



PUBLIC DISCLOSURE

October 25, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Eureka Homestead
Charter Number: 703193

1922 Veterans Boulevard
Metairie, LA 70005

Office of the Comptroller of the Currency

3838 North Causeway Blvd.
Suite 2890
Metairie, LA 70002-8105

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 **Satisfactory**.

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The average loan-to-deposit (LTD) ratio is more than reasonable relative the institution’s size, competition, and financial condition.
- The bank originated a substantial majority of its loans inside the assessment area (AA).
- Loan analysis indicates a reasonable distribution of loans in low- and moderate-income (LMI) geographies.
- Loan analysis indicates a reasonable distribution of lending to LMI borrowers.
- The institution did not receive any CRA-related complaints during the evaluation period.

LTD Ratio

Considering the size, financial condition, and credit needs of the AA, Eureka Homestead’s (Eureka’s) LTD ratio is more than reasonable. Eureka’s quarterly average LTD ratio during the evaluation period was 132.7 percent. Since the prior examination, the quarterly LTD has ranged from a low of approximately 110.2 percent in the second quarter of 2019 to a high of approximately 156.7 percent in the second quarter of 2017. The quarterly average LTD ratio for similarly situated financial institutions located within or near the AA was approximately 92.4 percent.

Lending in AA

A substantial majority of the bank’s loans are inside its AA. Eureka originated and purchased 88 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. This conclusion is based on the entire population of Eureka’s primary product during the evaluation period. The findings from the analysis is factored into the overall analysis of the geographic distribution of lending by income level of the geography.

Lending Inside and Outside of the AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	77	86.5	12	13.5	89	21,016	89.1	2,583	10.9	23,599
2019	93	90.3	10	9.7	103	25,508	92.3	2,115	7.7	27,623
2020	135	86.5	21	13.5	156	40,997	86.1	6,628	13.9	47,625
Total	305	87.6	43	12.4	348	87,521	88.5	11,326	11.5	98,847
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Eureka Homestead (Eureka) is a single-state federally chartered stock savings association headquartered in Metairie, Louisiana. Eureka currently operates from a single office in Metairie, which is located in Jefferson Parish, and a loan production office in New Orleans, Louisiana, which is located in Orleans Parish. Eureka is wholly owned by Eureka Homestead Bancorp, a single bank holding company. As of December 31, 2020, Eureka reported total assets of \$100 million and tier one capital of \$19 million.

Banking hours reasonably meet the community needs with lobby hours Monday through Friday at both locations. The main office location is a full-service facility with a drive through window. Deposits are not accepted at the loan production office, and the bank does not have any ATMs. Eureka's internet website functions as an informational site on the products and services the bank offers. Since the prior CRA evaluation, Eureka converted from a mutual owned thrift to stock owned thrift. Eureka has not opened or closed any branches during the review period.

As illustrated below in the table below, Eureka's lending focuses primarily residential real estate. As of December 31, 2020, total loans were \$74.3 million, representing 74.4 percent of total assets. The loan portfolio was comprised of approximately 99.7 percent real estate.

Eureka Homestead Loan Portfolio		
Loan Category	Dollars (000)	Percentage
1-4 Family Residential	69,416	92.88
Multifamily	2,929	4.32
Construction and Development	1,423	1.34
Commercial Real Estate	368	1.18
Consumer Loans	214	0.28
Total	74,350	100

Management has designated portions of the New Orleans-Metairie Metropolitan Statistical Area (MSA) as its AA. The MSA encompasses a total of eight parishes and, because Eureka only operates one branch in the MSA, management chose the portions of Jefferson and Orleans parishes where its offices are located as its AA. The Mississippi River bisects both parishes into two parts that are locally termed, the Eastbank and the Westbank. Eureka chose the Eastbank of Jefferson and Orleans parishes as its AA.

Eureka's AA is made up of 193 contiguous census tracts located in Jefferson and Orleans Parishes, Louisiana. Of the 193 tracts, 37 are designated as low-income tracts; 35 are designated as moderate-income tracts; 41 are designated as middle-income tracts; 73 are designated as upper-income tracts, and information was not available for seven tracts. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts.

Eureka has no affiliate or operating subsidiary activities considered when evaluating CRA performance. There were no legal or financial factors impeding the institution's ability to meet credit needs in its AA during the evaluation period. Eureka's CRA performance was rated "Satisfactory" in the last performance evaluation dated May 2, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated CRA performance of Eureka using the Interagency Small Bank CRA procedures, which focus on the analysis of the bank's primary loan products. The evaluation period for the lending test covered January 1, 2018, through December 31, 2020. Conclusions regarding Eureka's lending performance are based on a review of residential real estate loans. These loans represent all loans reported on the HMDA loan application register for 2018, 2019, and 2020.

Selection of Areas for Full-Scope Review

Eureka only operates in one assessment area in the state of Louisiana; therefore, it will receive a full scope review.

Ratings

Eureka operates in one state and has one AA, with one primary loan product (one- to four-family residential mortgages) that received consideration.

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.

State Rating

State of Louisiana

CRA rating for the State of Louisiana: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits a reasonable geographic distribution of loans to LMI geographies
- The bank exhibits a reasonable distribution of loans to individuals of different income levels

Description of Institution’s Operations in Louisiana

Eureka operates two locations in one AA within the state of Louisiana as discussed in the “Description of Institution” section of this report.

The institution’s primary business strategy focuses on real estate lending. Eureka offers bank portfolio loan products, as well as conventional and government conforming loan products including Federal National Mortgage Association (FNMA), Veteran’s Administration (VA), and Federal Housing Administration (FHA) mortgages.

Eureka’s competition is significant with state and federal community banks, credit unions, and mortgage banking companies with regional and national footprints all operating in the AA. Based on the most recent Deposit Market Share Report Eureka ranked 27th out of 61 institutions in its AA, holding 0.18 percent of market share. The largest five competitors Hancock Whitney (20.11), JP Morgan Chase (16.06), Capital One (29.38), Iberia Bank (8.09), and Regions Bank (4.89) command approximately 79 percent of the deposit market, evidencing fierce competition in the AA.

The Federal Financial Institutions Examination Council’s (FFIEC) updated 2020 median family income for the AA was \$70,400. Low-income is defined as less than 50 percent of the median family income. Moderate-income is defined as 50 percent to less than 80 percent of the median family income. Middle-income is defined as 80 percent to 119 percent of the median family income. Upper income is defined as income of 120 percent and over the median family income. The following table depicts income categories:

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
New Orleans-Metairie, LA MSA Median Family Income (35380)				
\$70,400	<\$35,200	\$35,200 to <\$56,320	\$56,320 to <\$84,480	≥\$84,480
<i>Source: FFIEC</i>				

Low-income families earning a median family income less than \$35,200 represented 27.95 percent of families in the AA, while moderate-income families comprised 15.95 percent of the AA population. According to 2015 ACS US census data, 20.54 percent of households in the MSA earned wages below the poverty level. In addition to these borrower lending constraints, opportunities for residential lending

are limited within the 139 low- and moderate-income census tracts in the MSA. Of the 63,986 housing units within low-income census tracts, approximately 23.01 percent of the units were occupied rental units with an average gross monthly rent of \$799, and 24.39 percent were vacant. Only 8.98 percent of housing units in the low-income census tracts were owner-occupied. In moderate-income census tracts, there were 106,200 housing units, of which approximately 32.49 percent of the units were rental occupied units with an average gross monthly rent of \$873, and another 30.74 percent were vacant. Only 23.01 percent of housing units in the moderate-income census tracts were owner-occupied.

The average of median housing in the MSA has increased from \$202,201 in 2015 to over \$275,000 according to recent reports from the National Association of Realtors. The continued low level of housing inventory, combined with record-low mortgage rates has spurred housing demand and caused the increase in median sales prices, which further impede homeownership for LMI borrowers. Local news outlets have published numerous articles over the last decade on the high cost of housing, taxes, and the need for more affordable housing in the New Orleans area.

Based on 2020 business demographic data, there were 88,411 non-farm businesses in the AA. Of these, 78,338 (88.61 percent) of the businesses had revenues of less than \$1 million, 3,664 (4.14 percent) had revenues greater than \$1 million, and 6,409 (7.25 percent) did not report revenue information. The AA's economy is dominated by four major sectors: oil/gas and related activities; tourism; the port and ship/boat building, and aerospace manufacturing. While tourism continues to be the driving force of the economy, the presence of universities, hospitals, legal/accounting and other professional services, further diversify the economic base. According to the Bureau of Labor Statistics, as of September 2021 the unemployment rate of the MSA was 6.1 percent, which was slightly higher than the Louisiana state average of 5.8 percent.

The following table depicts the demographic information for the full-scope AA in Louisiana.

New Orleans-Metairie MSA

Demographic Information of the Assessment Area						
Assessment Area: New Orleans-Metairie MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	304	21.1	24.7	23.4	26.3	4.6
Population by Geography	811,830	14.9	28.1	27.7	28.0	1.3
Housing Units by Geography	381,114	16.8	27.9	25.6	28.3	1.4
Owner-Occupied Units by Geography	174,834	9.0	23.0	32.2	35.1	0.8
Occupied Rental Units by Geography	146,410	23.0	32.5	21.2	21.4	1.9
Vacant Units by Geography	59,870	24.4	30.7	17.2	25.5	2.1
Businesses by Geography	88,411	12.1	21.0	24.1	41.0	1.8
Farms by Geography	972	10.2	20.7	29.8	38.3	1.0
Family Distribution by Income Level	182,906	28.0	16.0	16.9	39.2	0.0
Household Distribution by Income Level	321,244	29.6	15.6	15.4	39.5	0.0
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$61,124	Median Housing Value			\$202,201

	Median Gross Rent	\$925
	Families Below Poverty Level	16.7%
<i>Source: 2015 ACS and 2020 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.</i>		

In conjunction with this examination, we conducted an interview with a community leader in the AA. The primary credit needs in the community were identified as affordable housing and financial literacy. According to this contact, local banks have been active in helping meet the credit needs of the AA.

Scope of Evaluation in Louisiana

As previously discussed, the institution has one AA, which received a full-scope review. Consistent with the bank’s primary lending focus, residential real estate loans were analyzed.

Lending Test

The bank’s performance under the Lending Test in Louisiana is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the New-Orleans-Metairie AA is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Louisiana 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.

The geographic distribution of home mortgage loans within low- and moderate-income CTs in the AA is considered reasonable given the bank’s size, competition, and limited housing available. The bank’s lending in low- and moderate-income CTs was lower than both the level of owner-occupied housing units (comparator) and the aggregate lending in those geographies. However, owner-occupied units in low-income CTs only comprised a small percentage of housing units available at approximately 9 percent of total housing units in the AA. Most housing units within the low-income CTs were rented or vacant, with approximately 52 percent of housing units occupied as rentals, and 23 percent of the units vacant. The median housing value in low-income CTs was \$128,537. While the presence of owner-occupied housing units in moderate-income CTs was slightly higher at 23 percent of total housing units in the AA, there was a high level of rental and vacant housing units within moderate-income CTs as well. Approximately 45 percent of housing units in moderate-income CTs were renter occupied, and 17 percent were vacant units. The median housing value in moderate income CTs was \$149,150. In addition to the limited housing available, the bank also faced intense competition for financial services

with 61 institutions operating within its AA, of which many had significantly more locations compared to Eureka's single full-service location.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Louisiana 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.

Lending to borrowers of different income levels for residential real estate loans in the bank's AA is reasonable, considering the high cost of homes, limited housing stock, and elevated poverty levels in the AA. The bank's lending to low- and moderate-income borrowers was low compared to the percentage of low- and moderate-income families. The median housing value in the AA has increased from \$202,201 in 2015 to over \$275,000 in 2020 making homeownership difficult to achieve for LMI borrowers. A low-income family earning \$35,130 could qualify a \$120,000 home, assuming a maximum mortgage payment (including taxes and insurance) of \$787 per month amortizing a 97 percent loan of \$116,400. A moderate-income family with income of \$56,200 could afford a \$206,000 home, which was still significantly less than the median housing value of \$275,000. According to the Realtor.com website at the end of 2020, there were 258 homes, or 16.9 percent of listings for \$206,000 or less, of which the majority were under contract. In addition to the lack of affordable homes in the AA, cost burdened renters are unable to save for the down payment required to purchase a residence. Approximately 43 percent of renters in low income CT and 31 percent of renters in moderate income CTs have rental costs greater than 30 percent of income. Furthermore, approximately 32 percent of families in low-income CT and nearly 40 percent of families in moderate-income CT live below the poverty line. All these factors make lending difficult for low- and moderate-income families.

Responses to Complaints

There were no complaints related to the institution's CRA performance during the evaluation 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:	(01/01/18 to 12/31/20)	
Bank Products Reviewed:	Home Mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
N/A	N/A	N/A
State: Louisiana		
New Orleans-Metairie AA	Full-Scope	None

Appendix B: Summary of MMSA and State Ratings

RATINGS – EUREKA HOMESTEAD	
Overall Bank:	Lending Test Rating
Eureka	Satisfactory
MMSA or State:	
Louisiana	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 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 aggregate 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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 **2018-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
New Orleans AA 2020	305	87,521	100.0	30,536	9.0	6.2	8.4	23.0	11.1	18.8	32.2	19.3	28.6	35.1	63.3	42.9	0.8	0.0	1.4
Total	305	87,521	100.0	30,536	9.0	6.2	8.4	23.0	11.1	18.8	32.2	19.3	28.6	35.1	63.3	42.9	0.8	0.0	1.4

Source: 2015 ACS Census; 01/01/2018 - 12/21/2020 Bank Data, 2020 HMDA Aggregate Data, "--" 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 **2018-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New Orleans AA 2020	305	87,521	100.0	30,536	28.0	1.8	3.7	16.0	6.2	12.2	16.9	16.7	16.9	39.2	70.8	47.7	0.0	9.4	19.6
Total	305	87,521	100.0	30,536	28.0	1.8	3.7	16.0	6.2	12.2	16.9	16.7	16.9	39.2	70.8	47.7	0.0	9.4	19.6

Source: 2015 ACS Census ; 01/01/2018 - 12/21/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

