



PUBLIC DISCLOSURE

March 7, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Grand Bank for Savings, FSB
Hattiesburg, MS 39402
Charter # 707547

204 Westover Drive
Hattiesburg, MS 39402

Office of the Comptroller of the Currency

3850 North Causeway Blvd.
Suite 1330
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.
- Grand Bank's (Grand) distribution of home mortgage loans by income levels of geography is reasonable.
- Grand's distribution of loans to borrowers of different income levels is reasonable.
- Grand did not receive any complaints during the evaluation period.

LTD Ratio

Considering Grand's size, financial condition, and credit needs of the assessment area (AA), the loan-to-deposit ratio is more than reasonable. The quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 99.0 percent, with a high ratio of 106.3 percent in the third quarter of 2020. We compared the LTD ratio to other similarly-situated banks within the AA during the same period of time.

Institution	Assets – As of September 30, 2021 (in thousands)	Average LTD
Grand Bank	\$95,809	99.0%
First Bank	\$244,087	64.5%
Great Southern Bank	\$363,305	36.5%
Richton Bank and Trust	\$61,367	33.5%

Source: Call Reports and FDIC reports

Lending in AA

A substantial majority of Grand's loans are located outside its AA reflecting poor performance. Grand originated 565 mortgage loans totaling approximately \$80.6 million during the review period. This analysis was performed at the bank, rather than the AA, level, and does not include extensions of credit by affiliates that may be considered under the other performance criteria. The table below illustrates that a substantial majority, (71 percent) of these loans were originated outside of the AA. Grand is a niche lender that purchases owner-financed and other residential loans that are located nationwide.

Table D - 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										
2020	164	29.0	401	71.0	565	27,028	33.6	53,522	66.4	80,550
Subtotal	164	29.0	401	71.0	565	27,028	33.6	53,522	66.4	80,550
Total	164	29.0	401	71.0	565	27,028	33.6	53,522	66.4	80,550

Grand's owner-financed and other residential loans are purchased in accordance with the business plan, which directs management to purchase mortgage loans at a discount if the loan pools fit within the lending guidelines. However, to improve Grand's CRA performance (inclusive of the in and out criterion above), future lending and homeownership initiatives are being implemented.

Description of Institution

Grand is a federally-chartered stock bank, with total assets of \$97 million as of December 31, 2021. Its headquarters and mortgage center are located in Hattiesburg, Mississippi. Since the previous evaluation, Grand closed its branch that was located in Petal, Mississippi due to economic reasons. Management feels they can service the deposit and lending needs of the Petal area, through its main office, located in Hattiesburg.

Grand's business strategy is to originate and sell fixed-rate and variable-rate conventional and government-guaranteed mortgage loans for the construction, purchase, or refinance of one- to four-family dwellings. On a local level, and to assist low- and moderate-income homebuyers, Grand originates traditional FNMA, VA, FHA, and USDA mortgage loans for ultimate sale in the secondary market and originates local construction loans for individuals and builders. On a national level, since 1990, Grand purchases seller-financed, also known as "owner-financed", single-family loans and single-family loan pools from various sources. In addition, for more than five years, Grand has been successful in originating one- to four-family mortgages to borrowers who only have an individual tax identification number (ITIN) in selected nationwide markets and through correspondent broker relationships. Lastly, Grand offers both secured and unsecured consumer loans, home equity lines of credit, and commercial real estate loans.

As of December 31, 2021, Grand reported total assets of \$97 million; total loans of \$79 million, and total investments of \$13 million. Grand reported total deposits of \$83 million and total tier 1 capital of \$12 million. Grand's loan portfolio breakdown reflects one- to four-family mortgage loans, as its primary loan product at 93.3 percent of the total loan portfolio.

Grand Bank's Loan Portfolio: 12-31-2021		
Loan Category	Dollars (000)	Percentage
One- to Four-Family Residential Real Estate	\$73,758	93.3
Construction	4,010	5.0
Multifamily	310	0.4
Consumer	215	0.3
Commercial and Industrial	770	1.0
Total	79, 063	100%

Source: Internal bank documents.

Grand's two offices are located in Lamar County. The Petal office, which closed in 2020, was located in Forrest County. Lamar and Forrest Counties are both included in the Hattiesburg MSA. The Hattiesburg MSA additionally includes Perry County (during 2018) and Covington County during 2019 and 2020). However, Grand determined the entire MSA was too large to service and subsequently chose Lamar and Forrest Counties only as its current AA. Grand's headquarters and branch are both situated in middle-income census tracts (CTs). In total, Grand's AA consists of 25 CTs with four located in low-income CTs, four located in moderate-income CTs; 11 in middle-income CTs and the remaining six located in upper-income CTs. Grand's AA meets regulatory guidelines by including whole geographies and does not arbitrarily exclude low- and moderate-income areas.

Banking hours reasonably meet the community needs with lobby and drive-thru hours Monday through Thursday from approximately 9:00 a.m. to 4:30 p.m. and Friday hours being 9:00 a.m. to 5:00 p.m.

There are no known financial, legal, or other factors that impede Grand's ability to meet the credit needs of its AA during the evaluation period. Grand received a Satisfactory rating at the last CRA evaluation, dated January 22, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated CRA performance of Grand using the Interagency Small Bank CRA procedures, which focus on the analysis of the primary loan products. The evaluation period for the lending test covered January 1, 2018, through December 31, 2020. Conclusions regarding the 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 calendar years 2018, 2019, and 2020.

Selection of Areas for Full-Scope Review

Grand has one AA within one MSA in the state of Mississippi. We performed a full-scope review of the one AA. There were no limited-scope reviews.

Ratings

The bank's overall rating is a blend of the state rating. The state of Mississippi is heavily weighed because it is the only state where the branches are located.

Grand's rating is based on performance in its one AA. Only two offices and one ATM are located within the MSA in the state of Mississippi. The overall rating is based on the primary product (one- to four-family residential mortgages) within the AA in the state of Mississippi.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining Grand's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by Grand, or in any AA by an affiliate whose loans have been considered as part of Grand'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 Grand has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that Grand engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of Grand'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 Mississippi

CRA rating for the State of Mississippi: 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.
- Grand’s distribution of home mortgage loans by income levels of geography is reasonable.
- Grand’s distribution of loans to borrowers of different income levels is reasonable.
- Grand did not receive any complaints during the evaluation period.

Description of Grand’s Operations in Mississippi

Grand operates one branch and one mortgage center in the state of Mississippi as discussed in the “Description of Institution” section of this evaluation. Grand has one ATM, located in Hattiesburg, Mississippi that accepts deposits. Grand’s customers also have access to the MoneyPass ATM network, that is not managed by Grand and therefore does not factor into the CRA rating. Grand’s primary business strategy is to originate residential mortgage loans within its AA. Grand also purchases both pools and owner-financed mortgages secured by one- to four-family residences. Grand is an atypical lender in that management purchases a significant number of loans and focuses attention on loan products that target niche groups throughout the United States.

Grand’s competition is significant with state and federal community banks with regional and national footprints all operating in the AA. Based on the most recent Deposit Market Share Report, Grand ranked 12th out of 22 institutions in its AA, holding 3.3 percent of market share. The largest five competitors are Bancorp South Bank (14.8 percent), Hancock Whitney Bank (9.9 percent), Trustmark National Bank (9.9 percent), Regions Bank (9.9 percent), and The First (8.2 percent). These five banks comprise approximately 52 percent of the deposit market.

The Federal Financial Institutions Examination Council’s (FFIEC) updated 2020 median family income for the AA was \$59,500. 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 120 percent and over the median family income. The following table depicts income categories from 2018, 2019, and 2020.

Table B – Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Hattiesburg, MS MSA Median Family Income (25620)				
2018 (\$58,200)	<\$29,100	\$29,100 to <\$46,560	\$46,560 to <\$69,840	≥\$69,840
2019 (\$56,400)	<\$28,200	\$28,200 to <\$45,120	\$45,120 to <\$67,680	≥\$67,680
2020 (\$59,500)	<\$29,750	\$29,750 to <\$47,600	\$47,600 to <\$71,400	≥\$71,400
<i>Source: FFIEC</i>				

Low-income families earning a median family income less than \$29,750 represented 12.8 percent of families in the AA, while moderate-income families comprised 9.2 percent of the AA population. According to 2015 ACS US census data, 22.4 percent of households in the AA earned wages below the poverty level.

There are eight low- and moderate-income CTs in the MSA. Of the 7,309 housing units within low-income CTs, approximately 62.5 percent were occupied rental units with an average gross monthly rent of \$653, and 19.0 percent were vacant. A comparable 18.5 percent of housing units in the low-income CTs were owner-occupied. In moderate-income CTs, there were 5,812 housing units, of which approximately 42.3 percent were rental occupied units with an average gross monthly rent of \$629, and another 13.5 percent were vacant. The majority, 44.3 percent, of housing units in the moderate-income CTs were owner-occupied. The University of Southern Mississippi and William Carey University are located in Hattiesburg, Mississippi. Students that live off-campus will generally occupy rental units in low- and moderate-income CTs within the AA. The median property value in 2020 for the Hattiesburg MSA was \$130,779, significantly lower than the national average of \$217,500.

Based on 2020 business demographic data, there were 9,995 non-farm businesses in the AA. Of these, 8,345 (83.5 percent) had revenues of less than \$1 million, 426 (4.3 percent) had revenues greater than \$1 million, and 1,224 (12.3 percent) did not report revenue information. The AA's economy is primarily dominated by the service industry (33.4 percent) and retail trade (13.8 percent). According to the Bureau of Labor Statistics, the unemployment rate in Hattiesburg, Mississippi as of December 31, 2021, was 2.7 percent, significantly lower than the Mississippi state unemployment rate of 4.7.

The table below depicts the demographic information for the full-scope AA in Mississippi.

Table A – Demographic Information of the AA						
AA: Lamar and Forrest Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	16.0	16.0	44.0	24.0	0.0
Population by Geography	135,152	12.8	9.2	44.8	33.2	0.0
Housing Units by Geography	56,683	12.9	10.3	46.4	30.4	0.0
Owner-Occupied Units by Geography	29,884	4.5	8.6	47.0	39.9	0.0
Occupied Rental Units by Geography	19,964	22.9	12.3	45.5	19.3	0.0
Vacant Units by Geography	6,835	20.4	11.4	46.7	21.5	0.0
Businesses by Geography	9,995	10.5	7.4	52.1	30.1	0.0
Farms by Geography	259	1.9	6.2	45.6	46.3	0.0
Family Distribution by Income Level	33,371	24.2	14.3	19.0	42.5	0.0
Household Distribution by Income Level	49,848	27.1	13.4	15.4	44.1	0.0
Median Family Income MSA - 25620 Hattiesburg, MS MSA		\$52,275	Median Housing Value			\$130,779
			Median Gross Rent			\$771
			Families Below Poverty Level			16.8%
<i>Source: 2015 ACS and 2020 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>						

In conjunction with this evaluation, we completed one community contact with a local non-profit whose activities are primarily centered in Forrest and Lamar Counties. Approximately 85 percent of the organization's funds and services are targeted to low- to moderate-income families and individuals. The contact noted that affordable housing financing and construction is a necessary need of the AA.

Scope of Evaluation in Mississippi

The rating for the state of Mississippi is based wholly on the performance of the AA as it is the only one in the state of Mississippi. The Lamar and Forrest Counties AA received a full-scope review.

LENDING TEST

Grand's performance under the Lending Test in Mississippi is rated Satisfactory.

Based on a full-scope review, Grand's lending performance in the State of Mississippi is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The overall geographic distribution of loans in Grand's AA reflects a reasonable dispersion in low-income and in moderate-income CTs given Grand's size, competition, and limited housing availability.

For calendar years 2018 through 2020, Grand's mortgage lending in low-income CTs was below the level of owner-occupied units located in low-income CTs, and slightly below the level of aggregate lending within those CTs. In moderate-income CTs, Grand's mortgage lending was below the level of owner-occupied units in moderate-income CTs, but exceeded the aggregate lending originated by peer banks in the CTs.

Grand's loans in low-income CTs were less than both the level of owner-occupied housing units and the aggregate lending in those geographies; however, the owner-occupied units in low-income CTs only comprised a small percentage of housing units available at approximately 18 percent of total housing units in the AA. Most housing units within the low-income CTs were rented or vacant, with approximately 62 percent of housing units occupied as rentals, and 19 percent of the units vacant. While the presence of owner-occupied housing units in moderate-income CTs was higher at 44 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, 42 percent of housing units in moderate-income CTs were renter-occupied, and 13 percent were vacant units. In addition to the limited housing availability, Grand faces intense competition amongst regional and national banks within the AA.

Distribution of Loans by Income Level of the Borrower

Grand exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by Grand, the cost of housing, and competition.

Home Mortgage Loans

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

For calendar years 2018 through 2020, the proportion of loans to low-income borrowers was significantly lower than the percentage of families, but slightly below the aggregate data. The proportion of home mortgage loans to moderate-income borrowers was slightly below the percentage of families within the AA, but exceeded the aggregate data.

As of 2020, the median cost of housing was \$130,779 while a low-income person earns less than \$29,750, based on the FFIEC's 2020 median family income, which makes home ownership a bit challenging. Additionally, there is the existence of two major universities within the AA with student populations that will have an impact on both the housing and rental units. The aforementioned coupled with the most recent COVID-19 pandemic will drive up the cost of rentals and consequently impact the ability of low-income borrowers to save the necessary down payments required to purchase a home. Lastly, as stated in the geographic distribution section, Grand faces significant competition from larger regional and national banks with a greater capacity to originate loans within the AA.

Lending GAP Analysis

There were no unexplained conspicuous gaps regarding the full-scope examination in Forrest and Lamar Counties.

Responses to Complaints

Grand did not receive any complaints during the review period.

Appendix A: Scope of Examination

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

Time Period Reviewed	January 1, 2018 to December 31, 2020	
Bank Products Reviewed	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	N/A	N/A
List of AAs and Type of Examination		
Rating and AAs	Type of Exam	Other Information
Lamar and Forrest Counties	Full-scope	
State		
Mississippi	Full-scope	

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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs 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 low- to moderate-income 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 CT 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 CT 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/AA.

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 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 CD.

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 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/AA. 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. AA 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. AA 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/AA. The table also presents aggregate peer data for the years the data is available.

Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography																	2018-20		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
AA	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Grand	164	27,028	100.0	4.5	1.8	1.4	8.6	1.8	3.4	47.0	35.4	41.4	39.9	61.0	53.8	0.0	0.0	0.0	
Total	164	27,028	100.0	4.5	1.8	1.4	8.6	1.8	3.4	47.0	35.4	41.4	39.9	61.0	53.8	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 0*

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																	2018-20		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
AA:	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Grand	164	27,028	100.0	24.2	2.4	2.5	14.3	12.8	12.4	19.0	22.6	17.1	42.5	62.2	45.2	0.0	0.0	0.0	
Total	164	27,028	100.0	24.2	2.4	2.4	14.3	12.8	12.4	19.0	22.6	17.1	42.5	62.2	45.2	0.0	0.0	0.0	

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*