4%	0	0.0%	1.0%	\$0	0.0%	0.4%
Moderate		1	10.0%	\$108	2.5%	16.4%	0	0.0%	11.3%	\$0	0.0%	8.0%	1	33.3%	12.8%	\$108	5.8%	7.2%	
Middle		5	50.0%	\$2,172	51.1%	46.0%	3	42.9%	47.9%	\$426	17.8%	38.3%	2	66.7%	48.6%	\$1,746	94.2%	40.1%	
Upper		4	40.0%	\$1,973	46.4%	35.2%	4	57.1%	40.1%	\$1,973	82.2%	53.3%	0	0.0%	37.6%	\$0	0.0%	52.3%	
Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total		10	100.0%	\$4,253	100.0%	100.0%	7	100.0%	100.0%	\$2,399	100.0%	100.0%	3	100.0%	100.0%	\$1,854	100.0%	100.0%	
HOME IMPROVEMENT		Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	3.2%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	11.6%	\$0	0.0%	6.6%	0	0.0%	18.3%	\$0	0.0%	8.5%	
	Middle	0	0.0%	\$0	0.0%	46.0%	0	0.0%	51.0%	\$0	0.0%	34.6%	0	0.0%	49.2%	\$0	0.0%	29.8%	
	Upper	0	0.0%	\$0	0.0%	35.2%	0	0.0%	34.2%	\$0	0.0%	58.5%	0	0.0%	32.1%	\$0	0.0%	61.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	MULTI-FAMILY	Multi-Family Units																	
Low		0	0.0%	\$0	0.0%	3.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	3.5%	
Moderate		0	0.0%	\$0	0.0%	13.8%	0	0.0%	21.1%	\$0	0.0%	25.4%	0	0.0%	38.9%	\$0	0.0%	24.1%	
Middle		0	0.0%	\$0	0.0%	39.5%	0	0.0%	36.8%	\$0	0.0%	23.0%	0	0.0%	33.3%	\$0	0.0%	69.6%	
Upper		0	0.0%	\$0	0.0%	43.7%	0	0.0%	42.1%	\$0	0.0%	51.5%	0	0.0%	22.2%	\$0	0.0%	2.7%	
Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.6%	\$0	0.0%	0.6%	0	0.0%	1.5%	\$0	0.0%	0.8%	
	Moderate	4	18.2%	\$707	10.0%	16.4%	1	9.1%	12.4%	\$364	10.6%	8.5%	3	27.3%	13.5%	\$343	9.5%	8.5%	
	Middle	12	54.5%	\$3,793	53.8%	46.0%	6	54.5%	48.8%	\$1,095	31.9%	38.6%	6	54.5%	48.6%	\$2,698	74.7%	39.7%	
	Upper	6	27.3%	\$2,546	36.1%	35.2%	4	36.4%	37.2%	\$1,973	57.5%	52.2%	2	18.2%	36.4%	\$573	15.9%	51.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total		22	100.0%	\$7,046	100.0%	100.0%	11	100.0%	100.0%	\$3,432	100.0%	100.0%	11	100.0%	100.0%	\$3,614	100.0%	100.0%
	SMALL BUSINESSES	Small Businesses																	
Low		0	0.0%	\$0	0.0%	2.7%	0	0.0%	1.8%	\$0	0.0%	2.7%	0	0.0%	1.6%	\$0	0.0%	2.0%	
Moderate		1	4.3%	\$125	1.5%	13.7%	1	12.5%	10.1%	\$125	4.0%	7.7%	0	0.0%	10.7%	\$0	0.0%	8.5%	
Middle		8	34.8%	\$4,254	52.1%	43.6%	3	37.5%	40.2%	\$2,100	66.7%	36.0%	5	33.3%	40.3%	\$2,154	43.0%	37.1%	
Upper		14	60.9%	\$3,781	46.3%	40.0%	4	50.0%	45.4%	\$925	29.4%	52.6%	10	66.7%	46.3%	\$2,856	57.0%	51.9%	
Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Tr Unknown		0	0.0%	\$0	0.0%		0	0.0%	2.5%	\$0	0.0%	1.0%	0	0.0%	1.1%	\$0	0.0%	0.5%	
Total		23	100.0%	\$8,160	100.0%	100.0%	8	100.0%	100.0%	\$3,150	100.0%	100.0%	15	100.0%	100.0%	\$5,010	100.0%	100.0%	
SMALL FARM	Small Farms																		
	Low	0	0.0%	\$0	0.0%	8.5%	0	0.0%	11.8%	\$0	0.0%	10.0%	0	0.0%	9.5%	\$0	0.0%	32.9%	
	Moderate	0	0.0%	\$0	0.0%	15.3%	0	0.0%	11.8%	\$0	0.0%	0.7%	0	0.0%	19.0%	\$0	0.0%	10.8%	
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	47.1%	\$0	0.0%	45.4%	0	0.0%	52.4%	\$0	0.0%	25.0%	
	Upper	0	0.0%	\$0	0.0%	22.8%	0	0.0%	29.4%	\$0	0.0%	43.9%	0	0.0%	19.0%	\$0	0.0%	31.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL - Naples-Marco Island MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012						2013					
		Bank		Families by Family Income			Count		Dollar				Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	\$ %	\$ %	Agg	Bank	Agg	Bank	\$ %	\$ %	Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	3	25.0%	\$388	13.9%	21.1%	1	25.0%	8.3%	\$144	13.9%	3.4%	2	25.0%	4.1%	\$244	13.9%	1.5%
	Moderate	1	8.3%	\$147	5.3%	18.3%	0	0.0%	13.2%	\$0	0.0%	7.1%	1	12.5%	12.6%	\$147	8.4%	6.1%
	Middle	3	25.0%	\$319	11.4%	19.0%	1	25.0%	13.8%	\$108	10.5%	9.4%	2	25.0%	14.5%	\$211	12.0%	9.0%
	Upper	4	33.3%	\$1,539	55.1%	41.5%	2	50.0%	52.9%	\$781	75.6%	72.1%	2	25.0%	60.2%	\$758	43.1%	74.5%
	Unknown	1	8.3%	\$400	14.3%	0.0%	0	0.0%	11.7%	\$0	0.0%	8.0%	1	12.5%	8.6%	\$400	22.7%	9.0%
	Total	12	100.0%	\$2,793	100.0%	100.0%	4	100.0%	100.0%	\$1,033	100.0%	100.0%	8	100.0%	100.0%	\$1,760	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	6.4%	\$0	0.0%	3.3%	0	0.0%	5.9%	\$0	0.0%	2.5%
	Moderate	4	40.0%	\$534	12.6%	18.3%	3	42.9%	12.0%	\$426	17.8%	6.8%	1	33.3%	11.9%	\$108	5.8%	5.3%
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	17.0%	\$0	0.0%	11.7%	0	0.0%	15.9%	\$0	0.0%	8.4%
	Upper	6	60.0%	\$3,719	87.4%	41.5%	4	57.1%	55.7%	\$1,973	82.2%	67.7%	2	66.7%	58.2%	\$1,746	94.2%	60.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.9%	\$0	0.0%	10.5%	0	0.0%	8.2%	\$0	0.0%	23.4%
	Total	10	100.0%	\$4,253	100.0%	100.0%	7	100.0%	100.0%	\$2,399	100.0%	100.0%	3	100.0%	100.0%	\$1,854	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	12.9%	\$0	0.0%	1.2%	0	0.0%	4.2%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	18.1%	\$0	0.0%	8.2%	0	0.0%	19.6%	\$0	0.0%	6.7%
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	23.2%	\$0	0.0%	18.3%	0	0.0%	20.0%	\$0	0.0%	8.9%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	43.9%	\$0	0.0%	71.7%	0	0.0%	52.5%	\$0	0.0%	71.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.7%	0	0.0%	3.8%	\$0	0.0%	11.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	13.6%	\$388	5.5%	21.1%	1	9.1%	7.3%	\$144	4.2%	3.3%	2	18.2%	5.0%	\$244	6.8%	1.9%
	Moderate	5	22.7%	\$681	9.7%	18.3%	3	27.3%	12.6%	\$426	12.4%	6.8%	2	18.2%	12.3%	\$255	7.1%	5.5%
	Middle	3	13.6%	\$319	4.5%	19.0%	1	9.1%	15.6%	\$108	3.1%	10.6%	2	18.2%	15.2%	\$211	5.8%	8.4%
	Upper	10	45.5%	\$5,258	74.6%	41.5%	6	54.5%	54.3%	\$2,754	80.2%	68.7%	4	36.4%	59.0%	\$2,504	69.3%	65.0%
	Unknown	1	4.5%	\$400	5.7%	0.0%	0	0.0%	10.2%	\$0	0.0%	10.6%	1	9.1%	8.4%	\$400	11.1%	19.3%
	Total	22	100.0%	\$7,046	100.0%	100.0%	11	100.0%	100.0%	\$3,432	100.0%	100.0%	11	100.0%	100.0%	\$3,614	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	6	26.1%	\$2,109	25.8%	92.3%	3	37.5%	36.6%	\$675	21.4%	37.6%	3	20.0%	50.5%	\$1,434	28.6%	40.4%
	Over \$1 Million	11	47.8%	\$4,606	56.4%	4.4%	3	37.5%					8	53.3%				
	Total Rev. available	17	73.9%	\$6,715	82.2%	96.7%	6	75.0%					11	73.3%				
	Rev. Not Known	6	26.1%	\$1,445	17.7%	3.3%	2	25.0%					4	26.7%				
	Total	23	100.0%	\$8,160	100.0%	100.0%	8	100.0%					15	100.0%				
Small Farm	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	91.3%	0	0.0%	47.1%	\$0	0.0%	43.0%	0	0.0%	61.9%	\$0	0.0%	56.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	8.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm	Total Farms																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	76.5%	\$0	0.0%	20.8%	0	0.0%	81.0%	\$0	0.0%	12.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.6%	\$0	0.0%	40.6%	0	0.0%	9.5%	\$0	0.0%	24.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.9%	\$0	0.0%	38.6%	0	0.0%	9.5%	\$0	0.0%	63.1%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Naples-Marco Island MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units		Count	Bank		Agg	Dollar		Agg
		Count	Dollar	Count	Dollar		Count	Dollar				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.7%	\$0	0.0%	0.8%
	Moderate	4	40.0%	\$579	9.5%	16.4%	4	40.0%	15.2%	\$579	9.5%	10.1%
	Middle	3	30.0%	\$317	5.2%	46.0%	3	30.0%	48.4%	\$317	5.2%	37.3%
	Upper	3	30.0%	\$5,176	85.2%	35.2%	3	30.0%	34.7%	\$5,176	85.2%	51.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$6,072	100.0%	100.0%	10	100.0%	100.0%	\$6,072	100.0%	100.0%
REFINANCE	Low	1	50.0%	\$87	40.1%	2.4%	1	50.0%	1.3%	\$87	40.1%	0.5%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	13.3%	\$0	0.0%	9.1%
	Middle	1	50.0%	\$130	59.9%	46.0%	1	50.0%	49.6%	\$130	59.9%	37.7%
	Upper	0	0.0%	\$0	0.0%	35.2%	0	0.0%	35.7%	\$0	0.0%	52.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$217	100.0%	100.0%	2	100.0%	100.0%	\$217	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	4.8%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	12.3%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	46.0%	0	0.0%	53.2%	\$0	0.0%	38.5%
	Upper	0	0.0%	\$0	0.0%	35.2%	0	0.0%	29.8%	\$0	0.0%	53.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	15.8%	\$0	0.0%	11.4%
	Moderate	0	0.0%	\$0	0.0%	13.8%	0	0.0%	21.1%	\$0	0.0%	52.2%
	Middle	0	0.0%	\$0	0.0%	39.5%	0	0.0%	36.8%	\$0	0.0%	32.8%
	Upper	0	0.0%	\$0	0.0%	43.7%	0	0.0%	26.3%	\$0	0.0%	3.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	8.3%	\$87	1.4%	2.4%	1	8.3%	1.7%	\$87	1.4%	1.0%
	Moderate	4	33.3%	\$579	9.2%	16.4%	4	33.3%	14.6%	\$579	9.2%	10.6%
	Middle	4	33.3%	\$447	7.1%	46.0%	4	33.3%	48.8%	\$447	7.1%	37.3%
	Upper	3	25.0%	\$5,176	82.3%	35.2%	3	25.0%	34.8%	\$5,176	82.3%	51.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$6,289	100.0%	100.0%	12	100.0%	100.0%	\$6,289	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.9%	\$0	0.0%	1.9%
	Moderate	1	10.0%	\$156	4.6%	13.3%	1	10.0%	10.8%	\$156	4.6%	10.1%
	Middle	4	40.0%	\$2,100	61.3%	43.6%	4	40.0%	41.5%	\$2,100	61.3%	40.8%
	Upper	5	50.0%	\$1,170	34.2%	40.5%	5	50.0%	44.7%	\$1,170	34.2%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.6%
Total	10	100.0%	\$3,426	100.0%	100.0%	10	100.0%	100.0%	\$3,426	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	9.9%	0	0.0%	24.0%	\$0	0.0%	21.7%
	Moderate	1	100.0%	\$25	100.0%	12.2%	1	100.0%	12.0%	\$25	100.0%	3.2%
	Middle	0	0.0%	\$0	0.0%	52.9%	0	0.0%	44.0%	\$0	0.0%	64.4%
	Upper	0	0.0%	\$0	0.0%	25.0%	0	0.0%	16.0%	\$0	0.0%	8.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.0%	\$0	0.0%	2.1%
Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: FL - Naples-Marco Island MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	2.1%	\$0	0.0%	0.7%	
	Moderate	3	30.0%	\$317	5.2%	18.3%	3	30.0%	9.7%	\$317	5.2%	4.4%	
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	13.3%	\$0	0.0%	7.6%	
	Upper	7	70.0%	\$5,755	94.8%	41.5%	7	70.0%	60.9%	\$5,755	94.8%	75.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.1%	\$0	0.0%	12.3%	
	Total	10	100.0%	\$6,072	100.0%	100.0%	10	100.0%	100.0%	\$6,072	100.0%	100.0%	
REFINANCE	Low	1	50.0%	\$87	40.1%	21.1%	1	50.0%	4.7%	\$87	40.1%	2.0%	
	Moderate	1	50.0%	\$130	59.9%	18.3%	1	50.0%	11.3%	\$130	59.9%	5.2%	
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	16.5%	\$0	0.0%	9.7%	
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	54.7%	\$0	0.0%	70.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	13.1%	
	Total	2	100.0%	\$217	100.0%	100.0%	2	100.0%	100.0%	\$217	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	6.3%	\$0	0.0%	1.2%	
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	17.9%	\$0	0.0%	5.9%	
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	22.2%	\$0	0.0%	12.8%	
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	46.4%	\$0	0.0%	71.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.1%	\$0	0.0%	8.3%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	8.3%	\$87	1.4%	21.1%	1	8.3%	2.8%	\$87	1.4%	1.0%	
	Moderate	4	33.3%	\$447	7.1%	18.3%	4	33.3%	10.3%	\$447	7.1%	4.6%	
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	14.3%	\$0	0.0%	8.0%	
	Upper	7	58.3%	\$5,755	91.5%	41.5%	7	58.3%	58.9%	\$5,755	91.5%	72.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.7%	\$0	0.0%	14.0%	
	Total	12	100.0%	\$6,289	100.0%	100.0%	12	100.0%	100.0%	\$6,289	100.0%	100.0%	
Small Business	Total Businesses												
	Revenue	\$1 Million or Less	1	10.0%	\$100	2.9%	92.2%	1	10.0%	49.4%	\$100	2.9%	37.4%
		Over \$1 Million	7	70.0%	\$2,950	86.1%	4.6%	7	70.0%				
		Total Rev. available	8	80.0%	\$3,050	89.0%	96.8%	8	80.0%				
		Rev. Not Known	2	20.0%	\$376	11.0%	3.3%	2	20.0%				
		Total	10	100.0%	\$3,426	100.0%	100.0%	10	100.0%				
	Loan Size	\$100,000 or Less	2	20.0%	\$150	4.4%		2	20.0%	94.8%	\$150	4.4%	38.7%
		\$100,001 - \$250,000	3	30.0%	\$626	18.3%		3	30.0%	2.7%	\$626	18.3%	15.9%
		\$250,001 - \$1 Million	5	50.0%	\$2,650	77.3%		5	50.0%	2.5%	\$2,650	77.3%	45.4%
		Total	10	100.0%	\$3,426	100.0%		10	100.0%	100.0%	\$3,426	100.0%	100.0%
Small Farm	Total Farms												
	Revenue	\$1 Million or Less	1	100.0%	\$25	100.0%	90.5%	1	100.0%	64.0%	\$25	100.0%	71.1%
		Over \$1 Million	0	0.0%	\$0	0.0%	8.9%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.5%	0	0.0%				
		Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$25	100.0%		1	100.0%	92.0%	\$25	100.0%	34.2%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.0%	\$0	0.0%	14.7%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.0%	\$0	0.0%	51.1%
Total		1	100.0%	\$25	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables**FL - Naples-Marco Island MSA 2012**

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	143	25.2%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>50.0%</i>	<i>143</i>	<i>25.2%</i>
Middle	1	50.0%	143	25.2%	1	50.0%	425	74.8%
Upper	1	50.0%	425	74.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>568</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>568</i>	<i>100.0%</i>

FL - Naples-Marco Island MSA 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	33.3%	168	23.4%	0	0.0%	0	0.0%
Upper	2	66.7%	550	76.6%	3	100.0%	718	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>718</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>718</i>	<i>100.0%</i>

FL - Naples-Marco Island MSA 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	16.7%	77	9.4%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>16.7%</i>	<i>77</i>	<i>9.4%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	2	33.3%	115	14.0%	0	0.0%	0	0.0%
Upper	3	50.0%	627	76.6%	6	100.0%	819	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>819</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>819</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Port St. Lucie - Stuart

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison									
							2012					2013				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	\$0	0.0%	0.9%	0	0.0%	\$0	0.0%	1.5%
	Middle	1	50.0%	\$55	42.3%	53.4%	0	0.0%	\$0	0.0%	45.3%	1	100.0%	\$55	100.0%	44.1%
	Upper	1	50.0%	\$75	57.7%	39.9%	1	100.0%	\$75	100.0%	53.8%	0	0.0%	\$0	0.0%	54.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$130	100.0%	100.0%	1	100.0%	\$130	100.0%	100.0%	1	100.0%	\$130	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	\$0	0.0%	3.5%	0	0.0%	\$0	0.0%	2.2%
	Middle	1	100.0%	\$73	100.0%	53.4%	0	0.0%	\$0	0.0%	46.0%	1	100.0%	\$73	100.0%	47.6%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	\$0	0.0%	50.6%	0	0.0%	\$0	0.0%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$73	100.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	1	100.0%	\$73	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	1.3%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	\$0	0.0%	31.3%	0	0.0%	\$0	0.0%	37.8%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	\$0	0.0%	68.7%	0	0.0%	\$0	0.0%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.7%	0	0.0%	\$0	0.0%	63.4%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	50.4%	0	0.0%	\$0	0.0%	36.6%	0	0.0%	\$0	0.0%	97.5%
	Upper	0	0.0%	\$0	0.0%	35.9%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	2.5%
	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%
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%	6.7%	0	0.0%	\$0	0.0%	7.8%	0	0.0%	\$0	0.0%	1.8%
	Middle	2	66.7%	\$128	63.1%	53.4%	0	0.0%	\$0	0.0%	44.6%	2	100.0%	\$128	100.0%	47.1%
	Upper	1	33.3%	\$75	36.9%	39.9%	1	100.0%	\$75	100.0%	47.6%	0	0.0%	\$0	0.0%	51.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$203	100.0%	100.0%	1	100.0%	\$203	100.0%	100.0%	2	100.0%	\$203	100.0%	100.0%
SMALL BUSINESSES	Small Businesses															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	7	58.3%	\$3,665	64.7%	22.8%	5	62.5%	\$2,365	60.4%	39.8%	2	50.0%	\$1,300	74.3%	43.2%
	Middle	1	8.3%	\$100	1.8%	49.6%	0	0.0%	\$0	0.0%	34.5%	1	25.0%	\$100	5.7%	31.6%
	Upper	4	33.3%	\$1,900	33.5%	27.6%	3	37.5%	\$1,550	39.6%	25.7%	1	25.0%	\$350	20.0%	25.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
SMALL FARM	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$5,665	100.0%	100.0%	8	100.0%	\$3,915	100.0%	100.0%	4	100.0%	\$1,750	100.0%	100.0%
	Small Farms															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	56.3%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
SMALL FARM	Upper	0	0.0%	\$0	0.0%	31.3%	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	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
	Small Farms															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	56.3%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	31.3%	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	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL - Port St. Lucie - Stuart

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison												
							2012						2013						
		Bank				Families by Family Income	Count			Dollar			Count			Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	2.8%	\$0	0.0%	1.0%	0	0.0%	2.9%	\$0	0.0%	0.9%	
	Moderate	2	100.0%	\$130	100.0%	19.2%	1	100.0%	12.3%	\$75	100.0%	6.8%	1	100.0%	9.5%	\$55	100.0%	4.3%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.3%	\$0	0.0%	12.9%	0	0.0%	14.1%	\$0	0.0%	9.1%	
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	55.5%	\$0	0.0%	69.6%	0	0.0%	63.2%	\$0	0.0%	76.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.1%	\$0	0.0%	9.8%	0	0.0%	10.2%	\$0	0.0%	9.6%	
	Total	2	100.0%	\$130	100.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	1	100.0%	100.0%	\$55	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	6.0%	\$0	0.0%	3.3%	0	0.0%	6.3%	\$0	0.0%	2.4%	
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	11.9%	\$0	0.0%	6.5%	0	0.0%	10.1%	\$0	0.0%	4.2%	
	Middle	1	100.0%	\$73	100.0%	19.4%	0	0.0%	17.4%	\$0	0.0%	12.3%	1	100.0%	14.7%	\$73	100.0%	7.3%	
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	53.9%	\$0	0.0%	67.4%	0	0.0%	59.9%	\$0	0.0%	48.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.8%	\$0	0.0%	10.6%	0	0.0%	8.9%	\$0	0.0%	38.1%	
	Total	1	100.0%	\$73	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$73	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	4.7%	\$0	0.0%	1.8%	0	0.0%	6.0%	\$0	0.0%	1.4%	
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	18.6%	\$0	0.0%	3.8%	0	0.0%	16.0%	\$0	0.0%	7.2%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	34.9%	\$0	0.0%	15.7%	0	0.0%	20.0%	\$0	0.0%	11.9%	
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	37.2%	\$0	0.0%	68.3%	0	0.0%	56.0%	\$0	0.0%	77.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.7%	\$0	0.0%	10.4%	0	0.0%	2.0%	\$0	0.0%	2.3%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	4.7%	\$0	0.0%	2.1%	0	0.0%	4.8%	\$0	0.0%	1.7%	
	Moderate	2	66.7%	\$130	64.0%	19.2%	1	100.0%	12.2%	\$75	100.0%	5.9%	1	50.0%	10.0%	\$55	43.0%	4.2%	
	Middle	1	33.3%	\$73	36.0%	19.4%	0	0.0%	18.2%	\$0	0.0%	11.5%	1	50.0%	14.6%	\$73	57.0%	7.9%	
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	53.9%	\$0	0.0%	62.2%	0	0.0%	61.2%	\$0	0.0%	58.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.0%	\$0	0.0%	18.3%	0	0.0%	9.4%	\$0	0.0%	27.6%	
	Total	3	100.0%	\$203	100.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	2	100.0%	100.0%	\$128	100.0%	100.0%	
Small Business	Total Businesses																		
	Revenue	\$1 Million or Less	4	33.3%	\$2,450	43.2%	90.8%	4	50.0%	40.2%	\$2,450	62.6%	29.4%	0	0.0%	46.9%	\$0	0.0%	34.6%
		Over \$1 Million	6	50.0%	\$1,215	21.4%	5.9%	3	37.5%				3	75.0%					
		Total Rev. available	10	83.3%	\$3,665	64.6%	96.7%	7	87.5%				3	75.0%					
		Rev. Not Known	2	16.7%	\$2,000	35.3%	3.3%	1	12.5%				1	25.0%					
		Total	12	100.0%	\$5,665	100.0%	100.0%	8	100.0%				4	100.0%					
	Loan Size	\$100,000 or Less	3	25.0%	\$265	4.7%		2	25.0%	95.6%	\$165	4.2%	38.9%	1	25.0%	94.6%	\$100	5.7%	43.3%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	1.7%	\$0	0.0%	10.4%	0	0.0%	3.0%	\$0	0.0%	15.9%
		\$250,001 - \$1 Million	9	75.0%	\$5,400	95.3%		6	75.0%	2.7%	\$3,750	95.8%	50.7%	3	75.0%	2.3%	\$1,650	94.3%	40.8%
		Total	12	100.0%	\$5,665	100.0%		8	100.0%	100.0%	\$3,915	100.0%	100.0%	4	100.0%	100.0%	\$1,750	100.0%	100.0%
Small Farm	Total Farms																		
	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	94.1%	0	0.0%	66.7%	\$0	0.0%	78.7%	0	0.0%	100.0%	\$0	0.0%	100.0%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.9%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Port St. Lucie - Stuart

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$ (000s)		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	5.0%	\$0	0.0%	2.1%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	51.8%	\$0	0.0%	44.2%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	43.1%	\$0	0.0%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	3.8%	\$0	0.0%	2.3%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	55.9%	\$0	0.0%	47.5%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	40.3%	\$0	0.0%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	4.8%	\$0	0.0%	3.2%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	54.8%	\$0	0.0%	40.1%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	40.5%	\$0	0.0%	56.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.7%	0	0.0%	50.0%	\$0	0.0%	89.8%
	Middle	0	0.0%	\$0	0.0%	50.4%	0	0.0%	50.0%	\$0	0.0%	10.2%
	Upper	0	0.0%	\$0	0.0%	35.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	4.9%	\$0	0.0%	14.4%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	53.1%	\$0	0.0%	40.2%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	42.0%	\$0	0.0%	45.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	71.4%	\$1,693	79.0%	22.8%	5	71.4%	31.4%	\$1,693	79.0%	47.1%
	Middle	1	14.3%	\$100	4.7%	49.3%	1	14.3%	42.1%	\$100	4.7%	34.3%
	Upper	1	14.3%	\$350	16.3%	27.8%	1	14.3%	26.5%	\$350	16.3%	18.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$2,143	100.0%	100.0%	7	100.0%	100.0%	\$2,143	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	52.9%	0	0.0%	75.0%	\$0	0.0%	84.8%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	25.0%	\$0	0.0%	15.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: FL - Port St. Lucie - Stuart

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank			Families by Family Income	Count		Dollar				
		Count	Dollar			Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	2.5%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	10.4%	\$0	0.0%	5.3%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	16.3%	\$0	0.0%	10.6%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	55.8%	\$0	0.0%	70.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	13.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	6.7%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	10.3%	\$0	0.0%	5.3%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	15.1%	\$0	0.0%	10.9%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	53.1%	\$0	0.0%	68.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	12.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	4.8%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	11.9%	\$0	0.0%	2.5%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	21.4%	\$0	0.0%	23.5%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	59.5%	\$0	0.0%	69.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	3.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	3.8%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	10.4%	\$0	0.0%	4.5%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	16.0%	\$0	0.0%	9.4%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	54.9%	\$0	0.0%	60.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	25.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Business	Total Businesses											
	Revenue											
	\$1 Million or Less	1	14.3%	\$350	16.3%	90.4%	1	14.3%	46.0%	\$350	16.3%	34.9%
	Over \$1 Million	4	57.1%	\$693	32.3%	6.3%	4	57.1%				
	Total Rev. available	5	71.4%	\$1,043	48.6%	96.7%	5	71.4%				
	Rev. Not Known	2	28.6%	\$1,100	51.3%	3.3%	2	28.6%				
	Total	7	100.0%	\$2,143	100.0%	100.0%	7	100.0%				
	Loan Size											
	\$100,000 or Less	3	42.9%	\$260	12.1%		3	42.9%	94.2%	\$260	12.1%	41.5%
	\$100,001 - \$250,000	1	14.3%	\$233	10.9%		1	14.3%	2.9%	\$233	10.9%	14.9%
Small Farm	\$250,001 - \$1 Million	3	42.9%	\$1,650	77.0%		3	42.9%	2.9%	\$1,650	77.0%	43.5%
	Total	7	100.0%	\$2,143	100.0%		7	100.0%	100.0%	\$2,143	100.0%	100.0%
	Total Farms											
	Revenue											
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.4%	0	0.0%	50.0%	\$0	0.0%	35.4%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.6%	0	0.0%				
Small Farm	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables**FL - Port St Lucie (Martin) 2012**

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

FL - Port St Lucie (Martin) 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

FL - Port St Lucie (Martin) 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Sarasota

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank			Owner Occupied Units	Count		Dollar			Count		Dollar					
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	15.2%	\$0	0.0%	7.7%	0	0.0%	18.2%	\$0	0.0%	9.3%
	Middle	1	33.3%	\$104	13.0%	45.3%	1	100.0%	46.7%	\$104	100.0%	29.5%	0	0.0%	44.8%	\$0	0.0%	32.0%
	Upper	2	66.7%	\$694	87.0%	29.5%	0	0.0%	38.0%	\$0	0.0%	62.8%	2	100.0%	36.9%	\$694	100.0%	58.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$798	100.0%	100.0%	1	100.0%	100.0%	\$104	100.0%	100.0%	2	100.0%	100.0%	\$694	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	2	66.7%	\$256	65.6%	24.2%	1	50.0%	17.0%	\$145	52.0%	11.2%	1	100.0%	18.4%	\$111	100.0%	16.9%
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	46.1%	\$0	0.0%	34.7%	0	0.0%	46.7%	\$0	0.0%	30.9%
	Upper	1	33.3%	\$134	34.4%	29.5%	1	50.0%	36.7%	\$134	48.0%	53.9%	0	0.0%	34.8%	\$0	0.0%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$390	100.0%	100.0%	2	100.0%	100.0%	\$279	100.0%	100.0%	1	100.0%	100.0%	\$111	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	3.9%	\$0	0.0%	0.1%	0	0.0%	1.9%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	25.5%	\$0	0.0%	10.9%	0	0.0%	19.4%	\$0	0.0%	8.3%
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	38.2%	\$0	0.0%	25.7%	0	0.0%	48.4%	\$0	0.0%	32.1%
	Upper	1	100.0%	\$1,757	100.0%	29.5%	1	100.0%	32.4%	\$1,757	100.0%	63.3%	0	0.0%	30.3%	\$0	0.0%	59.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$1,757	100.0%	100.0%	1	100.0%	100.0%	\$1,757	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	42.9%	\$0	0.0%	2.5%	0	0.0%	72.7%	\$0	0.0%	98.1%
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	42.9%	\$0	0.0%	59.6%	0	0.0%	9.1%	\$0	0.0%	1.2%
	Upper	0	0.0%	\$0	0.0%	58.9%	0	0.0%	14.3%	\$0	0.0%	38.0%	0	0.0%	18.2%	\$0	0.0%	0.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	2	28.6%	\$256	8.7%	24.2%	1	25.0%	16.5%	\$145	6.8%	9.6%	1	33.3%	18.4%	\$111	13.8%	20.3%
	Middle	1	14.3%	\$104	3.5%	45.3%	1	25.0%	46.2%	\$104	4.9%	33.5%	0	0.0%	45.9%	\$0	0.0%	29.0%
	Upper	4	57.1%	\$2,585	87.8%	29.5%	2	50.0%	37.1%	\$1,891	88.4%	56.8%	2	66.7%	35.5%	\$694	86.2%	50.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Total	7	100.0%	\$2,945	100.0%	100.0%	4	100.0%	100.0%	\$2,140	100.0%	100.0%	3	100.0%	100.0%	\$805	100.0%	100.0%
	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	1.0%	\$0	0.0%	0.9%	0	0.0%	0.6%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	28.0%	0	0.0%	27.5%	\$0	0.0%	29.7%	0	0.0%	28.1%	\$0	0.0%	33.0%
	Middle	3	100.0%	\$350	100.0%	41.6%	1	100.0%	36.3%	\$50	100.0%	29.1%	2	100.0%	37.5%	\$300	100.0%	29.3%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	35.2%	\$0	0.0%	40.3%	0	0.0%	33.8%	\$0	0.0%	37.0%
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$350	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	2	100.0%	100.0%	\$300	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.4%	0	0.0%	28.6%	\$0	0.0%	45.9%	0	0.0%	33.3%	\$0	0.0%	22.4%
SMALL FARM	Middle	0	0.0%	\$0	0.0%	48.6%	0	0.0%	42.9%	\$0	0.0%	25.7%	0	0.0%	16.7%	\$0	0.0%	12.1%
	Upper	0	0.0%	\$0	0.0%	31.9%	0	0.0%	28.6%	\$0	0.0%	28.4%	0	0.0%	50.0%	\$0	0.0%	65.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL - Sarasota

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2012, 2013					2012						2013						
							Count				Dollar		Count		Dollar				
		Borrower Income Levels		Bank		Families by Family Income	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	1	33.3%	\$104	13.0%	20.6%	1	100.0%	6.5%	\$104	100.0%	2.4%	0	0.0%	4.4%	\$0	0.0%	1.5%	
	Moderate	1	33.3%	\$199	24.9%	18.3%	0	0.0%	15.6%	\$0	0.0%	7.4%	1	50.0%	15.3%	\$199	28.7%	7.3%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	13.9%	\$0	0.0%	8.9%	0	0.0%	16.5%	\$0	0.0%	9.8%	
	Upper	1	33.3%	\$495	62.0%	41.7%	0	0.0%	52.2%	\$0	0.0%	72.0%	1	50.0%	51.6%	\$495	71.3%	70.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.7%	\$0	0.0%	9.4%	0	0.0%	12.3%	\$0	0.0%	11.1%	
	Total	3	100.0%	\$798	100.0%	100.0%	1	100.0%	100.0%	\$104	100.0%	100.0%	2	100.0%	100.0%	\$694	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	6.5%	\$0	0.0%	3.4%	0	0.0%	8.8%	\$0	0.0%	3.7%	
	Moderate	1	33.3%	\$111	28.5%	18.3%	0	0.0%	13.7%	\$0	0.0%	8.0%	1	100.0%	13.7%	\$111	100.0%	6.3%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.6%	\$0	0.0%	12.8%	0	0.0%	18.3%	\$0	0.0%	9.5%	
	Upper	2	66.7%	\$279	71.5%	41.7%	2	100.0%	51.5%	\$279	100.0%	67.3%	0	0.0%	49.5%	\$0	0.0%	54.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.8%	\$0	0.0%	8.6%	0	0.0%	9.8%	\$0	0.0%	25.5%	
	Total	3	100.0%	\$390	100.0%	100.0%	2	100.0%	100.0%	\$279	100.0%	100.0%	1	100.0%	100.0%	\$111	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	11.8%	\$0	0.0%	0.8%	0	0.0%	8.4%	\$0	0.0%	0.8%	
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	16.7%	\$0	0.0%	4.5%	0	0.0%	19.4%	\$0	0.0%	7.1%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	17.6%	\$0	0.0%	11.1%	0	0.0%	32.9%	\$0	0.0%	24.2%	
	Upper	1	100.0%	\$1,757	100.0%	41.7%	1	100.0%	48.0%	\$1,757	100.0%	75.3%	0	0.0%	38.7%	\$0	0.0%	65.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	8.3%	0	0.0%	0.6%	\$0	0.0%	1.9%	
	Total	1	100.0%	\$1,757	100.0%	100.0%	1	100.0%	100.0%	\$1,757	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	14.3%	\$104	3.5%	20.6%	1	25.0%	6.6%	\$104	4.9%	2.9%	0	0.0%	6.9%	\$0	0.0%	2.6%	
	Moderate	2	28.6%	\$310	10.5%	18.3%	0	0.0%	14.4%	\$0	0.0%	7.5%	2	66.7%	14.4%	\$310	38.5%	6.2%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	16.8%	\$0	0.0%	10.9%	0	0.0%	17.9%	\$0	0.0%	9.0%	
	Upper	4	57.1%	\$2,531	85.9%	41.7%	3	75.0%	51.6%	\$2,036	95.1%	67.0%	1	33.3%	50.0%	\$495	61.5%	56.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.6%	\$0	0.0%	11.7%	0	0.0%	10.7%	\$0	0.0%	25.7%	
	Total	7	100.0%	\$2,945	100.0%	100.0%	4	100.0%	100.0%	\$2,140	100.0%	100.0%	3	100.0%	100.0%	\$805	100.0%	100.0%	
Small Business	Revenue	Total Businesses																	
		\$1 Million or Less	1	33.3%	\$50	14.3%	92.6%	1	100.0%	41.6%	\$50	100.0%	39.0%	0	0.0%	50.2%	\$0	0.0%	41.1%
		Over \$1 Million	1	33.3%	\$250	71.4%	4.6%	0	0.0%				1	50.0%					
		Total Rev. available	2	66.6%	\$300	85.7%	97.2%	1	100.0%				1	50.0%					
		Rev. Not Known	1	33.3%	\$50	14.3%	2.9%	0	0.0%				1	50.0%					
	Total	3	100.0%	\$350	100.0%	100.0%	1	100.0%				2	100.0%						
	Loan Size	\$100,000 or Less	2	66.7%	\$100	28.6%		1	100.0%	94.4%	\$50	100.0%	34.9%	1	50.0%	93.3%	\$50	16.7%	31.1%
		\$100,001 - \$250,000	1	33.3%	\$250	71.4%		0	0.0%	2.7%	\$0	0.0%	15.7%	1	50.0%	2.9%	\$250	83.3%	13.2%
		\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	49.4%	0	0.0%	3.8%	\$0	0.0%	55.7%
		Total	3	100.0%	\$350	100.0%		1	100.0%	100.0%	\$50	100.0%	100.0%	2	100.0%	100.0%	\$300	100.0%	100.0%
		Total Farms																	
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	97.3%	0	0.0%	85.7%	\$0	0.0%	77.1%	0	0.0%	66.7%	\$0	0.0%	86.2%
		Over \$1 Million	0	0.0%	\$0	0.0%	2.7%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
			Total Farms																
			Total Farms																

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Sarasota

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014					Bank & Aggregate Lending Comparison 2014					
		Count		Bank Dollar		Owner Occupied Units %	Count		Dollar		Agg	Agg
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	1	50.0%	\$75	55.6%	24.2%	1	50.0%	20.7%	\$75	55.6%	11.9%
	Middle	1	50.0%	\$60	44.4%	45.3%	1	50.0%	48.5%	\$60	44.4%	36.4%
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	30.5%	\$0	0.0%	51.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$135	100.0%	100.0%	2	100.0%	100.0%	\$135	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	19.2%	\$0	0.0%	11.2%
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	48.2%	\$0	0.0%	30.9%
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	32.2%	\$0	0.0%	57.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.6%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	34.2%	\$0	0.0%	16.5%
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	45.8%	\$0	0.0%	40.2%
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	19.4%	\$0	0.0%	43.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	50.0%	\$0	0.0%	21.6%
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	28.6%	\$0	0.0%	77.0%
	Upper	0	0.0%	\$0	0.0%	58.9%	0	0.0%	21.4%	\$0	0.0%	1.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	1	50.0%	\$75	55.6%	24.2%	1	50.0%	20.8%	\$75	55.6%	12.5%
	Middle	1	50.0%	\$60	44.4%	45.3%	1	50.0%	48.3%	\$60	44.4%	38.2%
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	30.6%	\$0	0.0%	49.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$135	100.0%	100.0%	2	100.0%	100.0%	\$135	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.7%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	28.2%	0	0.0%	28.5%	\$0	0.0%	33.3%
	Middle	2	100.0%	\$300	100.0%	41.4%	2	100.0%	37.6%	\$300	100.0%	29.9%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	33.2%	\$0	0.0%	35.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$300	100.0%	100.0%	2	100.0%	100.0%	\$300	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	7.1%	\$0	0.0%	2.3%
	Middle	0	0.0%	\$0	0.0%	44.9%	0	0.0%	64.3%	\$0	0.0%	68.3%
	Upper	0	0.0%	\$0	0.0%	37.7%	0	0.0%	28.6%	\$0	0.0%	29.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

FL - Sarasota 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

FL - Sarasota 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

FL - Sarasota 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	496	100.0%	1	100.0%	496	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>496</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>496</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Orlando (Orange County)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2012					2012					
		Count		Dollar		Owner Occupied Units	Count		Dollar		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	1.4%	\$0	0.0%	1.2%
	Moderate	1	50.0%	\$42	28.0%	38.5%	1	50.0%	23.2%	\$42	28.0%	17.0%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	31.2%	\$0	0.0%	25.9%
	Upper	1	50.0%	\$108	72.0%	31.6%	1	50.0%	44.2%	\$108	72.0%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$150	100.0%	100.0%	2	100.0%	100.0%	\$150	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	1.2%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	38.5%	0	0.0%	20.6%	\$0	0.0%	15.7%
	Middle	1	100.0%	\$97	100.0%	27.7%	1	100.0%	32.1%	\$97	100.0%	28.2%
	Upper	0	0.0%	\$0	0.0%	31.6%	0	0.0%	46.1%	\$0	0.0%	55.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$97	100.0%	100.0%	1	100.0%	100.0%	\$97	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	2.8%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	38.5%	0	0.0%	30.6%	\$0	0.0%	6.8%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	23.1%	\$0	0.0%	16.6%
	Upper	0	0.0%	\$0	0.0%	31.6%	0	0.0%	43.5%	\$0	0.0%	76.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	3.6%	0	0.0%	9.5%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	58.0%	0	0.0%	52.4%	\$0	0.0%	61.2%
	Middle	0	0.0%	\$0	0.0%	26.7%	0	0.0%	33.3%	\$0	0.0%	37.3%
	Upper	0	0.0%	\$0	0.0%	11.6%	0	0.0%	4.8%	\$0	0.0%	0.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	1.3%	\$0	0.0%	1.1%
	Moderate	1	33.3%	\$42	17.0%	38.5%	1	33.3%	21.8%	\$42	17.0%	21.3%
	Middle	1	33.3%	\$97	39.3%	27.7%	1	33.3%	31.6%	\$97	39.3%	28.4%
	Upper	1	33.3%	\$108	43.7%	31.6%	1	33.3%	45.2%	\$108	43.7%	49.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$247	100.0%	100.0%	3	100.0%	100.0%	\$247	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	1.8%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	45.0%	0	0.0%	43.5%	\$0	0.0%	49.6%
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	20.3%	\$0	0.0%	16.4%
	Upper	0	0.0%	\$0	0.0%	31.4%	0	0.0%	34.4%	\$0	0.0%	33.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	29.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	15.7%	0	0.0%	25.0%	\$0	0.0%	46.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	75.0%	\$0	0.0%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2012 FFIEC Census Data, ACS 2010 data, and 2012 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: FL - Orlando (Orange County)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2012					2012					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	50.0%	\$108	72.0%	29.2%	1	50.0%	6.6%	\$108	72.0%	2.6%
	Moderate	1	50.0%	\$42	28.0%	21.6%	1	50.0%	15.6%	\$42	28.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	17.2%	\$0	0.0%	13.9%
	Upper	0	0.0%	\$0	0.0%	30.9%	0	0.0%	46.9%	\$0	0.0%	63.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.8%	\$0	0.0%	10.9%
	Total	2	100.0%	\$150	100.0%	100.0%	2	100.0%	100.0%	\$150	100.0%	100.0%
REFINANCE	Low	1	100.0%	\$97	100.0%	29.2%	1	100.0%	5.6%	\$97	100.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	21.6%	0	0.0%	11.6%	\$0	0.0%	7.3%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	16.5%	\$0	0.0%	13.3%
	Upper	0	0.0%	\$0	0.0%	30.9%	0	0.0%	53.0%	\$0	0.0%	62.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	13.8%
	Total	1	100.0%	\$97	100.0%	100.0%	1	100.0%	100.0%	\$97	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	29.2%	0	0.0%	14.8%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	21.6%	0	0.0%	20.4%	\$0	0.0%	2.9%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	21.3%	\$0	0.0%	15.2%
	Upper	0	0.0%	\$0	0.0%	30.9%	0	0.0%	40.7%	\$0	0.0%	77.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	1.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	29.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	30.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	66.7%	\$205	83.0%	29.2%	2	66.7%	6.1%	\$205	83.0%	2.6%
	Moderate	1	33.3%	\$42	17.0%	21.6%	1	33.3%	13.1%	\$42	17.0%	7.2%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	16.8%	\$0	0.0%	12.0%
	Upper	0	0.0%	\$0	0.0%	30.9%	0	0.0%	50.4%	\$0	0.0%	55.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.6%	\$0	0.0%	22.6%
	Total	3	100.0%	\$247	100.0%	100.0%	3	100.0%	100.0%	\$247	100.0%	100.0%
Small Business	Total Businesses											
	Revenue											
	\$1 Million or Less	0	0.0%	\$0	0.0%	90.1%	0	0.0%	37.5%	\$0	0.0%	25.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	6.2%	0	0.0%				
	Total Rev. available	0	0.0%	\$0	0.0%	96.3%	0	0.0%				
	Rev. Not Known	0	0.0%	\$0	0.0%	3.7%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	94.3%	\$0	0.0%	34.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.7%	\$0	0.0%	15.4%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	3.0%	\$0	0.0%	49.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
Small Farm	Total Farms											
	Revenue											
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.4%	0	0.0%	62.5%	\$0	0.0%	67.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.6%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2012 FFIEC Census Data, ACS 2010 data, and 2012 D&B Information

Consumer Loan Distribution Table

FL - Orlando (Orange County) 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	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>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Ann Arbor MSA

Product Type	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	2.9%	\$58	1.1%	4.0%	1	4.5%	1.4%	\$58	1.8%	1.0%	0	0.0%	2.1%	\$0	0.0%	1.6%
	Moderate	2	5.9%	\$229	4.4%	14.9%	1	4.5%	11.9%	\$127	4.0%	7.8%	1	8.3%	11.7%	\$102	5.0%	7.5%
	Middle	19	55.9%	\$2,606	49.7%	51.9%	12	54.5%	52.8%	\$1,331	41.5%	45.6%	7	58.3%	54.5%	\$1,275	62.6%	48.0%
	Upper	12	35.3%	\$2,349	44.8%	29.3%	8	36.4%	33.9%	\$1,689	52.7%	45.6%	4	33.3%	31.8%	\$660	32.4%	42.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	34	100.0%	\$5,242	100.0%	100.0%	22	100.0%	100.0%	\$3,205	100.0%	100.0%	12	100.0%	100.0%	\$2,037	100.0%	100.0%
REFINANCE	Low	1	0.7%	\$55	0.2%	4.0%	1	1.0%	1.5%	\$55	0.3%	1.2%	0	0.0%	2.1%	\$0	0.0%	1.4%
	Moderate	10	6.8%	\$1,330	4.8%	14.9%	7	6.7%	8.8%	\$1,010	5.1%	6.2%	3	6.8%	10.4%	\$320	4.2%	6.6%
	Middle	84	56.8%	\$12,812	46.4%	51.9%	58	55.8%	49.6%	\$9,147	45.8%	44.1%	26	59.1%	50.8%	\$3,665	48.2%	48.8%
	Upper	53	35.8%	\$13,390	48.5%	29.3%	38	36.5%	40.1%	\$9,772	48.9%	48.6%	15	34.1%	36.7%	\$3,618	47.6%	43.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	148	100.0%	\$27,587	100.0%	100.0%	104	100.0%	100.0%	\$19,984	100.0%	100.0%	44	100.0%	100.0%	\$7,603	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	1.5%	\$0	0.0%	1.2%	0	0.0%	2.0%	\$0	0.0%	0.3%
	Moderate	1	20.0%	\$142	51.1%	14.9%	1	25.0%	12.5%	\$142	53.0%	5.0%	0	0.0%	7.1%	\$0	0.0%	2.2%
	Middle	4	80.0%	\$136	48.9%	51.9%	3	75.0%	50.6%	\$126	47.0%	36.7%	1	100.0%	51.7%	\$10	100.0%	37.7%
	Upper	0	0.0%	\$0	0.0%	29.3%	0	0.0%	35.4%	\$0	0.0%	57.1%	0	0.0%	39.2%	\$0	0.0%	59.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$278	100.0%	100.0%	4	100.0%	100.0%	\$268	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	20.0%	0	0.0%	21.7%	\$0	0.0%	18.9%	0	0.0%	14.6%	\$0	0.0%	26.9%
	Moderate	0	0.0%	\$0	0.0%	30.2%	0	0.0%	8.7%	\$0	0.0%	15.0%	0	0.0%	12.5%	\$0	0.0%	22.5%
	Middle	3	100.0%	\$1,280	100.0%	36.3%	1	100.0%	54.3%	\$260	100.0%	17.9%	2	100.0%	54.2%	\$1,020	100.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	13.1%	0	0.0%	15.2%	\$0	0.0%	48.2%	0	0.0%	18.8%	\$0	0.0%	23.8%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	3	100.0%	\$1,280	100.0%	100.0%	1	100.0%	100.0%	\$260	100.0%	100.0%	2	100.0%	100.0%	\$1,020	100.0%	100.0%	
HMDA TOTALS	Low	2	1.1%	\$113	0.3%	4.0%	2	1.5%	1.5%	\$113	0.5%	1.7%	0	0.0%	2.1%	\$0	0.0%	2.6%
	Moderate	13	6.8%	\$1,701	4.9%	14.9%	9	6.9%	9.6%	\$1,279	5.4%	6.8%	4	6.8%	10.8%	\$422	4.0%	7.6%
	Middle	110	57.9%	\$16,834	49.0%	51.9%	74	56.5%	50.4%	\$10,864	45.8%	43.6%	36	61.0%	52.1%	\$5,970	56.0%	47.3%
	Upper	65	34.2%	\$15,739	45.8%	29.3%	46	35.1%	38.4%	\$11,461	48.3%	47.9%	19	32.2%	35.0%	\$4,278	40.1%	42.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	190	100.0%	\$34,387	100.0%	100.0%	131	100.0%	100.0%	\$23,717	100.0%	100.0%	59	100.0%	100.0%	\$10,670	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	31	7.4%	\$13,237	14.8%	4.8%	14	7.0%	2.7%	\$6,822	15.1%	3.0%	17	7.7%	3.4%	\$6,415	14.5%	4.6%
	Moderate	44	10.5%	\$11,208	12.5%	12.5%	20	10.0%	12.4%	\$6,386	14.1%	10.6%	24	10.9%	11.9%	\$4,822	10.9%	10.8%
	Middle	200	47.5%	\$35,077	39.2%	50.1%	106	53.0%	50.9%	\$19,457	43.0%	56.1%	94	42.5%	51.8%	\$15,620	35.3%	56.7%
	Upper	146	34.7%	\$29,942	33.5%	31.8%	60	30.0%	31.7%	\$12,564	27.8%	29.6%	86	38.9%	32.1%	\$17,378	39.3%	26.7%
	Unknown	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.5%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.0%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.7%
Total	421	100.0%	\$89,464	100.0%	100.0%	200	100.0%	100.0%	\$45,229	100.0%	100.0%	221	100.0%	100.0%	\$44,235	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.7%	0	0.0%	4.5%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$430	100.0%	76.0%	0	0.0%	86.4%	\$0	0.0%	92.3%	2	100.0%	86.5%	\$430	100.0%	98.3%
	Upper	0	0.0%	\$0	0.0%	23.1%	0	0.0%	9.1%	\$0	0.0%	7.1%	0	0.0%	13.5%	\$0	0.0%	1.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	2	100.0%	\$430	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$430	100.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	3	8.8%	\$239	4.6%	21.7%	1	4.5%	13.1%	\$69	2.2%	6.6%	2	16.7%	11.1%	\$170	8.3%	5.0%
	Moderate	8	23.5%	\$776	14.8%	16.9%	4	18.2%	23.6%	\$253	7.9%	18.0%	4	33.3%	21.4%	\$523	25.7%	15.7%
	Middle	9	26.5%	\$1,723	32.9%	21.4%	6	27.3%	22.2%	\$1,027	32.0%	21.5%	3	25.0%	22.7%	\$696	34.2%	21.5%
	Upper	13	38.2%	\$2,369	45.2%	40.0%	10	45.5%	30.8%	\$1,721	53.7%	44.1%	3	25.0%	34.9%	\$648	31.8%	47.9%
	Unknown	1	2.9%	\$135	2.6%	0.0%	1	4.5%	10.3%	\$135	4.2%	9.8%	0	0.0%	9.9%	\$0	0.0%	10.0%
	Total	34	100.0%	\$5,242	100.0%	100.0%	22	100.0%	100.0%	\$3,205	100.0%	100.0%	12	100.0%	100.0%	\$2,037	100.0%	100.0%
REFINANCE	Low	10	6.8%	\$943	3.4%	21.7%	4	3.8%	6.8%	\$407	2.0%	4.2%	6	13.6%	9.2%	\$536	7.0%	5.2%
	Moderate	32	21.6%	\$4,087	14.8%	16.9%	23	22.1%	16.2%	\$2,937	14.7%	11.9%	9	20.5%	15.2%	\$1,150	15.1%	10.6%
	Middle	39	26.4%	\$6,332	23.0%	21.4%	29	27.9%	24.5%	\$4,642	23.2%	21.9%	10	22.7%	23.2%	\$1,690	22.2%	19.7%
	Upper	67	45.3%	\$16,225	58.8%	40.0%	48	46.2%	41.3%	\$11,998	60.0%	50.8%	19	43.2%	41.0%	\$4,227	55.6%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.1%	\$0	0.0%	11.3%	0	0.0%	11.4%	\$0	0.0%	15.8%
	Total	148	100.0%	\$27,587	100.0%	100.0%	104	100.0%	100.0%	\$19,984	100.0%	100.0%	44	100.0%	100.0%	\$7,603	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	10.4%	\$0	0.0%	4.6%	0	0.0%	11.8%	\$0	0.0%	3.9%
	Moderate	1	20.0%	\$142	51.1%	16.9%	1	25.0%	18.5%	\$142	53.0%	11.2%	0	0.0%	18.7%	\$0	0.0%	10.1%
	Middle	2	40.0%	\$116	41.7%	21.4%	2	50.0%	26.2%	\$116	43.3%	24.0%	0	0.0%	19.2%	\$0	0.0%	13.2%
	Upper	2	40.0%	\$20	7.2%	40.0%	1	25.0%	39.9%	\$10	3.7%	51.8%	1	100.0%	47.9%	\$10	100.0%	68.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.1%	\$0	0.0%	8.5%	0	0.0%	2.4%	\$0	0.0%	4.0%
	Total	5	100.0%	\$278	100.0%	100.0%	4	100.0%	100.0%	\$268	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$1,280	100.0%	0.0%	1	100.0%	100.0%	\$260	100.0%	100.0%	2	100.0%	100.0%	\$1,020	100.0%	100.0%
	Total	3	100.0%	\$1,280	100.0%	100.0%	1	100.0%	100.0%	\$260	100.0%	100.0%	2	100.0%	100.0%	\$1,020	100.0%	100.0%
HMDA TOTALS	Low	13	6.8%	\$1,182	3.4%	21.7%	5	3.8%	8.4%	\$476	2.0%	4.6%	8	13.6%	9.9%	\$706	6.6%	4.9%
	Moderate	41	21.6%	\$5,005	14.6%	16.9%	28	21.4%	18.0%	\$3,332	14.0%	12.9%	13	22.0%	17.4%	\$1,673	15.7%	11.8%
	Middle	50	26.3%	\$8,171	23.8%	21.4%	37	28.2%	23.9%	\$5,785	24.4%	21.1%	13	22.0%	22.9%	\$2,386	22.4%	19.3%
	Upper	82	43.2%	\$18,614	54.1%	40.0%	59	45.0%	38.6%	\$13,729	57.9%	47.7%	23	39.0%	39.0%	\$4,885	45.8%	46.4%
	Unknown	4	2.1%	\$1,415	4.1%	0.0%	2	1.5%	11.0%	\$395	1.7%	13.6%	2	3.4%	10.9%	\$1,020	9.6%	17.6%
	Total	190	100.0%	\$34,387	100.0%	100.0%	131	100.0%	100.0%	\$23,717	100.0%	100.0%	59	100.0%	100.0%	\$10,670	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	110	26.1%	\$13,844	15.5%	90.0%	57	28.5%	38.2%	\$8,277	18.3%	49.6%	53	24.0%	48.0%	\$5,567	12.6%	44.8%
	Over \$1 Million	203	48.2%	\$63,381	70.8%	6.6%	91	45.5%				112	50.7%					
	Total Rev. available	313	74.3%	\$77,225	86.3%	96.6%	148	74.0%				165	74.7%					
	Rev. Not Known	108	25.7%	\$12,239	13.7%	3.4%	52	26.0%				56	25.3%					
	Total	421	100.0%	\$89,464	100.0%	100.0%	200	100.0%				221	100.0%					
	\$100,000 or Less	217	51.5%	\$11,815	13.2%		98	49.0%	93.7%	\$5,751	12.7%	32.5%	119	53.8%	92.4%	\$6,064	13.7%	31.2%
	\$100,001 - \$250,000	97	23.0%	\$17,274	19.3%		50	25.0%	3.0%	\$8,778	19.4%	16.7%	47	21.3%	3.7%	\$8,496	19.2%	16.8%
	\$250,001 - \$1 Million	107	25.4%	\$60,375	67.5%		52	26.0%	3.3%	\$30,700	67.9%	50.8%	55	24.9%	3.9%	\$29,675	67.1%	51.9%
	Total	421	100.0%	\$89,464	100.0%		200	100.0%	100.0%	\$45,229	100.0%	100.0%	221	100.0%	100.0%	\$44,235	100.0%	100.0%
Small Farm	Total Farms																	
	\$1 Million or Less	2	100.0%	\$430	100.0%	98.8%	0	0.0%	31.8%	\$0	0.0%	58.9%	2	100.0%	24.3%	\$430	100.0%	40.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.2%	0	0.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	2	100.0%	\$430	100.0%	100.0%	0	0.0%				2	100.0%					
	\$100,000 or Less	1	50.0%	\$30	7.0%		0	0.0%	95.5%	\$0	0.0%	61.0%	1	50.0%	91.9%	\$30	7.0%	40.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.5%	\$0	0.0%	39.0%	0	0.0%	8.1%	\$0	0.0%	59.3%
	\$250,001 - \$500,000	1	50.0%	\$400	93.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	1	50.0%	0.0%	\$400	93.0%	0.0%
	Total	2	100.0%	\$430	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$430	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%					%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.3%	\$0	0.0%	1.3%
	Moderate	2	22.2%	\$216	15.2%	14.9%	2	22.2%	13.3%	\$216	15.2%	8.7%
	Middle	4	44.4%	\$508	35.7%	51.9%	4	44.4%	53.7%	\$508	35.7%	49.4%
	Upper	3	33.3%	\$699	49.1%	29.3%	3	33.3%	30.6%	\$699	49.1%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$1,423	100.0%	100.0%	9	100.0%	100.0%	\$1,423	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.3%	\$0	0.0%	1.7%
	Moderate	1	5.3%	\$92	1.6%	14.9%	1	5.3%	11.9%	\$92	1.6%	7.6%
	Middle	9	47.4%	\$2,710	48.2%	51.9%	9	47.4%	53.0%	\$2,710	48.2%	49.1%
	Upper	9	47.4%	\$2,826	50.2%	29.3%	9	47.4%	32.9%	\$2,826	50.2%	41.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	19	100.0%	\$5,628	100.0%	100.0%	19	100.0%	100.0%	\$5,628	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.3%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	9.2%	\$0	0.0%	3.9%
	Middle	0	0.0%	\$0	0.0%	51.9%	0	0.0%	54.6%	\$0	0.0%	50.2%
	Upper	0	0.0%	\$0	0.0%	29.3%	0	0.0%	33.8%	\$0	0.0%	45.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	20.0%	0	0.0%	13.9%	\$0	0.0%	32.7%
	Moderate	0	0.0%	\$0	0.0%	30.2%	0	0.0%	33.3%	\$0	0.0%	21.7%
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	36.1%	\$0	0.0%	29.9%
	Upper	0	0.0%	\$0	0.0%	13.1%	0	0.0%	16.7%	\$0	0.0%	15.7%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.3%	\$0	0.0%	5.3%
	Moderate	3	10.7%	\$308	4.4%	14.9%	3	10.7%	12.6%	\$308	4.4%	9.8%
	Middle	13	46.4%	\$3,218	45.6%	51.9%	13	46.4%	53.4%	\$3,218	45.6%	46.9%
	Upper	12	42.9%	\$3,525	50.0%	29.3%	12	42.9%	31.6%	\$3,525	50.0%	38.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$7,051	100.0%	100.0%	28	100.0%	100.0%	\$7,051	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	16	7.2%	\$5,279	10.5%	4.6%	16	7.2%	3.4%	\$5,279	10.5%	5.0%
	Moderate	20	9.0%	\$4,800	9.5%	11.9%	20	9.0%	11.0%	\$4,800	9.5%	9.6%
	Middle	113	51.1%	\$26,438	52.5%	50.1%	113	51.1%	50.4%	\$26,438	52.5%	55.0%
	Upper	72	32.6%	\$13,867	27.5%	32.4%	72	32.6%	33.9%	\$13,867	27.5%	29.5%
	Unknown	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.8%
Total	221	100.0%	\$50,384	100.0%	100.0%	221	100.0%	100.0%	\$50,384	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	100.0%	\$269	100.0%	76.1%	3	100.0%	73.1%	\$269	100.0%	74.1%
	Upper	0	0.0%	\$0	0.0%	22.4%	0	0.0%	26.9%	\$0	0.0%	25.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
Total	3	100.0%	\$269	100.0%	100.0%	3	100.0%	100.0%	\$269	100.0%	100.0%	

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%			
HOME PURCHASE	Low	5	55.6%	\$497	34.9%	21.7%	5	55.6%	10.3%	\$497	34.9%	4.8%	
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	20.0%	\$0	0.0%	14.4%	
	Middle	3	33.3%	\$542	38.1%	21.4%	3	33.3%	22.6%	\$542	38.1%	21.6%	
	Upper	1	11.1%	\$384	27.0%	40.0%	1	11.1%	32.4%	\$384	27.0%	44.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.7%	\$0	0.0%	14.4%	
	Total	9	100.0%	\$1,423	100.0%	100.0%	9	100.0%	100.0%	\$1,423	100.0%	100.0%	
REFINANCE	Low	1	5.3%	\$93	1.7%	21.7%	1	5.3%	9.8%	\$93	1.7%	5.7%	
	Moderate	4	21.1%	\$505	9.0%	16.9%	4	21.1%	16.6%	\$505	9.0%	11.9%	
	Middle	7	36.8%	\$1,248	22.2%	21.4%	7	36.8%	21.5%	\$1,248	22.2%	19.6%	
	Upper	6	31.6%	\$2,232	39.7%	40.0%	6	31.6%	37.5%	\$2,232	39.7%	47.2%	
	Unknown	1	5.3%	\$1,550	27.5%	0.0%	1	5.3%	14.5%	\$1,550	27.5%	15.7%	
	Total	19	100.0%	\$5,628	100.0%	100.0%	19	100.0%	100.0%	\$5,628	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	7.8%	\$0	0.0%	3.7%	
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	19.7%	\$0	0.0%	13.5%	
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	25.7%	\$0	0.0%	25.3%	
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	41.0%	\$0	0.0%	49.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.8%	\$0	0.0%	8.1%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	21.4%	\$590	8.4%	21.7%	6	21.4%	10.0%	\$590	8.4%	4.5%	
	Moderate	4	14.3%	\$505	7.2%	16.9%	4	14.3%	18.5%	\$505	7.2%	11.7%	
	Middle	10	35.7%	\$1,790	25.4%	21.4%	10	35.7%	22.2%	\$1,790	25.4%	18.3%	
	Upper	7	25.0%	\$2,616	37.1%	40.0%	7	25.0%	34.7%	\$2,616	37.1%	40.3%	
	Unknown	1	3.6%	\$1,550	22.0%	0.0%	1	3.6%	14.6%	\$1,550	22.0%	25.3%	
	Total	28	100.0%	\$7,051	100.0%	100.0%	28	100.0%	100.0%	\$7,051	100.0%	100.0%	
Small Business	Total Businesses												
	Revenue	\$1 Million or Less	56	25.3%	\$7,324	14.5%	89.4%	56	25.3%	43.4%	\$7,324	14.5%	40.3%
		Over \$1 Million	112	50.7%	\$34,553	68.6%	7.3%	112	50.7%				
		Total Rev. available	168	76.0%	\$41,877	83.1%	96.7%	168	76.0%				
		Rev. Not Known	53	24.0%	\$8,507	16.9%	3.3%	53	24.0%				
		Total	221	100.0%	\$50,384	100.0%	100.0%	221	100.0%				
	Loan Size	\$100,000 or Less	112	50.7%	\$6,015	11.9%		112	50.7%	93.1%	\$6,015	11.9%	32.0%
		\$100,001 - \$250,000	47	21.3%	\$8,530	16.9%		47	21.3%	3.2%	\$8,530	16.9%	15.1%
		\$250,001 - \$1 Million	62	28.1%	\$35,839	71.1%		62	28.1%	3.7%	\$35,839	71.1%	53.0%
		Total	221	100.0%	\$50,384	100.0%		221	100.0%	100.0%	\$50,384	100.0%	100.0%
Small Farm	Total Farms												
	Revenue	\$1 Million or Less	2	66.7%	\$239	88.8%	98.7%	2	66.7%	34.6%	\$239	88.8%	82.2%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.3%	0	0.0%				
		Not Known	1	33.3%	\$30	11.2%	0.0%	1	33.3%				
		Total	3	100.0%	\$269	100.0%	100.0%	3	100.0%				
	Loan Size	\$100,000 or Less	2	66.7%	\$47	17.5%		2	66.7%	90.4%	\$47	17.5%	39.1%
		\$100,001 - \$250,000	1	33.3%	\$222	82.5%		1	33.3%	7.7%	\$222	82.5%	42.8%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	18.1%
		Total	3	100.0%	\$269	100.0%		3	100.0%	100.0%	\$269	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

MI - Ann Arbor MSA 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	6	9.0%	346	5.3%
Moderate	4	6.0%	290	4.4%	10	14.9%	779	11.9%
<i>Low/Moderate Total</i>	<i>4</i>	<i>6.0%</i>	<i>290</i>	<i>4.4%</i>	<i>16</i>	<i>23.9%</i>	<i>1,125</i>	<i>17.1%</i>
Middle	33	49.3%	2,650	40.4%	17	25.4%	1,588	24.2%
Upper	30	44.8%	3,620	55.2%	34	50.7%	3,847	58.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>67</i>	<i>100.0%</i>	<i>6,560</i>	<i>100.0%</i>	<i>67</i>	<i>100.0%</i>	<i>6,560</i>	<i>100.0%</i>

MI - Ann Arbor MSA 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	3	1.6%	286	1.3%	17	9.3%	1,077	5.1%
Moderate	7	3.8%	379	1.8%	37	20.3%	3,107	14.6%
<i>Low/Moderate Total</i>	<i>10</i>	<i>5.5%</i>	<i>665</i>	<i>3.1%</i>	<i>54</i>	<i>29.7%</i>	<i>4,184</i>	<i>19.7%</i>
Middle	77	42.3%	6,028	28.3%	44	24.2%	4,132	19.4%
Upper	95	52.2%	14,570	68.5%	83	45.6%	12,887	60.6%
Unknown	0	0.0%	0	0.0%	1	0.5%	60	0.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>182</i>	<i>100.0%</i>	<i>21,263</i>	<i>100.0%</i>	<i>182</i>	<i>100.0%</i>	<i>21,263</i>	<i>100.0%</i>

MI - Ann Arbor MSA 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	24	11.1%	1,545	5.4%
Moderate	10	4.6%	1,105	3.9%	30	13.9%	3,493	12.2%
<i>Low/Moderate Total</i>	<i>10</i>	<i>4.6%</i>	<i>1,105</i>	<i>3.9%</i>	<i>54</i>	<i>25.0%</i>	<i>5,038</i>	<i>17.6%</i>
Middle	103	47.7%	10,186	35.5%	53	24.5%	6,022	21.0%
Upper	103	47.7%	17,387	60.6%	107	49.5%	17,033	59.4%
Unknown	0	0.0%	0	0.0%	2	0.9%	585	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>216</i>	<i>100.0%</i>	<i>28,678</i>	<i>100.0%</i>	<i>216</i>	<i>100.0%</i>	<i>28,678</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.2%	\$0	0.0%	0.6%	0	0.0%	1.3%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	22.4%	0	0.0%	17.2%	\$0	0.0%	9.8%	0	0.0%	18.2%	\$0	0.0%	11.0%
	Middle	1	14.3%	\$160	21.2%	38.9%	0	0.0%	37.0%	\$0	0.0%	35.9%	1	25.0%	37.6%	\$160	32.1%	34.7%
	Upper	6	85.7%	\$596	78.8%	33.7%	3	100.0%	44.6%	\$258	100.0%	53.6%	3	75.0%	43.0%	\$338	67.9%	53.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$756	100.0%	100.0%	3	100.0%	100.0%	\$258	100.0%	100.0%	4	100.0%	100.0%	\$498	100.0%	100.0%
	REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	2.2%	\$0	0.0%
Moderate		5	11.6%	\$292	4.3%	22.4%	2	6.1%	11.3%	\$152	2.7%	8.3%	3	30.0%	14.4%	\$140	12.0%	9.3%
Middle		13	30.2%	\$1,616	23.9%	38.9%	10	30.3%	40.1%	\$1,208	21.6%	38.6%	3	30.0%	39.3%	\$408	35.1%	38.6%
Upper		25	58.1%	\$4,855	71.8%	33.7%	21	63.6%	47.5%	\$4,239	75.7%	52.5%	4	40.0%	44.2%	\$616	52.9%	50.7%
Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total		43	100.0%	\$6,763	100.0%	100.0%	33	100.0%	100.0%	\$5,599	100.0%	100.0%	10	100.0%	100.0%	\$1,164	100.0%	100.0%
HOME IMPROVEMENT		Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	3.0%	\$0	0.0%	1.1%	0	0.0%	2.7%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.4%	0	0.0%	25.4%	\$0	0.0%	11.2%	0	0.0%	18.4%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	42.2%	\$0	0.0%	50.2%	0	0.0%	42.0%	\$0	0.0%	40.3%
	Upper	0	0.0%	\$0	0.0%	33.7%	0	0.0%	29.5%	\$0	0.0%	37.5%	0	0.0%	36.9%	\$0	0.0%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	MULTI-FAMILY	Multi-Family Units																
Low		0	0.0%	\$0	0.0%	9.7%	0	0.0%	16.7%	\$0	0.0%	3.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate		0	0.0%	\$0	0.0%	30.5%	0	0.0%	50.0%	\$0	0.0%	47.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
Middle		1	100.0%	\$532	100.0%	42.9%	1	100.0%	33.3%	\$532	100.0%	48.7%	0	0.0%	20.0%	\$0	0.0%	1.4%
Upper		0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	80.0%	\$0	0.0%	98.6%
Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total		1	100.0%	\$532	100.0%	100.0%	1	100.0%	100.0%	\$532	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.3%	\$0	0.0%	0.7%	0	0.0%	1.9%	\$0	0.0%	1.1%
	Moderate	5	9.8%	\$292	3.6%	22.4%	2	5.4%	14.0%	\$152	2.4%	10.2%	3	21.4%	15.9%	\$140	8.4%	9.8%
	Middle	15	29.4%	\$2,308	28.7%	38.9%	11	29.7%	39.3%	\$1,740	27.2%	38.4%	4	28.6%	38.9%	\$568	34.2%	36.6%
	Upper	31	60.8%	\$5,451	67.7%	33.7%	24	64.9%	45.4%	\$4,497	70.4%	50.7%	7	50.0%	43.3%	\$954	57.4%	52.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	51	100.0%	\$8,051	100.0%	100.0%	37	100.0%	100.0%	\$6,389	100.0%	100.0%	14	100.0%	100.0%	\$1,662	100.0%	100.0%
	SMALL BUSINESSES	Small Businesses																
Low		19	8.1%	\$3,266	6.7%	7.4%	11	9.5%	8.3%	\$1,868	8.2%	16.8%	8	6.7%	11.2%	\$1,398	5.3%	16.5%
Moderate		97	41.3%	\$22,353	45.5%	21.3%	46	39.7%	20.6%	\$11,047	48.4%	24.9%	51	42.9%	23.4%	\$11,306	43.1%	27.9%
Middle		63	26.8%	\$15,275	31.1%	39.5%	33	28.4%	35.6%	\$6,633	29.0%	36.1%	30	25.2%	35.2%	\$8,642	32.9%	35.8%
Upper		56	23.8%	\$8,182	16.7%	31.8%	26	22.4%	30.8%	\$3,293	14.4%	21.1%	30	25.2%	28.4%	\$4,889	18.6%	19.5%
Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown		0	0.0%	\$0	0.0%		0	0.0%	4.7%	\$0	0.0%	1.1%	0	0.0%	1.8%	\$0	0.0%	0.3%
Total		235	100.0%	\$49,076	100.0%	100.0%	116	100.0%	100.0%	\$22,841	100.0%	100.0%	119	100.0%	100.0%	\$26,235	100.0%	100.0%
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	1.9%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.0%	0	0.0%	3.8%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	61.3%	0	0.0%	56.6%	\$0	0.0%	60.8%	0	0.0%	80.6%	\$0	0.0%	78.5%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	35.8%	\$0	0.0%	37.5%	0	0.0%	19.4%	\$0	0.0%	21.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
		Bank Count # % \$ (000s) \$ % %					2012					2013						
							Count		Dollar			Count		Dollar				
		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
HOME PURCHASE	Low	2	28.6%	\$94	12.4%	21.0%	1	33.3%	5.5%	\$59	22.9%	2.5%	1	25.0%	9.9%	\$35	7.0%	5.0%
	Moderate	1	14.3%	\$64	8.5%	18.1%	1	33.3%	19.0%	\$64	24.8%	13.0%	0	0.0%	21.8%	\$0	0.0%	15.6%
	Middle	1	14.3%	\$135	17.9%	20.5%	1	33.3%	23.4%	\$135	52.3%	22.0%	0	0.0%	22.1%	\$0	0.0%	20.8%
	Upper	3	42.9%	\$463	61.2%	40.4%	0	0.0%	34.8%	\$0	0.0%	48.7%	3	75.0%	30.9%	\$463	93.0%	45.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.2%	\$0	0.0%	13.8%	0	0.0%	15.4%	\$0	0.0%	13.7%
	Total	7	100.0%	\$756	100.0%	100.0%	3	100.0%	100.0%	\$258	100.0%	100.0%	4	100.0%	100.0%	\$498	100.0%	100.0%
REFINANCE	Low	2	4.7%	\$82	1.2%	21.0%	0	0.0%	4.5%	\$0	0.0%	2.6%	2	20.0%	6.2%	\$82	7.0%	3.7%
	Moderate	2	4.7%	\$147	2.2%	18.1%	1	3.0%	11.3%	\$66	1.2%	6.9%	1	10.0%	16.0%	\$81	7.0%	11.5%
	Middle	8	18.6%	\$727	10.7%	20.5%	6	18.2%	18.1%	\$565	10.1%	15.1%	2	20.0%	19.3%	\$162	13.9%	16.5%
	Upper	31	72.1%	\$5,807	85.9%	40.4%	26	78.8%	48.7%	\$4,968	88.7%	56.2%	5	50.0%	42.8%	\$839	72.1%	51.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.4%	\$0	0.0%	19.2%	0	0.0%	15.7%	\$0	0.0%	16.9%
	Total	43	100.0%	\$6,763	100.0%	100.0%	33	100.0%	100.0%	\$5,599	100.0%	100.0%	10	100.0%	100.0%	\$1,164	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	11.2%	\$0	0.0%	5.9%	0	0.0%	12.9%	\$0	0.0%	5.2%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	23.1%	\$0	0.0%	11.5%	0	0.0%	19.6%	\$0	0.0%	12.9%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	25.4%	\$0	0.0%	21.3%	0	0.0%	26.3%	\$0	0.0%	22.4%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	38.1%	\$0	0.0%	58.4%	0	0.0%	40.4%	\$0	0.0%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	2.8%	0	0.0%	0.8%	\$0	0.0%	0.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$532	100.0%	0.0%	1	100.0%	100.0%	\$532	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	1	100.0%	\$532	100.0%	100.0%	1	100.0%	100.0%	\$532	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	7.8%	\$176	2.2%	21.0%	1	2.7%	5.2%	\$59	0.9%	2.6%	3	21.4%	7.8%	\$117	7.0%	4.1%
	Moderate	3	5.9%	\$211	2.6%	18.1%	2	5.4%	14.3%	\$130	2.0%	8.3%	1	7.1%	18.2%	\$81	4.9%	12.7%
	Middle	9	17.6%	\$862	10.7%	20.5%	7	18.9%	20.1%	\$700	11.0%	16.5%	2	14.3%	20.7%	\$162	9.7%	17.8%
	Upper	34	66.7%	\$6,270	77.9%	40.4%	26	70.3%	43.8%	\$4,968	77.8%	52.2%	8	57.1%	38.6%	\$1,302	78.3%	48.4%
	Unknown	1	2.0%	\$532	6.6%	0.0%	1	2.7%	16.5%	\$532	8.3%	20.4%	0	0.0%	14.7%	\$0	0.0%	17.0%
	Total	51	100.0%	\$8,051	100.0%	100.0%	37	100.0%	100.0%	\$6,389	100.0%	100.0%	14	100.0%	100.0%	\$1,662	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	63	26.8%	\$9,571	19.5%	90.4%	22	19.0%	25.8%	\$3,448	15.1%	29.3%	41	34.5%	34.9%	\$6,123	23.3%	33.1%
	Over \$1 Million	114	48.5%	\$34,733	70.8%	6.3%	55	47.4%					59	49.6%				
	Total Rev. available	177	75.3%	\$44,304	90.3%	96.7%	77	66.4%					100	84.1%				
	Rev. Not Known	58	24.7%	\$4,772	9.7%	3.3%	39	33.6%					19	16.0%				
	Total	235	100.0%	\$49,076	100.0%	100.0%	116	100.0%					119	100.0%				
Small Farm	Total Farms																	
	\$100,000 or Less	130	55.3%	\$7,951	16.2%		69	59.5%	92.2%	\$4,450	19.5%	29.6%	61	51.3%	87.5%	\$3,501	13.3%	21.5%
	\$100,001 - \$250,000	48	20.4%	\$8,518	17.4%		24	20.7%	4.2%	\$4,416	19.3%	19.4%	24	20.2%	6.9%	\$4,102	15.6%	23.1%
	\$250,001 - \$1 Million	57	24.3%	\$32,607	66.4%		23	19.8%	3.7%	\$13,975	61.2%	50.9%	34	28.6%	5.6%	\$18,632	71.0%	55.4%
	Total	235	100.0%	\$49,076	100.0%		116	100.0%	100.0%	\$22,841	100.0%	100.0%	119	100.0%	100.0%	\$26,235	100.0%	100.0%
Small Farm	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.3%	0	0.0%	34.0%	\$0	0.0%	71.9%	0	0.0%	55.6%	\$0	0.0%	63.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.4%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.3%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm	Total Farms																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	79.2%	\$0	0.0%	22.2%	0	0.0%	80.6%	\$0	0.0%	25.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	13.2%	\$0	0.0%	44.2%	0	0.0%	11.1%	\$0	0.0%	34.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.5%	\$0	0.0%	33.6%	0	0.0%	8.3%	\$0	0.0%	40.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner		Occupied Units	Count		Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	0.8%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	22.4%	0	0.0%	16.9%	\$0	0.0%	9.7%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	34.4%	\$0	0.0%	34.7%
	Upper	1	100.0%	\$304	100.0%	33.7%	1	100.0%	47.8%	\$304	100.0%	55.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$304	100.0%	100.0%	1	100.0%	100.0%	\$304	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	3.1%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	22.4%	0	0.0%	15.5%	\$0	0.0%	10.3%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	41.3%	\$0	0.0%	39.7%
	Upper	2	100.0%	\$295	100.0%	33.7%	2	100.0%	40.1%	\$295	100.0%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$295	100.0%	100.0%	2	100.0%	100.0%	\$295	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.9%	\$0	0.0%	1.6%
	Moderate	2	100.0%	\$8	100.0%	22.4%	2	100.0%	21.0%	\$8	100.0%	14.7%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	37.3%	\$0	0.0%	29.6%
	Upper	0	0.0%	\$0	0.0%	33.7%	0	0.0%	38.8%	\$0	0.0%	54.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$8	100.0%	100.0%	2	100.0%	100.0%	\$8	100.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	9.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	30.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	42.9%	0	0.0%	83.3%	\$0	0.0%	99.4%
	Upper	0	0.0%	\$0	0.0%	16.9%	0	0.0%	16.7%	\$0	0.0%	0.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.9%	\$0	0.0%	0.8%
	Moderate	2	40.0%	\$8	1.3%	22.4%	2	40.0%	16.7%	\$8	1.3%	9.8%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	37.6%	\$0	0.0%	38.4%
	Upper	3	60.0%	\$599	98.7%	33.7%	3	60.0%	43.7%	\$599	98.7%	51.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$607	100.0%	100.0%	5	100.0%	100.0%	\$607	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	8	7.0%	\$959	3.8%	7.4%	8	7.0%	10.1%	\$959	3.8%	18.6%
	Moderate	52	45.6%	\$14,058	55.2%	22.0%	52	45.6%	24.7%	\$14,058	55.2%	24.8%
	Middle	25	21.9%	\$6,352	24.9%	39.3%	25	21.9%	32.2%	\$6,352	24.9%	29.9%
	Upper	29	25.4%	\$4,117	16.2%	31.2%	29	25.4%	31.4%	\$4,117	16.2%	26.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	0.4%
	Total	114	100.0%	\$25,486	100.0%	100.0%	114	100.0%	100.0%	\$25,486	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$395	100.0%	61.8%	1	100.0%	75.0%	\$395	100.0%	68.0%
	Upper	0	0.0%	\$0	0.0%	29.6%	0	0.0%	25.0%	\$0	0.0%	32.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$395	100.0%	100.0%	1	100.0%	100.0%	\$395	100.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank			Families by Family Income %		Count			Dollar		
		Count	%	Dollar			Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	6.8%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	21.0%	\$0	0.0%	14.6%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	24.3%	\$0	0.0%	22.4%
	Upper	1	100.0%	\$304	100.0%	40.4%	1	100.0%	34.3%	\$304	100.0%	46.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.7%	\$0	0.0%	13.0%
	Total	1	100.0%	\$304	100.0%	100.0%	1	100.0%	100.0%	\$304	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	7.0%	\$0	0.0%	3.6%
	Moderate	1	50.0%	\$57	19.3%	18.1%	1	50.0%	16.0%	\$57	19.3%	10.9%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	19.6%	\$0	0.0%	16.5%
	Upper	1	50.0%	\$238	80.7%	40.4%	1	50.0%	40.6%	\$238	80.7%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.8%	\$0	0.0%	19.6%
	Total	2	100.0%	\$295	100.0%	100.0%	2	100.0%	100.0%	\$295	100.0%	100.0%
HOME IMPROVEMENT	Low	1	50.0%	\$3	37.5%	21.0%	1	50.0%	11.2%	\$3	37.5%	6.4%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	17.0%	\$0	0.0%	11.8%
	Middle	1	50.0%	\$5	62.5%	20.5%	1	50.0%	30.1%	\$5	62.5%	31.3%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	38.4%	\$0	0.0%	43.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	6.8%
	Total	2	100.0%	\$8	100.0%	100.0%	2	100.0%	100.0%	\$8	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	20.0%	\$3	0.5%	21.0%	1	20.0%	7.3%	\$3	0.5%	3.5%
	Moderate	1	20.0%	\$57	9.4%	18.1%	1	20.0%	18.5%	\$57	9.4%	12.7%
	Middle	1	20.0%	\$5	0.8%	20.5%	1	20.0%	22.9%	\$5	0.8%	19.7%
	Upper	2	40.0%	\$542	89.3%	40.4%	2	40.0%	37.2%	\$542	89.3%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.1%	\$0	0.0%	18.0%
	Total	5	100.0%	\$607	100.0%	100.0%	5	100.0%	100.0%	\$607	100.0%	100.0%
Small Business	Total Businesses											
	Revenue											
	\$1 Million or Less	41	36.0%	\$5,720	22.4%	89.4%	41	36.0%	33.2%	\$5,720	22.4%	29.9%
	Over \$1 Million	56	49.1%	\$18,013	70.7%	7.1%	56	49.1%				
	Total Rev. available	97	85.1%	\$23,733	93.1%	96.5%	97	85.1%				
	Rev. Not Known	17	14.9%	\$1,753	6.9%	3.5%	17	14.9%				
	Total	114	100.0%	\$25,486	100.0%	100.0%	114	100.0%				
	Loan Size											
	\$100,000 or Less	64	56.1%	\$3,905	15.3%		64	56.1%	90.5%	\$3,905	15.3%	29.6%
	\$100,001 - \$250,000	24	21.1%	\$4,531	17.8%		24	21.1%	5.3%	\$4,531	17.8%	20.8%
	\$250,001 - \$1 Million	26	22.8%	\$17,050	66.9%		26	22.8%	4.2%	\$17,050	66.9%	49.6%
	Total	114	100.0%	\$25,486	100.0%		114	100.0%	100.0%	\$25,486	100.0%	100.0%
Small Farm	Total Farms											
	Revenue											
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.4%	0	0.0%	39.3%	\$0	0.0%	70.3%
	Over \$1 Million	1	100.0%	\$395	100.0%	1.6%	1	100.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	1	100.0%	\$395	100.0%	100.0%	1	100.0%				
	Loan Size											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	71.4%	\$0	0.0%	21.8%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	21.4%	\$0	0.0%	51.2%
	\$250,001 - \$500,000	1	100.0%	\$395	100.0%		1	100.0%	7.1%	\$395	100.0%	27.0%
	Total	1	100.0%	\$395	100.0%		1	100.0%	100.0%	\$395	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

MI - Battle Creek MSA 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	3	20.0%	100	9.9%
Moderate	4	26.7%	165	16.4%	4	26.7%	153	15.2%
<i>Low/Moderate Total</i>	<i>4</i>	<i>26.7%</i>	<i>165</i>	<i>16.4%</i>	<i>7</i>	<i>46.7%</i>	<i>253</i>	<i>25.1%</i>
Middle	5	33.3%	552	54.7%	3	20.0%	164	16.3%
Upper	6	40.0%	292	28.9%	5	33.3%	592	58.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>1,009</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>1,009</i>	<i>100.0%</i>

MI - Battle Creek MSA 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	7	15.9%	203	7.4%
Moderate	11	25.0%	412	15.0%	4	9.1%	164	6.0%
<i>Low/Moderate Total</i>	<i>11</i>	<i>25.0%</i>	<i>412</i>	<i>15.0%</i>	<i>11</i>	<i>25.0%</i>	<i>367</i>	<i>13.3%</i>
Middle	14	31.8%	649	23.6%	16	36.4%	925	33.6%
Upper	19	43.2%	1,693	61.5%	17	38.6%	1,462	53.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>44</i>	<i>100.0%</i>	<i>2,754</i>	<i>100.0%</i>	<i>44</i>	<i>100.0%</i>	<i>2,754</i>	<i>100.0%</i>

MI - Battle Creek MSA 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	3.9%	115	4.0%	7	13.7%	376	13.2%
Moderate	8	15.7%	205	7.2%	12	23.5%	472	16.6%
<i>Low/Moderate Total</i>	<i>10</i>	<i>19.6%</i>	<i>320</i>	<i>11.2%</i>	<i>19</i>	<i>37.3%</i>	<i>848</i>	<i>29.7%</i>
Middle	16	31.4%	953	33.4%	11	21.6%	523	18.3%
Upper	25	49.0%	1,578	55.3%	21	41.2%	1,480	51.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>2,851</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>2,851</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Flint (Genesee)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count			Dollar		Count			Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	41.0%	\$0	0.0%	30.2%	0	0.0%	32.0%	\$0	0.0%	27.3%
	Upper	1	100.0%	\$244	100.0%	65.2%	1	100.0%	59.0%	\$244	100.0%	69.8%	0	0.0%	68.0%	\$0	0.0%	72.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$244	100.0%	100.0%	1	100.0%	100.0%	\$244	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	25.0%	\$141	9.2%	34.8%	1	25.0%	32.2%	\$93	8.1%	25.9%	1	25.0%	30.2%	\$48	12.3%	16.8%
	Upper	6	75.0%	\$1,395	90.8%	65.2%	3	75.0%	67.8%	\$1,052	91.9%	74.1%	3	75.0%	69.8%	\$343	87.7%	83.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$1,536	100.0%	100.0%	4	100.0%	100.0%	\$1,145	100.0%	100.0%	4	100.0%	100.0%	\$391	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	42.9%	\$0	0.0%	22.4%	0	0.0%	33.3%	\$0	0.0%	23.9%
	Upper	0	0.0%	\$0	0.0%	65.2%	0	0.0%	57.1%	\$0	0.0%	77.6%	0	0.0%	66.7%	\$0	0.0%	76.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	48.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	11.1%
	Upper	0	0.0%	\$0	0.0%	52.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	83.3%	\$0	0.0%	88.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	22.2%	\$141	7.9%	34.8%	1	20.0%	35.1%	\$93	6.7%	26.7%	1	25.0%	30.9%	\$48	12.3%	20.2%
	Upper	7	77.8%	\$1,639	92.1%	65.2%	4	80.0%	64.9%	\$1,296	93.3%	73.3%	3	75.0%	69.1%	\$343	87.7%	79.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$1,780	100.0%	100.0%	5	100.0%	100.0%	\$1,389	100.0%	100.0%	4	100.0%	100.0%	\$391	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	8	47.1%	\$1,607	29.2%	41.1%	3	50.0%	50.2%	\$665	31.4%	57.7%	5	45.5%	42.2%	\$942	27.8%	44.9%
	Upper	9	52.9%	\$3,900	70.8%	58.9%	3	50.0%	49.8%	\$1,450	68.6%	42.3%	6	54.5%	57.8%	\$2,450	72.2%	55.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	17	100.0%	\$5,507	100.0%	100.0%	6	100.0%	100.0%	\$2,115	100.0%	100.0%	11	100.0%	100.0%	\$3,392	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	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%	54.8%	0	0.0%	33.3%	\$0	0.0%	41.2%	0	0.0%	66.7%	\$0	0.0%	33.3%
	Upper	0	0.0%	\$0	0.0%	45.2%	0	0.0%	66.7%	\$0	0.0%	58.8%	0	0.0%	33.3%	\$0	0.0%	66.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Flint (Genesee)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison												
							2012					2013							
		Bank				Families by Family Income	Count			Dollar		Count			Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	8.8%	\$0	0.0%	4.2%	0	0.0%	3.6%	\$0	0.0%	1.7%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	23.3%	\$0	0.0%	16.5%	0	0.0%	13.5%	\$0	0.0%	8.5%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	24.2%	\$0	0.0%	22.0%	0	0.0%	24.0%	\$0	0.0%	19.6%	
	Upper	1	100.0%	\$244	100.0%	54.9%	1	100.0%	33.1%	\$244	100.0%	46.6%	0	0.0%	46.8%	\$0	0.0%	59.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.6%	\$0	0.0%	10.7%	0	0.0%	12.0%	\$0	0.0%	11.1%	
	Total	1	100.0%	\$244	100.0%	100.0%	1	100.0%	100.0%	\$244	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	4.1%	\$0	0.0%	2.6%	0	0.0%	3.6%	\$0	0.0%	1.5%	
	Moderate	1	12.5%	\$73	4.8%	13.6%	1	25.0%	10.3%	\$73	6.4%	7.1%	0	0.0%	9.9%	\$0	0.0%	4.6%	
	Middle	2	25.0%	\$169	11.0%	22.4%	0	0.0%	21.0%	\$0	0.0%	17.7%	2	50.0%	18.8%	\$169	43.2%	10.1%	
	Upper	5	62.5%	\$1,294	84.2%	54.9%	3	75.0%	49.8%	\$1,072	93.6%	57.2%	2	50.0%	54.1%	\$222	56.8%	44.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.8%	\$0	0.0%	15.4%	0	0.0%	13.6%	\$0	0.0%	39.1%	
	Total	8	100.0%	\$1,536	100.0%	100.0%	4	100.0%	100.0%	\$1,145	100.0%	100.0%	4	100.0%	100.0%	\$391	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	8.2%	\$0	0.0%	4.4%	0	0.0%	1.8%	\$0	0.0%	1.0%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	18.4%	\$0	0.0%	13.9%	0	0.0%	15.8%	\$0	0.0%	9.9%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	26.5%	\$0	0.0%	27.8%	0	0.0%	14.0%	\$0	0.0%	1.6%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	46.9%	\$0	0.0%	53.9%	0	0.0%	63.2%	\$0	0.0%	76.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	10.8%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	5.6%	\$0	0.0%	3.0%	0	0.0%	3.6%	\$0	0.0%	1.6%	
	Moderate	1	11.1%	\$73	4.1%	13.6%	1	20.0%	14.4%	\$73	5.3%	9.6%	0	0.0%	11.4%	\$0	0.0%	5.9%	
	Middle	2	22.2%	\$169	9.5%	22.4%	0	0.0%	22.1%	\$0	0.0%	18.6%	2	50.0%	20.7%	\$169	43.2%	13.0%	
	Upper	6	66.7%	\$1,538	86.4%	54.9%	4	80.0%	44.6%	\$1,316	94.7%	53.3%	2	50.0%	51.3%	\$222	56.8%	49.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.3%	\$0	0.0%	15.5%	0	0.0%	13.0%	\$0	0.0%	30.4%	
	Total	9	100.0%	\$1,780	100.0%	100.0%	5	100.0%	100.0%	\$1,389	100.0%	100.0%	4	100.0%	100.0%	\$391	100.0%	100.0%	
Small Business	Revenue	Total Businesses																	
		\$1 Million or Less	4	23.5%	\$727	13.2%	92.5%	3	50.0%	36.9%	\$715	33.8%	42.6%	1	9.1%	39.9%	\$12	0.4%	30.3%
		Over \$1 Million	10	58.8%	\$4,280	77.7%	5.0%	2	33.3%				8	72.7%					
		Total Rev. available	14	82.3%	\$5,007	90.9%	97.5%	5	83.3%				9	81.8%					
		Rev. Not Known	3	17.6%	\$500	9.1%	2.5%	1	16.7%				2	18.2%					
	Total	17	100.0%	\$5,507	100.0%	100.0%	6	100.0%				11	100.0%						
	Loan Size	\$100,000 or Less	5	29.4%	\$262	4.8%		1	16.7%	91.5%	\$100	4.7%	24.2%	4	36.4%	92.8%	\$162	4.8%	29.0%
		\$100,001 - \$250,000	6	35.3%	\$1,300	23.6%		3	50.0%	4.7%	\$650	30.7%	21.8%	3	27.3%	2.8%	\$650	19.2%	12.6%
		\$250,001 - \$1 Million	6	35.3%	\$3,945	71.6%		2	33.3%	3.8%	\$1,365	64.5%	54.0%	4	36.4%	4.4%	\$2,580	76.1%	58.4%
		Total	17	100.0%	\$5,507	100.0%		6	100.0%	100.0%	\$2,115	100.0%	100.0%	11	100.0%	100.0%	\$3,392	100.0%	100.0%
Small Farm		Revenue	Total Farms																
	\$1 Million or Less		0	0.0%	\$0	0.0%	100.0%	0	0.0%	66.7%	\$0	0.0%	41.2%	0	0.0%	33.3%	\$0	0.0%	19.4%
	Over \$1 Million		0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%						
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Flint (Genesee)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner		Occupied Units	Count		Dollar			Agg
		Count	Dollar	Dollar	%		Bank	Agg	Bank	Agg	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	33.2%	\$0	0.0%	26.7%
	Upper	2	100.0%	\$190	100.0%	65.2%	2	100.0%	66.8%	\$190	100.0%	73.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$190	100.0%	100.0%	2	100.0%	100.0%	\$190	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	31.6%	\$0	0.0%	25.5%
	Upper	0	0.0%	\$0	0.0%	65.2%	0	0.0%	68.4%	\$0	0.0%	74.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	34.7%	\$0	0.0%	23.8%
	Upper	0	0.0%	\$0	0.0%	65.2%	0	0.0%	65.3%	\$0	0.0%	76.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	48.0%	0	0.0%	40.0%	\$0	0.0%	65.9%
	Upper	0	0.0%	\$0	0.0%	52.0%	0	0.0%	60.0%	\$0	0.0%	34.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	32.7%	\$0	0.0%	29.5%
	Upper	2	100.0%	\$190	100.0%	65.2%	2	100.0%	67.3%	\$190	100.0%	70.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$190	100.0%	100.0%	2	100.0%	100.0%	\$190	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	5	45.5%	\$687	22.3%	41.5%	5	45.5%	41.5%	\$687	22.3%	43.0%
	Upper	6	54.5%	\$2,400	77.7%	58.5%	6	54.5%	58.5%	\$2,400	77.7%	57.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$3,087	100.0%	100.0%	11	100.0%	100.0%	\$3,087	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	56.4%	0	0.0%	16.7%	\$0	0.0%	24.3%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	83.3%	\$0	0.0%	75.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Flint (Genesee)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count		Dollar				
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	1.9%	\$0	0.0%	1.0%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	15.0%	\$0	0.0%	9.3%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	20.2%	\$0	0.0%	16.6%	
	Upper	2	100.0%	\$190	100.0%	54.9%	2	100.0%	44.6%	\$190	100.0%	56.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.4%	\$0	0.0%	16.7%	
	Total	2	100.0%	\$190	100.0%	100.0%	2	100.0%	100.0%	\$190	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	3.4%	\$0	0.0%	2.1%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	12.1%	\$0	0.0%	8.1%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	19.5%	\$0	0.0%	14.2%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	52.9%	\$0	0.0%	63.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.2%	\$0	0.0%	12.5%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	2.8%	\$0	0.0%	0.4%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	9.7%	\$0	0.0%	13.1%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	13.9%	\$0	0.0%	4.4%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	66.7%	\$0	0.0%	80.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	1.6%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	2.5%	\$0	0.0%	1.3%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	13.6%	\$0	0.0%	8.2%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	19.6%	\$0	0.0%	14.3%	
	Upper	2	100.0%	\$190	100.0%	54.9%	2	100.0%	48.5%	\$190	100.0%	54.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.8%	\$0	0.0%	22.0%	
	Total	2	100.0%	\$190	100.0%	100.0%	2	100.0%	100.0%	\$190	100.0%	100.0%	
Small Business	Revenue	Total Businesses											
		\$1 Million or Less	3	27.3%	\$237	7.7%	91.8%	3	27.3%	38.3%	\$237	7.7%	31.9%
		Over \$1 Million	7	63.6%	\$2,550	82.6%	5.7%	7	63.6%				
		Total Rev. available	10	90.9%	\$2,787	90.3%	97.5%	10	90.9%				
		Rev. Not Known	1	9.1%	\$300	9.7%	2.5%	1	9.1%				
	Total	11	100.0%	\$3,087	100.0%	100.0%	11	100.0%					
	Loan Size	\$100,000 or Less	3	27.3%	\$162	5.2%		3	27.3%	93.8%	\$162	5.2%	37.2%
		\$100,001 - \$250,000	4	36.4%	\$775	25.1%		4	36.4%	3.8%	\$775	25.1%	22.6%
		\$250,001 - \$1 Million	4	36.4%	\$2,150	69.6%		4	36.4%	2.4%	\$2,150	69.6%	40.2%
		Total	11	100.0%	\$3,087	100.0%		11	100.0%	100.0%	\$3,087	100.0%	100.0%
Small Farm	Revenue	Total Farms											
		\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	16.7%	\$0	0.0%	10.0%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

MI - Flint (Genesee) 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	8	11.8%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>50.0%</i>	<i>8</i>	<i>11.8%</i>
Middle	0	0.0%	0	0.0%	1	50.0%	60	88.2%
Upper	2	100.0%	68	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>68</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>68</i>	<i>100.0%</i>

MI - Flint (Genesee) 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	20.0%	31	9.2%
Moderate	0	0.0%	0	0.0%	1	20.0%	20	5.9%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>2</i>	<i>40.0%</i>	<i>51</i>	<i>15.1%</i>
Middle	2	40.0%	131	38.8%	1	20.0%	100	29.6%
Upper	3	60.0%	207	61.2%	2	40.0%	187	55.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>338</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>338</i>	<i>100.0%</i>

MI - Flint (Genesee) 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	14.3%	20	2.8%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>14.3%</i>	<i>20</i>	<i>2.8%</i>
Middle	1	14.3%	20	2.8%	4	57.1%	236	33.0%
Upper	6	85.7%	696	97.2%	2	28.6%	460	64.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>716</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>716</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Holland MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		Comparison 2012, 2013					2012					2013						
		Bank			Owner Occupied Units	Count		Dollar			Count		Dollar					
		Count	Dollar			Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	9.1%	\$248	16.7%	10.9%	0	0.0%	10.1%	\$0	0.0%	7.6%	1	20.0%	9.9%	\$248	34.3%	6.9%
	Middle	9	81.8%	\$1,073	72.2%	73.2%	5	83.3%	73.8%	\$599	78.3%	71.9%	4	80.0%	74.3%	\$474	65.7%	73.7%
	Upper	1	9.1%	\$166	11.2%	15.9%	1	16.7%	16.1%	\$166	21.7%	20.5%	0	0.0%	15.8%	\$0	0.0%	19.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$1,487	100.0%	100.0%	6	100.0%	100.0%	\$765	100.0%	100.0%	5	100.0%	100.0%	\$722	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	6.8%	\$203	3.9%	10.9%	1	3.3%	8.0%	\$43	1.1%	6.2%	2	14.3%	9.3%	\$160	11.5%	7.1%
	Middle	30	68.2%	\$3,375	65.0%	73.2%	19	63.3%	70.6%	\$2,268	59.6%	69.0%	11	78.6%	72.2%	\$1,107	79.5%	70.0%
	Upper	11	25.0%	\$1,617	31.1%	15.9%	10	33.3%	21.4%	\$1,492	39.2%	24.9%	1	7.1%	18.5%	\$125	9.0%	22.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	44	100.0%	\$5,195	100.0%	100.0%	30	100.0%	100.0%	\$3,803	100.0%	100.0%	14	100.0%	100.0%	\$1,392	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	10.9%	0	0.0%	9.6%	\$0	0.0%	7.5%	0	0.0%	10.4%	\$0	0.0%	11.8%
	Middle	1	100.0%	\$90	100.0%	73.2%	1	100.0%	77.3%	\$90	100.0%	78.7%	0	0.0%	71.3%	\$0	0.0%	65.1%
	Upper	0	0.0%	\$0	0.0%	15.9%	0	0.0%	13.1%	\$0	0.0%	13.9%	0	0.0%	18.3%	\$0	0.0%	23.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$90	100.0%	100.0%	1	100.0%	100.0%	\$90	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	33.1%	0	0.0%	35.3%	\$0	0.0%	5.4%	0	0.0%	46.2%	\$0	0.0%	57.4%
	Middle	0	0.0%	\$0	0.0%	64.7%	0	0.0%	64.7%	\$0	0.0%	94.6%	0	0.0%	53.8%	\$0	0.0%	42.6%
	Upper	0	0.0%	\$0	0.0%	2.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	7.1%	\$451	6.7%	10.9%	1	2.7%	8.7%	\$43	0.9%	6.6%	3	15.8%	9.6%	\$408	19.3%	7.7%
	Middle	40	71.4%	\$4,538	67.0%	73.2%	25	67.6%	71.6%	\$2,957	63.5%	70.2%	15	78.9%	73.0%	\$1,581	74.8%	71.2%
	Upper	12	21.4%	\$1,783	26.3%	15.9%	11	29.7%	19.7%	\$1,658	35.6%	23.2%	1	5.3%	17.4%	\$125	5.9%	21.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	56	100.0%	\$6,772	100.0%	100.0%	37	100.0%	100.0%	\$4,658	100.0%	100.0%	19	100.0%	100.0%	\$2,114	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	13	12.5%	\$3,010	10.8%	14.9%	6	14.3%	13.8%	\$1,850	15.1%	17.1%	7	11.3%	14.9%	\$1,160	7.5%	15.7%
	Middle	88	84.6%	\$24,052	86.6%	70.9%	36	85.7%	71.3%	\$10,422	84.9%	71.3%	52	83.9%	71.2%	\$13,630	88.0%	73.9%
	Upper	3	2.9%	\$700	2.5%	14.2%	0	0.0%	11.9%	\$0	0.0%	11.1%	3	4.8%	12.9%	\$700	4.5%	10.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.0%	\$0	0.0%	0.5%	0	0.0%	1.0%	\$0	0.0%	0.1%	
Total	104	100.0%	\$27,762	100.0%	100.0%	42	100.0%	100.0%	\$12,272	100.0%	100.0%	62	100.0%	100.0%	\$15,490	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.8%	0	0.0%	2.8%	\$0	0.0%	4.1%	0	0.0%	2.9%	\$0	0.0%	3.1%
	Middle	0	0.0%	\$0	0.0%	83.7%	0	0.0%	75.9%	\$0	0.0%	71.3%	0	0.0%	81.2%	\$0	0.0%	76.0%
	Upper	0	0.0%	\$0	0.0%	13.4%	0	0.0%	20.6%	\$0	0.0%	24.6%	0	0.0%	15.9%	\$0	0.0%	20.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Holland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
		Bank Count # % \$ (000s) \$ % Families by Family Income %					2012					2013						
							Count		Dollar			Count		Dollar			Count	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	3	27.3%	\$138	9.3%	16.4%	1	16.7%	13.4%	\$43	5.6%	7.8%	2	40.0%	11.3%	\$95	13.2%	6.1%
	Moderate	4	36.4%	\$408	27.4%	20.1%	3	50.0%	24.4%	\$378	49.4%	19.2%	1	20.0%	24.8%	\$30	4.2%	18.0%
	Middle	1	9.1%	\$118	7.9%	24.9%	1	16.7%	21.2%	\$118	15.4%	21.7%	0	0.0%	21.2%	\$0	0.0%	20.3%
	Upper	3	27.3%	\$823	55.3%	38.7%	1	16.7%	25.4%	\$226	29.5%	36.2%	2	40.0%	26.9%	\$597	82.7%	36.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.6%	\$0	0.0%	15.1%	0	0.0%	15.8%	\$0	0.0%	18.8%
	Total	11	100.0%	\$1,487	100.0%	100.0%	6	100.0%	100.0%	\$765	100.0%	100.0%	5	100.0%	100.0%	\$722	100.0%	100.0%
REFINANCE	Low	4	9.1%	\$302	5.8%	16.4%	2	6.7%	6.7%	\$150	3.9%	3.8%	2	14.3%	6.9%	\$152	10.9%	4.1%
	Moderate	11	25.0%	\$1,046	20.1%	20.1%	6	20.0%	17.7%	\$549	14.4%	12.9%	5	35.7%	18.3%	\$497	35.7%	13.5%
	Middle	14	31.8%	\$1,723	33.2%	24.9%	10	33.3%	22.9%	\$1,364	35.9%	19.7%	4	28.6%	22.4%	\$359	25.8%	20.1%
	Upper	15	34.1%	\$2,124	40.9%	38.7%	12	40.0%	33.0%	\$1,740	45.8%	44.1%	3	21.4%	31.9%	\$384	27.6%	41.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.7%	\$0	0.0%	19.5%	0	0.0%	20.5%	\$0	0.0%	21.3%
	Total	44	100.0%	\$5,195	100.0%	100.0%	30	100.0%	100.0%	\$3,803	100.0%	100.0%	14	100.0%	100.0%	\$1,392	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	16.4%	0	0.0%	9.6%	\$0	0.0%	4.6%	0	0.0%	8.2%	\$0	0.0%	4.0%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	21.5%	\$0	0.0%	18.9%	0	0.0%	19.9%	\$0	0.0%	16.2%
	Middle	1	100.0%	\$90	100.0%	24.9%	1	100.0%	30.0%	\$90	100.0%	26.5%	0	0.0%	32.5%	\$0	0.0%	33.3%
	Upper	0	0.0%	\$0	0.0%	38.7%	0	0.0%	33.5%	\$0	0.0%	42.9%	0	0.0%	35.5%	\$0	0.0%	39.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.4%	\$0	0.0%	7.1%	0	0.0%	3.8%	\$0	0.0%	7.4%
	Total	1	100.0%	\$90	100.0%	100.0%	1	100.0%	100.0%	\$90	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	7	12.5%	\$440	6.5%	16.4%	3	8.1%	8.7%	\$193	4.1%	4.9%	4	21.1%	8.7%	\$247	11.7%	4.9%
	Moderate	15	26.8%	\$1,454	21.5%	20.1%	9	24.3%	19.8%	\$927	19.9%	14.6%	6	31.6%	20.9%	\$527	24.9%	15.4%
	Middle	16	28.6%	\$1,931	28.5%	24.9%	12	32.4%	22.5%	\$1,572	33.7%	20.1%	4	21.1%	22.2%	\$359	17.0%	20.1%
	Upper	18	32.1%	\$2,947	43.5%	38.7%	13	35.1%	30.7%	\$1,966	42.2%	41.2%	5	26.3%	30.0%	\$981	46.4%	38.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.3%	\$0	0.0%	19.2%	0	0.0%	18.2%	\$0	0.0%	20.9%
	Total	56	100.0%	\$6,772	100.0%	100.0%	37	100.0%	100.0%	\$4,658	100.0%	100.0%	19	100.0%	100.0%	\$2,114	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	21	20.2%	\$3,160	11.4%	89.5%	9	21.4%	33.1%	\$1,471	12.0%	39.1%	12	19.4%	44.7%	\$1,689	10.9%	35.9%
	Over \$1 Million	70	67.3%	\$23,445	84.4%	7.9%	27	64.3%				43	69.4%					
	Total Rev. available	91	87.5%	\$26,605	95.8%	97.4%	36	85.7%				55	88.8%					
	Rev. Not Known	13	12.5%	\$1,157	4.2%	2.5%	6	14.3%				7	11.3%					
	Total	104	100.0%	\$27,762	100.0%	100.0%	42	100.0%				62	100.0%					
	Loan Size																	
	\$100,000 or Less	42	40.4%	\$2,302	8.3%		12	28.6%	86.1%	\$765	6.2%	20.5%	30	48.4%	81.9%	\$1,537	9.9%	18.2%
	\$100,001 - \$250,000	18	17.3%	\$2,972	10.7%		8	19.0%	6.5%	\$1,229	10.0%	18.3%	10	16.1%	8.1%	\$1,743	11.3%	17.2%
	\$250,001 - \$1 Million	44	42.3%	\$22,488	81.0%		22	52.4%	7.4%	\$10,278	83.8%	61.2%	22	35.5%	10.0%	\$12,210	78.8%	64.6%
Total	104	100.0%	\$27,762	100.0%		42	100.0%	100.0%	\$12,272	100.0%	100.0%	62	100.0%	100.0%	\$15,490	100.0%	100.0%	
Small Farm	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.6%	0	0.0%	39.0%	\$0	0.0%	34.5%	0	0.0%	44.1%	\$0	0.0%	50.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.4%	0	0.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	65.2%	\$0	0.0%	18.5%	0	0.0%	66.5%	\$0	0.0%	20.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.7%	\$0	0.0%	28.0%	0	0.0%	24.1%	\$0	0.0%	42.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	17.0%	\$0	0.0%	53.6%	0	0.0%	9.4%	\$0	0.0%	36.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Consumer Loan Distribution Tables

MI - Holland MSA 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	4	14.8%	145	7.8%
Moderate	0	0.0%	0	0.0%	7	25.9%	482	25.9%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>11</i>	<i>40.7%</i>	<i>627</i>	<i>33.7%</i>
Middle	24	88.9%	1,385	74.5%	8	29.6%	439	23.6%
Upper	3	11.1%	475	25.5%	8	29.6%	794	42.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>27</i>	<i>100.0%</i>	<i>1,860</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>1,860</i>	<i>100.0%</i>

MI - Holland MSA 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	7	13.2%	446	12.4%
Moderate	5	9.4%	279	7.8%	16	30.2%	812	22.7%
<i>Low/Moderate Total</i>	<i>5</i>	<i>9.4%</i>	<i>279</i>	<i>7.8%</i>	<i>23</i>	<i>43.4%</i>	<i>1,258</i>	<i>35.1%</i>
Middle	45	84.9%	3,072	85.7%	12	22.6%	759	21.2%
Upper	3	5.7%	233	6.5%	18	34.0%	1,567	43.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>3,584</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>3,584</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	2	8.7%	\$42	1.9%	6.4%	1	16.7%	3.0%	\$24	4.9%	1.3%	1	5.9%	2.1%	\$18	1.1%	1.2%
	Moderate	3	13.0%	\$168	7.6%	10.0%	1	16.7%	8.1%	\$62	12.8%	4.6%	2	11.8%	6.5%	\$106	6.2%	3.7%
	Middle	5	21.7%	\$425	19.3%	54.7%	0	0.0%	54.4%	\$0	0.0%	53.0%	5	29.4%	57.3%	\$425	24.8%	54.4%
	Upper	13	56.5%	\$1,565	71.1%	28.9%	4	66.7%	34.4%	\$400	82.3%	41.1%	9	52.9%	34.0%	\$1,165	68.0%	40.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	23	100.0%	\$2,200	100.0%	100.0%	6	100.0%	100.0%	\$486	100.0%	100.0%	17	100.0%	100.0%	\$1,714	100.0%	100.0%
REFINANCE	Low	1	0.8%	\$19	0.1%	6.4%	1	1.4%	2.3%	\$19	0.3%	1.6%	0	0.0%	2.5%	\$0	0.0%	1.4%
	Moderate	5	3.9%	\$297	2.3%	10.0%	3	4.1%	4.8%	\$150	2.1%	2.9%	2	3.7%	6.1%	\$147	2.5%	3.2%
	Middle	67	52.3%	\$6,014	46.2%	54.7%	44	59.5%	55.7%	\$3,907	54.6%	54.1%	23	42.6%	56.2%	\$2,107	35.9%	62.2%
	Upper	55	43.0%	\$6,694	51.4%	28.9%	26	35.1%	37.1%	\$3,086	43.1%	41.4%	29	53.7%	35.1%	\$3,608	61.5%	33.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	128	100.0%	\$13,024	100.0%	100.0%	74	100.0%	100.0%	\$7,162	100.0%	100.0%	54	100.0%	100.0%	\$5,862	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	4.1%	\$0	0.0%	1.9%	0	0.0%	4.2%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	10.5%	\$0	0.0%	3.8%	0	0.0%	10.6%	\$0	0.0%	5.6%
	Middle	0	0.0%	\$0	0.0%	54.7%	0	0.0%	56.1%	\$0	0.0%	56.7%	0	0.0%	51.4%	\$0	0.0%	47.2%
	Upper	2	100.0%	\$73	100.0%	28.9%	2	100.0%	29.3%	\$73	100.0%	37.6%	0	0.0%	33.8%	\$0	0.0%	44.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$73	100.0%	100.0%	2	100.0%	100.0%	\$73	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	25.5%	0	0.0%	25.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	8.3%	\$0	0.0%	16.9%	0	0.0%	16.7%	\$0	0.0%	35.2%
	Middle	0	0.0%	\$0	0.0%	37.4%	0	0.0%	50.0%	\$0	0.0%	57.8%	0	0.0%	83.3%	\$0	0.0%	64.8%
	Upper	0	0.0%	\$0	0.0%	10.0%	0	0.0%	16.7%	\$0	0.0%	24.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	2.0%	\$61	0.4%	6.4%	2	2.4%	2.7%	\$43	0.6%	1.5%	1	1.4%	2.5%	\$18	0.2%	1.3%
	Moderate	8	5.2%	\$465	3.0%	10.0%	4	4.9%	6.0%	\$212	2.7%	3.8%	4	5.6%	6.6%	\$253	3.3%	3.4%
	Middle	72	47.1%	\$6,439	42.1%	54.7%	44	53.7%	55.4%	\$3,907	50.6%	54.0%	28	39.4%	56.3%	\$2,532	33.4%	59.5%
	Upper	70	45.8%	\$8,332	54.5%	28.9%	32	39.0%	35.9%	\$3,559	46.1%	40.7%	38	53.5%	34.6%	\$4,773	63.0%	35.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	153	100.0%	\$15,297	100.0%	100.0%	82	100.0%	100.0%	\$7,721	100.0%	100.0%	71	100.0%	100.0%	\$7,576	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	110	28.1%	\$25,158	29.8%	12.4%	54	26.9%	15.0%	\$13,665	30.6%	26.7%	56	29.3%	14.8%	\$11,493	28.8%	21.6%
	Moderate	61	15.6%	\$9,790	11.6%	12.6%	32	15.9%	11.4%	\$5,996	13.4%	15.0%	29	15.2%	16.1%	\$3,794	9.5%	20.6%
	Middle	129	32.9%	\$25,126	29.7%	48.1%	67	33.3%	45.9%	\$12,623	28.3%	39.8%	62	32.5%	41.0%	\$12,503	31.3%	37.0%
	Upper	92	23.5%	\$24,490	29.0%	26.8%	48	23.9%	22.7%	\$12,349	27.7%	17.5%	44	23.0%	26.9%	\$12,141	30.4%	20.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	5.1%	\$0	0.0%	1.0%	0	0.0%	1.2%	\$0	0.0%	0.4%	
Total	392	100.0%	\$84,564	100.0%	100.0%	201	100.0%	100.0%	\$44,633	100.0%	100.0%	191	100.0%	100.0%	\$39,931	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	10.9%
	Moderate	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	33.3%	\$600	55.6%	58.6%	1	50.0%	56.4%	\$300	75.0%	64.1%	1	25.0%	44.1%	\$300	44.1%	46.5%
	Upper	4	66.7%	\$480	44.4%	39.5%	1	50.0%	43.6%	\$100	25.0%	35.9%	3	75.0%	50.0%	\$380	55.9%	42.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	6	100.0%	\$1,080	100.0%	100.0%	2	100.0%	100.0%	\$400	100.0%	100.0%	4	100.0%	100.0%	\$680	100.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	2	8.7%	\$89	4.0%	20.7%	2	33.3%	13.2%	\$89	18.3%	7.7%	0	0.0%	9.3%	\$0	0.0%	4.9%
	Moderate	6	26.1%	\$483	22.0%	18.3%	1	16.7%	26.5%	\$84	17.3%	21.0%	5	29.4%	22.2%	\$399	23.3%	17.2%
	Middle	7	30.4%	\$602	27.4%	21.3%	2	33.3%	18.0%	\$195	40.1%	18.4%	5	29.4%	24.7%	\$407	23.7%	23.6%
	Upper	8	34.8%	\$1,026	46.6%	39.7%	1	16.7%	24.1%	\$118	24.3%	37.3%	7	41.2%	28.4%	\$908	53.0%	41.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.2%	\$0	0.0%	15.6%	0	0.0%	15.3%	\$0	0.0%	13.3%
	Total	23	100.0%	\$2,200	100.0%	100.0%	6	100.0%	100.0%	\$486	100.0%	100.0%	17	100.0%	100.0%	\$1,714	100.0%	100.0%
REFINANCE	Low	14	10.9%	\$802	6.2%	20.7%	9	12.2%	8.2%	\$460	6.4%	5.5%	5	9.3%	7.2%	\$342	5.8%	4.0%
	Moderate	24	18.8%	\$1,752	13.5%	18.3%	15	20.3%	16.3%	\$1,045	14.6%	12.2%	9	16.7%	15.0%	\$707	12.1%	9.8%
	Middle	38	29.7%	\$3,922	30.1%	21.3%	19	25.7%	22.2%	\$1,894	26.4%	20.0%	19	35.2%	22.0%	\$2,028	34.6%	16.3%
	Upper	52	40.6%	\$6,548	50.3%	39.7%	31	41.9%	36.7%	\$3,763	52.5%	44.8%	21	38.9%	40.5%	\$2,785	47.5%	41.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	17.5%	0	0.0%	15.3%	\$0	0.0%	28.3%
	Total	128	100.0%	\$13,024	100.0%	100.0%	74	100.0%	100.0%	\$7,162	100.0%	100.0%	54	100.0%	100.0%	\$5,862	100.0%	100.0%
HOME IMPROVEMENT	Low	1	50.0%	\$3	4.1%	20.7%	1	50.0%	16.9%	\$3	4.1%	7.5%	0	0.0%	15.6%	\$0	0.0%	8.8%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	24.2%	\$0	0.0%	15.0%	0	0.0%	21.5%	\$0	0.0%	16.3%
	Middle	1	50.0%	\$70	95.9%	21.3%	1	50.0%	25.5%	\$70	95.9%	26.2%	0	0.0%	26.8%	\$0	0.0%	32.3%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	31.8%	\$0	0.0%	47.4%	0	0.0%	34.9%	\$0	0.0%	40.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	3.8%	0	0.0%	1.1%	\$0	0.0%	1.7%
	Total	2	100.0%	\$73	100.0%	100.0%	2	100.0%	100.0%	\$73	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	17	11.1%	\$894	5.8%	20.7%	12	14.6%	10.1%	\$552	7.1%	5.9%	5	7.0%	8.5%	\$342	4.5%	4.4%
	Moderate	30	19.6%	\$2,235	14.6%	18.3%	16	19.5%	19.5%	\$1,129	14.6%	14.0%	14	19.7%	17.8%	\$1,106	14.6%	12.2%
	Middle	46	30.1%	\$4,594	30.0%	21.3%	22	26.8%	21.1%	\$2,159	28.0%	19.0%	24	33.8%	23.2%	\$2,435	32.1%	18.8%
	Upper	60	39.2%	\$7,574	49.5%	39.7%	32	39.0%	32.8%	\$3,881	50.3%	41.4%	28	39.4%	36.1%	\$3,693	48.7%	41.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.5%	\$0	0.0%	19.6%	0	0.0%	14.5%	\$0	0.0%	23.3%
	Total	153	100.0%	\$15,297	100.0%	100.0%	82	100.0%	100.0%	\$7,721	100.0%	100.0%	71	100.0%	100.0%	\$7,576	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	120	30.6%	\$16,775	19.8%	89.9%	59	29.4%	22.2%	\$8,239	18.5%	27.2%	61	31.9%	36.5%	\$8,536	21.4%	30.0%
	Over \$1 Million	188	48.0%	\$56,279	66.6%	7.1%	92	45.8%				96	50.3%					
	Total Rev. available	308	78.6%	\$73,054	86.4%	97.0%	151	75.2%				157	82.2%					
	Rev. Not Known	84	21.4%	\$11,510	13.6%	3.0%	50	24.9%				34	17.8%					
	Total	392	100.0%	\$84,564	100.0%	100.0%	201	100.0%				191	100.0%					
Small Business Loan Size	\$100,000 or Less	168	42.9%	\$10,476	12.4%		81	40.3%	93.9%	\$5,322	11.9%	30.1%	87	45.5%	92.1%	\$5,154	12.9%	29.0%
	\$100,001 - \$250,000	116	29.6%	\$22,020	26.0%		61	30.3%	2.6%	\$11,604	26.0%	14.1%	55	28.8%	4.6%	\$10,416	26.1%	20.2%
	\$250,001 - \$1 Million	108	27.6%	\$52,068	61.6%		59	29.4%	3.5%	\$27,707	62.1%	55.8%	49	25.7%	3.4%	\$24,361	61.0%	50.8%
	Total	392	100.0%	\$84,564	100.0%		201	100.0%	100.0%	\$44,633	100.0%	100.0%	191	100.0%	100.0%	\$39,931	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	5	83.3%	\$980	90.7%	99.1%	1	50.0%	33.3%	\$300	75.0%	63.0%	4	100.0%	20.6%	\$680	100.0%	28.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.9%	0	0.0%				0	0.0%					
	Not Known	1	16.7%	\$100	9.3%	0.0%	1	50.0%				0	0.0%					
	Total	6	100.0%	\$1,080	100.0%	100.0%	2	100.0%				4	100.0%					
	\$100,000 or Less	3	50.0%	\$280	25.9%		1	50.0%	100.0%	\$100	25.0%	100.0%	2	50.0%	100.0%	\$180	26.5%	100.0%
	\$100,001 - \$250,000	1	16.7%	\$200	18.5%		0	0.0%	0.0%	\$0	0.0%	0.0%	1	25.0%	0.0%	\$200	29.4%	0.0%
	\$250,001 - \$500,000	2	33.3%	\$600	55.6%		1	50.0%	0.0%	\$300	75.0%	0.0%	1	25.0%	0.0%	\$300	44.1%	0.0%
Total	6	100.0%	\$1,080	100.0%		2	100.0%	100.0%	\$400	100.0%	100.0%	4	100.0%	100.0%	\$680	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	#	%	%					\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	2.1%	\$0	0.0%	1.1%
	Moderate	1	7.1%	\$56	3.0%	10.0%	1	7.1%	8.0%	\$56	3.0%	4.1%
	Middle	8	57.1%	\$1,073	57.2%	54.7%	8	57.1%	55.8%	\$1,073	57.2%	54.3%
	Upper	5	35.7%	\$747	39.8%	28.9%	5	35.7%	34.1%	\$747	39.8%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$1,876	100.0%	100.0%	14	100.0%	100.0%	\$1,876	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	4.0%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	8.3%	\$0	0.0%	5.5%
	Middle	7	50.0%	\$583	37.0%	54.7%	7	50.0%	56.6%	\$583	37.0%	57.1%
	Upper	7	50.0%	\$992	63.0%	28.9%	7	50.0%	31.0%	\$992	63.0%	35.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$1,575	100.0%	100.0%	14	100.0%	100.0%	\$1,575	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	6.5%	\$0	0.0%	3.6%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	10.3%	\$0	0.0%	5.8%
	Middle	0	0.0%	\$0	0.0%	54.7%	0	0.0%	53.5%	\$0	0.0%	55.5%
	Upper	1	100.0%	\$8	100.0%	28.9%	1	100.0%	29.7%	\$8	100.0%	35.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$8	100.0%	100.0%	1	100.0%	100.0%	\$8	100.0%	100.0%
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	25.5%	0	0.0%	66.7%	\$0	0.0%	43.6%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	33.3%	\$0	0.0%	56.4%
	Middle	0	0.0%	\$0	0.0%	37.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	10.0%	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%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	3.3%	\$0	0.0%	2.1%
	Moderate	1	3.4%	\$56	1.6%	10.0%	1	3.4%	8.4%	\$56	1.6%	5.2%
	Middle	15	51.7%	\$1,656	47.9%	54.7%	15	51.7%	55.8%	\$1,656	47.9%	54.8%
	Upper	13	44.8%	\$1,747	50.5%	28.9%	13	44.8%	32.5%	\$1,747	50.5%	38.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	29	100.0%	\$3,459	100.0%	100.0%	29	100.0%	100.0%	\$3,459	100.0%	100.0%
SMALL BUSINESSES	Low	59	30.1%	\$12,881	32.0%	13.1%	59	30.1%	15.0%	\$12,881	32.0%	24.0%
	Moderate	30	15.3%	\$5,943	14.8%	12.8%	30	15.3%	16.2%	\$5,943	14.8%	23.6%
	Middle	69	35.2%	\$13,196	32.8%	47.5%	69	35.2%	39.6%	\$13,196	32.8%	26.5%
	Upper	38	19.4%	\$8,258	20.5%	26.7%	38	19.4%	27.3%	\$8,258	20.5%	25.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	0.6%
	Total	196	100.0%	\$40,278	100.0%	100.0%	196	100.0%	100.0%	\$40,278	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	4	66.7%	\$775	68.9%	58.2%	4	66.7%	62.5%	\$775	68.9%	70.3%
	Upper	2	33.3%	\$350	31.1%	40.1%	2	33.3%	37.5%	\$350	31.1%	29.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$1,125	100.0%	100.0%	6	100.0%	100.0%	\$1,125	100.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income %	Count			Dollar			
		Count	%	Dollar \$ (000s)	%		Bank #	%	Agg %	Bank \$ (000s)	%	Agg %	
HOME PURCHASE	Low	3	21.4%	\$177	9.4%	20.7%	3	21.4%	7.4%	\$177	9.4%	3.5%	
	Moderate	3	21.4%	\$222	11.8%	18.3%	3	21.4%	22.6%	\$222	11.8%	15.3%	
	Middle	4	28.6%	\$442	23.6%	21.3%	4	28.6%	21.8%	\$442	23.6%	20.9%	
	Upper	4	28.6%	\$1,035	55.2%	39.7%	4	28.6%	30.4%	\$1,035	55.2%	43.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.9%	\$0	0.0%	16.8%	
	Total	14	100.0%	\$1,876	100.0%	100.0%	14	100.0%	100.0%	\$1,876	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	7.1%	\$0	0.0%	4.5%	
	Moderate	3	21.4%	\$208	13.2%	18.3%	3	21.4%	15.6%	\$208	13.2%	11.5%	
	Middle	4	28.6%	\$402	25.5%	21.3%	4	28.6%	20.5%	\$402	25.5%	18.9%	
	Upper	7	50.0%	\$965	61.3%	39.7%	7	50.0%	37.8%	\$965	61.3%	45.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.0%	\$0	0.0%	19.9%	
	Total	14	100.0%	\$1,575	100.0%	100.0%	14	100.0%	100.0%	\$1,575	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	100.0%	\$8	100.0%	20.7%	1	100.0%	11.4%	\$8	100.0%	8.4%	
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	23.8%	\$0	0.0%	16.9%	
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	26.2%	\$0	0.0%	19.1%	
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	35.4%	\$0	0.0%	51.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	3.6%	
	Total	1	100.0%	\$8	100.0%	100.0%	1	100.0%	100.0%	\$8	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	13.8%	\$185	5.3%	20.7%	4	13.8%	7.6%	\$185	5.3%	4.0%	
	Moderate	6	20.7%	\$430	12.4%	18.3%	6	20.7%	20.1%	\$430	12.4%	13.8%	
	Middle	8	27.6%	\$844	24.4%	21.3%	8	27.6%	21.7%	\$844	24.4%	19.9%	
	Upper	11	37.9%	\$2,000	57.8%	39.7%	11	37.9%	33.5%	\$2,000	57.8%	43.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.0%	\$0	0.0%	18.4%	
	Total	29	100.0%	\$3,459	100.0%	100.0%	29	100.0%	100.0%	\$3,459	100.0%	100.0%	
Small Business	Revenue	Total Businesses											
		\$1 Million or Less	53	27.0%	\$6,778	16.8%	88.7%	53	27.0%	36.7%	\$6,778	16.8%	25.0%
		Over \$1 Million	104	53.1%	\$28,121	69.8%	8.3%	104	53.1%				
		Total Rev. available	157	80.1%	\$34,899	86.6%	97.0%	157	80.1%				
	Rev. Not Known	39	19.9%	\$5,379	13.4%	3.1%	39	19.9%					
	Total	196	100.0%	\$40,278	100.0%	100.0%	196	100.0%					
	Loan Size	\$100,000 or Less	90	45.9%	\$5,345	13.3%		90	45.9%	94.2%	\$5,345	13.3%	36.6%
		\$100,001 - \$250,000	57	29.1%	\$10,593	26.3%		57	29.1%	3.6%	\$10,593	26.3%	22.3%
\$250,001 - \$1 Million		49	25.0%	\$24,340	60.4%		49	25.0%	2.2%	\$24,340	60.4%	41.1%	
Total		196	100.0%	\$40,278	100.0%		196	100.0%	100.0%	\$40,278	100.0%	100.0%	
Small Farm	Revenue	Total Farms											
		\$1 Million or Less	1	16.7%	\$300	26.7%	99.0%	1	16.7%	12.5%	\$300	26.7%	7.8%
		Over \$1 Million	5	83.3%	\$825	73.3%	1.0%	5	83.3%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	6	100.0%	\$1,125	100.0%	100.0%	6	100.0%					
	Loan Size	\$100,000 or Less	2	33.3%	\$150	13.3%		2	33.3%	95.8%	\$150	13.3%	52.0%
		\$100,001 - \$250,000	2	33.3%	\$375	33.3%		2	33.3%	0.0%	\$375	33.3%	0.0%
		\$250,001 - \$500,000	2	33.3%	\$600	53.3%		2	33.3%	4.2%	\$600	53.3%	48.0%
Total		6	100.0%	\$1,125	100.0%		6	100.0%	100.0%	\$1,125	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

MI - Jackson MSA 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	3	7.3%	192	10.1%	10	24.4%	316	16.7%
Moderate	1	2.4%	40	2.1%	11	26.8%	404	21.4%
<i>Low/Moderate Total</i>	<i>4</i>	<i>9.8%</i>	<i>232</i>	<i>12.3%</i>	<i>21</i>	<i>51.2%</i>	<i>720</i>	<i>38.1%</i>
Middle	23	56.1%	925	48.9%	8	19.5%	314	16.6%
Upper	14	34.1%	735	38.8%	12	29.3%	858	45.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>1,892</i>	<i>100.0%</i>	<i>41</i>	<i>100.0%</i>	<i>1,892</i>	<i>100.0%</i>

MI - Jackson MSA 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	2.6%	67	1.6%	10	12.8%	332	8.0%
Moderate	7	9.0%	187	4.5%	23	29.5%	1,250	30.2%
<i>Low/Moderate Total</i>	<i>9</i>	<i>11.5%</i>	<i>254</i>	<i>6.1%</i>	<i>33</i>	<i>42.3%</i>	<i>1,582</i>	<i>38.3%</i>
Middle	39	50.0%	1,901	46.0%	18	23.1%	1,107	26.8%
Upper	30	38.5%	1,978	47.9%	27	34.6%	1,444	34.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>78</i>	<i>100.0%</i>	<i>4,133</i>	<i>100.0%</i>	<i>78</i>	<i>100.0%</i>	<i>4,133</i>	<i>100.0%</i>

MI - Jackson MSA 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	2.3%	195	3.4%	12	14.0%	543	9.5%
Moderate	6	7.0%	223	3.9%	24	27.9%	1,394	24.4%
<i>Low/Moderate Total</i>	<i>8</i>	<i>9.3%</i>	<i>418</i>	<i>7.3%</i>	<i>36</i>	<i>41.9%</i>	<i>1,937</i>	<i>33.9%</i>
Middle	44	51.2%	3,081	53.9%	16	18.6%	1,062	18.6%
Upper	34	39.5%	2,222	38.8%	33	38.4%	2,557	44.7%
Unknown	0	0.0%	0	0.0%	1	1.2%	165	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>86</i>	<i>100.0%</i>	<i>5,721</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>5,721</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Kalamazoo

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	\$ (000s)									\$ %	\$ %	#	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.4%	\$0	0.0%	1.2%	0	0.0%	2.2%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	8.4%	\$0	0.0%	4.7%	0	0.0%	10.0%	\$0	0.0%	6.0%
	Middle	4	26.7%	\$315	11.3%	51.8%	1	25.0%	49.7%	\$140	17.4%	42.7%	3	27.3%	49.6%	\$175	8.9%	41.6%
	Upper	11	73.3%	\$2,462	88.7%	33.0%	3	75.0%	39.5%	\$663	82.6%	51.4%	8	72.7%	38.2%	\$1,799	91.1%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$2,777	100.0%	100.0%	4	100.0%	100.0%	\$803	100.0%	100.0%	11	100.0%	100.0%	\$1,974	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.2%	\$0	0.0%	0.7%	0	0.0%	2.0%	\$0	0.0%	1.1%
	Moderate	2	3.8%	\$263	3.8%	10.3%	2	5.3%	6.9%	\$263	5.1%	4.4%	0	0.0%	9.0%	\$0	0.0%	5.4%
	Middle	27	50.9%	\$2,622	37.8%	51.8%	21	55.3%	47.0%	\$2,101	40.7%	39.6%	6	40.0%	47.7%	\$521	29.2%	43.8%
	Upper	24	45.3%	\$4,057	58.4%	33.0%	15	39.5%	44.9%	\$2,796	54.2%	55.4%	9	60.0%	41.3%	\$1,261	70.8%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	53	100.0%	\$6,942	100.0%	100.0%	38	100.0%	100.0%	\$5,160	100.0%	100.0%	15	100.0%	100.0%	\$1,782	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	6.7%	\$0	0.0%	2.6%	0	0.0%	3.5%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	7.7%	\$0	0.0%	6.5%	0	0.0%	9.9%	\$0	0.0%	12.4%
	Middle	2	100.0%	\$179	100.0%	51.8%	1	100.0%	45.3%	\$51	100.0%	32.4%	1	100.0%	48.0%	\$128	100.0%	36.8%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	40.4%	\$0	0.0%	58.4%	0	0.0%	38.7%	\$0	0.0%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$179	100.0%	100.0%	1	100.0%	100.0%	\$51	100.0%	100.0%	1	100.0%	100.0%	\$128	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	9.9%	0	0.0%	11.1%	\$0	0.0%	44.9%	0	0.0%	22.6%	\$0	0.0%	10.0%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	22.2%	\$0	0.0%	1.5%	0	0.0%	32.3%	\$0	0.0%	46.1%
	Middle	0	0.0%	\$0	0.0%	51.6%	0	0.0%	51.9%	\$0	0.0%	49.7%	0	0.0%	45.2%	\$0	0.0%	44.0%
	Upper	0	0.0%	\$0	0.0%	11.4%	0	0.0%	14.8%	\$0	0.0%	4.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.7%	\$0	0.0%	2.9%	0	0.0%	2.2%	\$0	0.0%	1.3%
	Moderate	2	2.9%	\$263	2.7%	10.3%	2	4.7%	7.4%	\$263	4.4%	4.4%	0	0.0%	9.5%	\$0	0.0%	6.7%
	Middle	33	47.1%	\$3,116	31.5%	51.8%	23	53.5%	47.8%	\$2,292	38.1%	40.9%	10	37.0%	48.4%	\$824	21.2%	42.8%
	Upper	35	50.0%	\$6,519	65.9%	33.0%	18	41.9%	43.1%	\$3,459	57.5%	51.8%	17	63.0%	39.9%	\$3,060	78.8%	49.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	70	100.0%	\$9,898	100.0%	100.0%	43	100.0%	100.0%	\$6,014	100.0%	100.0%	27	100.0%	100.0%	\$3,884	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	35	10.9%	\$7,351	11.1%	6.7%	16	10.6%	6.9%	\$3,314	10.9%	10.6%	19	11.2%	6.2%	\$4,037	11.4%	9.5%
	Moderate	75	23.4%	\$12,153	18.4%	16.9%	37	24.5%	16.9%	\$5,920	19.4%	23.9%	38	22.4%	17.8%	\$6,233	17.5%	20.1%
	Middle	152	47.4%	\$33,757	51.1%	48.1%	70	46.4%	46.2%	\$15,588	51.2%	41.6%	82	48.2%	47.7%	\$18,169	51.1%	48.7%
	Upper	59	18.4%	\$12,760	19.3%	28.4%	28	18.5%	26.5%	\$5,648	18.5%	23.3%	31	18.2%	27.1%	\$7,112	20.0%	21.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	0.6%	0	0.0%	1.2%	\$0	0.0%	0.3%
Total	321	100.0%	\$66,021	100.0%	100.0%	151	100.0%	100.0%	\$30,470	100.0%	100.0%	170	100.0%	100.0%	\$35,551	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	2.7%	\$0	0.0%	1.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	2.7%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	63.2%	0	0.0%	70.3%	\$0	0.0%	73.7%	0	0.0%	76.9%	\$0	0.0%	82.8%
	Upper	0	0.0%	\$0	0.0%	29.8%	0	0.0%	24.3%	\$0	0.0%	25.0%	0	0.0%	23.1%	\$0	0.0%	17.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Kalamazoo

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	2	13.3%	\$95	3.4%	21.6%	0	0.0%	11.6%	\$0	0.0%	5.2%	2	18.2%	11.5%	\$95	4.8%	5.6%
	Moderate	3	20.0%	\$356	12.8%	16.0%	1	25.0%	21.1%	\$104	13.0%	14.4%	2	18.2%	21.0%	\$252	12.8%	14.5%
	Middle	1	6.7%	\$173	6.2%	20.2%	0	0.0%	21.9%	\$0	0.0%	18.9%	1	9.1%	18.9%	\$173	8.8%	17.4%
	Upper	9	60.0%	\$2,153	77.5%	42.2%	3	75.0%	32.0%	\$699	87.0%	45.1%	6	54.5%	33.3%	\$1,454	73.7%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.3%	\$0	0.0%	16.4%	0	0.0%	15.4%	\$0	0.0%	13.6%
	Total	15	100.0%	\$2,777	100.0%	100.0%	4	100.0%	100.0%	\$803	100.0%	100.0%	11	100.0%	100.0%	\$1,974	100.0%	100.0%
REFINANCE	Low	6	11.3%	\$269	3.9%	21.6%	4	10.5%	5.5%	\$163	3.2%	3.0%	2	13.3%	7.6%	\$106	5.9%	4.0%
	Moderate	10	18.9%	\$994	14.3%	16.0%	9	23.7%	13.8%	\$855	16.6%	9.1%	1	6.7%	13.9%	\$139	7.8%	9.1%
	Middle	13	24.5%	\$1,269	18.3%	20.2%	6	15.8%	20.0%	\$610	11.8%	16.0%	7	46.7%	21.5%	\$659	37.0%	16.7%
	Upper	24	45.3%	\$4,410	63.5%	42.2%	19	50.0%	43.4%	\$3,532	68.4%	53.9%	5	33.3%	40.9%	\$878	49.3%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.2%	\$0	0.0%	18.0%	0	0.0%	16.1%	\$0	0.0%	21.8%
	Total	53	100.0%	\$6,942	100.0%	100.0%	38	100.0%	100.0%	\$5,160	100.0%	100.0%	15	100.0%	100.0%	\$1,782	100.0%	100.0%
HOME IMPROVEMENT	Low	1	50.0%	\$51	28.5%	21.6%	1	100.0%	10.5%	\$51	100.0%	3.4%	0	0.0%	11.3%	\$0	0.0%	4.1%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	23.9%	\$0	0.0%	8.4%	0	0.0%	15.4%	\$0	0.0%	6.7%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	18.6%	\$0	0.0%	15.5%	0	0.0%	23.5%	\$0	0.0%	19.8%
	Upper	1	50.0%	\$128	71.5%	42.2%	0	0.0%	42.8%	\$0	0.0%	63.3%	1	100.0%	46.5%	\$128	100.0%	59.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.2%	\$0	0.0%	9.4%	0	0.0%	3.2%	\$0	0.0%	9.4%
	Total	2	100.0%	\$179	100.0%	100.0%	1	100.0%	100.0%	\$51	100.0%	100.0%	1	100.0%	100.0%	\$128	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	9	12.9%	\$415	4.2%	21.6%	5	11.6%	7.5%	\$214	3.6%	3.5%	4	14.8%	9.2%	\$201	5.2%	4.6%
	Moderate	13	18.6%	\$1,350	13.6%	16.0%	10	23.3%	16.2%	\$959	15.9%	10.3%	3	11.1%	16.6%	\$391	10.1%	11.0%
	Middle	14	20.0%	\$1,442	14.6%	20.2%	6	14.0%	20.4%	\$610	10.1%	16.1%	8	29.6%	20.5%	\$832	21.4%	16.6%
	Upper	34	48.6%	\$6,691	67.6%	42.2%	22	51.2%	39.9%	\$4,231	70.4%	48.8%	12	44.4%	38.1%	\$2,460	63.3%	47.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.9%	\$0	0.0%	21.3%	0	0.0%	15.7%	\$0	0.0%	20.3%
	Total	70	100.0%	\$9,898	100.0%	100.0%	43	100.0%	100.0%	\$6,014	100.0%	100.0%	27	100.0%	100.0%	\$3,884	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	88	27.4%	\$14,022	21.2%	89.5%	46	30.5%	31.3%	\$8,155	26.8%	37.8%	42	24.7%	42.7%	\$5,867	16.5%	33.7%
	Over \$1 Million	171	53.3%	\$44,863	68.0%	7.4%	73	48.3%				98	57.6%					
	Total Rev. available	259	80.7%	\$58,885	89.2%	96.9%	119	78.8%				140	82.3%					
	Rev. Not Known	62	19.3%	\$7,136	10.8%	3.1%	32	21.2%				30	17.6%					
	Total	321	100.0%	\$66,021	100.0%	100.0%	151	100.0%				170	100.0%					
	\$100,000 or Less	160	49.8%	\$9,250	14.0%		79	52.3%	91.3%	\$4,795	15.7%	28.5%	31	47.6%	87.4%	\$4,455	12.5%	26.0%
	\$100,001 - \$250,000	66	20.6%	\$11,671	17.7%		28	18.5%	4.1%	\$5,017	16.5%	16.6%	88	22.4%	6.0%	\$6,654	18.7%	17.5%
	\$250,001 - \$1 Million	95	29.6%	\$45,100	68.3%		44	29.1%	4.6%	\$20,658	67.8%	54.9%	51	30.0%	6.5%	\$24,442	68.8%	56.5%
	Total	321	100.0%	\$66,021	100.0%		151	100.0%	100.0%	\$30,470	100.0%	100.0%	170	100.0%	100.0%	\$35,551	100.0%	100.0%
Small Farm	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.7%	0	0.0%	29.7%	\$0	0.0%	46.9%	0	0.0%	23.1%	\$0	0.0%	25.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.3%	0	0.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	89.2%	\$0	0.0%	28.0%	0	0.0%	79.5%	\$0	0.0%	28.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	28.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.8%	\$0	0.0%	72.0%	0	0.0%	7.7%	\$0	0.0%	42.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Kalamazoo

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner		Occupied Units	Count		Dollar		Agg	Agg
		Count	Dollar	Dollar	%		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.4%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	8.8%	\$0	0.0%	5.2%
	Middle	4	57.1%	\$665	58.4%	51.8%	4	57.1%	49.7%	\$665	58.4%	40.9%
	Upper	3	42.9%	\$474	41.6%	33.0%	3	42.9%	40.1%	\$474	41.6%	53.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$1,139	100.0%	100.0%	7	100.0%	100.0%	\$1,139	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.9%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	9.2%	\$0	0.0%	5.8%
	Middle	4	40.0%	\$407	13.0%	51.8%	4	40.0%	50.9%	\$407	13.0%	44.2%
	Upper	6	60.0%	\$2,728	87.0%	33.0%	6	60.0%	38.0%	\$2,728	87.0%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$3,135	100.0%	100.0%	10	100.0%	100.0%	\$3,135	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	4.9%	\$0	0.0%	3.7%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	11.7%	\$0	0.0%	5.9%
	Middle	0	0.0%	\$0	0.0%	51.8%	0	0.0%	42.9%	\$0	0.0%	29.6%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	40.4%	\$0	0.0%	60.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	9.9%	0	0.0%	6.7%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	6.7%	\$0	0.0%	0.2%
	Middle	1	100.0%	\$3,425	100.0%	51.6%	1	100.0%	46.7%	\$3,425	100.0%	86.1%
	Upper	0	0.0%	\$0	0.0%	11.4%	0	0.0%	40.0%	\$0	0.0%	11.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$3,425	100.0%	100.0%	1	100.0%	100.0%	\$3,425	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.8%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	9.0%	\$0	0.0%	5.1%
	Middle	9	50.0%	\$4,497	58.4%	51.8%	9	50.0%	49.9%	\$4,497	58.4%	45.2%
	Upper	9	50.0%	\$3,202	41.6%	33.0%	9	50.0%	39.3%	\$3,202	41.6%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$7,699	100.0%	100.0%	18	100.0%	100.0%	\$7,699	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	22	13.5%	\$4,509	12.5%	6.6%	22	13.5%	5.7%	\$4,509	12.5%	9.2%
	Moderate	35	21.5%	\$5,468	15.2%	17.0%	35	21.5%	17.7%	\$5,468	15.2%	17.9%
	Middle	76	46.6%	\$19,228	53.4%	48.4%	76	46.6%	46.0%	\$19,228	53.4%	47.4%
	Upper	30	18.4%	\$6,780	18.8%	27.9%	30	18.4%	29.0%	\$6,780	18.8%	25.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.4%
	Total	163	100.0%	\$35,985	100.0%	100.0%	163	100.0%	100.0%	\$35,985	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	7.8%	0	0.0%	10.0%	\$0	0.0%	7.6%
	Middle	0	0.0%	\$0	0.0%	62.4%	0	0.0%	65.0%	\$0	0.0%	88.2%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	25.0%	\$0	0.0%	4.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Kalamazoo

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	5.3%	\$0	0.0%	2.5%	
	Moderate	1	14.3%	\$124	10.9%	16.0%	1	14.3%	18.8%	\$124	10.9%	11.7%	
	Middle	2	28.6%	\$272	23.9%	20.2%	2	28.6%	20.2%	\$272	23.9%	17.0%	
	Upper	4	57.1%	\$743	65.2%	42.2%	4	57.1%	39.2%	\$743	65.2%	54.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.5%	\$0	0.0%	14.4%	
	Total	7	100.0%	\$1,139	100.0%	100.0%	7	100.0%	100.0%	\$1,139	100.0%	100.0%	
REFINANCE	Low	1	10.0%	\$76	2.4%	21.6%	1	10.0%	7.0%	\$76	2.4%	3.8%	
	Moderate	3	30.0%	\$240	7.7%	16.0%	3	30.0%	12.8%	\$240	7.7%	8.4%	
	Middle	2	20.0%	\$260	8.3%	20.2%	2	20.0%	20.1%	\$260	8.3%	15.7%	
	Upper	4	40.0%	\$2,559	81.6%	42.2%	4	40.0%	43.1%	\$2,559	81.6%	53.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.1%	\$0	0.0%	18.9%	
	Total	10	100.0%	\$3,135	100.0%	100.0%	10	100.0%	100.0%	\$3,135	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	7.7%	\$0	0.0%	2.2%	
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	19.4%	\$0	0.0%	7.6%	
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	24.1%	\$0	0.0%	18.5%	
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	44.8%	\$0	0.0%	66.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	5.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$3,425	100.0%	0.0%	1	100.0%	100.0%	\$3,425	100.0%	100.0%	
	Total	1	100.0%	\$3,425	100.0%	100.0%	1	100.0%	100.0%	\$3,425	100.0%	100.0%	
HMDA TOTALS	Low	1	5.6%	\$76	1.0%	21.6%	1	5.6%	6.1%	\$76	1.0%	2.7%	
	Moderate	4	22.2%	\$364	4.7%	16.0%	4	22.2%	16.4%	\$364	4.7%	9.7%	
	Middle	4	22.2%	\$532	6.9%	20.2%	4	22.2%	20.3%	\$532	6.9%	15.3%	
	Upper	8	44.4%	\$3,302	42.9%	42.2%	8	44.4%	40.9%	\$3,302	42.9%	50.2%	
	Unknown	1	5.6%	\$3,425	44.5%	0.0%	1	5.6%	16.3%	\$3,425	44.5%	22.0%	
	Total	18	100.0%	\$7,699	100.0%	100.0%	18	100.0%	100.0%	\$7,699	100.0%	100.0%	
Small Business	Total Businesses												
	Revenue	\$1 Million or Less	22	13.5%	\$3,913	10.9%	88.8%	22	13.5%	45.5%	\$3,913	10.9%	36.4%
		Over \$1 Million	98	60.1%	\$26,112	72.6%	8.2%	98	60.1%				
		Total Rev. available	120	73.6%	\$30,025	83.5%	97.0%	120	73.6%				
		Rev. Not Known	43	26.4%	\$5,960	16.6%	3.0%	43	26.4%				
		Total	163	100.0%	\$35,985	100.0%	100.0%	163	100.0%				
	Loan Size	\$100,000 or Less	74	45.4%	\$4,514	12.5%		74	45.4%	91.4%	\$4,514	12.5%	33.9%
		\$100,001 - \$250,000	43	26.4%	\$7,748	21.5%		43	26.4%	4.3%	\$7,748	21.5%	16.2%
		\$250,001 - \$1 Million	46	28.2%	\$23,723	65.9%		46	28.2%	4.3%	\$23,723	65.9%	49.9%
		Total	163	100.0%	\$35,985	100.0%		163	100.0%	100.0%	\$35,985	100.0%	100.0%
Small Farm	Total Farms												
	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	94.2%	0	0.0%	25.0%	\$0	0.0%	35.2%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.8%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.5%	\$0	0.0%	40.2%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.5%	\$0	0.0%	16.5%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	43.3%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

MI - Kalamazoo 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	2.4%	30	0.8%	5	11.9%	131	3.7%
Moderate	3	7.1%	150	4.2%	6	14.3%	246	6.9%
<i>Low/Moderate Total</i>	<i>4</i>	<i>9.5%</i>	<i>180</i>	<i>5.1%</i>	<i>11</i>	<i>26.2%</i>	<i>377</i>	<i>10.6%</i>
Middle	18	42.9%	1,377	38.8%	10	23.8%	674	19.0%
Upper	20	47.6%	1,994	56.2%	21	50.0%	2,500	70.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>3,551</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>3,551</i>	<i>100.0%</i>

MI - Kalamazoo 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	3	5.0%	60	1.3%	9	15.0%	338	7.2%
Moderate	4	6.7%	126	2.7%	13	21.7%	742	15.8%
<i>Low/Moderate Total</i>	<i>7</i>	<i>11.7%</i>	<i>186</i>	<i>4.0%</i>	<i>22</i>	<i>36.7%</i>	<i>1,080</i>	<i>23.1%</i>
Middle	23	38.3%	2,201	47.0%	10	16.7%	750	16.0%
Upper	30	50.0%	2,296	49.0%	28	46.7%	2,853	60.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>4,683</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>4,683</i>	<i>100.0%</i>

MI - Kalamazoo 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	2.6%	77	1.1%	13	17.1%	599	8.6%
Moderate	4	5.3%	171	2.5%	14	18.4%	932	13.4%
<i>Low/Moderate Total</i>	<i>6</i>	<i>7.9%</i>	<i>248</i>	<i>3.6%</i>	<i>27</i>	<i>35.5%</i>	<i>1,531</i>	<i>22.0%</i>
Middle	31	40.8%	2,633	37.8%	15	19.7%	950	13.6%
Upper	39	51.3%	4,083	58.6%	33	43.4%	4,423	63.5%
Unknown	0	0.0%	0	0.0%	1	1.3%	60	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>76</i>	<i>100.0%</i>	<i>6,964</i>	<i>100.0%</i>	<i>76</i>	<i>100.0%</i>	<i>6,964</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison									
							2012					2013				
		Bank		Owner Occupied Units		%	Count		Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	\$0	0.0%	1.1%	0	0.0%	\$0	0.0%	1.2%
	Moderate	5	16.1%	\$333	9.7%	17.2%	2	16.7%	\$123	8.5%	7.1%	3	15.8%	\$210	10.5%	7.2%
	Middle	15	48.4%	\$1,320	38.3%	42.1%	7	58.3%	\$583	40.3%	42.8%	8	42.1%	\$737	36.9%	41.7%
	Upper	11	35.5%	\$1,789	52.0%	35.7%	3	25.0%	\$740	51.2%	49.0%	8	42.1%	\$1,049	52.6%	49.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.0%
	Total	31	100.0%	\$3,442	100.0%	100.0%	12	100.0%	\$1,446	100.0%	100.0%	19	100.0%	\$1,996	100.0%	100.0%
REFINANCE	Low	2	3.8%	\$126	1.8%	4.9%	1	3.1%	\$38	0.8%	0.9%	1	5.0%	\$88	3.7%	1.4%
	Moderate	5	9.6%	\$397	5.5%	17.2%	4	12.5%	\$350	7.3%	6.0%	1	5.0%	\$47	2.0%	7.7%
	Middle	22	42.3%	\$2,590	36.0%	42.1%	13	40.6%	\$1,514	31.6%	38.6%	9	45.0%	\$1,076	45.0%	32.9%
	Upper	23	44.2%	\$4,072	56.7%	35.7%	14	43.8%	\$2,890	60.3%	54.4%	9	45.0%	\$1,182	49.4%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.1%
	Total	52	100.0%	\$7,185	100.0%	100.0%	32	100.0%	\$4,792	100.0%	100.0%	20	100.0%	\$2,393	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	\$0	0.0%	1.8%	0	0.0%	\$0	0.0%	1.6%
	Moderate	1	100.0%	\$1	100.0%	17.2%	1	100.0%	\$1	100.0%	10.7%	0	0.0%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	42.1%	0	0.0%	\$0	0.0%	43.2%	0	0.0%	\$0	0.0%	38.1%
	Upper	0	0.0%	\$0	0.0%	35.7%	0	0.0%	\$0	0.0%	44.1%	0	0.0%	\$0	0.0%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.3%	0	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$1	100.0%	100.0%	1	100.0%	\$1	100.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	8.1%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	29.2%	0	0.0%	\$0	0.0%	40.8%	0	0.0%	\$0	0.0%	47.9%
	Middle	1	100.0%	\$6,000	100.0%	39.7%	0	0.0%	\$0	0.0%	7.9%	1	100.0%	\$6,000	100.0%	42.8%
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	\$0	0.0%	35.6%	0	0.0%	\$0	0.0%	3.5%
	Unknown	0	0.0%	\$0	0.0%	3.1%	0	0.0%	\$0	0.0%	15.8%	0	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$6,000	100.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	1	100.0%	\$6,000	100.0%	100.0%
HMDA TOTALS	Low	2	2.4%	\$126	0.8%	4.9%	1	2.2%	\$38	0.6%	1.0%	1	2.5%	\$88	0.8%	1.8%
	Moderate	11	12.9%	\$731	4.4%	17.2%	7	15.6%	\$474	7.6%	7.2%	4	10.0%	\$257	2.5%	11.4%
	Middle	38	44.7%	\$9,910	59.6%	42.1%	20	44.4%	\$2,097	33.6%	39.0%	18	45.0%	\$7,813	75.2%	36.7%
	Upper	34	40.0%	\$5,861	35.2%	35.7%	17	37.8%	\$3,630	58.2%	52.3%	17	42.5%	\$2,231	21.5%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.5%	0	0.0%	\$0	0.0%	0.1%
	Total	85	100.0%	\$16,628	100.0%	100.0%	45	100.0%	\$6,239	100.0%	100.0%	40	100.0%	\$10,389	100.0%	100.0%
SMALL BUSINESSES	Small Businesses															
	Low	7	3.7%	\$915	2.9%	5.1%	3	4.2%	\$460	3.5%	6.1%	4	3.4%	\$455	2.5%	8.1%
	Moderate	83	43.9%	\$14,874	47.3%	24.4%	29	40.8%	\$6,854	52.4%	28.1%	54	45.8%	\$8,020	43.7%	27.9%
	Middle	43	22.8%	\$7,681	24.4%	34.7%	17	23.9%	\$2,270	17.4%	32.3%	26	22.0%	\$5,411	29.5%	29.9%
	Upper	52	27.5%	\$7,807	24.8%	34.1%	21	29.6%	\$3,473	26.6%	32.4%	31	26.3%	\$4,334	23.6%	32.0%
	Unknown	4	2.1%	\$150	0.5%	1.7%	1	1.4%	\$20	0.2%	1.1%	3	2.5%	\$130	0.7%	2.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	189	100.0%	\$31,427	100.0%	100.0%	71	100.0%	\$13,077	100.0%	100.0%	118	100.0%	\$18,350	100.0%	100.0%
SMALL FARM	Small Farms															
	Low	0	0.0%	\$0	0.0%	1.4%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.6%	0	0.0%	\$0	0.0%	7.3%	0	0.0%	\$0	0.0%	2.5%
	Middle	0	0.0%	\$0	0.0%	44.9%	0	0.0%	\$0	0.0%	16.6%	0	0.0%	\$0	0.0%	27.3%
	Upper	0	0.0%	\$0	0.0%	47.4%	0	0.0%	\$0	0.0%	76.1%	0	0.0%	\$0	0.0%	70.2%
	Unknown	0	0.0%	\$0	0.0%	0.7%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison												
							2012					2013							
		Bank				Families by Family Income	Count			Dollar		Count			Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	6	19.4%	\$501	14.6%	21.8%	3	25.0%	14.7%	\$259	17.9%	7.8%	3	15.8%	11.4%	\$242	12.1%	5.7%	
	Moderate	17	54.8%	\$1,409	40.9%	17.1%	7	58.3%	23.2%	\$536	37.1%	18.3%	10	52.6%	23.3%	\$873	43.7%	17.6%	
	Middle	1	3.2%	\$66	1.9%	20.4%	0	0.0%	22.6%	\$0	0.0%	23.5%	1	5.3%	23.1%	\$66	3.3%	23.2%	
	Upper	7	22.6%	\$1,466	42.6%	40.8%	2	16.7%	25.4%	\$651	45.0%	37.5%	5	26.3%	28.7%	\$815	40.8%	40.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.0%	\$0	0.0%	12.9%	0	0.0%	13.6%	\$0	0.0%	12.6%	
	Total	31	100.0%	\$3,442	100.0%	100.0%	12	100.0%	100.0%	\$1,446	100.0%	100.0%	19	100.0%	100.0%	\$1,996	100.0%	100.0%	
REFINANCE	Low	7	13.5%	\$392	5.5%	21.8%	6	18.8%	6.6%	\$329	6.9%	3.8%	1	5.0%	7.0%	\$63	2.6%	3.7%	
	Moderate	11	21.2%	\$1,003	14.0%	17.1%	3	9.4%	14.1%	\$306	6.4%	10.2%	8	40.0%	15.8%	\$697	29.1%	9.7%	
	Middle	7	13.5%	\$637	8.9%	20.4%	5	15.6%	22.4%	\$430	9.0%	19.4%	2	10.0%	22.3%	\$207	8.7%	17.1%	
	Upper	27	51.9%	\$5,153	71.7%	40.8%	18	56.3%	37.3%	\$3,727	77.8%	46.0%	9	45.0%	35.3%	\$1,426	59.6%	38.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.6%	\$0	0.0%	20.6%	0	0.0%	19.7%	\$0	0.0%	31.1%	
	Total	52	100.0%	\$7,185	100.0%	100.0%	32	100.0%	100.0%	\$4,792	100.0%	100.0%	20	100.0%	100.0%	\$2,393	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	100.0%	\$1	100.0%	21.8%	1	100.0%	17.2%	\$1	100.0%	11.6%	0	0.0%	11.9%	\$0	0.0%	7.6%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	27.0%	\$0	0.0%	20.3%	0	0.0%	25.2%	\$0	0.0%	20.2%	
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	25.2%	\$0	0.0%	23.1%	0	0.0%	30.0%	\$0	0.0%	22.9%	
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	30.1%	\$0	0.0%	43.9%	0	0.0%	32.6%	\$0	0.0%	48.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	1.1%	0	0.0%	0.4%	\$0	0.0%	1.2%	
	Total	1	100.0%	\$1	100.0%	100.0%	1	100.0%	100.0%	\$1	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$6,000	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$6,000	100.0%	100.0%	
	Total	1	100.0%	\$6,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$6,000	100.0%	100.0%	
HMDA TOTALS	Low	14	16.5%	\$894	5.4%	21.8%	10	22.2%	9.6%	\$589	9.4%	4.9%	4	10.0%	8.9%	\$305	2.9%	4.0%	
	Moderate	28	32.9%	\$2,412	14.5%	17.1%	10	22.2%	17.5%	\$842	13.5%	12.3%	18	45.0%	19.1%	\$1,570	15.1%	11.4%	
	Middle	8	9.4%	\$703	4.2%	20.4%	5	11.1%	22.6%	\$430	6.9%	20.1%	3	7.5%	23.1%	\$273	2.6%	17.4%	
	Upper	34	40.0%	\$6,619	39.8%	40.8%	20	44.4%	33.3%	\$4,378	70.2%	42.4%	14	35.0%	32.6%	\$2,241	21.6%	35.6%	
	Unknown	1	1.2%	\$6,000	36.1%	0.0%	0	0.0%	17.0%	\$0	0.0%	20.3%	1	2.5%	16.3%	\$6,000	57.8%	31.5%	
	Total	85	100.0%	\$16,628	100.0%	100.0%	45	100.0%	100.0%	\$6,239	100.0%	100.0%	40	100.0%	100.0%	\$10,389	100.0%	100.0%	
Small Business	Revenue	Total Businesses																	
		\$1 Million or Less	48	25.4%	\$4,876	15.5%	89.5%	15	21.1%	31.3%	\$1,620	12.4%	40.7%	33	28.0%	43.3%	\$3,256	17.7%	37.3%
		Over \$1 Million	80	42.3%	\$19,770	62.9%	6.9%	26	36.6%				54	45.8%					
		Total Rev. available	128	67.7%	\$24,646	78.4%	96.4%	41	57.7%				87	73.8%					
		Rev. Not Known	61	32.3%	\$6,781	21.6%	3.6%	30	42.3%				31	26.3%					
	Total	189	100.0%	\$31,427	100.0%	100.0%	71	100.0%				118	100.0%						
	Loan Size	\$100,000 or Less	115	60.8%	\$5,969	19.0%		39	54.9%	91.5%	\$2,100	16.1%	30.1%	76	64.4%	87.8%	\$3,869	21.1%	25.7%
		\$100,001 - \$250,000	35	18.5%	\$6,566	20.9%		14	19.7%	4.5%	\$2,680	20.5%	20.0%	21	17.8%	6.4%	\$3,886	21.2%	21.1%
		\$250,001 - \$1 Million	39	20.6%	\$18,892	60.1%		18	25.4%	4.0%	\$8,297	63.4%	49.9%	21	17.8%	5.9%	\$10,595	57.7%	53.2%
		Total	189	100.0%	\$31,427	100.0%		71	100.0%	100.0%	\$13,077	100.0%	100.0%	118	100.0%	100.0%	\$18,350	100.0%	100.0%
Small Farm		Revenue	Total Farms																
	\$1 Million or Less		0	0.0%	\$0	0.0%	99.3%	0	0.0%	38.9%	\$0	0.0%	56.7%	0	0.0%	25.0%	\$0	0.0%	56.6%
	Over \$1 Million		0	0.0%	\$0	0.0%	0.7%	0	0.0%				0	0.0%					
	Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%						
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	97.2%	\$0	0.0%	79.0%	0	0.0%	95.8%	\$0	0.0%	67.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.8%	\$0	0.0%	21.0%	0	0.0%	4.2%	\$0	0.0%	32.3%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner		Occupied Units	Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.5%	\$0	0.0%	1.1%
	Moderate	1	9.1%	\$63	3.9%	17.2%	1	9.1%	11.9%	\$63	3.9%	6.7%
	Middle	6	54.5%	\$505	31.1%	42.1%	6	54.5%	44.1%	\$505	31.1%	39.7%
	Upper	4	36.4%	\$1,055	65.0%	35.7%	4	36.4%	41.4%	\$1,055	65.0%	52.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$1,623	100.0%	100.0%	11	100.0%	100.0%	\$1,623	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	4.4%	\$0	0.0%	2.4%
	Moderate	3	42.9%	\$395	41.6%	17.2%	3	42.9%	13.4%	\$395	41.6%	8.6%
	Middle	2	28.6%	\$190	20.0%	42.1%	2	28.6%	42.8%	\$190	20.0%	39.7%
	Upper	2	28.6%	\$364	38.4%	35.7%	2	28.6%	39.3%	\$364	38.4%	49.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	7	100.0%	\$949	100.0%	100.0%	7	100.0%	100.0%	\$949	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	4.0%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	16.4%	\$0	0.0%	9.3%
	Middle	0	0.0%	\$0	0.0%	42.1%	0	0.0%	41.3%	\$0	0.0%	42.6%
	Upper	2	100.0%	\$13	100.0%	35.7%	2	100.0%	38.1%	\$13	100.0%	45.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	2	100.0%	\$13	100.0%	100.0%	2	100.0%	100.0%	\$13	100.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	8.1%	0	0.0%	4.8%	\$0	0.0%	4.4%
	Moderate	0	0.0%	\$0	0.0%	29.2%	0	0.0%	28.6%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	39.7%	0	0.0%	40.5%	\$0	0.0%	37.2%
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	21.4%	\$0	0.0%	42.3%
	Unknown	0	0.0%	\$0	0.0%	3.1%	0	0.0%	4.8%	\$0	0.0%	5.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	3.4%	\$0	0.0%	2.0%
	Moderate	4	20.0%	\$458	17.7%	17.2%	4	20.0%	13.1%	\$458	17.7%	7.9%
	Middle	8	40.0%	\$695	26.9%	42.1%	8	40.0%	43.3%	\$695	26.9%	39.4%
	Upper	8	40.0%	\$1,432	55.4%	35.7%	8	40.0%	40.2%	\$1,432	55.4%	49.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.9%
	Total	20	100.0%	\$2,585	100.0%	100.0%	20	100.0%	100.0%	\$2,585	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	3	2.5%	\$420	2.1%	5.0%	3	2.5%	5.9%	\$420	2.1%	7.9%
	Moderate	55	46.2%	\$8,306	41.6%	24.4%	55	46.2%	23.8%	\$8,306	41.6%	27.2%
	Middle	31	26.1%	\$5,970	29.9%	34.9%	31	26.1%	32.3%	\$5,970	29.9%	28.7%
	Upper	27	22.7%	\$5,141	25.7%	34.2%	27	22.7%	36.1%	\$5,141	25.7%	33.0%
	Unknown	3	2.5%	\$130	0.7%	1.6%	3	2.5%	1.9%	\$130	0.7%	3.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
Total	119	100.0%	\$19,967	100.0%	100.0%	119	100.0%	100.0%	\$19,967	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	1.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.3%	0	0.0%	6.3%	\$0	0.0%	1.2%
	Middle	0	0.0%	\$0	0.0%	44.1%	0	0.0%	37.5%	\$0	0.0%	52.8%
	Upper	0	0.0%	\$0	0.0%	47.4%	0	0.0%	56.3%	\$0	0.0%	46.0%
	Unknown	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	2	18.2%	\$136	8.4%	21.8%	2	18.2%	8.9%	\$136	8.4%	4.3%	
	Moderate	5	45.5%	\$443	27.3%	17.1%	5	45.5%	20.4%	\$443	27.3%	14.4%	
	Middle	2	18.2%	\$195	12.0%	20.4%	2	18.2%	22.8%	\$195	12.0%	21.4%	
	Upper	2	18.2%	\$849	52.3%	40.8%	2	18.2%	32.7%	\$849	52.3%	46.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.3%	\$0	0.0%	13.8%	
	Total	11	100.0%	\$1,623	100.0%	100.0%	11	100.0%	100.0%	\$1,623	100.0%	100.0%	
REFINANCE	Low	2	28.6%	\$98	10.3%	21.8%	2	28.6%	7.7%	\$98	10.3%	4.7%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	15.1%	\$0	0.0%	10.7%	
	Middle	2	28.6%	\$206	21.7%	20.4%	2	28.6%	22.4%	\$206	21.7%	19.8%	
	Upper	3	42.9%	\$645	68.0%	40.8%	3	42.9%	35.5%	\$645	68.0%	45.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.4%	\$0	0.0%	19.0%	
	Total	7	100.0%	\$949	100.0%	100.0%	7	100.0%	100.0%	\$949	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	12.0%	\$0	0.0%	6.1%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	21.9%	\$0	0.0%	17.0%	
	Middle	1	50.0%	\$3	23.1%	20.4%	1	50.0%	26.5%	\$3	23.1%	23.1%	
	Upper	1	50.0%	\$10	76.9%	40.8%	1	50.0%	35.6%	\$10	76.9%	49.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	3.9%	
	Total	2	100.0%	\$13	100.0%	100.0%	2	100.0%	100.0%	\$13	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.4%	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%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	20.0%	\$234	9.1%	21.8%	4	20.0%	8.9%	\$234	9.1%	3.8%	
	Moderate	5	25.0%	\$443	17.1%	17.1%	5	25.0%	18.7%	\$443	17.1%	11.0%	
	Middle	5	25.0%	\$404	15.6%	20.4%	5	25.0%	23.0%	\$404	15.6%	17.5%	
	Upper	6	30.0%	\$1,504	58.2%	40.8%	6	30.0%	33.8%	\$1,504	58.2%	38.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.6%	\$0	0.0%	28.9%	
	Total	20	100.0%	\$2,585	100.0%	100.0%	20	100.0%	100.0%	\$2,585	100.0%	100.0%	
Small Business	Total Businesses												
	Revenue	\$1 Million or Less	28	23.5%	\$2,539	12.7%	88.8%	28	23.5%	40.5%	\$2,539	12.7%	33.9%
		Over \$1 Million	55	46.2%	\$11,161	55.9%	7.6%	55	46.2%				
		Total Rev. available	83	69.7%	\$13,700	68.6%	96.4%	83	69.7%				
		Rev. Not Known	36	30.3%	\$6,267	31.4%	3.5%	36	30.3%				
		Total	119	100.0%	\$19,967	100.0%	100.0%	119	100.0%				
	Loan Size	\$100,000 or Less	71	59.7%	\$3,550	17.8%		71	59.7%	89.2%	\$3,550	17.8%	29.8%
		\$100,001 - \$250,000	25	21.0%	\$4,863	24.4%		25	21.0%	5.9%	\$4,863	24.4%	21.6%
		\$250,001 - \$1 Million	23	19.3%	\$11,554	57.9%		23	19.3%	4.9%	\$11,554	57.9%	48.6%
		Total	119	100.0%	\$19,967	100.0%		119	100.0%	100.0%	\$19,967	100.0%	100.0%
Small Farm	Total Farms												
	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	99.6%	0	0.0%	34.4%	\$0	0.0%	38.6%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.4%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	96.9%	\$0	0.0%	72.6%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	27.4%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

MI - Lansing-East Lansing 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	3.8%	25	1.7%	8	30.8%	295	20.6%
Moderate	4	15.4%	119	8.3%	4	15.4%	176	12.3%
<i>Low/Moderate Total</i>	5	19.2%	144	10.0%	12	46.2%	471	32.8%
Middle	9	34.6%	396	27.6%	3	11.5%	191	13.3%
Upper	12	46.2%	894	62.3%	11	42.3%	772	53.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	26	100.0%	1,434	100.0%	26	100.0%	1,434	100.0%

MI - Lansing-East Lansing 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	1.8%	20	0.6%	12	21.8%	413	11.4%
Moderate	10	18.2%	426	11.7%	9	16.4%	561	15.5%
<i>Low/Moderate Total</i>	11	20.0%	446	12.3%	21	38.2%	974	26.9%
Middle	15	27.3%	687	18.9%	11	20.0%	726	20.0%
Upper	29	52.7%	2,494	68.8%	22	40.0%	1,777	49.0%
Unknown	0	0.0%	0	0.0%	1	1.8%	150	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	55	100.0%	3,627	100.0%	55	100.0%	3,627	100.0%

MI - Lansing-East Lansing 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	3	6.8%	69	2.4%	7	15.9%	239	8.3%
Moderate	7	15.9%	347	12.1%	13	29.5%	714	24.8%
<i>Low/Moderate Total</i>	10	22.7%	416	14.5%	20	45.5%	953	33.2%
Middle	12	27.3%	608	21.2%	7	15.9%	555	19.3%
Upper	22	50.0%	1,850	64.4%	17	38.6%	1,366	47.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	44	100.0%	2,874	100.0%	44	100.0%	2,874	100.0%

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Midland MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner		Occupied Units	Count		Dollar		Agg	Agg
		Count	Dollar	Dollar	%		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	25.0%	\$74	15.5%	2.0%	1	25.0%	1.4%	\$74	15.5%	0.7%
	Moderate	1	25.0%	\$79	16.6%	12.5%	1	25.0%	13.3%	\$79	16.6%	17.2%
	Middle	2	50.0%	\$324	67.9%	46.3%	2	50.0%	40.3%	\$324	67.9%	33.9%
	Upper	0	0.0%	\$0	0.0%	39.2%	0	0.0%	45.0%	\$0	0.0%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$477	100.0%	100.0%	4	100.0%	100.0%	\$477	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	1.8%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	12.7%	\$0	0.0%	7.6%
	Middle	0	0.0%	\$0	0.0%	46.3%	0	0.0%	43.7%	\$0	0.0%	40.1%
	Upper	1	100.0%	\$80	100.0%	39.2%	1	100.0%	41.8%	\$80	100.0%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$80	100.0%	100.0%	1	100.0%	100.0%	\$80	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.7%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	11.5%	\$0	0.0%	10.1%
	Middle	0	0.0%	\$0	0.0%	46.3%	0	0.0%	56.1%	\$0	0.0%	53.5%
	Upper	0	0.0%	\$0	0.0%	39.2%	0	0.0%	31.7%	\$0	0.0%	31.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	5.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	28.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.8%	0	0.0%	33.3%	\$0	0.0%	36.8%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	66.7%	\$0	0.0%	63.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	20.0%	\$74	13.3%	2.0%	1	20.0%	1.5%	\$74	13.3%	0.8%
	Moderate	1	20.0%	\$79	14.2%	12.5%	1	20.0%	12.9%	\$79	14.2%	13.3%
	Middle	2	40.0%	\$324	58.2%	46.3%	2	40.0%	42.5%	\$324	58.2%	36.4%
	Upper	1	20.0%	\$80	14.4%	39.2%	1	20.0%	43.1%	\$80	14.4%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$557	100.0%	100.0%	5	100.0%	100.0%	\$557	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	6	20.7%	\$2,370	28.0%	4.4%	6	20.7%	9.6%	\$2,370	28.0%	17.7%
	Moderate	4	13.8%	\$325	3.8%	17.6%	4	13.8%	17.3%	\$325	3.8%	14.3%
	Middle	8	27.6%	\$4,508	53.3%	39.1%	8	27.6%	29.7%	\$4,508	53.3%	22.7%
	Upper	11	37.9%	\$1,252	14.8%	38.9%	11	37.9%	41.1%	\$1,252	14.8%	44.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	0.4%
	Total	29	100.0%	\$8,455	100.0%	100.0%	29	100.0%	100.0%	\$8,455	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.4%	0	0.0%	5.2%	\$0	0.0%	0.8%
	Middle	1	100.0%	\$50	100.0%	62.5%	1	100.0%	87.9%	\$50	100.0%	93.5%
	Upper	0	0.0%	\$0	0.0%	18.4%	0	0.0%	6.9%	\$0	0.0%	5.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$50	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Midland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	1	25.0%	\$74	15.5%	20.7%	1	25.0%	12.2%	\$74	15.5%	5.6%	
	Moderate	1	25.0%	\$79	16.6%	17.7%	1	25.0%	17.5%	\$79	16.6%	11.0%	
	Middle	1	25.0%	\$125	26.2%	20.0%	1	25.0%	18.4%	\$125	26.2%	15.2%	
	Upper	1	25.0%	\$199	41.7%	41.7%	1	25.0%	36.1%	\$199	41.7%	46.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.7%	\$0	0.0%	21.8%	
	Total	4	100.0%	\$477	100.0%	100.0%	4	100.0%	100.0%	\$477	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	10.5%	\$0	0.0%	5.6%	
	Moderate	1	100.0%	\$80	100.0%	17.7%	1	100.0%	16.6%	\$80	100.0%	11.2%	
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	21.2%	\$0	0.0%	16.8%	
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	35.4%	\$0	0.0%	48.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.3%	\$0	0.0%	18.4%	
	Total	1	100.0%	\$80	100.0%	100.0%	1	100.0%	100.0%	\$80	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	10.1%	\$0	0.0%	2.5%	
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	15.1%	\$0	0.0%	13.4%	
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	28.1%	\$0	0.0%	22.7%	
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	36.7%	\$0	0.0%	52.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.1%	\$0	0.0%	8.8%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	20.0%	\$74	13.3%	20.7%	1	20.0%	11.5%	\$74	13.3%	5.3%	
	Moderate	2	40.0%	\$159	28.5%	17.7%	2	40.0%	17.0%	\$159	28.5%	10.6%	
	Middle	1	20.0%	\$125	22.4%	20.0%	1	20.0%	20.0%	\$125	22.4%	15.2%	
	Upper	1	20.0%	\$199	35.7%	41.7%	1	20.0%	35.8%	\$199	35.7%	44.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.7%	\$0	0.0%	24.1%	
	Total	5	100.0%	\$557	100.0%	100.0%	5	100.0%	100.0%	\$557	100.0%	100.0%	
Small Business	Total Businesses												
	Revenue	\$1 Million or Less	6	20.7%	\$634	7.5%	90.4%	6	20.7%	45.0%	\$634	7.5%	46.8%
		Over \$1 Million	16	55.2%	\$6,914	81.8%	6.4%	16	55.2%				
		Total Rev. available	22	75.9%	\$7,548	89.3%	96.8%	22	75.9%				
		Rev. Not Known	7	24.1%	\$907	10.7%	3.2%	7	24.1%				
		Total	29	100.0%	\$8,455	100.0%	100.0%	29	100.0%				
	Loan Size	\$100,000 or Less	15	51.7%	\$749	8.9%		15	51.7%	89.5%	\$749	8.9%	25.9%
		\$100,001 - \$250,000	6	20.7%	\$1,185	14.0%		6	20.7%	4.8%	\$1,185	14.0%	15.8%
		\$250,001 - \$1 Million	8	27.6%	\$6,521	77.1%		8	27.6%	5.8%	\$6,521	77.1%	58.3%
		Total	29	100.0%	\$8,455	100.0%		29	100.0%	100.0%	\$8,455	100.0%	100.0%
Small Farm	Total Farms												
	Revenue	\$1 Million or Less	1	100.0%	\$50	100.0%	98.6%	1	100.0%	79.3%	\$50	100.0%	72.9%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.4%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
		Total	1	100.0%	\$50	100.0%	100.0%	1	100.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$50	100.0%		1	100.0%	82.8%	\$50	100.0%	37.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	13.8%	\$0	0.0%	38.3%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	24.7%
Total		1	100.0%	\$50	100.0%		1	100.0%	100.0%	\$50	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Table

MI - Midland MSA 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	5.0%	50	2.4%	3	15.0%	137	6.6%
Moderate	3	15.0%	141	6.8%	4	20.0%	270	13.0%
<i>Low/Moderate Total</i>	<i>4</i>	<i>20.0%</i>	<i>191</i>	<i>9.2%</i>	<i>7</i>	<i>35.0%</i>	<i>407</i>	<i>19.5%</i>
Middle	4	20.0%	596	28.6%	1	5.0%	164	7.9%
Upper	12	60.0%	1,296	62.2%	12	60.0%	1,512	72.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>20</i>	<i>100.0%</i>	<i>2,083</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>2,083</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	%									\$ (000s)	\$ %	%	#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	7.7%	\$0	0.0%	4.4%	0	0.0%	9.9%	\$0	0.0%	5.7%
	Middle	8	53.3%	\$831	46.6%	51.3%	3	50.0%	54.4%	\$386	59.5%	53.7%	5	55.6%	52.7%	\$445	39.2%	49.8%
	Upper	7	46.7%	\$953	53.4%	30.1%	3	50.0%	37.3%	\$263	40.5%	41.6%	4	44.4%	36.9%	\$690	60.8%	44.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$1,784	100.0%	100.0%	6	100.0%	100.0%	\$649	100.0%	100.0%	9	100.0%	100.0%	\$1,135	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.4%	\$0	0.0%	0.3%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Moderate	3	5.8%	\$179	3.4%	17.1%	0	0.0%	6.9%	\$0	0.0%	3.8%	3	18.8%	10.6%	\$179	10.3%	5.4%
	Middle	27	51.9%	\$2,241	42.9%	51.3%	20	55.6%	51.7%	\$1,633	46.8%	50.5%	7	43.8%	54.0%	\$608	35.0%	45.3%
	Upper	22	42.3%	\$2,805	53.7%	30.1%	16	44.4%	40.9%	\$1,855	53.2%	45.4%	6	37.5%	34.6%	\$950	54.7%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	52	100.0%	\$5,225	100.0%	100.0%	36	100.0%	100.0%	\$3,488	100.0%	100.0%	16	100.0%	100.0%	\$1,737	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	1.8%	\$0	0.0%	0.6%	0	0.0%	2.5%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	12.7%	\$0	0.0%	4.7%	0	0.0%	16.4%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	51.3%	0	0.0%	57.0%	\$0	0.0%	63.9%	0	0.0%	48.3%	\$0	0.0%	41.2%
	Upper	1	100.0%	\$68	100.0%	30.1%	0	0.0%	28.5%	\$0	0.0%	30.7%	1	100.0%	32.8%	\$68	100.0%	47.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$68	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$68	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.8%	0	0.0%	12.5%	\$0	0.0%	1.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	55.9%	0	0.0%	25.0%	\$0	0.0%	25.0%	0	0.0%	14.3%	\$0	0.0%	3.5%
	Middle	0	0.0%	\$0	0.0%	27.3%	0	0.0%	37.5%	\$0	0.0%	8.8%	0	0.0%	71.4%	\$0	0.0%	81.9%
	Upper	0	0.0%	\$0	0.0%	11.0%	0	0.0%	25.0%	\$0	0.0%	64.4%	0	0.0%	14.3%	\$0	0.0%	14.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	3	4.4%	\$179	2.5%	17.1%	0	0.0%	7.3%	\$0	0.0%	4.2%	3	11.5%	10.5%	\$179	6.1%	5.5%
	Middle	35	51.5%	\$3,072	43.4%	51.3%	23	54.8%	52.7%	\$2,019	48.8%	51.2%	12	46.2%	53.3%	\$1,053	35.8%	47.0%
	Upper	30	44.1%	\$3,826	54.1%	30.1%	19	45.2%	39.4%	\$2,118	51.2%	44.3%	11	42.3%	35.5%	\$1,708	58.1%	47.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	68	100.0%	\$7,077	100.0%	100.0%	42	100.0%	100.0%	\$4,137	100.0%	100.0%	26	100.0%	100.0%	\$2,940	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	22	11.2%	\$5,305	11.3%	3.9%	6	6.7%	5.8%	\$2,625	11.2%	10.1%	16	15.0%	7.6%	\$2,680	11.5%	10.0%
	Moderate	62	31.6%	\$12,861	27.5%	20.7%	27	30.3%	19.7%	\$4,954	21.2%	19.4%	35	32.7%	20.7%	\$7,907	33.8%	19.8%
	Middle	55	28.1%	\$17,804	38.1%	45.7%	26	29.2%	43.2%	\$9,197	39.4%	40.3%	29	27.1%	44.0%	\$8,607	36.8%	47.7%
	Upper	57	29.1%	\$10,786	23.1%	29.7%	30	33.7%	28.4%	\$6,577	28.2%	29.8%	27	25.2%	27.0%	\$4,209	18.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.1%
Total	196	100.0%	\$46,756	100.0%	100.0%	89	100.0%	100.0%	\$23,353	100.0%	100.0%	107	100.0%	100.0%	\$23,403	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	80.9%	0	0.0%	93.8%	\$0	0.0%	84.6%	0	0.0%	96.4%	\$0	0.0%	99.5%
	Upper	0	0.0%	\$0	0.0%	17.6%	0	0.0%	6.3%	\$0	0.0%	15.4%	0	0.0%	3.6%	\$0	0.0%	0.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2012, 2013					2012						2013						
							Count		Dollar		Count		Dollar		Count		Dollar		
		Borrower Income Levels		Bank		Families by Family Income	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	#	%		\$ (000s)	\$ %		\$ %	#		%	\$ %		\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	14.8%	\$0	0.0%	9.2%	0	0.0%	9.0%	\$0	0.0%	4.7%	
	Moderate	6	40.0%	\$439	24.6%	17.9%	2	33.3%	24.2%	\$191	29.4%	20.3%	4	44.4%	24.0%	\$248	21.9%	17.8%	
	Middle	3	20.0%	\$290	16.3%	21.2%	3	50.0%	20.9%	\$290	44.7%	21.8%	0	0.0%	22.5%	\$0	0.0%	21.0%	
	Upper	6	40.0%	\$1,055	59.1%	39.7%	1	16.7%	20.3%	\$168	25.9%	30.3%	5	55.6%	27.0%	\$887	78.1%	39.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.8%	\$0	0.0%	18.5%	0	0.0%	17.5%	\$0	0.0%	16.7%	
	Total	15	100.0%	\$1,784	100.0%	100.0%	6	100.0%	100.0%	\$649	100.0%	100.0%	9	100.0%	100.0%	\$1,135	100.0%	100.0%	
REFINANCE	Low	5	9.6%	\$314	6.0%	21.1%	3	8.3%	7.0%	\$191	5.5%	4.3%	2	12.5%	6.8%	\$123	7.1%	3.4%	
	Moderate	10	19.2%	\$649	12.4%	17.9%	8	22.2%	15.2%	\$477	13.7%	10.6%	2	12.5%	13.8%	\$172	9.9%	8.6%	
	Middle	13	25.0%	\$1,185	22.7%	21.2%	9	25.0%	21.1%	\$833	23.9%	17.5%	4	25.0%	18.3%	\$352	20.3%	13.0%	
	Upper	23	44.2%	\$2,863	54.8%	39.7%	15	41.7%	33.6%	\$1,773	50.8%	43.6%	8	50.0%	38.6%	\$1,090	62.8%	40.7%	
	Unknown	1	1.9%	\$214	4.1%	0.0%	1	2.8%	23.1%	\$214	6.1%	24.0%	0	0.0%	22.4%	\$0	0.0%	34.3%	
	Total	52	100.0%	\$5,225	100.0%	100.0%	36	100.0%	100.0%	\$3,488	100.0%	100.0%	16	100.0%	100.0%	\$1,737	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	11.5%	\$0	0.0%	4.7%	0	0.0%	12.9%	\$0	0.0%	6.5%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	22.4%	\$0	0.0%	8.2%	0	0.0%	19.4%	\$0	0.0%	11.5%	
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	27.9%	\$0	0.0%	21.5%	0	0.0%	31.8%	\$0	0.0%	26.9%	
	Upper	1	100.0%	\$68	100.0%	39.7%	0	0.0%	37.0%	\$0	0.0%	60.5%	1	100.0%	34.3%	\$68	100.0%	51.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	5.1%	0	0.0%	1.5%	\$0	0.0%	3.5%	
	Total	1	100.0%	\$68	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$68	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	5	7.4%	\$314	4.4%	21.1%	3	7.1%	9.7%	\$191	4.6%	5.7%	2	7.7%	7.8%	\$123	4.2%	3.9%	
	Moderate	16	23.5%	\$1,088	15.4%	17.9%	10	23.8%	18.3%	\$668	16.1%	13.3%	6	23.1%	18.1%	\$420	14.3%	12.1%	
	Middle	16	23.5%	\$1,475	20.8%	21.2%	12	28.6%	21.2%	\$1,123	27.1%	18.7%	4	15.4%	20.4%	\$352	12.0%	16.1%	
	Upper	30	44.1%	\$3,986	56.3%	39.7%	16	38.1%	29.4%	\$1,941	46.9%	39.4%	14	53.8%	33.8%	\$2,045	69.6%	40.4%	
	Unknown	1	1.5%	\$214	3.0%	0.0%	1	2.4%	21.5%	\$214	5.2%	22.9%	0	0.0%	19.9%	\$0	0.0%	27.5%	
	Total	68	100.0%	\$7,077	100.0%	100.0%	42	100.0%	100.0%	\$4,137	100.0%	100.0%	26	100.0%	100.0%	\$2,940	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	49	25.0%	\$8,531	18.2%	89.7%	22	24.7%	29.9%	\$4,674	20.0%	40.7%	27	25.2%	38.2%	\$3,857	16.5%	30.3%	
	Over \$1 Million	119	60.7%	\$35,461	75.8%	6.8%	53	59.6%					66	61.7%					
	Total Rev. available	168	85.7%	\$43,992	94.0%	96.5%	75	84.3%					93	86.9%					
	Rev. Not Known	28	14.3%	\$2,764	5.9%	3.5%	14	15.7%					14	13.1%					
	Total	196	100.0%	\$46,756	100.0%	100.0%	89	100.0%					107	100.0%					
	Small Business Loan Size	\$100,000 or Less	86	43.9%	\$5,139	11.0%		33	37.1%	89.6%	\$2,265	9.7%	28.3%	53	49.5%	84.7%	\$2,874	12.3%	23.1%
\$100,001 - \$250,000		53	27.0%	\$9,864	21.1%		26	29.2%	5.9%	\$4,911	21.0%	21.0%	27	25.2%	8.4%	\$4,953	21.2%	21.8%	
\$250,001 - \$1 Million		57	29.1%	\$31,753	67.9%		30	33.7%	4.5%	\$16,177	69.3%	50.7%	27	25.2%	6.8%	\$15,576	66.6%	55.0%	
Total		196	100.0%	\$46,756	100.0%		89	100.0%	100.0%	\$23,353	100.0%	100.0%	107	100.0%	100.0%	\$23,403	100.0%	100.0%	
Small Farm Revenue		Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.9%	0	0.0%	56.3%	\$0	0.0%	41.6%	0	0.0%	46.4%	\$0	0.0%	21.4%	
	Over \$1 Million	0	0.0%	\$0	0.0%	2.1%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	75.0%	\$0	0.0%	11.8%	0	0.0%	67.9%	\$0	0.0%	12.2%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	54.6%	
\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	25.0%	\$0	0.0%	88.2%	0	0.0%	7.1%	\$0	0.0%	33.2%		
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%					%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	11.4%	\$0	0.0%	6.4%
	Middle	2	40.0%	\$435	39.7%	51.3%	2	40.0%	50.9%	\$435	39.7%	49.8%
	Upper	3	60.0%	\$660	60.3%	30.1%	3	60.0%	37.3%	\$660	60.3%	43.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$1,095	100.0%	100.0%	5	100.0%	100.0%	\$1,095	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	1	16.7%	\$52	10.9%	17.1%	1	16.7%	9.3%	\$52	10.9%	5.5%
	Middle	3	50.0%	\$240	50.4%	51.3%	3	50.0%	52.4%	\$240	50.4%	49.9%
	Upper	2	33.3%	\$184	38.7%	30.1%	2	33.3%	37.8%	\$184	38.7%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$476	100.0%	100.0%	6	100.0%	100.0%	\$476	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	2.2%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	8.8%	\$0	0.0%	4.3%
	Middle	0	0.0%	\$0	0.0%	51.3%	0	0.0%	56.0%	\$0	0.0%	64.7%
	Upper	0	0.0%	\$0	0.0%	30.1%	0	0.0%	33.0%	\$0	0.0%	30.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	5.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	55.9%	0	0.0%	40.0%	\$0	0.0%	16.6%
	Middle	0	0.0%	\$0	0.0%	27.3%	0	0.0%	60.0%	\$0	0.0%	83.4%
	Upper	0	0.0%	\$0	0.0%	11.0%	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%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Multi-Family Units											
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Moderate	1	9.1%	\$52	3.3%	17.1%	1	9.1%	10.5%	\$52	3.3%	6.4%
	Middle	5	45.5%	\$675	43.0%	51.3%	5	45.5%	51.6%	\$675	43.0%	51.2%
	Upper	5	45.5%	\$844	53.7%	30.1%	5	45.5%	37.2%	\$844	53.7%	42.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$1,571	100.0%	100.0%	11	100.0%	100.0%	\$1,571	100.0%	100.0%
	Small Businesses											
SMALL BUSINESSES	Low	15	14.9%	\$2,260	10.4%	4.2%	15	14.9%	8.0%	\$2,260	10.4%	13.6%
	Moderate	29	28.7%	\$6,937	31.9%	20.3%	29	28.7%	20.2%	\$6,937	31.9%	17.6%
	Middle	26	25.7%	\$6,329	29.1%	45.6%	26	25.7%	43.8%	\$6,329	29.1%	47.5%
	Upper	31	30.7%	\$6,199	28.5%	29.9%	31	30.7%	26.7%	\$6,199	28.5%	20.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.3%
	Total	101	100.0%	\$21,725	100.0%	100.0%	101	100.0%	100.0%	\$21,725	100.0%	100.0%
	Small Farms											
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	81.2%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	18.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Small Farms											

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	1	20.0%	\$60	5.5%	21.1%	1	20.0%	6.8%	\$60	5.5%	3.7%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	22.9%	\$0	0.0%	15.9%	
	Middle	1	20.0%	\$104	9.5%	21.2%	1	20.0%	20.2%	\$104	9.5%	19.6%	
	Upper	3	60.0%	\$931	85.0%	39.7%	3	60.0%	26.7%	\$931	85.0%	38.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.4%	\$0	0.0%	22.2%	
	Total	5	100.0%	\$1,095	100.0%	100.0%	5	100.0%	100.0%	\$1,095	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	6.8%	\$0	0.0%	3.9%	
	Moderate	1	16.7%	\$52	10.9%	17.9%	1	16.7%	16.0%	\$52	10.9%	11.1%	
	Middle	3	50.0%	\$284	59.7%	21.2%	3	50.0%	18.9%	\$284	59.7%	15.7%	
	Upper	2	33.3%	\$140	29.4%	39.7%	2	33.3%	35.7%	\$140	29.4%	44.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.7%	\$0	0.0%	24.9%	
	Total	6	100.0%	\$476	100.0%	100.0%	6	100.0%	100.0%	\$476	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	9.3%	\$0	0.0%	5.8%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	19.2%	\$0	0.0%	13.8%	
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	23.1%	\$0	0.0%	17.4%	
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	42.9%	\$0	0.0%	54.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.5%	\$0	0.0%	8.5%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	9.1%	\$60	3.8%	21.1%	1	9.1%	6.9%	\$60	3.8%	3.6%	
	Moderate	1	9.1%	\$52	3.3%	17.9%	1	9.1%	20.2%	\$52	3.3%	13.7%	
	Middle	4	36.4%	\$388	24.7%	21.2%	4	36.4%	19.8%	\$388	24.7%	17.5%	
	Upper	5	45.5%	\$1,071	68.2%	39.7%	5	45.5%	30.7%	\$1,071	68.2%	39.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.5%	\$0	0.0%	25.5%	
	Total	11	100.0%	\$1,571	100.0%	100.0%	11	100.0%	100.0%	\$1,571	100.0%	100.0%	
Small Business	Total Businesses												
	Revenue	\$1 Million or Less	21	20.8%	\$2,379	11.0%	89.1%	21	20.8%	38.7%	\$2,379	11.0%	30.4%
		Over \$1 Million	65	64.4%	\$17,245	79.4%	7.7%	65	64.4%				
		Total Rev. available	86	85.2%	\$19,624	90.4%	96.8%	86	85.2%				
		Rev. Not Known	15	14.9%	\$2,101	9.7%	3.2%	15	14.9%				
		Total	101	100.0%	\$21,725	100.0%	100.0%	101	100.0%				
	Loan Size	\$100,000 or Less	47	46.5%	\$2,447	11.3%		47	46.5%	87.9%	\$2,447	11.3%	27.7%
		\$100,001 - \$250,000	25	24.8%	\$4,593	21.1%		25	24.8%	6.4%	\$4,593	21.1%	20.0%
		\$250,001 - \$1 Million	29	28.7%	\$14,685	67.6%		29	28.7%	5.7%	\$14,685	67.6%	52.3%
		Total	101	100.0%	\$21,725	100.0%		101	100.0%	100.0%	\$21,725	100.0%	100.0%
Small Farm	Total Farms												
	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	97.6%	0	0.0%	38.5%	\$0	0.0%	17.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	2.4%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	61.5%	\$0	0.0%	13.9%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	15.4%	\$0	0.0%	22.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	23.1%	\$0	0.0%	64.0%
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

MI - Muskegon MSA 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	4	15.4%	86	6.1%
Moderate	3	11.5%	94	6.6%	8	30.8%	248	17.5%
<i>Low/Moderate Total</i>	<i>3</i>	<i>11.5%</i>	<i>94</i>	<i>6.6%</i>	<i>12</i>	<i>46.2%</i>	<i>334</i>	<i>23.6%</i>
Middle	14	53.8%	660	46.7%	5	19.2%	367	26.0%
Upper	9	34.6%	660	46.7%	9	34.6%	713	50.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>26</i>	<i>100.0%</i>	<i>1,414</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>1,414</i>	<i>100.0%</i>

MI - Muskegon MSA 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	3.7%	29	0.9%	6	11.1%	240	7.6%
Moderate	2	3.7%	80	2.5%	10	18.5%	388	12.2%
<i>Low/Moderate Total</i>	<i>4</i>	<i>7.4%</i>	<i>109</i>	<i>3.4%</i>	<i>16</i>	<i>29.6%</i>	<i>628</i>	<i>19.8%</i>
Middle	35	64.8%	2,183	68.9%	11	20.4%	550	17.4%
Upper	15	27.8%	876	27.7%	27	50.0%	1,990	62.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>54</i>	<i>100.0%</i>	<i>3,168</i>	<i>100.0%</i>	<i>54</i>	<i>100.0%</i>	<i>3,168</i>	<i>100.0%</i>

MI - Muskegon MSA 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	3	5.7%	110	3.4%
Moderate	5	9.4%	164	5.0%	16	30.2%	797	24.3%
<i>Low/Moderate Total</i>	<i>5</i>	<i>9.4%</i>	<i>164</i>	<i>5.0%</i>	<i>19</i>	<i>35.8%</i>	<i>907</i>	<i>27.6%</i>
Middle	23	43.4%	1,521	46.4%	11	20.8%	641	19.5%
Upper	25	47.2%	1,596	48.6%	23	43.4%	1,733	52.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>3,281</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>3,281</i>	<i>100.0%</i>

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - Austin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
						Owner Occupied Units	2012					2013						
		Bank		Dollar	Count		Dollar		Agg	Count		Dollar	Agg					
		Count					Bank	Agg		Bank	Agg			Bank	Agg			
		#	%	\$ (000s)	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	3.2%	\$147	1.3%	5.5%	0	0.0%	3.7%	\$0	0.0%	2.5%	1	5.9%	3.9%	\$147	2.9%	2.8%
	Moderate	4	12.9%	\$544	4.8%	17.2%	2	14.3%	14.0%	\$247	4.0%	9.6%	2	11.8%	15.4%	\$297	5.8%	11.1%
	Middle	7	22.6%	\$1,004	8.9%	32.9%	4	28.6%	33.1%	\$548	8.9%	26.2%	3	17.6%	33.8%	\$456	8.9%	27.4%
	Upper	19	61.3%	\$9,603	85.0%	44.3%	8	57.1%	49.3%	\$5,352	87.1%	61.7%	11	64.7%	46.9%	\$4,251	82.5%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	31	100.0%	\$11,298	100.0%	100.0%	14	100.0%	100.0%	\$6,147	100.0%	100.0%	17	100.0%	100.0%	\$5,151	100.0%	100.0%
REFINANCE	Low	1	1.3%	\$62	0.2%	5.5%	1	2.0%	2.5%	\$62	0.4%	1.6%	0	0.0%	3.7%	\$0	0.0%	3.4%
	Moderate	9	11.4%	\$1,230	4.6%	17.2%	5	10.2%	9.8%	\$809	5.7%	6.7%	4	13.3%	12.9%	\$421	3.5%	11.2%
	Middle	19	24.1%	\$2,549	9.6%	32.9%	13	26.5%	28.8%	\$1,995	13.9%	21.3%	6	20.0%	31.9%	\$554	4.5%	24.1%
	Upper	50	63.3%	\$22,668	85.5%	44.3%	30	61.2%	58.9%	\$11,451	80.0%	70.4%	20	66.7%	51.5%	\$11,217	92.0%	61.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	79	100.0%	\$26,509	100.0%	100.0%	49	100.0%	100.0%	\$14,317	100.0%	100.0%	30	100.0%	100.0%	\$12,192	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	2.9%	\$0	0.0%	1.6%	0	0.0%	4.1%	\$0	0.0%	2.1%
	Moderate	1	50.0%	\$106	33.3%	17.2%	0	0.0%	10.0%	\$0	0.0%	6.3%	1	50.0%	13.6%	\$106	33.3%	8.4%
	Middle	0	0.0%	\$0	0.0%	32.9%	0	0.0%	27.4%	\$0	0.0%	18.1%	0	0.0%	31.7%	\$0	0.0%	23.0%
	Upper	1	50.0%	\$212	66.7%	44.3%	0	0.0%	59.6%	\$0	0.0%	74.0%	1	50.0%	50.6%	\$212	66.7%	66.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$318	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$318	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	1	100.0%	\$350	100.0%	23.4%	0	0.0%	29.5%	\$0	0.0%	18.9%	1	100.0%	23.3%	\$350	100.0%	13.0%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	18.2%	\$0	0.0%	22.5%	0	0.0%	41.4%	\$0	0.0%	43.6%
	Middle	0	0.0%	\$0	0.0%	28.5%	0	0.0%	25.0%	\$0	0.0%	28.9%	0	0.0%	24.1%	\$0	0.0%	30.4%
	Upper	0	0.0%	\$0	0.0%	21.0%	0	0.0%	27.3%	\$0	0.0%	29.8%	0	0.0%	11.3%	\$0	0.0%	13.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Multi-Family Units																	
	Low	3	2.7%	\$559	1.5%	5.5%	1	1.6%	3.0%	\$62	0.3%	2.8%	2	4.0%	3.8%	\$497	2.8%	3.6%
	Moderate	14	12.4%	\$1,880	4.9%	17.2%	7	11.1%	11.6%	\$1,056	5.2%	8.7%	7	14.0%	14.3%	\$824	4.6%	13.0%
	Middle	26	23.0%	\$3,553	9.2%	32.9%	17	27.0%	30.6%	\$2,543	12.4%	23.7%	9	18.0%	32.9%	\$1,010	5.6%	26.1%
	Upper	70	61.9%	\$32,483	84.4%	44.3%	38	60.3%	54.7%	\$16,803	82.1%	64.8%	32	64.0%	49.0%	\$15,680	87.1%	57.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Small Businesses																	
	Low	25	8.9%	\$6,336	10.1%	6.8%	4	5.2%	6.7%	\$450	2.5%	8.1%	21	10.3%	6.4%	\$5,886	13.2%	7.1%
	Moderate	50	17.8%	\$14,315	22.8%	17.1%	14	18.2%	15.4%	\$4,298	23.5%	17.4%	36	17.6%	15.6%	\$10,017	22.4%	16.9%
	Middle	59	21.0%	\$13,231	21.0%	28.3%	25	32.5%	25.9%	\$5,448	29.8%	25.0%	34	16.7%	26.2%	\$7,783	17.4%	26.1%
	Upper	147	52.3%	\$29,021	46.1%	47.7%	34	44.2%	49.4%	\$8,075	44.2%	48.0%	113	55.4%	50.2%	\$20,946	46.9%	48.9%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	4.4%	\$0	0.0%	14.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	32.2%	\$0	0.0%	42.5%	0	0.0%	28.5%	\$0	0.0%	36.7%
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	33.6%	\$0	0.0%	29.0%	0	0.0%	38.0%	\$0	0.0%	26.8%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	30.8%	\$0	0.0%	27.3%	0	0.0%	29.1%	\$0	0.0%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
TOTALS	Small Farms																	

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX - Austin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		Comparison 2012, 2013					2012						2013					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg				
#	%	\$ (000s)	\$ %	%	#	%	Agg	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	%		
HOME PURCHASE	Low	2	6.5%	\$176	1.6%	21.8%	1	7.1%	5.8%	\$76	1.2%	2.8%	1	5.9%	4.2%	\$100	1.9%	2.0%
	Moderate	5	16.1%	\$697	6.2%	17.0%	2	14.3%	18.2%	\$256	4.2%	12.5%	3	17.6%	15.0%	\$441	8.6%	9.8%
	Middle	6	19.4%	\$1,133	10.0%	19.3%	4	28.6%	21.0%	\$797	13.0%	18.4%	2	11.8%	20.4%	\$336	6.5%	17.0%
	Upper	18	58.1%	\$9,292	82.2%	42.0%	7	50.0%	45.0%	\$5,018	81.6%	58.1%	11	64.7%	48.8%	\$4,274	83.0%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	8.2%	0	0.0%	11.7%	\$0	0.0%	10.3%
	Total	31	100.0%	\$11,298	100.0%	100.0%	14	100.0%	100.0%	\$6,147	100.0%	100.0%	17	100.0%	100.0%	\$5,151	100.0%	100.0%
REFINANCE	Low	4	5.1%	\$460	1.7%	21.8%	3	6.1%	3.2%	\$322	2.2%	1.6%	1	3.3%	4.2%	\$138	1.1%	2.0%
	Moderate	11	13.9%	\$1,331	5.0%	17.0%	5	10.2%	10.7%	\$754	5.3%	6.5%	6	20.0%	11.1%	\$577	4.7%	6.2%
	Middle	25	31.6%	\$4,783	18.0%	19.3%	16	32.7%	17.6%	\$3,570	24.9%	13.7%	9	30.0%	16.7%	\$1,213	9.9%	11.3%
	Upper	37	46.8%	\$16,485	62.2%	42.0%	25	51.0%	55.1%	\$9,671	67.5%	66.5%	12	40.0%	50.7%	\$6,814	55.9%	55.6%
	Unknown	2	2.5%	\$3,450	13.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	11.7%	2	6.7%	17.3%	\$3,450	28.3%	25.0%
	Total	79	100.0%	\$26,509	100.0%	100.0%	49	100.0%	100.0%	\$14,317	100.0%	100.0%	30	100.0%	100.0%	\$12,192	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	4.2%	\$0	0.0%	1.5%	0	0.0%	5.6%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	11.2%	\$0	0.0%	4.9%	0	0.0%	15.0%	\$0	0.0%	7.6%
	Middle	1	50.0%	\$212	66.7%	19.3%	0	0.0%	20.0%	\$0	0.0%	13.5%	1	50.0%	20.2%	\$212	66.7%	13.0%
	Upper	1	50.0%	\$106	33.3%	42.0%	0	0.0%	62.7%	\$0	0.0%	77.6%	1	50.0%	57.3%	\$106	33.3%	74.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	2.5%	0	0.0%	1.9%	\$0	0.0%	3.1%
	Total	2	100.0%	\$318	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$318	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$350	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$350	100.0%	100.0%
	Total	1	100.0%	\$350	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$350	100.0%	100.0%
HMDA TOTALS	Low	6	5.3%	\$636	1.7%	21.8%	4	6.3%	4.3%	\$398	1.9%	2.1%	2	4.0%	4.2%	\$238	1.3%	1.9%
	Moderate	16	14.2%	\$2,028	5.3%	17.0%	7	11.1%	14.0%	\$1,010	4.9%	8.7%	9	18.0%	13.3%	\$1,018	5.7%	7.7%
	Middle	32	28.3%	\$6,128	15.9%	19.3%	20	31.7%	19.1%	\$4,367	21.3%	15.0%	12	24.0%	18.7%	\$1,761	9.8%	13.6%
	Upper	56	49.6%	\$25,883	67.3%	42.0%	32	50.8%	50.8%	\$14,689	71.8%	59.9%	24	48.0%	49.8%	\$11,194	62.2%	55.3%
	Unknown	3	2.7%	\$3,800	9.9%	0.0%	0	0.0%	11.9%	\$0	0.0%	14.3%	3	6.0%	14.1%	\$3,800	21.1%	21.5%
	Total	113	100.0%	\$38,475	100.0%	100.0%	63	100.0%	100.0%	\$20,464	100.0%	100.0%	50	100.0%	100.0%	\$18,011	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	73	26.0%	\$13,062	20.8%	90.9%	26	33.8%	42.9%	\$2,880	15.8%	39.3%	47	23.0%	49.3%	\$10,182	22.8%	38.7%
	Over \$1 Million	117	41.6%	\$41,948	66.7%	5.4%	30	39.0%					87	42.6%				
	Total Rev. available	190	67.6%	\$55,010	87.5%	96.3%	56	72.8%					134	65.6%				
	Rev. Not Known	91	32.4%	\$7,893	12.5%	3.7%	21	27.3%					70	34.3%				
	Total	281	100.0%	\$62,903	100.0%	100.0%	77	100.0%					204	100.0%				
Small Business Loan Size	\$100,000 or Less	161	57.3%	\$7,538	12.0%		44	57.1%	94.7%	\$2,309	12.6%	37.9%	117	57.4%	93.6%	\$5,229	11.7%	36.0%
	\$100,001 - \$250,000	47	16.7%	\$8,728	13.9%		13	16.9%	2.4%	\$2,541	13.9%	13.6%	34	16.7%	3.1%	\$6,187	13.9%	14.4%
	\$250,001 - \$1 Million	73	26.0%	\$46,637	74.1%		20	26.0%	2.9%	\$13,421	73.5%	48.5%	53	26.0%	3.4%	\$33,216	74.4%	49.6%
	Total	281	100.0%	\$62,903	100.0%		77	100.0%	100.0%	\$18,271	100.0%	100.0%	204	100.0%	100.0%	\$44,632	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	99.1%	0	0.0%	56.6%	\$0	0.0%	65.4%	0	0.0%	64.6%	\$0	0.0%	71.7%
Small Farm Loan Size	Over \$1 Million	0	0.0%	\$0	0.0%	0.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	88.8%	\$0	0.0%	33.3%	0	0.0%	83.5%	\$0	0.0%	30.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	10.9%	0	0.0%	8.9%	\$0	0.0%	24.1%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.7%	\$0	0.0%	55.8%	0	0.0%	7.6%	\$0	0.0%	45.6%
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - Austin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%					%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	4.2%	\$0	0.0%	3.2%
	Moderate	1	6.7%	\$162	2.7%	17.2%	1	6.7%	16.0%	\$162	2.7%	11.8%
	Middle	2	13.3%	\$323	5.4%	32.9%	2	13.3%	34.1%	\$323	5.4%	28.5%
	Upper	12	80.0%	\$5,500	91.9%	44.3%	12	80.0%	45.7%	\$5,500	91.9%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$5,985	100.0%	100.0%	15	100.0%	100.0%	\$5,985	100.0%	100.0%
REFINANCE	Low	1	5.9%	\$57	1.0%	5.5%	1	5.9%	4.9%	\$57	1.0%	3.2%
	Moderate	1	5.9%	\$61	1.1%	17.2%	1	5.9%	15.0%	\$61	1.1%	10.4%
	Middle	4	23.5%	\$406	7.4%	32.9%	4	23.5%	33.9%	\$406	7.4%	25.8%
	Upper	11	64.7%	\$4,967	90.5%	44.3%	11	64.7%	46.1%	\$4,967	90.5%	60.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$5,491	100.0%	100.0%	17	100.0%	100.0%	\$5,491	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	4.7%	\$0	0.0%	3.3%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	13.0%	\$0	0.0%	8.3%
	Middle	0	0.0%	\$0	0.0%	32.9%	0	0.0%	31.5%	\$0	0.0%	20.9%
	Upper	0	0.0%	\$0	0.0%	44.3%	0	0.0%	50.8%	\$0	0.0%	67.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	Multi-Family Units				0	0.0%	28.1%	\$0	0.0%	17.5%	
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	28.9%	\$0	0.0%	31.4%
	Middle	0	0.0%	\$0	0.0%	28.5%	0	0.0%	25.6%	\$0	0.0%	18.9%
	Upper	0	0.0%	\$0	0.0%	21.0%	0	0.0%	17.4%	\$0	0.0%	32.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	1	3.1%	\$57	0.5%	5.5%	1	3.1%	4.5%	\$57	0.5%	4.3%
Moderate	2	6.3%	\$223	1.9%	17.2%	2	6.3%	15.7%	\$223	1.9%	13.0%	
Middle	6	18.8%	\$729	6.4%	32.9%	6	18.8%	34.0%	\$729	6.4%	27.0%	
Upper	23	71.9%	\$10,467	91.2%	44.3%	23	71.9%	45.9%	\$10,467	91.2%	55.8%	
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	32	100.0%	\$11,476	100.0%	100.0%	32	100.0%	100.0%	\$11,476	100.0%	100.0%	
SMALL BUSINESSES	Low	Small Businesses				21	10.7%	6.8%	\$5,280	11.9%	8.4%	
	Moderate	30	15.3%	\$9,650	21.8%	16.6%	30	15.3%	16.4%	\$9,650	21.8%	16.2%
	Middle	40	20.4%	\$9,089	20.5%	27.7%	40	20.4%	26.5%	\$9,089	20.5%	25.0%
	Upper	105	53.6%	\$20,282	45.8%	49.0%	105	53.6%	48.8%	\$20,282	45.8%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	1.0%
	Total	196	100.0%	\$44,301	100.0%	100.0%	196	100.0%	100.0%	\$44,301	100.0%	100.0%
	Low	Small Farms				0	0.0%	2.6%	\$0	0.0%	4.3%	
Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	27.6%	\$0	0.0%	29.9%	
Middle	0	0.0%	\$0	0.0%	27.5%	0	0.0%	31.4%	\$0	0.0%	27.0%	
Upper	0	0.0%	\$0	0.0%	53.0%	0	0.0%	37.8%	\$0	0.0%	38.4%	
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.6%	\$0	0.0%	0.4%	
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: TX - Austin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	1	6.7%	\$365	6.1%	21.8%	1	6.7%	3.0%	\$365	6.1%	1.4%	
	Moderate	3	20.0%	\$481	8.0%	17.0%	3	20.0%	13.5%	\$481	8.0%	8.7%	
	Middle	3	20.0%	\$532	8.9%	19.3%	3	20.0%	18.7%	\$532	8.9%	15.6%	
	Upper	7	46.7%	\$3,607	60.3%	42.0%	7	46.7%	46.4%	\$3,607	60.3%	57.4%	
	Unknown	1	6.7%	\$1,000	16.7%	0.0%	1	6.7%	18.4%	\$1,000	16.7%	16.9%	
	Total	15	100.0%	\$5,985	100.0%	100.0%	15	100.0%	100.0%	\$5,985	100.0%	100.0%	
REFINANCE	Low	4	23.5%	\$304	5.5%	21.8%	4	23.5%	4.4%	\$304	5.5%	2.2%	
	Moderate	4	23.5%	\$421	7.7%	17.0%	4	23.5%	12.5%	\$421	7.7%	7.5%	
	Middle	2	11.8%	\$266	4.8%	19.3%	2	11.8%	17.6%	\$266	4.8%	13.0%	
	Upper	7	41.2%	\$4,500	82.0%	42.0%	7	41.2%	44.5%	\$4,500	82.0%	58.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.9%	\$0	0.0%	19.2%	
	Total	17	100.0%	\$5,491	100.0%	100.0%	17	100.0%	100.0%	\$5,491	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	4.3%	\$0	0.0%	1.0%	
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	12.6%	\$0	0.0%	6.1%	
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	18.0%	\$0	0.0%	11.2%	
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	59.4%	\$0	0.0%	74.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	6.9%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	5	15.6%	\$669	5.8%	21.8%	5	15.6%	3.5%	\$669	5.8%	1.5%	
	Moderate	7	21.9%	\$902	7.9%	17.0%	7	21.9%	13.1%	\$902	7.9%	7.7%	
	Middle	5	15.6%	\$798	7.0%	19.3%	5	15.6%	18.4%	\$798	7.0%	13.7%	
	Upper	14	43.8%	\$8,107	70.6%	42.0%	14	43.8%	46.3%	\$8,107	70.6%	53.3%	
	Unknown	1	3.1%	\$1,000	8.7%	0.0%	1	3.1%	18.7%	\$1,000	8.7%	23.8%	
	Total	32	100.0%	\$11,476	100.0%	100.0%	32	100.0%	100.0%	\$11,476	100.0%	100.0%	
Small Business	Revenue	Total Businesses											
		\$1 Million or Less	45	23.0%	\$5,840	13.2%	90.5%	45	23.0%	45.5%	\$5,840	13.2%	36.7%
		Over \$1 Million	104	53.1%	\$34,745	78.4%	5.7%	104	53.1%				
		Total Rev. available	149	76.1%	\$40,585	91.6%	96.2%	149	76.1%				
		Rev. Not Known	47	24.0%	\$3,716	8.4%	3.8%	47	24.0%				
		Total	196	100.0%	\$44,301	100.0%	100.0%	196	100.0%				
	Loan Size	\$100,000 or Less	109	55.6%	\$5,076	11.5%		109	55.6%	94.4%	\$5,076	11.5%	39.6%
		\$100,001 - \$250,000	29	14.8%	\$5,297	12.0%		29	14.8%	2.6%	\$5,297	12.0%	13.0%
		\$250,001 - \$1 Million	58	29.6%	\$33,928	76.6%		58	29.6%	3.0%	\$33,928	76.6%	47.4%
		Total	196	100.0%	\$44,301	100.0%		196	100.0%	100.0%	\$44,301	100.0%	100.0%
Small Farm	Revenue	Total Farms											
		\$1 Million or Less	0	0.0%	\$0	0.0%	98.9%	0	0.0%	55.8%	\$0	0.0%	75.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.0%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	86.5%	\$0	0.0%	37.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.3%	\$0	0.0%	38.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.2%	\$0	0.0%	24.9%
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

Consumer Loan Distribution Tables

TX - Austin 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	6	17.1%	262	7.9%
Moderate	8	22.9%	377	11.4%	4	11.4%	163	4.9%
<i>Low/Moderate Total</i>	8	22.9%	377	11.4%	10	28.6%	425	12.8%
Middle	4	11.4%	170	5.1%	11	31.4%	911	27.5%
Upper	23	65.7%	2,769	83.5%	12	34.3%	1,580	47.6%
Unknown	0	0.0%	0	0.0%	2	5.7%	400	12.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	35	100.0%	3,316	100.0%	35	100.0%	3,316	100.0%

TX - Austin 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	5	8.9%	304	4.2%
Moderate	8	14.3%	511	7.0%	9	16.1%	493	6.8%
<i>Low/Moderate Total</i>	8	14.3%	511	7.0%	14	25.0%	797	10.9%
Middle	18	32.1%	1,232	16.9%	12	21.4%	817	11.2%
Upper	30	53.6%	5,559	76.1%	29	51.8%	5,438	74.5%
Unknown	0	0.0%	0	0.0%	1	1.8%	250	3.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	56	100.0%	7,302	100.0%	56	100.0%	7,302	100.0%

TX - Austin 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	5	7.2%	437	4.0%
Moderate	6	8.7%	413	3.7%	10	14.5%	888	8.1%
<i>Low/Moderate Total</i>	6	8.7%	413	3.7%	15	21.7%	1,325	12.0%
Middle	23	33.3%	1,692	15.4%	9	13.0%	967	8.8%
Upper	40	58.0%	8,910	80.9%	43	62.3%	7,423	67.4%
Unknown	0	0.0%	0	0.0%	2	2.9%	1,300	11.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	69	100.0%	11,015	100.0%	69	100.0%	11,015	100.0%

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - San Antonio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison									
							2012					2013				
		Bank		Owner Occupied Units			Count		Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	9.1%	\$161	5.6%	5.2%	0	0.0%	\$0	0.0%	0.7%	1	12.5%	\$161	11.5%	0.8%
	Moderate	1	9.1%	\$271	9.5%	25.9%	0	0.0%	\$0	0.0%	6.3%	1	12.5%	\$271	19.3%	6.3%
	Middle	2	18.2%	\$225	7.9%	32.3%	0	0.0%	\$0	0.0%	25.2%	2	25.0%	\$225	16.0%	25.3%
	Upper	7	63.6%	\$2,195	77.0%	36.6%	3	100.0%	\$1,447	100.0%	67.7%	4	50.0%	\$748	53.2%	67.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$2,852	100.0%	100.0%	3	100.0%	\$1,447	100.0%	100.0%	8	100.0%	\$1,405	100.0%	100.0%
REFINANCE	Low	1	3.7%	\$52	1.3%	5.2%	0	0.0%	\$0	0.0%	0.4%	1	7.1%	\$52	2.4%	1.5%
	Moderate	1	3.7%	\$76	1.9%	25.9%	0	0.0%	\$0	0.0%	4.2%	1	7.1%	\$76	3.6%	15.4%
	Middle	7	25.9%	\$568	14.4%	32.3%	4	30.8%	\$294	16.2%	19.3%	3	21.4%	\$274	12.8%	31.5%
	Upper	18	66.7%	\$3,257	82.4%	36.6%	9	69.2%	\$1,519	83.8%	76.0%	9	64.3%	\$1,738	81.2%	51.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	27	100.0%	\$3,953	100.0%	100.0%	13	100.0%	\$1,813	100.0%	100.0%	14	100.0%	\$2,140	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	25.9%	0	0.0%	\$0	0.0%	11.4%	0	0.0%	\$0	0.0%	11.1%
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	\$0	0.0%	21.6%	0	0.0%	\$0	0.0%	22.4%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	\$0	0.0%	64.7%	0	0.0%	\$0	0.0%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units															
	Low	0	0.0%	\$0	0.0%	7.4%	0	0.0%	\$0	0.0%	3.6%	0	0.0%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	35.6%	0	0.0%	\$0	0.0%	24.0%	0	0.0%	\$0	0.0%	32.7%
	Middle	1	100.0%	\$2,480	100.0%	31.6%	0	0.0%	\$0	0.0%	24.3%	1	100.0%	\$2,480	100.0%	21.4%
	Upper	0	0.0%	\$0	0.0%	25.4%	0	0.0%	\$0	0.0%	48.2%	0	0.0%	\$0	0.0%	43.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$2,480	100.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	1	100.0%	\$2,480	100.0%	100.0%
HMDA TOTALS	Low	2	5.1%	\$213	2.3%	5.2%	0	0.0%	\$0	0.0%	0.7%	2	8.7%	\$213	3.5%	1.2%
	Moderate	2	5.1%	\$347	3.7%	25.9%	0	0.0%	\$0	0.0%	6.3%	2	8.7%	\$347	5.8%	12.1%
	Middle	10	25.6%	\$3,273	35.3%	32.3%	4	25.0%	\$294	9.0%	22.5%	6	26.1%	\$2,979	49.4%	27.9%
	Upper	25	64.1%	\$5,452	58.7%	36.6%	12	75.0%	\$2,966	91.0%	70.5%	13	56.5%	\$2,486	41.3%	58.8%
	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%
	Total	39	100.0%	\$9,285	100.0%	100.0%	16	100.0%	\$3,260	100.0%	100.0%	23	100.0%	\$6,025	100.0%	100.0%
SMALL BUSINESSES	Small Businesses															
	Low	18	12.8%	\$4,254	14.3%	5.5%	7	9.1%	\$2,013	12.1%	6.9%	11	17.2%	\$2,241	17.1%	6.9%
	Moderate	45	31.9%	\$10,028	33.7%	23.5%	25	32.5%	\$5,671	34.1%	21.1%	20	31.3%	\$4,357	33.2%	22.3%
	Middle	34	24.1%	\$6,119	20.6%	31.3%	22	28.6%	\$4,203	25.3%	29.3%	12	18.8%	\$1,916	14.6%	30.5%
	Upper	44	31.2%	\$9,337	31.4%	39.5%	23	29.9%	\$4,745	28.5%	41.7%	21	32.8%	\$4,592	35.0%	39.0%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.4%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.9%	0	0.0%	\$0	0.0%	0.9%
	Total	141	100.0%	\$29,738	100.0%	100.0%	77	100.0%	\$16,632	100.0%	100.0%	64	100.0%	\$13,106	100.0%	100.0%
SMALL FARM	Small Farms															
	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%	11.2%	0	0.0%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	12.8%	0	0.0%	\$0	0.0%	3.0%	0	0.0%	\$0	0.0%	1.0%
	Middle	1	100.0%	\$16	100.0%	34.1%	1	100.0%	\$16	100.0%	24.6%	0	0.0%	\$0	0.0%	17.2%
	Upper	0	0.0%	\$0	0.0%	50.7%	0	0.0%	\$0	0.0%	61.2%	0	0.0%	\$0	0.0%	80.4%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.2%
	Total	1	100.0%	\$16	100.0%	100.0%	1	100.0%	\$16	100.0%	100.0%	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX - San Antonio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
		Bank Count # % \$ (000s) \$ % Families by Family Income % %					2012						2013					
							Count			Dollar			Count			Dollar		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	5.3%	\$0	0.0%	2.5%	0	0.0%	4.4%	\$0	0.0%	1.9%
	Moderate	2	18.2%	\$225	7.9%	17.2%	0	0.0%	17.5%	\$0	0.0%	11.9%	2	25.0%	17.0%	\$225	16.0%	11.2%
	Middle	2	18.2%	\$326	11.4%	19.2%	0	0.0%	23.5%	\$0	0.0%	20.7%	2	25.0%	22.4%	\$326	23.2%	19.5%
	Upper	7	63.6%	\$2,301	80.7%	39.9%	3	100.0%	42.4%	\$1,447	100.0%	56.2%	4	50.0%	43.6%	\$854	60.8%	57.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.3%	\$0	0.0%	8.7%	0	0.0%	12.6%	\$0	0.0%	10.0%
	Total	11	100.0%	\$2,852	100.0%	100.0%	3	100.0%	100.0%	\$1,447	100.0%	100.0%	8	100.0%	100.0%	\$1,405	100.0%	100.0%
REFINANCE	Low	3	11.1%	\$207	5.2%	23.7%	3	23.1%	3.2%	\$207	11.4%	1.5%	0	0.0%	4.1%	\$0	0.0%	1.4%
	Moderate	5	18.5%	\$936	23.7%	17.2%	2	15.4%	7.5%	\$192	10.6%	4.2%	3	21.4%	8.8%	\$744	34.8%	3.4%
	Middle	7	25.9%	\$841	21.3%	19.2%	3	23.1%	14.3%	\$374	20.6%	10.1%	4	28.6%	14.7%	\$467	21.8%	7.0%
	Upper	12	44.4%	\$1,969	49.8%	39.9%	5	38.5%	46.0%	\$1,040	57.4%	54.9%	7	50.0%	41.7%	\$929	43.4%	33.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	29.0%	\$0	0.0%	29.3%	0	0.0%	30.7%	\$0	0.0%	54.7%
	Total	27	100.0%	\$3,953	100.0%	100.0%	13	100.0%	100.0%	\$1,813	100.0%	100.0%	14	100.0%	100.0%	\$2,140	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	8.5%	\$0	0.0%	3.9%	0	0.0%	8.9%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	12.3%	\$0	0.0%	6.6%	0	0.0%	14.8%	\$0	0.0%	8.4%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	20.9%	\$0	0.0%	15.0%	0	0.0%	20.7%	\$0	0.0%	13.9%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	55.0%	\$0	0.0%	69.8%	0	0.0%	52.3%	\$0	0.0%	68.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	4.7%	0	0.0%	3.3%	\$0	0.0%	6.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$2,480	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,480	100.0%	100.0%
	Total	1	100.0%	\$2,480	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,480	100.0%	100.0%
HMDA TOTALS	Low	3	7.7%	\$207	2.2%	23.7%	3	18.8%	4.4%	\$207	6.3%	2.0%	0	0.0%	4.4%	\$0	0.0%	1.6%
	Moderate	7	17.9%	\$1,161	12.5%	17.2%	2	12.5%	12.5%	\$192	5.9%	7.8%	5	21.7%	13.4%	\$969	16.1%	6.9%
	Middle	9	23.1%	\$1,167	12.6%	19.2%	3	18.8%	19.0%	\$374	11.5%	14.9%	6	26.1%	19.1%	\$793	13.2%	12.6%
	Upper	19	48.7%	\$4,270	46.0%	39.9%	8	50.0%	44.5%	\$2,487	76.3%	53.0%	11	47.8%	43.0%	\$1,783	29.6%	43.1%
	Unknown	1	2.6%	\$2,480	26.7%	0.0%	0	0.0%	19.6%	\$0	0.0%	22.3%	1	4.3%	20.1%	\$2,480	41.2%	35.8%
	Total	39	100.0%	\$9,285	100.0%	100.0%	16	100.0%	100.0%	\$3,260	100.0%	100.0%	23	100.0%	100.0%	\$6,025	100.0%	100.0%
Small Business	Total Businesses																	
	\$1 Million or Less	41	29.1%	\$5,984	20.1%	90.7%	25	32.5%	36.4%	\$4,178	25.1%	33.3%	16	25.0%	44.0%	\$1,806	13.8%	32.6%
	Over \$1 Million	70	49.6%	\$19,277	64.8%	5.4%	36	46.8%					34	53.1%				
	Total Rev. available	111	78.7%	\$25,261	84.9%	96.1%	61	79.3%					50	78.1%				
	Rev. Not Known	30	21.3%	\$4,477	15.1%	3.9%	16	20.8%					14	21.9%				
	Total	141	100.0%	\$29,738	100.0%	100.0%	77	100.0%					64	100.0%				
	\$100,000 or Less	64	45.4%	\$3,754	12.6%		36	46.8%	92.8%	\$2,035	12.2%	31.0%	28	43.8%	91.5%	\$1,719	13.1%	30.3%
	\$100,001 - \$250,000	47	33.3%	\$8,373	28.2%		24	31.2%	3.4%	\$4,003	24.1%	15.5%	23	35.9%	4.1%	\$4,370	33.3%	16.0%
	\$250,001 - \$1 Million	30	21.3%	\$17,611	59.2%		17	22.1%	3.8%	\$10,594	63.7%	53.5%	13	20.3%	4.4%	\$7,017	53.5%	53.7%
	Total	141	100.0%	\$29,738	100.0%		77	100.0%	100.0%	\$16,632	100.0%	100.0%	64	100.0%	100.0%	\$13,106	100.0%	100.0%
Small Farm	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	99.1%	0	0.0%	58.9%	\$0	0.0%	60.5%	0	0.0%	56.0%	\$0	0.0%	47.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.9%	0	0.0%					0	0.0%				
	Not Known	1	100.0%	\$16	100.0%	0.0%	1	100.0%					0	0.0%				
	Total	1	100.0%	\$16	100.0%	100.0%	1	100.0%					0	0.0%				
	\$100,000 or Less	1	100.0%	\$16	100.0%		1	100.0%	83.3%	\$16	100.0%	25.4%	0	0.0%	82.1%	\$0	0.0%	25.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.7%	\$0	0.0%	16.8%	0	0.0%	8.3%	\$0	0.0%	19.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.0%	\$0	0.0%	57.8%	0	0.0%	9.5%	\$0	0.0%	55.7%
	Total	1	100.0%	\$16	100.0%		1	100.0%	100.0%	\$16	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - San Antonio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	%	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%				%	\$ (000s)	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.4%	\$0	0.0%	0.9%
	Moderate	1	20.0%	\$84	12.5%	25.9%	1	20.0%	11.1%	\$84	12.5%	6.4%
	Middle	2	40.0%	\$284	42.4%	32.3%	2	40.0%	34.0%	\$284	42.4%	26.3%
	Upper	2	40.0%	\$302	45.1%	36.6%	2	40.0%	53.5%	\$302	45.1%	66.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Total	5	100.0%	\$670	100.0%	100.0%	5	100.0%	100.0%	\$670	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.9%	\$0	0.0%	1.1%
	Moderate	1	16.7%	\$95	12.1%	25.9%	1	16.7%	13.3%	\$95	12.1%	7.4%
	Middle	3	50.0%	\$150	19.1%	32.3%	3	50.0%	35.3%	\$150	19.1%	26.5%
	Upper	2	33.3%	\$542	68.9%	36.6%	2	33.3%	49.5%	\$542	68.9%	65.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$787	100.0%	100.0%	6	100.0%	100.0%	\$787	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	4.1%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	25.9%	0	0.0%	19.8%	\$0	0.0%	11.5%
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	29.2%	\$0	0.0%	24.8%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	46.9%	\$0	0.0%	61.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	Multi-Family Units				0	0.0%	7.8%	\$0	0.0%	1.5%	
	Moderate	0	0.0%	\$0	0.0%	35.6%	0	0.0%	40.2%	\$0	0.0%	22.8%
	Middle	0	0.0%	\$0	0.0%	31.6%	0	0.0%	22.5%	\$0	0.0%	21.1%
	Upper	0	0.0%	\$0	0.0%	25.4%	0	0.0%	29.4%	\$0	0.0%	54.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.6%	\$0	0.0%	1.0%
Moderate	2	18.2%	\$179	12.3%	25.9%	2	18.2%	12.1%	\$179	12.3%	8.5%	
Middle	5	45.5%	\$434	29.8%	32.3%	5	45.5%	34.2%	\$434	29.8%	25.7%	
Upper	4	36.4%	\$844	57.9%	36.6%	4	36.4%	52.0%	\$844	57.9%	64.7%	
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	11	100.0%	\$1,457	100.0%	100.0%	11	100.0%	100.0%	\$1,457	100.0%	100.0%	
SMALL BUSINESSES	Low	Small Businesses				14	17.5%	5.7%	\$5,388	27.4%	7.3%	
	Moderate	21	26.3%	\$5,729	29.1%	22.9%	21	26.3%	20.9%	\$5,729	29.1%	20.7%
	Middle	18	22.5%	\$1,918	9.7%	30.4%	18	22.5%	28.0%	\$1,918	9.7%	28.9%
	Upper	27	33.8%	\$6,665	33.8%	41.1%	27	33.8%	43.8%	\$6,665	33.8%	42.0%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	0.7%
	Total	80	100.0%	\$19,700	100.0%	100.0%	80	100.0%	100.0%	\$19,700	100.0%	100.0%
SMALL FARM	Low	Small Farms				0	0.0%	2.9%	\$0	0.0%	6.1%	
	Moderate	0	0.0%	\$0	0.0%	12.4%	0	0.0%	12.4%	\$0	0.0%	11.3%
	Middle	0	0.0%	\$0	0.0%	33.0%	0	0.0%	21.0%	\$0	0.0%	19.6%
	Upper	0	0.0%	\$0	0.0%	52.3%	0	0.0%	61.0%	\$0	0.0%	61.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	1.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2014 FRIC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: TX - San Antonio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2014					2014						
		Bank				Families by Family Income	Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	2.7%	\$0	0.0%	1.1%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	11.8%	\$0	0.0%	7.2%	
	Middle	2	40.0%	\$409	61.0%	19.2%	2	40.0%	20.7%	\$409	61.0%	16.9%	
	Upper	2	40.0%	\$198	29.6%	39.9%	2	40.0%	46.1%	\$198	29.6%	58.6%	
	Unknown	1	20.0%	\$63	9.4%	0.0%	1	20.0%	18.7%	\$63	9.4%	16.1%	
	Total	5	100.0%	\$670	100.0%	100.0%	5	100.0%	100.0%	\$670	100.0%	100.0%	
REFINANCE	Low	1	16.7%	\$45	5.7%	23.7%	1	16.7%	4.3%	\$45	5.7%	2.0%	
	Moderate	2	33.3%	\$149	18.9%	17.2%	2	33.3%	9.0%	\$149	18.9%	5.2%	
	Middle	1	16.7%	\$51	6.5%	19.2%	1	16.7%	15.6%	\$51	6.5%	10.6%	
	Upper	2	33.3%	\$542	68.9%	39.9%	2	33.3%	40.6%	\$542	68.9%	50.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	30.5%	\$0	0.0%	31.9%	
	Total	6	100.0%	\$787	100.0%	100.0%	6	100.0%	100.0%	\$787	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	11.5%	\$0	0.0%	3.5%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	12.8%	\$0	0.0%	7.2%	
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	16.1%	\$0	0.0%	11.3%	
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	52.7%	\$0	0.0%	68.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	9.3%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	9.1%	\$45	3.1%	23.7%	1	9.1%	3.5%	\$45	3.1%	1.2%	
	Moderate	2	18.2%	\$149	10.2%	17.2%	2	18.2%	11.0%	\$149	10.2%	6.0%	
	Middle	3	27.3%	\$460	31.6%	19.2%	3	27.3%	19.0%	\$460	31.6%	13.7%	
	Upper	4	36.4%	\$740	50.8%	39.9%	4	36.4%	44.7%	\$740	50.8%	50.5%	
	Unknown	1	9.1%	\$63	4.3%	0.0%	1	9.1%	21.7%	\$63	4.3%	28.7%	
	Total	11	100.0%	\$1,457	100.0%	100.0%	11	100.0%	100.0%	\$1,457	100.0%	100.0%	
Small Business	Total Businesses												
	Revenue	\$1 Million or Less	22	27.5%	\$2,780	14.1%	90.1%	22	27.5%	43.0%	\$2,780	14.1%	32.1%
		Over \$1 Million	41	51.3%	\$12,995	66.0%	6.0%	41	51.3%				
		Total Rev. available	63	78.8%	\$15,775	80.1%	96.1%	63	78.8%				
		Rev. Not Known	17	21.3%	\$3,925	19.9%	3.9%	17	21.3%				
		Total	80	100.0%	\$19,700	100.0%	100.0%	80	100.0%				
	Loan Size	\$100,000 or Less	37	46.3%	\$1,850	9.4%		37	46.3%	92.7%	\$1,850	9.4%	33.9%
		\$100,001 - \$250,000	18	22.5%	\$3,629	18.4%		18	22.5%	3.5%	\$3,629	18.4%	15.4%
		\$250,001 - \$1 Million	25	31.3%	\$14,221	72.2%		25	31.3%	3.8%	\$14,221	72.2%	50.7%
		Total	80	100.0%	\$19,700	100.0%		80	100.0%	100.0%	\$19,700	100.0%	100.0%
Small Farm	Total Farms												
	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.8%	0	0.0%	44.8%	\$0	0.0%	53.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.1%	0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	88.6%	\$0	0.0%	33.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.8%	\$0	0.0%	15.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.6%	\$0	0.0%	51.2%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

TX - San Antonio 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	5.0%	17	1.0%	3	15.0%	95	5.4%
Moderate	2	10.0%	118	6.7%	3	15.0%	281	16.0%
<i>Low/Moderate Total</i>	3	15.0%	135	7.7%	6	30.0%	376	21.4%
Middle	4	20.0%	402	22.9%	2	10.0%	208	11.9%
Upper	13	65.0%	1,216	69.4%	12	60.0%	1,169	66.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	20	100.0%	1,753	100.0%	20	100.0%	1,753	100.0%

TX - San Antonio 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	2	7.7%	53	2.2%	4	15.4%	160	6.8%
Moderate	4	15.4%	357	15.1%	4	15.4%	283	12.0%
<i>Low/Moderate Total</i>	6	23.1%	410	17.4%	8	30.8%	443	18.8%
Middle	1	3.8%	74	3.1%	3	11.5%	252	10.7%
Upper	19	73.1%	1,877	79.5%	15	57.7%	1,666	70.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	26	100.0%	2,361	100.0%	26	100.0%	2,361	100.0%

TX - San Antonio 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	1	5.3%	29	1.9%	3	15.8%	75	4.8%
Moderate	5	26.3%	155	10.0%	5	26.3%	294	18.9%
<i>Low/Moderate Total</i>	6	31.6%	184	11.8%	8	42.1%	369	23.7%
Middle	6	31.6%	417	26.8%	3	15.8%	202	13.0%
Upper	7	36.8%	955	61.4%	8	42.1%	985	63.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	19	100.0%	1,556	100.0%	19	100.0%	1,556	100.0%

Appendix I – NonMetropolitan Limited Scope Assessment Areas Loan Tables

The assessment area loan tables appear in the following order:

1. Geographic Distribution of HMDA, Small Business, and Small Farm Loans for the bank and aggregate
2. Borrower Profile of HMDA, Small Business, and Small Farm Loans for the bank and aggregate
3. HELOC Loan Tables

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - NonMSA (Gladwin and Midland)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison														
							2012					2013									
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar		Count		Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	20.0%	\$156	15.8%	12.1%	2	33.3%	11.4%	\$156	35.6%	7.2%	0	0.0%	9.3%	\$0	0.0%	5.4%	0	0.0%	5.4%
	Middle	6	60.0%	\$651	65.8%	46.1%	3	50.0%	34.8%	\$174	39.7%	28.1%	3	75.0%	36.4%	\$477	86.4%	29.5%	3	75.0%	36.4%
	Upper	2	20.0%	\$183	18.5%	41.7%	1	16.7%	53.4%	\$108	24.7%	64.3%	1	25.0%	54.1%	\$75	13.6%	65.0%	1	25.0%	54.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.2%
	Total	10	100.0%	\$990	100.0%	100.0%	6	100.0%	100.0%	\$438	100.0%	100.0%	4	100.0%	100.0%	\$552	100.0%	100.0%	4	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	7.1%	\$358	10.8%	12.1%	1	5.6%	8.4%	\$299	12.9%	6.0%	1	10.0%	11.2%	\$59	6.0%	6.8%	1	10.0%	11.2%
	Middle	10	35.7%	\$861	26.1%	46.1%	7	38.9%	35.6%	\$619	26.7%	31.1%	3	30.0%	41.6%	\$242	24.6%	31.8%	3	30.0%	41.6%
	Upper	16	57.1%	\$2,085	63.1%	41.7%	10	55.6%	55.7%	\$1,404	60.5%	62.8%	6	60.0%	47.1%	\$681	69.3%	61.3%	6	60.0%	47.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%
	Total	28	100.0%	\$3,304	100.0%	100.0%	18	100.0%	100.0%	\$2,322	100.0%	100.0%	10	100.0%	100.0%	\$982	100.0%	100.0%	10	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.1%	0	0.0%	14.9%	\$0	0.0%	14.4%	0	0.0%	13.5%	\$0	0.0%	8.8%	0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	46.1%	0	0.0%	38.7%	\$0	0.0%	25.8%	0	0.0%	50.6%	\$0	0.0%	39.1%	0	0.0%	39.1%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	46.4%	\$0	0.0%	59.8%	0	0.0%	35.9%	\$0	0.0%	52.0%	0	0.0%	35.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																				
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.6%	0	0.0%	33.3%	\$0	0.0%	24.3%	0	0.0%	33.3%	\$0	0.0%	3.0%	0	0.0%	3.0%
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.4%	0	0.0%	66.7%	\$0	0.0%	75.7%	0	0.0%	66.7%	\$0	0.0%	97.0%	0	0.0%	66.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
HMDA TOTALS																					
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	4	10.5%	\$514	12.0%	12.1%	3	12.5%	9.6%	\$455	16.5%	6.6%	1	7.1%	10.6%	\$59	3.8%	6.2%	1	7.1%	10.6%
	Middle	16	42.1%	\$1,512	35.2%	46.1%	10	41.7%	35.4%	\$793	28.7%	29.9%	6	42.9%	39.9%	\$719	46.9%	30.7%	6	42.9%	39.9%
	Upper	18	47.4%	\$2,268	52.8%	41.7%	11	45.8%	54.7%	\$1,512	54.8%	63.3%	7	50.0%	49.5%	\$756	49.3%	63.0%	7	50.0%	49.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%
SMALL BUSINESSES																					
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	22	25.9%	\$4,390	23.8%	18.3%	11	27.5%	20.8%	\$2,888	35.2%	29.8%	11	24.4%	24.3%	\$1,502	14.7%	30.6%	11	24.4%	24.3%
	Middle	22	25.9%	\$3,916	21.3%	39.4%	10	25.0%	35.5%	\$1,724	21.0%	30.2%	12	26.7%	33.6%	\$2,192	21.4%	30.4%	12	26.7%	33.6%
	Upper	41	48.2%	\$10,118	54.9%	42.3%	19	47.5%	38.9%	\$3,586	43.7%	39.1%	22	48.9%	39.3%	\$6,532	63.9%	38.7%	22	48.9%	39.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	0.8%	0	0.0%	2.9%	\$0	0.0%	0.3%	0	0.0%	2.9%
	Total	85	100.0%	\$18,424	100.0%	100.0%	40	100.0%	100.0%	\$8,198	100.0%	100.0%	45	100.0%	100.0%	\$10,226	100.0%	100.0%	45	100.0%	100.0%
SMALL FARM																					
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.3%	0	0.0%	2.0%	\$0	0.0%	0.6%	0	0.0%	4.8%	\$0	0.0%	1.3%	0	0.0%	4.8%
	Middle	4	100.0%	\$150	100.0%	62.8%	2	100.0%	58.8%	\$75	100.0%	75.3%	2	100.0%	66.7%	\$75	100.0%	72.0%	2	100.0%	66.7%
	Upper	0	0.0%	\$0	0.0%	27.9%	0	0.0%	39.2%	\$0	0.0%	24.1%	0	0.0%	28.6%	\$0	0.0%	26.8%	0	0.0%	28.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%
	Total	4	100.0%	\$150	100.0%	100.0%	2	100.0%	100.0%	\$75	100.0%	100.0%	2	100.0%	100.0%	\$75	100.0%	100.0%	2	100.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - NonMSA (Gladwin)

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	#	%	%					\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$45	100.0%	31.2%	1	100.0%	34.2%	\$45	100.0%	30.9%
	Middle	0	0.0%	\$0	0.0%	68.8%	0	0.0%	65.5%	\$0	0.0%	68.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Total	1	100.0%	\$45	100.0%	100.0%	1	100.0%	100.0%	\$45	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.2%	0	0.0%	28.4%	\$0	0.0%	24.9%
	Middle	0	0.0%	\$0	0.0%	68.8%	0	0.0%	71.6%	\$0	0.0%	75.1%
	Upper	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%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.2%	0	0.0%	23.7%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	68.8%	0	0.0%	76.3%	\$0	0.0%	92.5%
	Upper	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%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	62.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	37.9%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$45	100.0%	31.2%	1	100.0%	30.8%	\$45	100.0%	27.3%
	Middle	0	0.0%	\$0	0.0%	68.8%	0	0.0%	69.1%	\$0	0.0%	72.5%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Total	1	100.0%	\$45	100.0%	100.0%	1	100.0%	100.0%	\$45	100.0%	100.0%
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	12	70.6%	\$3,023	81.5%	44.7%	12	70.6%	47.5%	\$3,023	81.5%	42.4%
	Middle	5	29.4%	\$685	18.5%	55.3%	5	29.4%	51.1%	\$685	18.5%	57.5%
	Upper	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.1%
	Total	17	100.0%	\$3,708	100.0%	100.0%	17	100.0%	100.0%	\$3,708	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	27.7%	0	0.0%	22.2%	\$0	0.0%	51.4%
	Middle	1	100.0%	\$25	100.0%	72.3%	1	100.0%	66.7%	\$25	100.0%	47.0%
	Upper	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	11.1%	\$0	0.0%	1.7%
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - NonMSA (Gladwin and Midland)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2012, 2013					2012						2013						
		Bank			Families by Family Income	Count			Dollar			Count			Dollar				
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %			
HOME PURCHASE	Low	2	20.0%	\$86	8.7%	17.7%	2	33.3%	6.7%	\$86	19.6%	3.4%	0	0.0%	6.7%	\$0	0.0%	3.3%	
	Moderate	3	30.0%	\$302	30.5%	15.2%	2	33.3%	13.9%	\$238	54.3%	9.0%	1	25.0%	14.3%	\$64	11.6%	8.9%	
	Middle	1	10.0%	\$95	9.6%	20.7%	0	0.0%	19.5%	\$0	0.0%	15.9%	1	25.0%	18.3%	\$95	17.2%	14.8%	
	Upper	4	40.0%	\$507	51.2%	46.4%	2	33.3%	45.3%	\$114	26.0%	59.5%	2	50.0%	46.6%	\$393	71.2%	62.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.6%	\$0	0.0%	12.1%	0	0.0%	14.1%	\$0	0.0%	10.9%	
	Total	10	100.0%	\$990	100.0%	100.0%	6	100.0%	100.0%	\$438	100.0%	100.0%	4	100.0%	100.0%	\$552	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	17.7%	0	0.0%	3.3%	\$0	0.0%	1.8%	0	0.0%	4.7%	\$0	0.0%	2.2%	
	Moderate	8	28.6%	\$724	21.9%	15.2%	5	27.8%	9.3%	\$455	19.6%	5.7%	3	30.0%	11.3%	\$269	27.4%	6.6%	
	Middle	4	14.3%	\$272	8.2%	20.7%	2	11.1%	17.1%	\$135	5.8%	12.5%	2	20.0%	18.8%	\$137	14.0%	12.3%	
	Upper	16	57.1%	\$2,308	69.9%	46.4%	11	61.1%	57.2%	\$1,732	74.6%	66.6%	5	50.0%	49.6%	\$576	58.7%	49.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	13.4%	0	0.0%	15.5%	\$0	0.0%	29.7%	
	Total	28	100.0%	\$3,304	100.0%	100.0%	18	100.0%	100.0%	\$2,322	100.0%	100.0%	10	100.0%	100.0%	\$982	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.7%	0	0.0%	6.0%	\$0	0.0%	2.0%	0	0.0%	12.4%	\$0	0.0%	5.9%	
	Moderate	0	0.0%	\$0	0.0%	15.2%	0	0.0%	13.1%	\$0	0.0%	5.6%	0	0.0%	15.3%	\$0	0.0%	8.4%	
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	25.6%	\$0	0.0%	22.3%	0	0.0%	22.9%	\$0	0.0%	16.5%	
	Upper	0	0.0%	\$0	0.0%	46.4%	0	0.0%	49.4%	\$0	0.0%	64.0%	0	0.0%	44.7%	\$0	0.0%	65.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.0%	\$0	0.0%	6.1%	0	0.0%	4.7%	\$0	0.0%	4.3%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	15.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	46.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	5.3%	\$86	2.0%	17.7%	2	8.3%	4.4%	\$86	3.1%	2.3%	0	0.0%	5.9%	\$0	0.0%	2.7%	
	Moderate	11	28.9%	\$1,026	23.9%	15.2%	7	29.2%	10.8%	\$693	25.1%	6.7%	4	28.6%	12.7%	\$333	21.7%	7.5%	
	Middle	5	13.2%	\$367	8.5%	20.7%	2	8.3%	18.1%	\$135	4.9%	13.6%	3	21.4%	18.8%	\$232	15.1%	13.3%	
	Upper	20	52.6%	\$2,815	65.6%	46.4%	13	54.2%	53.3%	\$1,846	66.9%	64.0%	7	50.0%	48.1%	\$969	63.2%	54.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	13.4%	0	0.0%	14.5%	\$0	0.0%	22.3%	
	Total	38	100.0%	\$4,294	100.0%	100.0%	24	100.0%	100.0%	\$2,760	100.0%	100.0%	14	100.0%	100.0%	\$1,534	100.0%	100.0%	
Small Business	Revenue	Total Businesses																	
		\$1 Million or Less	23	27.1%	\$2,751	14.9%	91.3%	9	22.5%	33.9%	\$1,010	12.3%	44.4%	14	31.1%	48.7%	\$1,741	17.0%	47.2%
		Over \$1 Million	37	43.5%	\$11,821	64.2%	5.5%	16	40.0%				21	46.7%					
		Total Rev. available	60	70.6%	\$14,572	79.1%	96.8%	25	62.5%				35	77.8%					
		Rev. Not Known	25	29.4%	\$3,852	20.9%	3.2%	15	37.5%				10	22.2%					
	Total	85	100.0%	\$18,424	100.0%	100.0%	40	100.0%				45	100.0%						
	Loan Size	\$100,000 or Less	46	54.1%	\$2,652	14.4%		22	55.0%	92.0%	\$1,368	16.7%	32.9%	24	53.3%	86.8%	\$1,284	12.6%	25.1%
		\$100,001 - \$250,000	17	20.0%	\$3,171	17.2%		9	22.5%	4.5%	\$1,769	21.6%	20.8%	8	17.8%	7.6%	\$1,402	13.7%	23.3%
		\$250,001 - \$1 Million	22	25.9%	\$12,601	68.4%		9	22.5%	3.5%	\$5,061	61.7%	46.3%	13	28.9%	5.6%	\$7,540	73.7%	51.7%
		Total	85	100.0%	\$18,424	100.0%		40	100.0%	100.0%	\$8,198	100.0%	100.0%	45	100.0%	100.0%	\$10,226	100.0%	100.0%
Small Farm		Revenue	Total Farms																
	\$1 Million or Less		4	100.0%	\$150	100.0%	98.7%	2	100.0%	68.6%	\$75	100.0%	63.6%	2	100.0%	60.3%	\$75	100.0%	52.9%
	Over \$1 Million		0	0.0%	\$0	0.0%	1.3%	0	0.0%				0	0.0%					
	Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total		4	100.0%	\$150	100.0%	100.0%	2	100.0%				2	100.0%					
	Loan Size	\$100,000 or Less	4	100.0%	\$150	100.0%		2	100.0%	76.5%	\$75	100.0%	28.0%	2	100.0%	85.7%	\$75	100.0%	37.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	19.6%	\$0	0.0%	49.7%	0	0.0%	9.5%	\$0	0.0%	30.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.9%	\$0	0.0%	22.3%	0	0.0%	4.8%	\$0	0.0%	32.9%
		Total	4	100.0%	\$150	100.0%		2	100.0%	100.0%	\$75	100.0%	100.0%	2	100.0%	100.0%	\$75	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRIC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix I

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - NonMSA (Gladwin)

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	5.9%	\$0	0.0%	2.9%
	Moderate	1	100.0%	\$45	100.0%	21.9%	1	100.0%	15.3%	\$45	100.0%	12.1%
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	15.9%	\$0	0.0%	14.0%
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	44.5%	\$0	0.0%	55.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.3%	\$0	0.0%	15.8%
	Total	1	100.0%	\$45	100.0%	100.0%	1	100.0%	100.0%	\$45	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	9.2%	\$0	0.0%	7.5%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	16.5%	\$0	0.0%	14.5%
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	23.8%	\$0	0.0%	21.3%
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	38.0%	\$0	0.0%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.5%	\$0	0.0%	12.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	16.9%	\$0	0.0%	5.2%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	25.4%	\$0	0.0%	9.1%
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	18.6%	\$0	0.0%	14.9%
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	33.9%	\$0	0.0%	68.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.1%	\$0	0.0%	2.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	8.3%	\$0	0.0%	4.9%
	Moderate	1	100.0%	\$45	100.0%	21.9%	1	100.0%	16.7%	\$45	100.0%	12.9%
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	19.5%	\$0	0.0%	17.0%
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	40.7%	\$0	0.0%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.8%	\$0	0.0%	14.4%
	Total	1	100.0%	\$45	100.0%	100.0%	1	100.0%	100.0%	\$45	100.0%	100.0%
Small Business	Total Businesses											
	Revenue											
	\$1 Million or Less	2	11.8%	\$60	1.6%	91.3%	2	11.8%	51.4%	\$60	1.6%	45.9%
	Over \$1 Million	14	82.4%	\$3,623	97.7%	4.9%	14	82.4%				
	Total Rev. available	16	94.2%	\$3,683	99.3%	96.2%	16	94.2%				
	Rev. Not Known	1	5.9%	\$25	0.7%	3.8%	1	5.9%				
	Total	17	100.0%	\$3,708	100.0%	100.0%	17	100.0%				
	Loan Size											
	\$100,000 or Less	10	58.8%	\$358	9.7%		10	58.8%	86.5%	\$358	9.7%	31.6%
	\$100,001 - \$250,000	3	17.6%	\$600	16.2%		3	17.6%	11.0%	\$600	16.2%	38.5%
	\$250,001 - \$1 Million	4	23.5%	\$2,750	74.2%		4	23.5%	2.5%	\$2,750	74.2%	29.9%
	Total	17	100.0%	\$3,708	100.0%		17	100.0%	100.0%	\$3,708	100.0%	100.0%
Small Farm	Total Farms											
	Revenue											
	\$1 Million or Less	1	100.0%	\$25	100.0%	98.5%	1	100.0%	55.6%	\$25	100.0%	66.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.5%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%				
	Loan Size											
	\$100,000 or Less	1	100.0%	\$25	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$25	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix I

Consumer Loan Distribution Tables

MI - NonMSA (Gladwin and Midland) 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	10.0%	40	10.3%
Moderate	0	0.0%	0	0.0%	2	20.0%	47	12.1%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>3</i>	<i>30.0%</i>	<i>87</i>	<i>22.4%</i>
Middle	2	20.0%	100	25.8%	2	20.0%	106	27.3%
Upper	8	80.0%	288	74.2%	5	50.0%	195	50.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>388</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>388</i>	<i>100.0%</i>

MI - NonMSA (Gladwin and Midland) 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	4	17.4%	209	11.1%
Moderate	1	4.3%	92	4.9%	3	13.0%	229	12.2%
<i>Low/Moderate Total</i>	<i>1</i>	<i>4.3%</i>	<i>92</i>	<i>4.9%</i>	<i>7</i>	<i>30.4%</i>	<i>438</i>	<i>23.3%</i>
Middle	14	60.9%	909	48.3%	5	21.7%	287	15.3%
Upper	8	34.8%	880	46.8%	11	47.8%	1,156	61.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>23</i>	<i>100.0%</i>	<i>1,881</i>	<i>100.0%</i>	<i>23</i>	<i>100.0%</i>	<i>1,881</i>	<i>100.0%</i>

MI - NonMSA (Gladwin) 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	3.8%	30	2.2%
Moderate	6	23.1%	215	16.1%	10	38.5%	502	37.5%
<i>Low/Moderate Total</i>	<i>6</i>	<i>23.1%</i>	<i>215</i>	<i>16.1%</i>	<i>11</i>	<i>42.3%</i>	<i>532</i>	<i>39.8%</i>
Middle	20	76.9%	1,123	83.9%	8	30.8%	504	37.7%
Upper	0	0.0%	0	0.0%	7	26.9%	302	22.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>26</i>	<i>100.0%</i>	<i>1,338</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>1,338</i>	<i>100.0%</i>

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - NonMsa Lenawee

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		Comparison 2012, 2013					2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	20.0%	\$125	20.1%	32.4%	0	0.0%	30.7%	\$0	0.0%	24.4%	1	33.3%	35.0%	\$125	25.4%	31.7%
	Upper	4	80.0%	\$497	79.9%	67.6%	2	100.0%	69.3%	\$130	100.0%	75.6%	2	66.7%	65.0%	\$367	74.6%	68.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$622	100.0%	100.0%	2	100.0%	100.0%	\$130	100.0%	100.0%	3	100.0%	100.0%	\$492	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	11.1%	\$254	13.6%	32.4%	2	20.0%	28.6%	\$254	22.1%	25.3%	0	0.0%	32.6%	\$0	0.0%	29.6%
	Upper	16	88.9%	\$1,612	86.4%	67.6%	8	80.0%	71.4%	\$894	77.9%	74.7%	8	100.0%	67.4%	\$718	100.0%	70.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$1,866	100.0%	100.0%	10	100.0%	100.0%	\$1,148	100.0%	100.0%	8	100.0%	100.0%	\$718	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	52.2%	\$0	0.0%	66.9%	0	0.0%	58.1%	\$0	0.0%	35.1%
	Upper	0	0.0%	\$0	0.0%	67.6%	0	0.0%	47.8%	\$0	0.0%	33.1%	0	0.0%	41.9%	\$0	0.0%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	56.3%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	43.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	13.0%	\$379	15.2%	32.4%	2	16.7%	29.7%	\$254	19.9%	25.4%	1	9.1%	34.2%	\$125	10.3%	30.6%
	Upper	20	87.0%	\$2,109	84.8%	67.6%	10	83.3%	70.3%	\$1,024	80.1%	74.6%	10	90.9%	65.8%	\$1,085	89.7%	69.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	23	100.0%	\$2,488	100.0%	100.0%	12	100.0%	100.0%	\$1,278	100.0%	100.0%	11	100.0%	100.0%	\$1,210	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	16.7%	\$105	2.8%	38.2%	2	28.6%	42.5%	\$105	5.5%	44.9%	0	0.0%	47.0%	\$0	0.0%	41.5%
	Upper	10	83.3%	\$3,660	97.2%	61.8%	5	71.4%	57.5%	\$1,800	94.5%	55.1%	5	100.0%	53.0%	\$1,860	100.0%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	12	100.0%	\$3,765	100.0%	100.0%	7	100.0%	100.0%	\$1,905	100.0%	100.0%	5	100.0%	100.0%	\$1,860	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.3%	0	0.0%	6.7%	\$0	0.0%	9.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	3	100.0%	\$688	100.0%	79.7%	1	100.0%	93.3%	\$313	100.0%	90.8%	2	100.0%	100.0%	\$375	100.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	3	100.0%	\$688	100.0%	100.0%	1	100.0%	100.0%	\$313	100.0%	100.0%	2	100.0%	100.0%	\$375	100.0%	100.0%	

Originations & Purchases
2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - NonMsa Lenawee

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units		%	Count		Dollar		%	%
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	27.2%	\$0	0.0%	23.2%
	Upper	0	0.0%	\$0	0.0%	67.6%	0	0.0%	72.8%	\$0	0.0%	76.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	32.6%	\$0	0.0%	27.8%
	Upper	1	100.0%	\$148	100.0%	67.6%	1	100.0%	67.4%	\$148	100.0%	72.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$148	100.0%	100.0%	1	100.0%	100.0%	\$148	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	45.7%	\$0	0.0%	28.1%
	Upper	0	0.0%	\$0	0.0%	67.6%	0	0.0%	54.3%	\$0	0.0%	71.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	56.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.7%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	30.2%	\$0	0.0%	24.7%
	Upper	1	100.0%	\$148	100.0%	67.6%	1	100.0%	69.8%	\$148	100.0%	75.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$148	100.0%	100.0%	1	100.0%	100.0%	\$148	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	37.5%	\$316	15.5%	38.4%	3	37.5%	39.5%	\$316	15.5%	34.3%
	Upper	5	62.5%	\$1,726	84.5%	61.6%	5	62.5%	60.5%	\$1,726	84.5%	65.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$2,042	100.0%	100.0%	8	100.0%	100.0%	\$2,042	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	1	100.0%	\$319	100.0%	82.7%	1	100.0%	100.0%	\$319	100.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$319	100.0%	100.0%	1	100.0%	100.0%	\$319	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - NonMsa Lenawee

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2012, 2013					2012						2013					
							Count			Dollar			Count			Dollar		
		Borrower Income Levels		Bank		Families by Family Income	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
Count																		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	1	20.0%	\$58	9.3%	9.6%	1	50.0%	5.5%	\$58	44.6%	2.8%	0	0.0%	5.1%	\$0	0.0%	2.9%
	Moderate	1	20.0%	\$125	20.1%	14.7%	0	0.0%	21.7%	\$0	0.0%	15.5%	1	33.3%	17.5%	\$125	25.4%	13.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	25.8%	\$0	0.0%	22.7%	0	0.0%	22.4%	\$0	0.0%	20.2%
	Upper	3	60.0%	\$439	70.6%	55.5%	1	50.0%	38.0%	\$72	55.4%	49.7%	2	66.7%	45.0%	\$367	74.6%	53.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.0%	\$0	0.0%	9.3%	0	0.0%	10.0%	\$0	0.0%	10.2%
	Total	5	100.0%	\$622	100.0%	100.0%	2	100.0%	100.0%	\$130	100.0%	100.0%	3	100.0%	100.0%	\$492	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	9.6%	0	0.0%	3.5%	\$0	0.0%	2.3%	0	0.0%	4.2%	\$0	0.0%	2.8%
	Moderate	7	38.9%	\$549	29.4%	14.7%	2	20.0%	7.2%	\$143	12.5%	5.4%	5	62.5%	9.8%	\$406	56.5%	6.9%
	Middle	6	33.3%	\$696	37.3%	20.1%	3	30.0%	20.1%	\$384	33.4%	16.9%	3	37.5%	20.4%	\$312	43.5%	17.8%
	Upper	5	27.8%	\$621	33.3%	55.5%	5	50.0%	58.6%	\$621	54.1%	64.5%	0	0.0%	55.1%	\$0	0.0%	60.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.6%	\$0	0.0%	11.0%	0	0.0%	10.5%	\$0	0.0%	11.7%
	Total	18	100.0%	\$1,866	100.0%	100.0%	10	100.0%	100.0%	\$1,148	100.0%	100.0%	8	100.0%	100.0%	\$718	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	9.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	14.7%	0	0.0%	21.7%	\$0	0.0%	4.5%	0	0.0%	22.6%	\$0	0.0%	8.9%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	21.7%	\$0	0.0%	20.0%	0	0.0%	19.4%	\$0	0.0%	21.6%
	Upper	0	0.0%	\$0	0.0%	55.5%	0	0.0%	52.2%	\$0	0.0%	72.8%	0	0.0%	54.8%	\$0	0.0%	67.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.3%	\$0	0.0%	2.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	9.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	55.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	4.3%	\$58	2.3%	9.6%	1	8.3%	4.0%	\$58	4.5%	2.4%	0	0.0%	4.5%	\$0	0.0%	2.8%
	Moderate	8	34.8%	\$674	27.1%	14.7%	2	16.7%	11.5%	\$143	11.2%	8.0%	6	54.5%	12.9%	\$531	43.9%	9.2%
	Middle	6	26.1%	\$696	28.0%	20.1%	3	25.0%	21.7%	\$384	30.0%	18.4%	3	27.3%	21.0%	\$312	25.8%	18.7%
	Upper	8	34.8%	\$1,060	42.6%	55.5%	6	50.0%	52.8%	\$693	54.2%	60.6%	2	18.2%	51.5%	\$367	30.3%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.1%	\$0	0.0%	10.6%	0	0.0%	10.1%	\$0	0.0%	11.1%
	Total	23	100.0%	\$2,488	100.0%	100.0%	12	100.0%	100.0%	\$1,278	100.0%	100.0%	11	100.0%	100.0%	\$1,210	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	5	41.7%	\$3,000	79.7%	92.9%	3	42.9%	31.5%	\$1,500	78.7%	47.6%	2	40.0%	43.6%	\$1,500	80.6%	51.6%
	Over \$1 Million	3	25.0%	\$291	7.7%	3.9%	2	28.6%					1	20.0%				
	Total Rev. available	8	66.7%	\$3,291	87.4%	96.8%	5	71.5%					3	60.0%				
	Rev. Not Known	4	33.3%	\$474	12.6%	3.2%	2	28.6%					2	40.0%				
	Total	12	100.0%	\$3,765	100.0%	100.0%	7	100.0%					5	100.0%				
	\$100,000 or Less	6	50.0%	\$465	12.4%		4	57.1%	93.0%	\$305	16.0%	28.6%	2	40.0%	91.3%	\$160	8.6%	20.7%
	\$100,001 - \$250,000	2	16.7%	\$400	10.6%		1	14.3%	4.6%	\$200	10.5%	25.1%	1	20.0%	3.0%	\$200	10.8%	10.4%
	\$250,001 - \$1 Million	4	33.3%	\$2,900	77.0%		2	28.6%	2.4%	\$1,400	73.5%	46.4%	2	40.0%	5.7%	\$1,500	80.6%	68.8%
	Total	12	100.0%	\$3,765	100.0%		7	100.0%	100.0%	\$1,905	100.0%	100.0%	5	100.0%	100.0%	\$1,860	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.3%	0	0.0%	46.7%	\$0	0.0%	32.3%	0	0.0%	31.3%	\$0	0.0%	54.7%
	Over \$1 Million	3	100.0%	\$688	100.0%	1.7%	1	100.0%					2	100.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	3	100.0%	\$688	100.0%	100.0%	1	100.0%					2	100.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	86.7%	\$0	0.0%	26.5%	0	0.0%	75.0%	\$0	0.0%	27.9%
	\$100,001 - \$250,000	2	66.7%	\$375	54.5%		0	0.0%	6.7%	\$0	0.0%	17.0%	2	100.0%	18.8%	\$375	100.0%	44.1%
	\$250,001 - \$500,000	1	33.3%	\$313	45.5%		1	100.0%	6.7%	\$313	100.0%	56.5%	0	0.0%	6.3%	\$0	0.0%	28.0%
	Total	3	100.0%	\$688	100.0%		1	100.0%	100.0%	\$313	100.0%	100.0%	2	100.0%	100.0%	\$375	100.0%	100.0%
	Total Farms																	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix I

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - NonMsa Lenawee

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	2.8%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	17.8%	\$0	0.0%	11.0%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	24.4%	\$0	0.0%	20.6%
	Upper	0	0.0%	\$0	0.0%	56.1%	0	0.0%	42.4%	\$0	0.0%	54.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.7%	\$0	0.0%	12.9%
	<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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	4.9%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	10.5%	\$0	0.0%	6.3%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	18.9%	\$0	0.0%	15.0%
	Upper	1	100.0%	\$148	100.0%	56.1%	1	100.0%	52.6%	\$148	100.0%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	14.7%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$148</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	8.6%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	17.1%	\$0	0.0%	2.7%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	22.9%	\$0	0.0%	9.9%
	Upper	0	0.0%	\$0	0.0%	56.1%	0	0.0%	42.9%	\$0	0.0%	83.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.6%	\$0	0.0%	1.2%
	<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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	56.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	3.9%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	14.8%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	22.1%	\$0	0.0%	17.9%
	Upper	1	100.0%	\$148	100.0%	56.1%	1	100.0%	46.4%	\$148	100.0%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	14.7%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$148</i>	<i>100.0%</i>	<i>100.0%</i>
Small Business	Total Businesses											
	Revenue											
	\$1 Million or Less	3	37.5%	\$1,426	69.8%	92.1%	3	37.5%	50.3%	\$1,426	69.8%	53.5%
	Over \$1 Million	3	37.5%	\$293	14.3%	4.7%	3	37.5%				
	<i>Total Rev. available</i>	<i>6</i>	<i>75.0%</i>	<i>\$1,719</i>	<i>84.1%</i>	<i>96.8%</i>	<i>6</i>	<i>75.0%</i>				
	Rev. Not Known	2	25.0%	\$323	15.8%	3.2%	2	25.0%				
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$2,042</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>				
	Loan Size											
	\$100,000 or Less	2	25.0%	\$143	7.0%		2	25.0%	88.1%	\$143	7.0%	23.0%
	\$100,001 - \$250,000	4	50.0%	\$675	33.1%		4	50.0%	6.8%	\$675	33.1%	22.4%
	\$250,001 - \$1 Million	2	25.0%	\$1,224	59.9%		2	25.0%	5.1%	\$1,224	59.9%	54.6%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$2,042</i>	<i>100.0%</i>		<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,042</i>	<i>100.0%</i>	<i>100.0%</i>
Small Farm	Total Farms											
	Revenue											
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.1%	0	0.0%	46.2%	\$0	0.0%	44.0%
	Over \$1 Million	1	100.0%	\$319	100.0%	1.9%	1	100.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$319</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>				
	Loan Size											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	69.2%	\$0	0.0%	18.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	23.1%	\$0	0.0%	40.3%
	\$250,001 - \$500,000	1	100.0%	\$319	100.0%		1	100.0%	7.7%	\$319	100.0%	41.6%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$319</i>	<i>100.0%</i>		<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$319</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

MI - NonMsa Lenawee 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	22.2%	50	8.2%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>2</i>	<i>22.2%</i>	<i>50</i>	<i>8.2%</i>
Middle	2	22.2%	85	14.0%	2	22.2%	100	16.4%
Upper	7	77.8%	524	86.0%	5	55.6%	459	75.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>609</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>609</i>	<i>100.0%</i>

MI - NonMsa Lenawee 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	0	0.0%	0	0.0%	2	14.3%	150	15.2%
Moderate	0	0.0%	0	0.0%	2	14.3%	147	14.9%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>4</i>	<i>28.6%</i>	<i>297</i>	<i>30.1%</i>
Middle	5	35.7%	307	31.1%	6	42.9%	261	26.4%
Upper	9	64.3%	681	68.9%	4	28.6%	430	43.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>988</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>988</i>	<i>100.0%</i>

MI - NonMsa Lenawee 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HELOC							
Low	0	0.0%	0	0.0%	2	14.3%	136	13.5%
Moderate	0	0.0%	0	0.0%	4	28.6%	325	32.1%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>6</i>	<i>42.9%</i>	<i>461</i>	<i>45.6%</i>
Middle	5	35.7%	296	29.3%	1	7.1%	50	4.9%
Upper	9	64.3%	715	70.7%	7	50.0%	500	49.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>1,011</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>1,011</i>	<i>100.0%</i>

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - NonMSA Kerr

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012, 2013					Bank & Aggregate Lending Comparison											
							2012					2013						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	11.1%	\$70	7.5%	2.6%	0	0.0%	4.4%	\$0	0.0%	4.8%	1	16.7%	5.1%	\$70	11.6%	4.5%
	Middle	3	33.3%	\$232	24.9%	68.7%	2	66.7%	58.8%	\$187	57.2%	55.7%	1	16.7%	62.6%	\$45	7.4%	56.6%
	Upper	5	55.6%	\$631	67.6%	28.7%	1	33.3%	36.7%	\$140	42.8%	39.5%	4	66.7%	32.3%	\$491	81.0%	38.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$933	100.0%	100.0%	3	100.0%	100.0%	\$327	100.0%	100.0%	6	100.0%	100.0%	\$606	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.2%	\$0	0.0%	2.1%	0	0.0%	2.2%	\$0	0.0%	5.7%
	Middle	2	22.2%	\$263	11.5%	68.7%	0	0.0%	59.5%	\$0	0.0%	58.0%	2	50.0%	65.4%	\$263	37.4%	47.0%
	Upper	7	77.8%	\$2,020	88.5%	28.7%	5	100.0%	38.3%	\$1,579	100.0%	40.0%	2	50.0%	32.4%	\$441	62.6%	47.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$2,283	100.0%	100.0%	5	100.0%	100.0%	\$1,579	100.0%	100.0%	4	100.0%	100.0%	\$704	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	4.7%	\$0	0.0%	9.9%	0	0.0%	3.8%	\$0	0.0%	8.9%
	Middle	0	0.0%	\$0	0.0%	68.7%	0	0.0%	67.4%	\$0	0.0%	59.8%	0	0.0%	64.2%	\$0	0.0%	57.1%
	Upper	0	0.0%	\$0	0.0%	28.7%	0	0.0%	27.9%	\$0	0.0%	30.3%	0	0.0%	32.1%	\$0	0.0%	33.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	86.8%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	8.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	5.6%	\$70	2.2%	2.6%	0	0.0%	3.2%	\$0	0.0%	3.2%	1	10.0%	3.7%	\$70	5.3%	5.2%
	Middle	5	27.8%	\$495	15.4%	68.7%	2	25.0%	59.6%	\$187	9.8%	57.5%	3	30.0%	64.1%	\$308	23.5%	52.0%
	Upper	12	66.7%	\$2,651	82.4%	28.7%	6	75.0%	37.3%	\$1,719	90.2%	39.3%	6	60.0%	32.2%	\$932	71.1%	42.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$3,216	100.0%	100.0%	8	100.0%	100.0%	\$1,906	100.0%	100.0%	10	100.0%	100.0%	\$1,310	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	3.5%	\$47	0.9%	1.9%	0	0.0%	1.9%	\$0	0.0%	0.5%	2	5.3%	1.9%	\$47	1.4%	0.5%
	Middle	41	71.9%	\$4,829	92.7%	76.9%	14	73.7%	66.0%	\$1,793	94.7%	70.1%	27	71.1%	70.0%	\$3,036	91.5%	72.8%
	Upper	14	24.6%	\$336	6.4%	21.1%	5	26.3%	18.9%	\$101	5.3%	21.6%	9	23.7%	22.4%	\$235	7.1%	21.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL FARM	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	13.2%	\$0	0.0%	7.8%	0	0.0%	5.8%	\$0	0.0%	5.2%
	Total	57	100.0%	\$5,212	100.0%	100.0%	19	100.0%	100.0%	\$1,894	100.0%	100.0%	38	100.0%	100.0%	\$3,318	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	67.1%	0	0.0%	68.3%	\$0	0.0%	60.5%	0	0.0%	40.0%	\$0	0.0%	66.7%
SMALL FARM	Upper	2	100.0%	\$93	100.0%	32.3%	2	100.0%	22.0%	\$93	100.0%	27.9%	0	0.0%	40.0%	\$0	0.0%	13.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	9.8%	\$0	0.0%	11.6%	0	0.0%	20.0%	\$0	0.0%	20.3%
	Total	2	100.0%	\$93	100.0%	100.0%	2	100.0%	100.0%	\$93	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2013 FFIEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - NonMSA Kerr

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank		Owner Occupied Units			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	3.7%	\$0	0.0%	2.9%
	Middle	0	0.0%	\$0	0.0%	68.7%	0	0.0%	58.6%	\$0	0.0%	54.9%
	Upper	0	0.0%	\$0	0.0%	28.7%	0	0.0%	37.7%	\$0	0.0%	42.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	3.3%	\$0	0.0%	2.6%
	Middle	1	100.0%	\$124	100.0%	68.7%	1	100.0%	65.1%	\$124	100.0%	60.5%
	Upper	0	0.0%	\$0	0.0%	28.7%	0	0.0%	31.6%	\$0	0.0%	36.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$124	100.0%	100.0%	1	100.0%	100.0%	\$124	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	68.7%	0	0.0%	75.9%	\$0	0.0%	68.2%
	Upper	0	0.0%	\$0	0.0%	28.7%	0	0.0%	24.1%	\$0	0.0%	31.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	86.8%	0	0.0%	75.0%	\$0	0.0%	89.1%
	Upper	0	0.0%	\$0	0.0%	8.3%	0	0.0%	25.0%	\$0	0.0%	10.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	3.4%	\$0	0.0%	2.7%
	Middle	1	100.0%	\$124	100.0%	68.7%	1	100.0%	61.4%	\$124	100.0%	57.5%
	Upper	0	0.0%	\$0	0.0%	28.7%	0	0.0%	35.2%	\$0	0.0%	39.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$124	100.0%	100.0%	1	100.0%	100.0%	\$124	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.5%	0	0.0%	2.3%	\$0	0.0%	0.6%
	Middle	18	81.8%	\$1,426	89.6%	77.1%	18	81.8%	67.6%	\$1,426	89.6%	70.0%
	Upper	4	18.2%	\$165	10.4%	21.3%	4	18.2%	23.8%	\$165	10.4%	22.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.3%	\$0	0.0%	6.8%
	Total	22	100.0%	\$1,591	100.0%	100.0%	22	100.0%	100.0%	\$1,591	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	50.0%	\$31	40.8%	70.9%	1	50.0%	68.8%	\$31	40.8%	65.6%
	Upper	1	50.0%	\$45	59.2%	28.4%	1	50.0%	12.5%	\$45	59.2%	9.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	25.4%
	Total	2	100.0%	\$76	100.0%	100.0%	2	100.0%	100.0%	\$76	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX - NonMSA Kerr

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2012, 2013					2012					2013						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	4.4%	\$0	0.0%	1.8%	0	0.0%	4.2%	\$0	0.0%	2.2%
	Moderate	1	11.1%	\$133	14.3%	18.1%	1	33.3%	11.2%	\$133	40.7%	6.8%	0	0.0%	15.2%	\$0	0.0%	9.9%
	Middle	4	44.4%	\$443	47.5%	19.2%	1	33.3%	23.0%	\$140	42.8%	17.7%	3	50.0%	22.7%	\$303	50.0%	18.4%
	Upper	4	44.4%	\$357	38.3%	45.2%	1	33.3%	53.3%	\$54	16.5%	66.7%	3	50.0%	51.7%	\$303	50.0%	63.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.1%	\$0	0.0%	7.0%	0	0.0%	6.2%	\$0	0.0%	5.9%
	Total	9	100.0%	\$933	100.0%	100.0%	3	100.0%	100.0%	\$327	100.0%	100.0%	6	100.0%	100.0%	\$606	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	3.0%	\$0	0.0%	1.7%	0	0.0%	1.6%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	5.2%	\$0	0.0%	2.7%	0	0.0%	9.5%	\$0	0.0%	2.2%
	Middle	1	11.1%	\$141	6.2%	19.2%	1	20.0%	13.8%	\$141	8.9%	8.7%	0	0.0%	13.1%	\$0	0.0%	3.7%
	Upper	8	88.9%	\$2,142	93.8%	45.2%	4	80.0%	59.0%	\$1,438	91.1%	68.4%	4	100.0%	59.2%	\$704	100.0%	29.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.0%	\$0	0.0%	18.5%	0	0.0%	16.5%	\$0	0.0%	64.5%
	Total	9	100.0%	\$2,283	100.0%	100.0%	5	100.0%	100.0%	\$1,579	100.0%	100.0%	4	100.0%	100.0%	\$704	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	7.0%	\$0	0.0%	1.0%	0	0.0%	5.7%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	9.3%	\$0	0.0%	5.2%	0	0.0%	17.0%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	16.3%	\$0	0.0%	12.4%	0	0.0%	22.6%	\$0	0.0%	17.6%
	Upper	0	0.0%	\$0	0.0%	45.2%	0	0.0%	58.1%	\$0	0.0%	71.1%	0	0.0%	52.8%	\$0	0.0%	68.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.3%	\$0	0.0%	10.2%	0	0.0%	1.9%	\$0	0.0%	0.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	45.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	3.7%	\$0	0.0%	1.7%	0	0.0%	3.1%	\$0	0.0%	0.9%
	Moderate	1	5.6%	\$133	4.1%	18.1%	1	12.5%	7.7%	\$133	7.0%	4.3%	0	0.0%	12.7%	\$0	0.0%	4.3%
	Middle	5	27.8%	\$584	18.2%	19.2%	2	25.0%	17.5%	\$281	14.7%	12.1%	3	30.0%	18.3%	\$303	23.1%	7.8%
	Upper	12	66.7%	\$2,499	77.7%	45.2%	5	62.5%	56.7%	\$1,492	78.3%	67.2%	7	70.0%	54.9%	\$1,007	76.9%	38.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.5%	\$0	0.0%	14.7%	0	0.0%	11.1%	\$0	0.0%	48.9%
	Total	18	100.0%	\$3,216	100.0%	100.0%	8	100.0%	100.0%	\$1,906	100.0%	100.0%	10	100.0%	100.0%	\$1,310	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	11	19.3%	\$1,342	25.7%	93.7%	4	21.1%	41.8%	\$231	12.2%	57.0%	7	18.4%	55.6%	\$1,111	33.5%	38.2%
	Over \$1 Million	10	17.5%	\$693	13.3%	3.5%	2	10.5%				8	21.1%					
	Total Rev. available	21	36.8%	\$2,035	39.0%	97.2%	6	31.6%				15	39.5%					
	Rev. Not Known	36	63.2%	\$3,177	61.0%	2.8%	13	68.4%				23	60.5%					
	Total	57	100.0%	\$5,212	100.0%	100.0%	19	100.0%				38	100.0%					
	\$100,000 or Less	44	77.2%	\$1,855	35.6%		15	78.9%	95.8%	\$506	26.7%	49.1%	29	76.3%	95.3%	\$1,349	40.7%	50.3%
	\$100,001 - \$250,000	11	19.3%	\$1,818	34.9%		3	15.8%	2.5%	\$516	27.2%	15.0%	8	21.1%	2.6%	\$1,302	39.2%	14.1%
	\$250,001 - \$1 Million	2	3.5%	\$1,539	29.5%		1	5.3%	1.7%	\$872	46.0%	35.9%	1	2.6%	2.1%	\$667	20.1%	35.6%
	Total	57	100.0%	\$5,212	100.0%		19	100.0%	100.0%	\$1,894	100.0%	100.0%	38	100.0%	100.0%	\$3,318	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	50.0%	\$40	43.0%	98.8%	1	50.0%	61.0%	\$40	43.0%	78.5%	0	0.0%	86.7%	\$0	0.0%	95.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.6%	0	0.0%				0	0.0%					
	Not Known	1	50.0%	\$53	57.0%	0.6%	1	50.0%				0	0.0%					
	Total	2	100.0%	\$93	100.0%	100.0%	2	100.0%				0	0.0%					
	\$100,000 or Less	2	100.0%	\$93	100.0%		2	100.0%	97.6%	\$93	100.0%	80.5%	0	0.0%	93.3%	\$0	0.0%	62.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.4%	\$0	0.0%	19.5%	0	0.0%	6.7%	\$0	0.0%	37.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$93	100.0%		2	100.0%	100.0%	\$93	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total Farms																	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FRFEC Census Data, ACS 2010 data, and 2013 D&B Information

Appendix I

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: TX - NonMSA Kerr

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2014					2014					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	3.0%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	13.3%	\$0	0.0%	7.4%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	17.9%	\$0	0.0%	12.9%
	Upper	0	0.0%	\$0	0.0%	45.5%	0	0.0%	52.6%	\$0	0.0%	62.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.2%	\$0	0.0%	15.9%
	<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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	3.0%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	8.9%	\$0	0.0%	4.6%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	17.8%	\$0	0.0%	11.9%
	Upper	1	100.0%	\$124	100.0%	45.5%	1	100.0%	48.4%	\$124	100.0%	59.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.0%	\$0	0.0%	22.7%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	6.9%	\$0	0.0%	5.4%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	10.3%	\$0	0.0%	6.4%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	20.7%	\$0	0.0%	19.2%
	Upper	0	0.0%	\$0	0.0%	45.5%	0	0.0%	55.2%	\$0	0.0%	50.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	18.4%
	<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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	45.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<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>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	3.1%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	11.7%	\$0	0.0%	6.4%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	17.9%	\$0	0.0%	12.4%
	Upper	1	100.0%	\$124	100.0%	45.5%	1	100.0%	51.0%	\$124	100.0%	60.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.3%	\$0	0.0%	19.8%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>
Small Business	Total Businesses											
	Revenue											
	\$1 Million or Less	7	31.8%	\$778	48.9%	93.1%	7	31.8%	50.8%	\$778	48.9%	39.2%
	Over \$1 Million	3	13.6%	\$215	13.5%	4.1%	3	13.6%				
	<i>Total Rev. available</i>	10	45.4%	\$993	62.4%	97.2%	10	45.4%				
	Rev. Not Known	12	54.5%	\$598	37.6%	2.8%	12	54.5%				
	<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>\$1,591</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,591</i>	<i>100.0%</i>	<i>100.0%</i>
	Loan Size											
	\$100,000 or Less	21	95.5%	\$1,091	68.6%		21	95.5%	95.9%	\$1,091	68.6%	56.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	17.5%
Small Farm	\$250,001 - \$1 Million	1	4.5%	\$500	31.4%		1	4.5%	1.2%	\$500	31.4%	25.8%
	<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>\$1,591</i>	<i>100.0%</i>		<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,591</i>	<i>100.0%</i>	<i>100.0%</i>
	Total Farms											
	Revenue											
	\$1 Million or Less	1	50.0%	\$45	59.2%	99.3%	1	50.0%	43.8%	\$45	59.2%	57.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.7%	0	0.0%				
	Not Known	1	50.0%	\$31	40.8%	0.0%	1	50.0%				
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$76</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$76</i>	<i>100.0%</i>	<i>100.0%</i>
	Loan Size											
	\$100,000 or Less	2	100.0%	\$76	100.0%		2	100.0%	100.0%	\$76	100.0%	100.0%
Small Farm	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$76</i>	<i>100.0%</i>		<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$76</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2014 FFIEC Census Data, ACS 2010 data, and 2014 D&B Information

Consumer Loan Distribution Tables

TX - NonMSA Kerr 2012

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	11.1%	140	18.0%	1	11.1%	53	6.8%
<i>Low/Moderate Total</i>	<i>1</i>	<i>11.1%</i>	<i>140</i>	<i>18.0%</i>	<i>1</i>	<i>11.1%</i>	<i>53</i>	<i>6.8%</i>
Middle	5	55.6%	460	59.1%	1	11.1%	50	6.4%
Upper	3	33.3%	178	22.9%	7	77.8%	675	86.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>778</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>778</i>	<i>100.0%</i>

TX - NonMSA Kerr 2013

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	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%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	2	50.0%	187	67.5%	1	25.0%	62	22.4%
Upper	2	50.0%	90	32.5%	3	75.0%	215	77.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>277</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>277</i>	<i>100.0%</i>

TX - NonMSA Kerr 2014

Income Categories	Consumer Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HELOC								
Low	0	0.0%	0	0.0%	1	7.7%	35	2.9%
Moderate	0	0.0%	0	0.0%	4	30.8%	320	26.9%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>5</i>	<i>38.5%</i>	<i>355</i>	<i>29.8%</i>
Middle	9	69.2%	955	80.2%	3	23.1%	345	29.0%
Upper	4	30.8%	236	19.8%	5	38.5%	491	41.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>1,191</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>1,191</i>	<i>100.0%</i>