



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 13, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BankSouth
Charter Number 713480

6340 Lake Oconee Parkway, Greensboro, GA 30642

Office of the Comptroller of the Currency

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Atlanta, GA 30346

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:

- A more than reasonable loan-to-deposit ratio given the bank's size, financial condition, and credit needs of the assessment areas (AAs);
- A substantial majority of the bank's home mortgage loans are outside its AAs;
- A reasonable geographic distribution of home mortgages loans by income level;
- A reasonable distribution of home mortgage loans to individuals of different income levels;

The Community Development (CD) Test is rated Satisfactory.

- Considering the bank's capacity, along with the need and availability of opportunities for CD in the bank's assessment area, the bank's performance demonstrates an adequate responsiveness to the CD needs of its AAs through CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the areas AAs, the bank's loan-to-deposit ratio is more than reasonable.

The bank's quarterly average loan-to-deposit (LTD) ratio during this review period is 98 percent compared to a peer bank average of 69 percent. Since the last CRA Examination, BankSouth's quarterly average LTD ranged from a high of 110 percent to a low of 90 percent.

We were able to identify seven similarly situated institutions that operate in the bank's primary market area. However, these peer banks lacked in asset size as compared to BankSouth. The peer banks had assets between \$181 million and \$575 million, with an average LTD ratio that ranged from a high of 108 percent to a low of 45 percent.

Lending in Assessment Area

The bank originated and purchased 24 percent of its total loans inside the bank's AAs during the evaluation period. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The table below depicts the number and dollar volume of home mortgage loans originated inside and outside the delineated assessment areas from January 1, 2016, through December 31, 2018. Information in the table was compiled based upon internal loan registers.

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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage Loans	3,514	24	10,983	76	14,497	890,968	26	2,585,880	74	3,476,848

Source: HMDA-reportable data for 2016 through 2018.

As indicated in the above table, the percentage of mortgage loans based on number and dollar volume inside the delineated AAs is substantially less than the percentage of loans outside the bank's AAs. BankSouth operates a mortgage subsidiary, BankSouth Mortgage (BSM), originates and sells 1-4 family mortgage loans on the secondary market. The mortgage operations are not limited to BankSouth's assessment areas and loans are originated throughout a larger regional area that includes portions of the greater Atlanta and Savannah MSAs. The bank's lending policy and practices are consistent with its business strategy and have adequately met the demand for credit in its AAs. Based on the bank's asset size, residential lending in the AAs is very reasonable totaling \$891 million over the evaluation period.

Description of Institution

BankSouth is a federally-chartered thrift headquartered in Greensboro, Georgia. The single-state thrift is wholly owned by BankSouth Holding Company (BSH), a closely held, unitary thrift holding company, also located in Greensboro, Georgia. The bank operates from its main office in Greensboro, Georgia, at Lake Oconee, and from five branch offices. Other branch locations include downtown Greensboro (1), Watkinsville (1), Atlanta (1), and Savannah (2). The main office at Lake Oconee is in an upper-income census tract, while the downtown Greensboro office is in a moderate-income census tract. The Atlanta office and one of the Savannah offices are in upper-income census tracts. The other Savannah office is in a middle-income census tract. All branch locations have an Automatic Teller Machine (ATMs) except for one Savannah branch (Stephenson Avenue). The bank also has a Loan Production Office (LPO) in Athens, GA. The bank owns BSM, a mortgage subsidiary which originates and sells mortgage loans on the secondary market. BSM, headquartered in Atlanta, GA, operates 9 locations throughout Georgia. During the evaluation period, there was one BSM location opened (Forum – Atlanta, GA) on August 22, 2016, and one location closing (Hammond Drive - Atlanta, GA) on August 19, 2016. The bank offers various products and services including checking, savings, certificate of deposits, money markets, online banking, wire transfers, consumer loans, commercial loans and real estate loans.

As of September 30, 2019, BankSouth reported total assets of \$716 million, net loans of \$600 million, total deposits of \$603 million, and total equity of \$65 million. The tier-one risk-based, total risk-based (RBC), and tier-one leverage capital ratios were 12.14 percent, 13.36 percent, and 9.35 percent, respectively. Primary earning assets are loans with lending focused on originating consumer and business purpose loans within the bank's footprint. The bank continues to have a high concentration of

Commercial Real Estate and Construction Loans, however, most of the bank's construction loans exposure is within consumer loans, where the repayment comes from individual's salary/wages. Loan growth over the past 12 months has been concentrated in 1-4 family residential first-lien loans, 1-4 family residential construction and Non-Owner Occupied and Commercial Real Estate. Deposits are made up of retail and business deposits within the local communities served by the bank. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2018, BankSouth's deposits total \$469,816 or 0.22 percent of the market share among depository institutions in the state of Georgia.

There are no legal or financial impediments that hinder the bank's ability to meet the credit needs of the community. BankSouth received an overall "Satisfactory" rating at its prior intermediate small bank CRA examination dated October 24, 2016.

Description of Assessment Area(s)

BankSouth has established four assessment areas, two of which were selected for a full scope review. The combined AAs have a population of approximately 930,000 and 233 census tracts. The Atlanta AA is the largest with nearly 49 percent of the combined AAs population. BankSouth's Savannah AA is the next largest with just over 30 percent of the combined population, while the Lake Country and Watkinsville AAs contain nearly 21 percent of the combined population. At year-end 2019, BankSouth operated 6 offices and 17 ATMs within its CRA assessment area and offers a full range of credit and deposit services.

Atlanta AA

The Atlanta assessment area includes tracts within Cobb County and Fulton County. All tracts are in the Atlanta MSA, but the assessment area does not include the entire Atlanta MSA. For Fulton County, the assessment area includes all tracts inside Interstate 285 and north of Interstate 20. For Cobb County, the assessment area includes those tracts surrounding Interstate 75 and South Cobb Drive that are a reasonable distance from the Atlanta branch. There is one office located in the assessment area. The FDIC's Market Share report data is available for whole counties, however, BankSouth's assessment area is comprised of portions of two counties. Fifty-three other banks operated 448 offices within these counties. In 2018, the top three financial institutions in the MSA were SunTrust Bank, Bank of America, and Wells Fargo, which collectively made up 73 percent of deposit market share.

Atlanta is the capital and most populous city in the state of Georgia. The city is home to 5.9 million people and the ninth largest metropolitan area in the nation. Atlanta's economy is considered diverse, with dominant sectors that include aerospace, transportation, logistics, professional and business services, media operations, medical services, and information technology. Atlanta has attained international prominence as a major air transportation hub, with Hartsfield-Jackson Atlanta International Airport being the world's busiest airport by passenger traffic since 1998. The Metro Atlanta Chamber of Commerce identifies Delta Airlines, Emory University and Emory Healthcare, and Home Depot as the top three employers.

The table below, which is based on the 2015 U.S. Census data, sets forth a summary of demographics for the Atlanta assessment area:

Demographic Information of the Assessment Area						
Assessment Area: BankSouth - Atlanta MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	114	20.2	20.2	11.4	45.6	2.6
Population by Geography	459,285	15.4	21.1	13.1	48.2	2.3
Housing Units by Geography	238,866	15.3	20.6	11.8	51.1	1.1
Owner-Occupied Units by Geography	83,342	7.4	13.6	11.2	67.5	0.2
Occupied Rental Units by Geography	118,866	18.1	25.0	13.7	41.4	1.8
Vacant Units by Geography	36,658	24.3	22.3	7.0	45.4	0.9
Businesses by Geography	91,133	7.3	15.9	10.8	62.8	3.2
Farms by Geography	801	7.0	14.7	14.0	62.7	1.6
Family Distribution by Income Level	86,396	24.2	13.4	13.4	49.0	0.0
Household Distribution by Income Level	202,208	26.4	15.2	16.1	42.3	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$271,443
			Median Gross Rent			\$1,026
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS Census 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>						

Savannah AA

The Savannah assessment area includes all of Chatham County. All tracts are in the Savannah MSA, but the assessment area does not include the entire Savannah MSA. There are 2 branches located within the Savannah assessment area. A total of 19 institutions operated 83 offices within Chatham County. In 2018, the top three financial institutions were SunTrust Bank, Wells Fargo and Bank of America, which collectively made up 62 percent of deposit market share. (Source: FDIC Market Share Report as of June 30, 2018).

Chatham County is located on the state's Atlantic coast. The county seat and largest city is Savannah. The U.S. Census Bureau's 2018 population estimate for Chatham County was 289,195 residents, making Chatham the most populous Georgia county outside the Atlanta metropolitan area. According to the Bureau of Labor Statistics data for 2018, the average unemployment rate for Chatham County was 3.7 percent. The largest employers in Chatham County include Candler Hospital, Gulfstream Aerospace Corporation, Gulfstream Services Corporation and International Paper Company (Source: Georgia Department of Labor).

The table below, which is based on the 2015 U.S. Census data, sets forth a summary of demographics for the Savannah assessment area:

Demographic Information of the Assessment Area						
Assessment Area: BankSouth - Savannah MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	71	14.1	38.0	22.5	22.5	2.8
Population by Geography	279,290	10.1	29.8	29.0	31.1	0.0
Housing Units by Geography	121,877	9.8	29.7	29.2	31.3	0.0
Owner-Occupied Units by Geography	57,315	5.6	21.2	33.5	39.8	0.0
Occupied Rental Units by Geography	47,597	13.4	39.5	24.3	22.7	0.0
Vacant Units by Geography	16,965	13.8	31.2	28.4	26.6	0.1
Businesses by Geography	26,394	8.7	23.0	33.2	34.8	0.3
Farms by Geography	445	5.8	21.1	39.1	33.9	0.0
Family Distribution by Income Level	64,069	25.1	16.6	20.2	38.2	0.0
Household Distribution by Income Level	104,912	26.9	16.5	17.6	39.0	0.0
Median Family Income MSA - 42340 Savannah, GA MSA		\$61,754	Median Housing Value			\$188,202
			Median Gross Rent			\$955
			Families Below Poverty Level			14.4%
<i>Source: 2015 ACS Census 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>						

Lake Country AA

The Lake Country assessment area includes all of Greene County, four tracts covering the northern half of Putnam County, and one tract in Morgan County. All the tracts are non-MSA, except for the tract in Morgan County. Greene County, where BankSouth's main office is located, is home of Lake Oconee; an area which offers golfing, fishing, watersports and is widely recognized as a popular destination for those looking to retire or relocate in the Southeast.

The Lake Oconee region enjoys a stable economy. Major employers vary by each county in the Lake Oconee area. Morgan County on the west side has two large employers - The Morgan County Board of Education and Georgia-Pacific. Putnam County to the south has three large employers - Horton Industries, the Putnam County School System and Georgia Power Co. In Greene County, on the east side of the lake, most of the employment is in the tourism industry at Reynolds Plantation and The Ritz-Carlton Lodge.

Demographic Information of the Assessment Area						
Assessment Area: BankSouth - Lake Country AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	16.7	50.0	33.3	0.0
Population by Geography	36,317	0.0	20.0	47.5	32.6	0.0
Housing Units by Geography	20,164	0.0	16.3	43.8	39.9	0.0
Owner-Occupied Units by Geography	10,465	0.0	14.4	45.2	40.5	0.0
Occupied Rental Units by Geography	4,111	0.0	30.6	48.9	20.5	0.0
Vacant Units by Geography	5,588	0.0	9.5	37.6	52.9	0.0
Businesses by Geography	3,329	0.0	19.0	31.0	50.0	0.0
Farms by Geography	165	0.0	25.5	35.2	39.4	0.0
Family Distribution by Income Level	10,278	20.4	16.1	16.9	46.6	0.0
Household Distribution by Income Level	14,576	21.7	15.8	16.1	46.3	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA	\$67,322	Median Housing Value				\$231,515
Median Family Income Non-MSAs - GA	\$45,886	Median Gross Rent				\$691
		Families Below Poverty Level				15.3%
<i>Source: 2015 ACS Census 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>						

Watkinsville AA

The Watkinsville assessment area includes all of Clarke County. All tracts are in the Athens-Clarke County MSA, but the assessment area does not include the entire Athens-Clarke County MSA. There is one branch located within the Watkinsville assessment area. The county seat is Athens; home to The University of Georgia, a state supported institution.

According to the Bureau of Labor Statistics data for 2018, the average unemployment rate for Clarke County was 4.0 percent. The largest employers in the area include Athens Regional Medical Centers, Athens Technical College and University of Georgia (Source: Georgia Department of Labor).

The table below, which is based on the 2015 U.S. Census data, sets forth a summary of demographics for the Watkinsville assessment area:

Demographic Information of the Assessment Area						
Assessment Area: BankSouth - Athens MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	19.4	11.1	27.8	38.9	2.8
Population by Geography	155,305	17.1	10.0	28.4	39.5	5.0
Housing Units by Geography	64,376	17.7	10.4	32.4	39.0	0.5
Owner-Occupied Units by Geography	27,002	9.1	6.8	30.1	53.9	0.0
Occupied Rental Units by Geography	28,234	24.2	13.3	34.3	27.2	1.0
Vacant Units by Geography	9,140	23.0	12.2	33.1	31.1	0.7
Businesses by Geography	13,490	12.5	6.7	28.9	50.6	1.4
Farms by Geography	475	6.3	6.5	21.1	65.3	0.8
Family Distribution by Income Level	30,336	25.2	13.8	16.9	44.0	0.0
Household Distribution by Income Level	55,236	29.9	13.5	14.3	42.3	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$57,116	Median Housing Value			\$173,689
			Median Gross Rent			\$809
			Families Below Poverty Level			16.8%
<i>Source: 2015 ACS Census 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>						

Community Contacts

To help identify needs and opportunities within the assessment areas, we reviewed community contact forms prepared within the evaluation period of the examination.

An interview was conducted with the University of Georgia-Small Business Development Center in the Athens area. The organization provides services and resources to clients interested in starting or expanding a business. While the community contact indicated that general banking and credit needs are met, there is ample opportunity for local institutions to help with training small business owners on various areas including credit/financing, business plans, strategic planning and funding.

An interview was also conducted with the Greene County Board of Commissioners (Greensboro, GA). The organization's primary purpose is to promote economic development, capital investment, and job creation within the city of Greensboro, and throughout all of Greene County. The contact indicated that all the banks in the area contribute to, and support the local area, including providing support to local

non-profit organizations. Housing and small business lending appears to be the primary credit needs within the community. The contact indicated that as the lake area has developed, homeowners need additional support services such as restaurants, retail trade, and maintenance companies. As such, the area has a need for small business lending for entrepreneurial start-up companies, and could use more workforce housing, for those with incomes from \$30,000 to \$50,000, which would assist some moderate-income individuals. The contact concluded that, local financial institutions are meeting the current credit needs of the community.

Scope of the Evaluation

We completed a review of BankSouth's CRA performance in its AA under the Intermediate Small Bank (IBS) examination procedures, which includes a Lending Test and a Community Development Test (CD). The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through qualified lending, investments, donations, and services.

BankSouth's primary lending products by dollar amount and number are residential real estate loans. The Lending Test covers the time frame from January 1, 2016 through December 31, 2018. These loans were evaluated from data reported pursuant to Home Mortgage Disclosure Act (HMDA) requirements. The bank's performance with respect to the Lending Test in the limited scope AAs is not inconsistent with the performance noted in the full scope review. To derive our conclusions for the Lending Test, we focused on the bank's primary product, which is residential mortgages. As the bank is a non-traditional thrift with mortgage loans originations throughout its regional area, an analysis of small loans to business and small loans to farms are immaterial and omitted from the PE analysis.

The Community Development Test evaluated the bank's loans, grants, donations, services, and qualified investments that satisfied the definition of community development for the period January 1, 2016 through December 31, 2018. October 24, 2016 through January 10, 2018.

The bank has designated four separate assessment areas. Full scope procedures were conducted for two of the bank's assessment areas, and two received limited scope reviews.

Selection of Areas for Full-Scope Review

BankSouth has identified four AAs, all are within the state of Georgia. BankSouth's AAs consist of delineated portions in the Atlanta and Savannah metropolitan statistical areas (MSAs). The other two AAs which are in non-MSAs include the Lake Country AA and Watkinsville AA. (Please refer to Description of Assessment Areas for details.)

The majority of the bank's deposits and commercial lending are concentrated in the Atlanta MSA and Savannah MSA. For this reason, we performed full-scope reviews of these AAs. We based our ratings primarily on the results of the full-scope reviews.

Ratings

The bank's overall rating is based on findings in each metropolitan statistical areas (MSA) reviewed. The overall rating takes into account the ratings in different MSAs by considering:

- The significance of the bank's activities in each MSA compared with the bank's overall activities.
- The lending opportunities in each MSA.
- The importance of the bank in providing loans to each MSA, particularly considering the number of other institutions and the extent of their activities in each MSA.
- Demographic and economic conditions in each MSA. We based the bank's ratings on those areas that received full-scope reviews.

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 or any affiliate whose loans have been 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 does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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 is rated Satisfactory.

Based on full-scope and limited-scope reviews, the bank's lending performance is reasonable.

BankSouth's performance in meeting the credit needs within its delineated community is reasonable. Most of the emphasis of the lending test evaluation was placed on the bank's lending responsiveness within the Atlanta and Savannah MSAs. Non-MSAs such as Lake Country and Watkinsville received limited scope reviews. As noted during our review, affordable one-to-four family residential housing was identified as a major credit need within the AAs. The bank's level of HMDA lending is satisfactory. During this evaluation period, BankSouth reported 14,497 HMDA loans approximating \$3.5 billion. This lending activity is considered satisfactory given the strong competition within the bank's AAs.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans to individuals of different income levels given the product line offered by the bank.

Home Mortgage Loans

Based on the data in table O, in appendix D, and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of home mortgage loans reflects a reasonable penetration. When consideration is given to the number of substantial competitors from national and regional financial institutions, percentage of owner-occupied housing units (OOHUs) for LMI borrowers, and prior economic environment, the bank has consistently met the challenge of mortgage loan originations relative to its geographic opportunities.

Atlanta MSA

- The distribution of the bank's home mortgage loans in low-income geographies reflects an excellent penetration within the MSA. The bank's proportion of loans in low-income geographies exceeds performance levels as compared to the percentage of OOHUs. Twenty-four percent of the housing units in this geography is vacant.
- The proportion of home mortgage loans in moderate-income geographies is reasonable. The level of home purchase lending in moderate-income geographies meets the percent of OOHUs in the MSA. Twenty-two percent of the OOHUs is vacant and makes it a challenge for the bank to loan in this income geography.

Savannah MSA

- The distribution of the bank's home mortgage loans in low-income geographies reflects a reasonable penetration within the MSA. The bank's proportion of loans in low-income borrowers is somewhat

lower than the percentage of OOHUs. It remains a significant challenge to lend in this geography as only 5.6 percent of the OOHUs are owner-occupied.

- The proportion of home mortgage loans in moderate-income geographies is reasonable. The level of home purchase lending in moderate-income geographies is somewhat lower than the percent of OOHUs in the AA. Thirty-one percent of the OOHUs is vacant in this geography and does not afford the bank many opportunities to originate mortgage loans.

The bank's distribution of loans by income level of geography in limited scope AAs is not inconsistent with the performance noted in the full scope MSAs.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed BankSouth's home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank's AAs consist of whole geographies, meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income areas.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels given the product line offered by the bank.

Home Mortgage Loans

Based on the data in table P, in appendix D, and the following performance context considerations, we concluded the distribution of loans by income level of the borrower for home mortgage loans reflects a reasonable dispersion in the AAs.

Atlanta MSA

- The distribution of loans by borrower's income level to low-income borrowers reflects a poor dispersion within the MSA. The bank's proportion of loans to low-income borrowers is significantly lower than the percentage of low-income families. While distribution of loans by borrower's income is poor, the level of poverty at 13 percent has had an adverse effect on the bank's ability to make a greater penetration among low-income borrowers.
- The proportion of home mortgage loans to moderate-income borrowers is reasonable. The level of home purchase lending to moderate-income borrowers meets the percent of moderate-income families in the MSA. In 2017 and 2018, the bank's loan penetration percentage to moderate-income borrowers was 13.3 and 11.3 percent, respectively, compared to moderate-income families in the MSA of 13.4 percent and 13.4 percent, respectively.

Savannah MSA

- The distribution of the bank's home mortgage loans to low-income borrowers reflects a poor dispersion within the MSA. The bank's proportion of loans to low-income borrowers is significantly

lower as compared to the percentage of low-income families. The level of families living below poverty is 14 percent in the Savannah MSA.

- The proportion of home mortgage loans to moderate-income borrowers is excellent. The level of home purchase lending to moderate-income borrowers exceeds the percent of moderate-income families in the MSA.

The bank's distribution of loans by borrower's income level in limited scope AAs was not inconsistent with the performance noted in the full scope reviews.

Response to Complaints

BankSouth has not received any complaints during this evaluation period directly related to CRA performance.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lake County and Watkinsville AAs is not inconsistent with the bank's overall performance under the Lending Test in the full scope area(s).

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development (CD) Test is rated Satisfactory. When considering BankSouth's financial resources, competition, and economic challenges in the LMI areas of its largest market, the bank's CD performance demonstrates an adequate responsiveness to CD needs in its AAs through a combination of CD loans, investments, and services. This is evidenced by its participation, and sometimes leadership roles, on various committees and boards that provide affordable housing or community services to LMI individuals, or that provide economic development to the community.

The bank has demonstrated a commitment to the community by financing CD organizations that operate in its AAs.

Number and Amount of Community Development Loans

Qualified CD loans are those that meet the CD definition in the CRA regulation and do not include loans considered under the Lending Test. BankSouth originated several CD loans supporting economic growth and job retention in its AAs and were not considered under the Lending Test.

BankSouth's performance in extending CD loans is adequate. During the evaluation period, the bank generated 22 CD loans totaling \$15 million in the bank's AAs. This includes new and renewed loans for affordable housing, the provision of social services targeted to LMI persons, loans for programs that finance small businesses, and loans for initiatives to revitalize and stabilize LMI areas within the community. Some examples of significant CD lending activities are summarized below.

Non-MSA Assessment Area

- A \$700 thousand commercial line of credit to fund business operations for a company in a moderate-income census tract. This extension helps to provide economic stability to the area and support permanent job creation.
- A \$100 thousand line of credit to provide community development services. The business is in a moderate-income census tract and is a catalyst for the development of affordable housing in the AA.
- A \$56 thousand and 36 thousand working line of credits to fund operations for two faith-based organizations that provide community development services targeted to LMI individuals.
- A \$6.4 million loan to fund the construction of an 82 room Hilton Hotel. This hotel will promote economic development and support permanent job creation.

MSA Assessment Areas

- The origination of a \$309 thousand loan for the purchase of 6 apartments in Atlanta's Historic West End that are affordable housing. This housing will be provided to individuals in the low-income census tract.
- A \$896 thousand loan to purchase a 20-unit apartment building in west Atlanta. This loan will fund affordable housing in a moderate-income tract.
- A \$600 thousand loan to renovate and purchase equipment for a new YMCA in Statesboro, GA. The new YMCA is in a moderate-income tract and will provide services such as childcare and offer food programs in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Lending Tests in the Watkinsville AA is not inconsistent with the bank's overall CD performance. Due to the size and limited opportunities in the Watkinsville AA, the bank's performance had a neutral effect on the CD test rating.

Number and Amount of Qualified Investments

BankSouth has provided an adequate level of qualified community development investments and donations throughout its full scope AAs. BankSouth has 12 qualified investments totaling \$199,786. Performance in the limited scope AAs is not inconsistent with performance in the full scope areas.

Some of BankSouth's qualified investments benefit the entire state of Georgia, including the bank's AAs. Specifically, the bank had a remaining balance of \$166,431 in a Georgia Tax Credit Fund investment. The Georgia Tax Credit Fund provides for the construction and rehabilitation of apartment complexes throughout Georgia, including the delineated AAs that offer rents affordable to low- and moderate-income families and senior citizens.

Non MSA AA

Since October 2016, the bank has made qualified investments/donations in the non-MSA assessment area totaling \$22,805. These were made up of donations to various non-profit organizations. These organizations are involved in such activities as economic revitalization, building affordable housing, providing shelter and other needed services for at-risk youth, providing educational assistance to low- and moderate-income students, and offering financial literacy and education and childcare services for low- and moderate-income families.

MSA AA

BankSouth has made qualifying donations totaling \$10,550 in its Savannah AA. These were made to organizations that benefit and promote affordable housing and education for low- and moderate-income families, and to organizations that provide general life assistance programs for the underprivileged. Among these donations is a \$8,000 donation to the United Way of the Coastal Empire. This organization serves LMI housing or other community development needs such as counseling for credit, homeownership, home maintenance, and other financial literacy programs. There were no qualified investments noted in the Atlanta AA.

Extent to Which the Bank Provides Community Development Services

BankSouth has provided an adequate level of community development services throughout its full scope AAs. Performance in the limited scope assessment area is consistent with performance in the full scope areas.

BankSouth offers a full range of loan and deposit services at each of its branch locations. All locations feature ATMs and drive-thru facilities with extended hours. In addition, to serve the needs of low- and moderate-income individuals, the bank participates in the “Step up Savannah” program offering no and low-cost checking accounts for those who have never had accounts before or who have had trouble managing an account in the past. As a bank wide effort, BankSouth also offers a product called Second Chance Checking. This account is designed for people who have had trouble managing a checking account in the past. Management’s goal is to help customers recover financially. Currently, there are approximately 90 Second Chance Checking accounts. These accounts feature Non-Interest Checking, Unlimited check writing, \$9.00 monthly service charge, \$50 minimum deposit to open the account. After eighteen months, customers in good standing can qualify for a conventional checking account of their choice.

Atlanta Assessment Area

Bank officers serve on the boards of directors providing financial expertise to civic organizations that support charities benefiting low- and moderate-income individuals and low-income areas. These charities provide life assistance to at-risk youth and help meet the housing needs of low- and moderate-income families.

Bank representatives serve as board members on the Atlanta Center for Self Sufficiency Foundation. This foundation provides workforce readiness and job placement for homeless and financially vulnerable community members.

Bank officers serve in various capacities in non-profit organizations and community associations that promote downtown economic stabilization, as well as the expansion and improvement of low- and moderate-income housing stock.

Lake Country Assessment Area

Bank employees provided financial and professional expertise to several qualified organizations in Greene County during the evaluation period. Specifically, bank representatives taught financial wellness courses to Habitat home recipients and developed the course materials used. Employees also participate in the Habitat for Humanity annual spring build in Greensboro. This organization provides various types of assistance to the underprivileged. In addition, an employee in mortgage operations served on the Board of Directors for the Greene County Habitat for Humanity.

Watkinsville Assessment Area

Bank officers and employees are active in financial capacities for several non-profit organizations that address low- and moderate-income needs in the AA. Specifically, bank officers serve on the boards of directors and participate in financial planning and fund raising for the Boys and Girls Club, Wilderness Works, and Cancer Foundation. These groups provide such services as financial literacy for the underprivileged, educational assistance for at-risk youth, the empowerment of developmentally disabled children, and fund-raising activities.

Savannah Assessment Area

Bank officers lend their financial acumen to support several United Way of the Coastal Empire initiatives in the Savannah AA. Bank representatives aid organizations serving LMI housing or other community development needs such as credit counseling, homeownership, home maintenance, and other literacy programs. All these organizations serve the needs of low- and moderate-income families in Chatham County.

Responsiveness to Community Development Needs

The bank's community development performance is adequate. Responsiveness to the community development needs of the AAs through community development loans, qualified investments, and community development services is reasonable.

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 MSA(s) and non-MSA(s) 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:	January 1, 2016 through December 31, 2018	
Bank Products Reviewed:	Home Mortgage Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Atlanta, and Savannah	Full Scope	
Non MSA		
Watkinsville and Lake Country	Limited Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS		BankSouth	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
BankSouth	Satisfactory	Satisfactory	Satisfactory
Atlanta	Satisfactory	Satisfactory	Satisfactory
Savannah	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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 (Age.): 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 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 2016

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
Atlanta AA 2016	457	132,084	40.3	18,994	8.7	4.4	4.6	14.4	10.9	13.0	14.3	18.6	15.6	62.7	66.1	66.8	0.0	0.0	0.0
Lake Country AA 2016	176	47,461	15.5	1,311	0.0	0.0	0.0	35.2	13.6	13.2	41.8	43.8	46.6	22.9	42.6	40.2	0.0	0.0	0.0
Savannah AA 2016	310	61,579	27.4	8,879	5.7	4.8	3.8	21.4	17.1	13.1	28.6	21.6	29.0	44.3	56.5	54.1	0.0	0.0	0.0
Watkins. AA 2016	190	35,408	16.8	5,005	6.8	6.8	7.7	9.4	7.4	6.1	33.7	28.9	31.1	50.0	56.8	55.0	0.0	0.0	0.0
Total	1,133	276,532	100.0	34,189	6.9	4.2	4.7	17.1	12.4	12.0	23.5	25.1	22.5	52.5	58.3	60.8	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

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
Atlanta-Sandy Springs-Marietta AA 2018	887	269,651	37.3	17,111	7.4	8.2	7.5	13.6	12.4	14.9	11.2	13.3	12.3	67.5	65.6	64.8	0.2	0.5	0.5
Lake Country AA 2018	295	91,993	12.4	1,379	0.0	0.0	0.0	14.4	11.2	15.4	45.2	12.2	20.7	40.5	76.6	63.9	0.0	0.0	0.0
Savannah AA 2018	842	179,921	35.4	9,107	5.6	2.7	2.6	21.2	14.8	16.2	33.5	32.4	32.5	39.8	50.0	48.6	0.0	0.0	0.0
Watkins. AA 2018	357	72,870	15.0	4,746	9.1	6.4	7.8	6.8	4.2	6.2	30.1	35.0	31.6	53.9	54.3	54.4	0.0	0.0	0.0
Total	2,381	614,436	100.0	32,343	6.6	5.0	5.9	15.1	11.9	14.0	23.2	23.2	21.2	54.9	59.8	58.7	0.1	0.2	0.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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																			2016
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
Atlanta AA 2016	457	132,084	40.3	18,994	26.6	1.8	1.9	14.6	7.2	7.4	13.1	24.3	16.0	45.7	66.7	61.8	0.0	0.0	12.8
Lake Country AA 2016	176	47,461	15.5	1,311	22.4	1.1	2.1	16.6	8.0	6.9	21.1	15.9	9.3	40.0	72.7	66.4	0.0	2.3	15.4
Savannah AA 2016	310	61,579	27.4	8,879	23.1	7.1	4.4	18.1	15.5	12.4	19.4	31.9	18.6	39.5	44.5	37.9	0.0	1.0	26.6
Watkins. 2016	190	35,408	16.8	5,005	23.8	1.6	2.8	14.9	15.8	9.2	17.5	21.6	15.3	43.8	50.0	51.4	0.0	11.1	21.2
Total	1,133	276,532	100.0	34,189	24.7	3.1	2.7	16.0	11.0	9.0	16.4	24.6	16.3	43.0	58.8	54.3	0.0	2.5	17.7

Source: 2010 U.S Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																				2017-18	
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		
Atlanta-Sandy Springs-Marietta AA 2018	887	269,651	37.3	17,111	24.2	1.9	2.5	13.4	12.5	9.1	13.4	19.8	16.8	49.0	65.7	57.3	0.0	0.0	14.3		
Lake Country AA 2018	295	91,993	26.3	1,379	20.4	1.4	2.6	16.1	5.4	5.9	16.9	9.5	9.4	46.6	83.7	65.6	0.0	0.0	16.5		
Savannah AA 2018	842	179,921	35.4	9,107	25.1	3.2	4.4	16.6	18.1	13.8	20.2	28.0	19.4	38.2	50.7	39.6	0.0	0.0	22.7		
Watkinsville AA 2018	357	72,870	15.0	4,746	25.2	4.8	3.3	13.8	15.7	10.3	16.9	24.7	17.2	44.1	54.9	53.4	0.0	0.0	15.8		
Total	2,381	614,436	100.0	32,343	24.5	2.7	3.2	14.6	14.1	10.4	16.4	22.2	17.3	44.5	61.0	52.1	0.0	0.0	17.0		

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0