

# **PUBLIC DISCLOSURE**

April 13, 2020

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Chesapeake Bank of Maryland Charter Number: 702148

> 2001 E Joppa Road Baltimore, MD 21234

Office of the Comptroller of the Currency

400 7th Street S.W. Washington, DC 20291

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

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# **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Outstanding.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

• Chesapeake Bank of Maryland's (Chesapeake or bank) net loan-to-deposit ratio (LTD) is more than reasonable and exceeds the standard for satisfactory performance;

- The bank made a substantial majority of its home mortgage and commercial loans in the assessment area;
- The bank exhibits reasonable geographic distribution of home mortgage and small business loans in low- and moderate-income (LMI) census tracts;
- The bank exhibits reasonable distribution of loans to borrowers of different income levels and businesses with revenues of \$1 million or less in the bank's assessment area;
- The bank's performance with respect to the optional review of community development loans, investments, and services were sufficient to elevate the bank's overall CRA rating to outstanding;
- No CRA-related complaints were received since the previous evaluation.

#### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the assessment area, the bank's LTD ratio is more than reasonable.

Chesapeake's quarterly average net LTD ratio over the 20-quarter review period was 84.3 percent. The ratio ranged from a quarterly low of 78.3 percent as of September 30, 2015, to a quarterly high of 93.0 percent as of December 31, 2019. The ratio is calculated on a bank-wide basis. The quarterly average net LTD ratio for a custom peer group of nine similarly situated institutions with assets ranging from \$130.1 million to \$443.1 million and located in the same MSA was 91.7 percent over the same period. The peer group's ratio ranged from a quarterly low average of 81.5 percent to a quarterly high average of 99.5 percent during that time period.

#### **Lending in Assessment Area**

Chesapeake originated a substantial majority of home mortgage and commercial loans, by number and dollar volume within its assessment area and exceeds the standard for satisfactory performance.

As detailed in Table D below, 87.7 percent of home mortgage loans and 90.9 percent of commercial loans were originated inside the bank's assessment area during the evaluation period. This analysis is performed at the bank level, rather than the assessment area level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

	Number	of Loan	ıs			Dollar A	mount (	of Loans \$	(000s)	
Loan Category	Inside		Outside	Outside		Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	185	87.7	26	12.3	211	53,867	88.1	7,244	11.9	61,111
Commercial	20	90.9	2	9.1	22	9,221	92.1	795	7.9	10,016
Total	205	88.0	28	12.0	233	63,088	88.7	8,039	11.3	71,127

Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data

Due to rounding, totals may not equal 100.0

## **Description of Institution**

Chesapeake is a single-state federally chartered, stock savings association and is a wholly owned subsidiary of CBM Bancorp, Inc. Both the bank and holding company are headquartered in Baltimore, Maryland. The bank converted from a mutual thrift to a stock savings bank in September 2018. CBM Bancorp was incorporated on May 22, 2018, and its stock is listed on the NASDAQ Capital Market under the ticker symbol CBMB. CBM Bancorp is a shell company with no activities outside of its ownership of 100 percent of the outstanding stock of the bank. The bank does not have any affiliates or subsidiaries.

As of December 31, 2019, Chesapeake's total assets were \$220.3 million with a net loan portfolio of approximately \$160.0 million, representing 72.5 percent of total assets. Total deposits were \$172.0 million, or 78.1 percent of total assets. Tier one capital was \$41.6 million.

The bank focuses on the origination of home mortgage loans and commercial loans in the local community. As of the December 31, 2019 call report (Consolidated Reports of Condition and Income), the loan portfolio consisted of approximately 49.2 percent residential real estate mortgages, followed by 45.8 percent commercial loans, 3.5 percent home equity lines of credit, 1.2 percent home equity loans, and less than 1.0 percent auto loans. The bank sells a majority of fixed-rate residential mortgage loans to the secondary market, generally with the servicing rights released.

Chesapeake operates a main office in Parkville, Maryland and three full-service banking offices in Arbutus, Bel Air, and Pasadena, Maryland. Two of the branch offices are in Baltimore County, one in Harford County, and one in Anne Arundel County. All branches are located in middle-income census tracts. The bank does not have any branches or ATMs in LMI census tracts. However, the bank's main office and Arbutus branch are located in close proximity to LMI census tracts. This proximity provides Chesapeake with the opportunity to serve lower-income areas and individuals. Branch hours of operations are comparable to other local financial institutions. The bank did not open or close any branch offices during the evaluation period, nor were there any mergers or acquisitions.

Chesapeake offers a variety of deposit and loan products for individuals and businesses. Mortgage loan products include conventional, fixed- and adjustable-rate residential mortgage loans, home equity lines of credit, fixed-rate home equity loans, commercial, commercial real estate, equipment loans, small business loans, share loans, various types of consumer loans, and overdraft protection.

Deposit products include certificates of deposit, individual retirement accounts, money market, and various checking and savings accounts for individuals and businesses. Alternative systems include online banking, a mobile banking application, remote deposit capture and telephone banking. The bank also participates in the surcharge free MoneyPass ATM Network. The bank's website, https://www.chesapeakebank.com, provides additional information on its services.

There are no financial or legal impediments to hinder Chesapeake's ability to help meet the credit needs of the communities it services. The bank received an "Outstanding" rating under the "Small bank" rating criteria at the previous CRA evaluation, dated February 23, 2015.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

Chesapeake was evaluated using the Small Bank CRA examination procedures, which only includes a Lending Test. The Lending Test considers the bank's performance pursuant to the following criteria: Loan-to-Deposit Ratio Analysis; Assessment Area Concentration; Geographic Distribution; Borrower Distribution; and Response to CRA Complaints. The consideration and evaluation of community development activities is optional under the Small Bank examination procedures. At the option of bank management, and in accordance with the Interagency Small Bank CRA Examination Procedures, examiners evaluated the bank's community development loans, investments, and services extended from February 23, 2015, the date of the previous CRA evaluation, through December 31, 2019 for consideration to enhance the overall lending performance rating.

Chesapeake's primary loan products were determined to be home mortgage and commercial loans, based on the number and dollar amount of loans originated and purchased between January 1, 2017 and December 31, 2019, per bank data. Home mortgage loans originated totaled 45.1 percent by dollar amount and 39.6 percent by number during the evaluation period. Commercial loan originations totaled 51.6 percent by dollar amount and 35.4 percent by number during the evaluation period. The bank is a Home Mortgage Disclosure Act (HMDA) reporter; therefore, the OCC considered all home mortgage loans reported on the bank's 2017, 2018, and 2019 HMDA Loan Application Registers (LARs). The HMDA data was tested and found to be reliable. Chesapeake is not required to report small business lending and does not collect small business loan data; therefore, the OCC reviewed a sample of business loans from January 1, 2017 through December 31, 2019.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

#### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or

combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

#### **Ratings**

Chesapeake's overall rating is based solely on its performance in the State of Maryland. The State of Maryland rating is derived from the bank's performance under the CRA Small Bank Lending Test based on the bank's lending performance in relation to its primary products of home mortgage loans and commercial loans in the bank's assessment area. The bank also submitted community development loans, investments, and services to be considered to enhance its overall rating.

# **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# **State Rating**

#### **State of Maryland**

**CRA** rating for the State of Maryland: Outstanding

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's geographic distribution of home mortgage loans and small business loans is reasonable;
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes is reasonable given the product lines offered by the bank;
- The bank's community development performance demonstrates excellent responsiveness to community development needs in its assessment area and warrant an enhancement of its satisfactory lending record to Outstanding.

#### **Description of Institution's Operations in Maryland**

The bank operates only in the state of Maryland and provides its products and services through its home office and three branches located in middle-income census tracts. The bank's primary business focus is home mortgage lending and commercial lending. Bank operations within the state of Maryland are primarily detailed in the Description of Institution section above.

There is a high level of competition for financial services in the assessment area. According to the most recent Federal Deposit Insurance Corporation (FDIC) Deposit Market Share data as of June 30, 2019, 49 financial institutions operate 666 full-service offices in the MSA. Of all those institutions, Chesapeake ranked 30<sup>th</sup> with only 0.2 percent of the market share. The top two depository institutions, Bank of America, NA and Manufacturers and Traders Trust Company hold 48.9 percent of the deposit market share in the assessment area.

The bank faces strong competition from other financial institutions that originate mortgage loans within the assessment area. According to 2018 Peer Mortgage Data, Chesapeake is ranked 173 out of 611 mortgage lenders in the MSA, with a market share of 0.1 percent of mortgage loans. Chesapeake's major competitors were: Wells Fargo Bank, NA, Quicken Loans, PennyMac Loan Services, LLC, and Bank of America, NA.

The competition for small business loans is intense and includes local commercial and savings banks and branches of larger regional and nationwide banks. Based upon the most recent 2018 Peer Small Business Data, there were 145 lending institutions within Chesapeake's assessment area competing for small business applications. The top five small business loan reporters in 2018 were American Express National Bank, Chase Bank USA, NA, Bank of America, NA, Citibank, NA, and Wells Fargo Bank, NA with a combined small business loan market share of 58.3 percent. Chesapeake is not required to publicly report small business lending data. As a result, the bank is not captured on the small business lending market share report.

Data obtained from the U.S. Bureau of Labor Statistics indicates that as of December 31, 2019, the preliminary unemployment rate for Baltimore-Columbia-Towson, MD MSA was 2.9 percent, which is slightly lower than the 2019 state average of 3.5 percent and the national average of 3.5 percent.

There have been no changes to the bank's assessment area since the previous evaluation. Management has designated the entire Baltimore-Columbia-Towson, MD MSA 12580, with the exception of Queen Anne's County, as Chesapeake's assessment area. Queen Anne's County is not contiguous with the rest of the Baltimore Metropolitan Area as it is located across the Chesapeake Bay on Maryland's Eastern Shore. The assessment area consists of Baltimore, Harford, Anne Arundel, Carroll, and Howard counties and the City of Baltimore, Maryland. The assessment area is contiguous, meets the requirements of the CRA regulation, and does not arbitrarily exclude LMI census tracts. The table below, which is based on 2015 American Community Survey (ACS) Census data, presents certain demographic characteristics of Chesapeake's assessment area.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	669	13.3	22.7	33.3	28.7	1.9
Population by Geography	2,721,218	9.1	22.1	35.3	32.6	0.9
Housing Units by Geography	1,124,935	10.9	23.0	35.4	30.4	0.3
Owner-Occupied Units by Geography	672,873	5.0	17.3	38.2	39.4	0.1
Occupied Rental Units by Geography	345,917	16.8	33.0	32.8	16.9	0.5
Vacant Units by Geography	106,145	29.0	27.1	26.1	17.0	0.8
Businesses by Geography	182,154	5.2	15.5	38.2	40.4	0.8
Farms by Geography	4,040	1.2	10.4	39.0	49.3	0.1
Family Distribution by Income Level	662,413	22.4	17.1	19.8	40.7	0.0
Household Distribution by Income Level	1,018,790	25.2	15.4	17.3	42.0	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Hou	using Value		\$271,604
			Median Gro	ss Rent		\$1,181
			Families Be	low Poverty	Level	7.7%

Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

According to 2015 ACS data, the assessment area consists of 669 census tracts, of which 89 are low-income, 152 are moderate-income, 223 are middle-income, 192 are upper-income, and 13 are unclassified. Based on the ACS data the total population of the assessment area is 2,721,218. Within the assessment area, there are 1,018,790 households and 662,413 families. There are 1,124,935 housing units, of which, 59.8 percent are owner-occupied, 30.8 percent are rental-

occupied, and 9.4 percent are vacant housing units. Approximately 5.0 percent of owner-occupied housing is located in low-income census tracts, 17.3 percent in moderate-income census tracts, 38.2 percent in middle-income census tracts, and 39.4 percent in upper-income census tracts. The median housing cost is \$271,604.

The 2019 FFIEC updated median family income is \$101,000. Approximately 22.4 percent of families are low-income, 17.1 percent are moderate-income, 19.8 percent are middle-income, and 40.7 percent are upper-income. Additionally, 27.5 percent of households received social security, 20.0 percent were retired, and 10.6 percent of households were below the poverty level.

The FFIEC adjusted median family income levels were used to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle- and upper-income categories for each year. Based on the data found in the table below, the annual FFIEC adjusted MFI increased by approximately 10.9 percent (\$9,900) between 2017 and 2019.

Table B – Median Family Income Ranges												
Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%									
wson, MD MSA M	ledian Family Income (12	580)										
<\$45,550	\$45,550 to <\$72,880	\$72,880 to <\$109,320	≥\$109,320									
<\$47,450	\$47,450 to <\$75,920	\$75,920 to <\$113,880	≥\$113,880									
<\$50,500	\$50,500 to <\$80,800	\$80,800 to <\$121,200	≥\$121,200									
	Low <50% owson, MD MSA M <\$45,550 <\$47,450	Low	Low									

According to the 2018 Dun & Bradstreet (D&B) business geo-demographic data, there were approximately 182,154 non-farm businesses operating within the bank's assessment area. Approximately 83.8 percent of the businesses have revenues less than \$1 million, approximately 6.1 percent have revenues greater than \$1 million, and revenue was not reported for approximately 10.1 percent of the businesses. Approximately 5.2 percent of businesses are located in low-income census tracts, 15.5 percent are located in moderate-income census tracts, 38.2 percent are located in middle- income census tracts, and 40.4 percent are located in upper-income census tracts. Service industries represent the largest portion of businesses at 48.1 percent, followed by retail trade at 11.9 percent, non-classifiable establishments at 11.4 percent, finance, and insurance and real estate at 8.5 percent. In addition, 66.8 percent of businesses have four or fewer employees, and 88.9 percent operate from a single location. Additionally, 79.7 percent of businesses have gross annual revenues of \$0.5 million or less, indicating that the majority of businesses in the assessment area are very small.

Leading industries in the area include Federal, State, and local government, along with health and educational services. The largest employers in the assessment area include Fort George G. Meade, Johns Hopkins University, Aberdeen Proving Ground, University of Maryland Medical Systems and John Hopkins Health System.

According to February 2020 economic information from Moody's Analytics, Baltimore-Columbia-Towson's economy appears to have started 2020 with significant momentum, which is misleading after further review. The jobless rate has dropped to an all-time low of 3.5 percent. The

comprehensive count of jobs from the Quarterly Census of Employment and Wages shows that employment decreased in the third quarter, casting doubt on the surge in job creation and labor force growth reported in the monthly employment surveys. Housing market data corroborate the more downbeat story. Permit issuance has ticked only slightly higher over the past year, and house price appreciation ranks in the bottom 10 of Northeast metro areas.

Baltimore's leisure/hospitality industry is struggling, and prospects of a near-term rebound have diminished in light of the COVID-19 outbreak and falling revenues at Baltimore's Horseshoe Casino. The coronavirus will deal a temporary blow to leisure/hospitality nationwide, but Baltimore will suffer more than most given its reliance on the cruise industry at the Port of Baltimore.

Reduced global growth prospects will affect Baltimore's logistics industry in the near term, but long-term prospects remain bright. Global supply chain disruptions are slowing cargo volumes at the Port of Baltimore, and officials at the American Association of Port Authorities estimate volumes may drop 20 percent in the first quarter. The Port of Baltimore is cutting employee hours in anticipation of reduced demand and hiring plans will be put on hold until the COVID-19 outbreak uncertainty recedes. After record breaking cargo volumes in each of the last few years, the outlook in the medium and long term is still strong, and logistics will be a robust growth driver in the coming years.

Moody's Analytics reports that the near-term outlook for Baltimore-Columbia-Towson is positive but tenuous. Healthcare and business/professional services will propel steady gains in employment and output. However, gathering headwinds will weigh on the rest of the economy. Longer term, weak population and labor force growth coupled with relatively high business costs will keep Baltimore from being a top-performing metro area.

#### **Community Contacts**

The OCC performed one new community contact and reviewed one community contact performed in 2019 pertinent to the bank's assessment area to obtain additional information regarding the bank's assessment area. The first contact representing a US Treasury certified nonprofit Community Development Financial Institution in Baltimore stated that a number of Baltimore's neighborhoods are unbanked or underbanked as residents do not have access to traditional banking services. Many of these neighborhoods have high minority populations and a high percentage of low-income residents. There is a need for greater investment in Baltimore's underserved neighborhoods, particularly in West Baltimore, which needs better access to traditional banking services, including bank branches. There is a need for lending for small businesses; financial support for local non-profit and community development organizations; support for revitalization and stabilization activities and job training/workforce development for area residents. There is an opportunity for area financial institutions to support this effort. However, according to the contact, most of the banks in Baltimore will talk a good game but are not as supportive as they could or should be.

The second community contact was a representative with a local nonprofit organization that provides a variety of direct assistance; including homeownership counseling, foreclosure prevention counseling, down payment and closing cost assistance, accessibility modifications, property rehabilitation and affordable rental units to in Anne Arundel County. According to the contact, Anne Arundel County has a strong economy with high household incomes, low

unemployment, and a strong housing market. The strong economy has led to an increase in the construction of luxury housing, which is unaffordable to LMI residents as well as working class residents such as police officers and teachers. Affordable housing is a significant need in the community. Existing housing prices remain high and vacancy rates for less expensive housing remains low. Home prices in the county have been increasing but incomes for some residents have not kept up. Federal funding is not sufficient to meet the demand for affordable housing.

#### **Scope of Evaluation in Maryland**

The bank operates only in the state of Maryland. The OCC performed a full-scope evaluation of the bank's only assessment area. There are no limited-scope review areas.

As previously stated, Chesapeake's primary loan products based on originations and purchases during the evaluation period were home mortgage and commercial loans. The bank's home mortgage and loans to small businesses were weighted equally. The OCC analyzed the bank's performance in relation to the comparative demographic data from the 2015 ACS of the U.S. Census and 2019 D&B Business Geo-demographic data. The OCC also compared the bank's home mortgage lending to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to HMDA. These data are reported annually, and the most recent year for which information is available is 2018. The bank's small business loans were compared to the aggregate of all lenders in the assessment area reporting small business loan pursuant to CRA on an annual basis. The most recent year for available aggregate small business loan data is also 2018.

#### **LENDING TEST**

The bank's performance under the Lending Test in Maryland is rated Satisfactory.

Based on a full-scope review, the bank's lending performance in the state of Maryland is reasonable. The bank's community development lending enhances its lending to borrowers of different incomes in the assessment area. The bank's loan-to-deposit ratio was reasonable, and a substantial majority of its loans were originated within its assessment area. The geographic distribution of loans reflected reasonable penetration among census tracts of different income levels throughout the bank's assessment areas. The overall distribution of loans to borrowers of different income levels and businesses of different sizes was also reasonable. The geographic and borrower distribution analyses were based on loan activity conducted inside the bank's assessment area.

For evaluation of the geographic distribution of loans, performance was rated based on penetration in LMI areas. Demographic data from the 2015 ACS census was used to categorize LMI areas. The proportion of home mortgage loan originations in LMI census tracts were compared with the proportion of owner-occupied units located in LMI census tracts in the assessment area. For small business loans, the analysis compared the proportion of loan originations with the proportion of businesses located in LMI census tracts as reported by D&B.

To analyze the borrower characteristics of home mortgage loans, the proportion of originations to LMI borrowers was compared with the proportion of LMI families. Income estimates from U.S. Department of Housing and Urban Development (HUD) and the FFIEC were used to categorize borrower income. For small business loans, the proportion of loans to borrowers with gross annual

revenues of \$1 million or less were compared with the proportion of such businesses as reported by D&B.

The bank's home mortgage and small business lending performance was also compared to the performance of the 2018 aggregate of all lenders in the assessment area subject to HMDA and/or CRA small business loan reporting. The aggregate data for 2019 was not available at the time of the analysis.

#### Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state of Maryland.

Demographic and performance context challenges, such as the limited availability of owner-occupied housing in low-income census tracts in the assessment area were also considered. The majority of owner-occupied housing units and businesses are located in the middle-and upper-income census tracts and the majority of the bank's home mortgage and small business lending was also in those respective tracts. No unexplained, conspicuous gaps were identified.

#### Home Mortgage Loans

Considering the bank's assessment area demographics and performance context factors, the geographic distribution of home mortgage loans reflects reasonable distribution throughout the assessment area.

The bank's percentage of home mortgage lending was below the percentage of owner-occupied housing units in both low-income and moderate-income census tracts as well as the aggregate data. Chesapeake originated 1.6 percent of home mortgage loans in low-income census tracts, compared to 5.0 percent of owner-occupied housing units located within the low-income census tracts. The aggregate originated 3.5 percent home mortgage loans in low-income census tracts. The bank's lending in moderate-income census tracts at 10.8 percent was also below the aggregate lending at 15.7 percent and the owner-occupied housing unit's percentage at 17.3 percent within the assessment area. A substantial majority of Chesapeake's mortgage loans were concentrated in middle-and upper -income census tracts. This distribution can be attributed to the fact that the assessment area predominately consists of middle-and upper- income census tracts.

There are several factors affecting the bank's mortgage lending in LMI census tracts. According to 2015 ACS census data, the percentage of occupied rental and vacant units are greater than the percentage of owner-occupied housing units. The 2015 ACS data indicated that 72.4 percent of housing units in low-income census tracts are renter-occupied or vacant units and 55.1 percent of the housing units in moderate-income census tracts are renter-occupied or vacant.

Furthermore, significant market competition in the LMI census tracts and the fact that Chesapeake does not have any branch offices in these census tracts affects the bank's ability to originate mortgage loans in LMI census tracts. An analysis of 2018 Peer Market Share data for originations and purchases in LMI tracts showed that Chesapeake ranked 125 out of 411 institutions lending within the LMI census tracts with a 0.1 percent market share.

Taking into consideration the above factors, the geographic distribution of home mortgage loans is reasonable and meets the standards for satisfactory performance.

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

#### Small Business Loans

Chesapeake's small business lending added strength to the geographic distribution of its lending. The percentage of small business loans in LMI census tracts in the assessment area exceeded both the demographic and aggregate benchmarks. The bank originated 18.2 percent of the small business loans in low-income census tracts compared to 5.2 percent of the businesses and 4.3 percent of the aggregate's lending located in low-income census tracts.

Small business lending in moderate-income census tracts at 18.2 percent also exceeded both the demographic and aggregate benchmarks. The aggregate originated 13.9 percent of its small business loans in moderate-income census tracts, while 15.5 percent of businesses operating within the assessment area are located in moderate-income census tracts. As such, the bank's lending to small businesses among census tracts of different income levels exceeds the standards for satisfactory performance.

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

#### Distribution of Loans by Income Level and to Businesses of Different Sizes

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

#### Home Mortgage Loans

Chesapeake's lending performance to LMI borrowers was reasonable. Distribution to low-income borrowers is reasonable, and distribution to moderate-income borrowers is excellent. The bank made 8.6 percent of home mortgage loans to low-income borrowers, while 22.4 percent of families in the assessment area were low-income. While this performance is below the demographic data, it is comparable to HMDA aggregate lending performance of 8.9 percent. Some of this gap is attributable to the fact that 10.6 percent of households within the assessment area are below the poverty level and may find it difficult to qualify for a home loan.

The percentage of mortgage lending to moderate-income borrowers was substantially higher than both the assessment area demographics and the average of all HMDA-reporting lenders. Chesapeake originated 23.8 percent of home mortgage loans to moderate-income borrowers compared to 17.1 of moderate-income families in the assessment area. The aggregate made approximately 19.2 percent of home loans to moderate-income borrowers.

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

#### Small Business Loans

Chesapeake's lending performance to small businesses with gross annual revenues of less than \$1 million was reasonable when compared to the aggregate lending of CRA small business reporters and the level of competition for small business loans in the assessment area. The bank originated 45.0 percent of small business loans to businesses with gross annual revenues of \$1 million or less. This percentage is comparable to the aggregate at 45.6 percent and significantly lower than the percentage of small businesses at 83.8 percent.

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

#### **Responses to Complaints**

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

#### **COMMUNITY DEVELOPMENT**

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. Performance related to community development activities had a positive effect on the bank's rating in the state.

A small savings association that is not an intermediate small savings association that meets each of the standards for a "satisfactory" rating under the lending test and exceeds some or all of those standards may warrant consideration for an overall rating of "outstanding." In assessing whether a savings association's performance is "outstanding," the appropriate Federal banking agency considers the extent to which the savings association exceeds each of the performance standards for a "satisfactory" rating and its performance in making qualified investments and its performance in providing branches and other services and delivery systems that enhance credit availability in its assessment area(s).

Chesapeake met the standards for a "satisfactory" rating under the Lending Test and exceeded that standard under the "Lending in the Assessment Area" criteria. After considering performance context factors such as the bank's capacity and the assessment area credit and community needs, the OCC determined that the performance in these activities enhances credit availability in the bank's assessment area and warrant an enhancement of its satisfactory lending record to outstanding.

#### **Number and Amount of Community Development Loans**

The level of community development loans enhanced the bank's lending performance in the assessment area. During the evaluation period, Chesapeake originated or renewed six community development loans totaling \$2.8 million. The bank's community development loans supported

affordable housing initiatives for LMI individuals which was identified as a critical need by community representatives.

The highlights of the bank's community development loans are as follows:

- Three loans and a working line of credit totaling \$2.4 million to a non-profit mental health organization which receives a substantial part of its support from a governmental unit or the general public. The organization provides behavioral healthcare to underprivileged children, lower income families, the homeless, the elderly, and individuals who are on state funded assistance and/or Medicare in the bank's assessment area.
- One loan totaling \$200,000 to provide operating capital to a non-profit public support organization whose mission is to assist victims and families to obtain safe housing to rebuild their lives to regain self-confidence and dignity offering transitional housing to permanent housing with financial assistance.
- A \$100,000 line of credit to a faith based non-profit organization organized to assist in the development of affordable housing for low -income families in the bank's assessment area.

#### Flexible Lending Programs

Chesapeake participates in several flexible lending programs to provide borrowers with various options to obtain mortgage loans. These programs include government-guaranteed loans through the Federal Housing Administration (FHA), United States Department of Agriculture (USDA) Rural Housing, Veterans Administration (VA). No loans were originated under these programs during the evaluation period.

In addition, the bank provides access to enhanced homebuyer loan services through the Federal Home Loan Bank (FHLB) of Atlanta's Affordable Housing Products. During the evaluation period, the bank facilitated twenty-one (21) loans under the FHLB of Atlanta's First-Time Home Buyer (FHP) and Community Partner Grant Programs, resulting in \$107,500 in grants to borrowers. Both of these programs provide grants to assist borrowers earning no more than 80 percent of the county area median income or the state median family income for the area, adjusted for family size as published annually by the HUD, whichever is higher. To be eligible to receive assistance through these programs, the borrowers are required to complete a homebuyer counseling program administered by an approved agency. The FHP product provides up to \$5,000 in down-payment, closing-cost, and principal reduction assistance to eligible first-time homebuyers. The Community Partners product provides up to \$7,500 in down-payment, closing-cost, and principal reduction assistance for first-time or non-first-time homebuyers who are currently employed or retired law enforcement officers, educators, firefighters, health care workers, and other first responders.

#### **Number and Amount of Qualified Investments**

The bank's investment record enhances the credit availability in its assessment area. Qualified investments were responsive in helping the bank address community credit needs in its assessment area.

The bank's qualified investment activities during the evaluation period consisted solely of charitable donations. The bank made nineteen (19) qualified donations totaling \$29,596 to five (5) different organizations during the evaluation period. The bank's donations supported affordable housing initiatives and community services targeted to LMI residents. Community contacts identified affordable housing as critical need in the bank's assessment area.

The following are notable organizations that received qualified donations:

- *Habitat for Humanity Susquehanna:* The organization is dedicated to eliminating substandard housing locally and worldwide through constructing, rehabilitating and preserving homes by advocating for fair and just housing policies; and by providing training and access to resources to help families improve their shelter conditions. The bank provided nine (9) donations totaling \$17,796 to Habitat for Humanity Susquehanna during the evaluation period.
- HARBEL Community Organization, Inc. (HARBEL): HARBEL is a multipurpose organization that works to build and support communities through service, advocacy, and empowerment. The organization offers community services centered in housing partnerships providing homeowner counseling and education, and outpatient services to adults and adolescents who need outpatient treatment for substance use disorders. The bank provided five (5) donations totaling \$7,500 to HARBEL during the evaluation period.
- ARC of North Chesapeake (ARC): The organization focuses on supporting individuals with intellectual and/or developmental disabilities from birth through end of life. ARC services include community living, community partnerships, employment services, family support services, personal support systems, and treatment foster care. The bank provided three (3) donations totaling \$3,850 to ARC during the evaluation period.
- *Harford House*: Harford House is a multipurpose organization that helps families and unaccompanied young adults who are experiencing homelessness transition into stable/permanent housing. Harford House is committed to ending homelessness for families with children and unaccompanied young adults in Harford County, Maryland. The organization also provides high quality services to assist individuals on reducing and eliminating harmful involvement with substance abuse. The bank provided one (1) donation totaling \$250 to Harford House during the evaluation period.
- *Key Point Health Services (Key Point):* Key Point is a non-profit organization that offers mental health clinics, rehabilitation, community outreach programs, and counseling services to LMI individuals in the state of Maryland. The bank provided one (1) donation totaling \$200 to Key Point during the evaluation period.

#### **Community Development Services**

Throughout the evaluation period, bank personnel provided their banking expertise to a number of community organizations involved in affordable housing and social services for LMI individuals. During the evaluation period, six (6) bank employees provided 325 hours of community service to four (4) different entities located within the bank's assessment area. Three (3) officers demonstrated leadership and served on the Board of Directors or on committees for four (4) organizations. Bank employees also provided technical assistance on financial and banking related matters to various community development organizations involved in affordable housing initiatives targeted to LMI people in the bank's assessment area.

#### **Responsiveness to Credit and Community Development Needs**

Chesapeake demonstrated excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services. The OCC considered the institution's capacity and the need and availability of such opportunities in the bank's assessment area. The bank's community development loans, charitable donations and services focused towards affordable housing initiatives and community services for LMI individuals demonstrates the bank's responsiveness to the community's needs of its assessment area.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed:	01/01/2017 to 12/31/2019 L 02/23/2015 to 12/31/2019 C	S										
Bank Products Reviewed:	Home mortgage and small be Community development lo development services	ousiness loans ans, qualified investments, community										
Affiliate(s)	Affiliate Relationship	Products Reviewed										
None												
List of	List of Assessment Areas and Type of Examination											
Rating and Assessment Areas	Type of Exam	Other Information										
Maryland	Full-scope	Anne Arundel, Baltimore, Carroll, Harford, a Howard counties and the City of Baltimore, Maryland.										

# **Appendix B: Summary of MMSA and State Ratings**

RATINGS (CI	hesapeake Bank of Maryland)
Overall Bank:	Lending Test Rating
Chesapeake Bank of Maryland	Outstanding
State:	
Maryland	Outstanding

# **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

# **Appendix D: Tables of Performance Data**

### **Content of Standardized Tables**

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

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

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

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

2017-19

	Total	Home Mo	ortgage	Loans	Low-l	ncome	Tracts	Moderate-Income Tracts			Middle-Income Tracts			<b>Upper-Income Tracts</b>			Not Available-Income Tracts		
Assessment Area:	#	\$			( )ccunied			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
Chesapeake AA	185	53,867	100.0	87,122	5.0	1.6	3.5	17.3	10.8	15.7	38.2	47.0	40.3	39.4	40.5	40.5	0.1	0.0	0.1
Total	185	53,867	100.0	87,122	5.0	1.6	3.5	17.3	10.8	15.7	38.2	47.0	40.3	39.4	40.5	40.5	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, 2019 data not available.

Due to rounding, totals may not equal 100.0

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

2017-19

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$		Overall Market	Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chesapeake AA	185	53,867	100.0	87,122	22.4	8.6	8.9	17.1	23.8	19.2	19.8	23.2	20.3	40.7	36.2	32.0	0.0	8.1	19.6
Total	185	53,867	100.0	87,122	22.4	8.6	8.9	17.1	23.8	19.2	19.8	23.2	20.3	40.7	36.2	32.0	0.0	8.1	19.6

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, 2019 data not available.

Due to rounding, totals may not equal 100.0

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

2017-19

	Total Loans to Small Businesses Low-Income				Income T	'racts	Moderate-Income Tracts				Middle-Income Tracts			Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chesapeake AA	20	9,221,120	100.0	60,907	5.2	18.2	4.3	15.5	18.2	13.9	38.2	45.6	37.1	40.4	40.4	44.2	0.8	0.0	0.5
Total	20	9,221,120	100.0	60,907	5.2	18.2	4.3	15.5	18.2	13.9	38.2	45.6	37.1	40.4	40.4	44.2	0.8	0.0	0.5

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, 2019 data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues	2017-19
Table N. Assessment Area Distribution of Louis to Sman Dusinesses by Gross Amidai Revenues	

		Total Loans to Sma	all Businesses		Businesses	s with Revenues	<= 1MM	Businesses wit 1M		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Chesapeake AA	20	9,221,120	100.0	60,907	83.8	45.0	45.6	6.1	55.0	10.1	0.0	
Total	20	9,221,120	100.0	60,907	83.8	45.0	45.6	6.1	55.0	10.1	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, 2019 data not available.

Due to rounding, totals may not equal 100.0