



PUBLIC DISCLOSURE

November 2, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Town-Country National Bank
Charter Number: 16708

118 Broad Street
Camden, AL 36726

Office of the Comptroller of the Currency

Birmingham Field Office
3595 Grandview Parkway
Suite 655
Birmingham, AL 35243

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.

Table of Contents

Overall CRA Rating..... 1
Description of Institution..... 2
Scope of the Evaluation..... 4
Discriminatory or Other Illegal Credit Practices Review..... 5
Lending Test 6
Appendix A: Scope of Examination..... A-1
Appendix B: Summary of MMSA and State Ratings..... B-1
Appendix C: Definitions and Common Abbreviations..... C-1
Appendix D: Tables of Performance Data..... D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory

The major factors that support this rating include:

The Lending Test rating is based on:

- The loan-to-deposit ratio is reasonable given the bank's size, financial condition, economic environment, and assessment area (AA) credit needs.
- The bank originates a majority of loans within its AA.
- The bank has a reasonable penetration for lending to borrowers of different income levels within its AA.
- The bank has a reasonable dispersion of home and consumer loans to low- and moderate-income census tracts in the AA.

Loan-to-Deposit Ratio

Considering the bank's size and financial condition, and the AA's credit needs, the bank's loan-to-deposit ratio is reasonable.

Town-Country National Bank's (TCNB) net loan-to-deposit (LTD) ratio averaged 72.04 percent over the 16 quarters since the prior CRA examination, with a quarterly high of 78 percent at March 31, 2020 and a quarterly low of 67.93 percent at March 31, 2017. This ratio is calculated on a bank-wide basis.

TCNB's LTD ratio compares favorably with other community institutions of similar size, location, and product offerings. TCNB ranks fourth among seven similarly situated institutions serving its AA. The other six peer banks had a combined average LTD ratio of 69.3 percent, with a high average of 80.6 percent and a low average of 46.5 percent.

The following table reflects TCNB's and similarly situated institutions' LTD ratios over the review period of September 2016 through June 2020.

BANK NAME	TOTAL ASSETS (000s)	Avg.
		LTD Ratio
Town-Country National Bank	118,417	72.04
Community Neighbor Bank	119,378	68.37
Sweet Water State Bank	110,913	80.57
First Bank of Linden	82,086	46.45
Peoples Exchange Bank	82,026	76.71
First National Bank and Trust	184,097	64.74
First Cahawba Bank	144,489	78.79

Source: Institution Reports of Condition for the 16-quarter period from September 31, 2016 to June 30, 2020.

Lending in Assessment Area

A majority of the bank's loans are inside Wilcox County, its AA).

During the review period, TCNB originated 70 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Auto	23	77%	7	23%	30	211,912	68%	100,710	32%	312,622
Mortgages	19	63%	11	37%	30	1,308,813	54%	1,117,311	46%	2,426,124
Total	42	70%	18	30%	60	1,520,725	56%	1,218,021	44%	2,738,746
<i>Source: Bank Loan Sample Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

The loans identified as inside the AA were also used for the analysis of the geographic distribution of lending by income level of geography and income level of the borrower.

Description of Institution

TCNB is a national bank with total assets of \$118 million as of June 30, 2020. TCNB operates one, full-service branch located in downtown Camden, AL, a rural community in Wilcox County. TCNB has two automated teller machines (ATMs), both also located in Camden. The Bank has one AA, Wilcox County in the state of Alabama, for the CRA rating. The bank's previous CRA rating, dated July 25, 2016, was "Satisfactory." TCNB does not have a holding company or affiliates.

TCNB is a community bank engaged in residential real estate, commercial, and consumer lending. The Bank offers 1-4 family mortgage loans to residential borrowers for home construction, purchase, refinance, and improvement. The Bank also offers commercial and industrial loans to manufacturers, wholesalers, retailers, service industries, construction companies, agriculture companies, local government, and small businesses. The Bank focuses on meeting the community's credit needs through automobile and other consumer loans for various purposes. TCNB offers various deposit products, including personal checking, savings, money market, business checking, certificates of deposits, and individual retirement account services. The Bank offers online banking to customers.

At June 30, 2020 TCNB's net loans represented 58 percent of total assets. The following table shows the loan portfolio composition. *Source: June 30, 2020 Call Report*

Loan Portfolio Composition as of June 30, 2020		
Loan Type	Dollar Amount (000's)	Percent of Total Loans
Residential Real Estate	15,789	22.06%
Agricultural	2,170	3.03%
Consumer (Auto)	7,528	10.52%
Consumer (Other)	7,259	10.14%
Other loans	54	0.08%
Commercial Real Estate	22,217	31.04%
Commercial and Industrial	16,565	23.14%
Total Loans	71,582	100%

TCNB designated Wilcox County as its sole AA for CRA purposes. Wilcox County has four census tracts, one low-, two moderate-, and one middle-income tract. Nine percent of the county's population resides in the low-income tract, with ninety-one percent residing in the moderate- or middle-income tracts. In 2019, the median housing value was \$76 thousand and the median family income was \$45 thousand. In September 2020, The Bureau of Labor Statistics reported an unemployment rate of 17 percent in Wilcox County. At the same time, the state of Alabama and the U.S. had employment rates of 6.6 percent and 7.9 percent, respectively. This is a drastic increase from September 2019, when the county's unemployment rate was 6.2 percent versus the state-wide average of 3.5 percent. Historically, Wilcox County's unemployment rate has exceeded the state and national averages. A community contact explained that the unemployment rate has increased as a result of the COVID-19 pandemic. The 2015 American Community Survey (ACS), reported 30 percent of families in the county live below poverty level.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wilcox AA 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	25.0	50.0	25.0	0.0	0.0
Population by Geography	11,235	8.7	45.7	45.6	0.0	0.0
Housing Units by Geography	5,616	11.8	45.8	42.4	0.0	0.0
Owner-Occupied Units by Geography	2,645	11.9	43.5	44.6	0.0	0.0
Occupied Rental Units by Geography	1,198	9.0	38.8	52.2	0.0	0.0
Vacant Units by Geography	1,773	13.6	53.9	32.5	0.0	0.0
Businesses by Geography	465	8.0	32.9	59.1	0.0	0.0
Farms by Geography	14	28.6	35.7	35.7	0.0	0.0
Family Distribution by Income Level	2,430	37.0	15.5	17.1	30.4	0.0
Household Distribution by Income Level	3,843	38.8	17.8	14.5	28.9	0.0
Median Family Income Non-MSAs - AL		\$45,454	Median Housing Value			\$76,152
			Median Gross Rent			\$474
			Families Below Poverty Level			30.4%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The county economy historically has been dependent on the timber products industry and agriculture. Golden Dragon Copper USA, a copper tubing manufacturing facility opened in 2014 and presently employs 400 people. The community contact explained the local banks were involved in financing the land for the facility.

Primary needs, identified by a community contact, are working capital for small businesses and working with customers experiencing difficulty from the pandemic. The community contact stated that the local banks have been excellent in helping customers during the pandemic. The contact stated that people in

the community know the banks work with them to try to find a way to help them with credit needs. The contact also stated the local banks actively support the community, including the local job-training program Wilcox Works.

We found no legal or financial impediments adversely affecting the Bank's ability to help meet community credit needs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of TCNB's CRA activities in its sole AA under the small bank CRA procedures. This includes the lending test, which evaluates the bank's record of meeting the credit needs of the AA through its lending activities. We based conclusions regarding the lending test on samples of residential mortgage and automobile loans. At June 30, 2020, residential real estate loans represented 23 percent and automobile loans represented 11 percent of the loan portfolio. We selected home and automobile loans because of the significance of these products in the bank's strategy to serve consumers. For the lending tests, we analyzed a random sample of loans originated in 2017, 2018, and 2019. We also contacted a local economic development organization serving Wilcox County to better assess community needs and determine opportunities for financial institutions to lend and provide services to the area.

Selection of Areas for Full-Scope Review

A full scope review was performed on the bank's single AA. Refer to appendix A, Scope of Examination.

Ratings

The bank's overall rating is based on assessing the Bank's performance within a single AA. As the bank has only one AA, the overall rating is also the State Rating. Weighting was equally proportioned to mortgage and automobile loans.

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 AA 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 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.

LENDING TEST

The bank's performance under the Lending Test in the AA, Wilcox County is rated **Satisfactory**.

Based on a full-scope review, the bank's performance in the AA, Wilcox County is **reasonable**.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA.

Home Mortgage Loans

For 2017 – 2019, the percentage of bank mortgage loans in the moderate-income tracts exceeded the percentage of owner-occupied housing units and aggregate lending in those tracts. The percentage of loans in the low-income tract was reasonable given the low percentage of owner-occupied housing in that tract.

Refer to Table O in the "MMSA" 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.

Consumer Loans

For 2017 – 2019, the percentage of bank consumer loans in the low-income tract exceeded the percentage of the households in that tract. The loans in the moderate-income tracts were only slightly lower than the percentage of households in those tracts.

Refer to Table U in the "MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels in the product lines included in this review.

Home Mortgage Loans

For 2017-2019, the percentage of home mortgage loans to low-income borrowers was slightly below the percentage of low-income borrower households. Mortgage loans exceeded the aggregate level of lending to low-income borrowers.

For 2017-2019, mortgage loans to moderate income borrowers was less than the percentage of families and the aggregate percentage of lending to those borrowers but still reasonable. The AA has a high percentage of families living below the poverty level; which limits the opportunities for lending in the AA.

Refer to Table P in the "MMSA" 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.

Consumer Loans

For 2017-2019, the percentage of consumer loans to low-income borrowers greatly exceeded the percentage of low-income households.

For 2017-2019, consumer loans to moderate income borrowers was equal to the percentage of moderate-income households.

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

Responses to Complaints

There were no complaints received, either by the bank, or the regulatory agency related to CRA during the review period.

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:	09/31/2016 to 06/30/2020	
Bank Products Reviewed:	Home mortgage and automobile loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wilcox County, AL	Full Scope	Wilcox County, AL

Appendix B: Summary of MMSA and State Ratings

RATINGS	Town-County National Bank
Overall Bank:	Lending Test Rating
Town-Country National Bank	Satisfactory
MMSA or State:	
Alabama	Satisfactory

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 geographies, 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 30th 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 U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-2019**

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Wilcox County	20	1,430,452	100%	11.9	5	11.5	43.5	50	37.5	44.6	70	51	0	0	0	0	0	0
Total	20	1,430,452	100%	11.9	5	11.5	43.5	50	37.5	44.6	70	51	0	0	0	0	0	0

Source: 2015 ACS Census ; 01/01/2019 - 12/31/2019 Bank Loan Sample Data, 2019 HMDA Aggregate Data.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-2019**

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers	
	#	\$	% of Total	% Families	% Bank Loans	% of Aggregate	% Families	% Bank Loans	% of Aggregate	% Families	% Bank Loans	% of # Aggregate	% Families	% Bank Loans	% of # Aggregate	% Families	% of # Aggregate
Wilcox AA 2019	20	1,430,452	100%	37.0	30%	4.8	15.5	10%	20.2	17.1	10%	23.1	30.4	50%	41.3	0.0	10.6
Total	20	1,430,452	100%	37.0	30%	4.8	15.5	10	20.2	17.1	10%	23.1	30.4	50%	41.3	0.0	10.6

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Loan Sample Data.
 Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wilcox Co	23	211,911	100	11	17	42	35	47	48	0	0	0	0
<i>Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Loan Sample Data. Due to rounding, totals may not equal 100.0%</i>													

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wilcox Co.	23	211,911	100	38.9	60.9	17.8	17.4	14.5	17.4	28.9	4.3	0	0
Total	23	211,911	100	38.9	60.9	17.8	17.4	14.5	17.4	28.9	4.3	0	0
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Loan Sample Data. Due to rounding, totals may not equal 100%</i>													