



## **PUBLIC DISCLOSURE**

August 24, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Embassy National Bank  
Charter Number 24679

1817 North Brown Road  
Lawrenceville, GA 30043

Office of the Comptroller of the Currency

Three Ravinia Drive  
Suite 550  
Atlanta, Georgia 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 majority of the bank's loans are inside the AA.
- A reasonable distribution of lending to businesses in different geographies and businesses of different income levels.
- Examiners did not identify discriminatory or other illegal credit practices at this institution.
- There were no consumer complaints regarding CRA performance.

## Loan-to-Deposit Ratio

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

The bank's loan-to-deposit ratio (LTD) is reasonable considering the bank's size, financial condition, and credit needs of the AA. Embassy National Bank's (ENB) average LTD ratio of 80.02 percent is reasonable. This determination is based on the quarterly LTD ratios from September 30, 2015 to December 31, 2019. The bank's quarterly LTD ratio ranged from a high of 95.04 percent as of September 30, 2019 to a low of 67.21 percent as of March 31, 2018.

## Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AA). The bank meets the standards for satisfactory performance.

ENB originated 68 percent of its total number of loans inside the AA during the evaluation period. From 2017 to 2019, the bank's \$168 million in loan originations were centered in commercial real estate loans. The borrowers include hotel operators and commercial development companies with high loan amounts as reflected in the dollar volume of loans. While most of these companies maintain corporate offices located within the bank's AA, the development and construction sites expand beyond the bank's AA to the entire Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (MSA).

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Business	41	68.33	19	31.67	60	11,271,447	28.24	28,647,470	71.76	39,98,917
<b>Total</b>	<b>41</b>	<b>68.33</b>	<b>19</b>	<b>31.67</b>	<b>60</b>	<b>11,271,447</b>	<b>28.24</b>	<b>28,647,470</b>	<b>71.76</b>	<b>39,98,917</b>

## Description of Institution

Embassy National Bank is a federally chartered national bank wholly owned by Embassy Bancshares, Inc., a one bank Holding Company. The bank's only full-service branch and deposit taking Automated Teller Machine (ATM) is located at its headquarters in Lawrenceville, GA, the county seat of Gwinnett County, GA. The holding company is also at this location.

Established in March 2007, ENB is a single state, traditional community bank that accepts local retail deposits and primarily originates commercial loans. The bank offers commercial lending products to a variety of businesses including hotels, medical facilities, residential and commercial real estate construction projects and convenience stores. ENB is a preferred lender for the Small Business Administration (SBA) Government Guaranteed Loan Program, through which the bank offers SBA 7(a) and 504 loans. The bank is an OCC Minority Depository Institution. Non-complex products offered by ENB include personal and business checking and savings accounts. Additionally, ENB offers remote deposit capture, on-line banking and mobile banking services

As of December 31, 2019, the bank had total assets of \$109.6 million, with \$80.6 million in loans, \$78.2 million in core deposits, and Tier 1 Capital of \$19.4 million.

ENB's CRA AA comprises seven of the twenty-nine counties located in the Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (MSA): Clayton, Cobb, Gwinnett, DeKalb, Forsyth, Fulton and Hall. The MSA was originally established in 1950 as the Atlanta MSA, and comprised Fulton, Dekalb, Gwinnett, Cobb and Clayton counties. These counties remain the core of the metro area and have the densest suburban development. The AA contains 713 census tracts (CTs). According to the 2015 American Community Survey (ACS) Census data, CTs by income level include: 97 low, 176 moderate, 169 middle, 263 upper-income and 8 not applicable.

The 2015 ACS reports the population in the ENB AA is 3.9 million with 912 thousand families. Approximately 23 percent of the families in the AA are low-income and 16.0 percent are moderate-income. Approximately 12.4 percent of the families live below the poverty level. During the evaluation period, the median family income in the AA was \$67,322.

According to the Georgia Department of Labor (DOL), at December 31, 2019, the unemployment rate in the AA was 2.7 percent. The unemployment rate for the state of Georgia was higher at 3.1 percent. The AA is home to top employers such as Gwinnett County Public Schools, Delta Airlines, Clayton County Public Schools, Home Depot, Northside Hospital, Emory Health Care and Northeast Georgia Medical System.

There have not been any significant changes to ENB's corporate structure. There are no legal or financial impediments adversely impacting the bank's ability to meet the credit needs of its AA during the evaluation period. The previous CRA evaluation, dated October 12, 2015, rated the bank's performance as "Satisfactory".

## **Scope of the Evaluation**

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

The OCC conducted this CRA performance review to evaluate ENB's record of meeting the credit needs of the communities where the bank operates. Examiners performed this review using the Small Bank (SB) CRA procedures, which include a lending test to evaluate the distribution of the bank's primary loan products among geographies and borrower characteristics. The evaluation period for the lending test is January 1, 2017 through December 31, 2019.

During the evaluation period, business loans represented approximately 98 percent the bank's loan originations. To evaluate the bank's lending performance, examiners selected random samples of 20 loans for each full calendar year of the evaluation period. Therefore, the sampling encompassed 60 business loan originations.

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

Examiners conducted a full-scope review of the Embassy National Bank AA. There are no limited-scope areas. *For more information regarding the scope of this examination, see Appendix A: Scope of Evaluation.*

### **Ratings**

The bank's overall rating is based on the full-scope review of the Embassy National Bank AA.

## **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 considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Georgia

**CRA rating for the State of Georgia<sup>1</sup>:** *Satisfactory*

**The Lending Test is rated:** *Satisfactory*

The major factors that support this rating include:

- A reasonable distribution of lending to businesses in different geographies and businesses of different income levels;
- Examiners did not identify discriminatory or other illegal credit practices at this institution.
- There were no consumer complaints regarding ENB's CRA performance.

### Description of Institution's Operations in Georgia

ENB is a small community bank with one branch located in Lawrenceville, GA, a northeast suburb of Atlanta. Lawrenceville is the county seat of Gwinnett County. The bank designated AA comprises seven of the twenty-nine counties located in the Atlanta-Sandy Springs-Alpharetta MSA: Clayton, Cobb, Gwinnett, DeKalb, Forsyth, Fulton and Hall. ENB offers a variety of traditional loan and deposit products. Commercial lending is the bank's primary business focus.

The 2015 ACS reports the population in the ENB AA is 3.9 million with 912 thousand families. Approximately 23.0 percent of the families in the AA are low-income and 16.0 percent are moderate-income. Approximately 12.4 percent of the families live below the poverty level. During the evaluation period, the median family income in the AA was \$67,322.

ENB encounters strong competition from other financial institutions including large, regional, community banks and credit unions. According to the June 30, 2019 FDIC Deposit Market Share Data, there were 68 FDIC-insured financial institutions with 863 branch locations throughout the AA. The top three banks, based on total deposits, were SunTrust Bank, Bank of America and Wells Fargo with 29 percent, 20 percent and 18 percent market share, respectively. ENB ranks 66<sup>th</sup> with \$88.7 million in deposits, or only 0.06 percent of deposits in the AA.

Examiners contacted one local government community development agency and two Community Development Financial Institutions (CDFI). The representatives of these organizations identified revitalizing and stabilizing local communities and support for affordable housing and small businesses as credit needs for their communities. They noted that banks in the community are involved in meeting community development needs by investing in various programs to finance economic and community development projects throughout the AA.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

**Embassy NB AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Embassy NB</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	713	13.6	24.7	23.7	36.9	1.1
Population by Geography	3,929,987	10.0	24.5	27.4	37.7	0.4
Housing Units by Geography	1,581,287	11.1	25.0	26.2	37.6	0.2
Owner-Occupied Units by Geography	839,175	4.4	18.6	29.2	47.8	0.0
Occupied Rental Units by Geography	563,891	18.2	32.7	22.6	26.2	0.4
Vacant Units by Geography	178,221	19.9	30.8	23.1	26.0	0.2
Businesses by Geography	500,512	7.1	20.8	25.9	45.6	0.7
Farms by Geography	7,505	5.2	19.2	30.7	44.7	0.2
Family Distribution by Income Level	912,090	23.0	16.0	17.0	43.9	0.0
Household Distribution by Income Level	1,403,066	23.8	16.1	17.0	43.0	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$199,192
Median Family Income MSA - 23580 Gainesville, GA MSA		\$58,558	Median Gross Rent			\$1,016
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS and 2019 D&amp;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>						

**Scope of Evaluation in Georgia**

ENB designates one AA in Georgia comprising Clayton, Cobb, Gwinnett, DeKalb, Forsyth, Fulton and Hall counties.

**LENDING TEST**

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

**Conclusions for ENB AA Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the ENB AA is good.

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

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

### ***Small Loans to Businesses***

During the evaluation period, approximately 27.9 percent of small businesses within the AA were located in low- or moderate-income CTs. Approximately 24.5 percent of ENB's small business loans were originated within those CTs.

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

### **Distribution of Loans by Income Level of the Borrower**

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

### ***Small Loans to Businesses***

During 2017-2019, the distribution of the bank's small loans to businesses by revenue was reasonable. Ninety percent of businesses in the AA reported total revenues less than \$1 million. Thirty-nine percent of ENB's loan originations were to businesses with annual revenues of less than \$1 million. This is slightly below the aggregate lending by all lenders at 46.7 percent.

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

### **Responses to Complaints**

Neither, ENB nor the OCC received complaints related to the bank's CRA performance since the prior CRA examination.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	January 1, 2017 to December 31, 2019	
<b>Bank Products Reviewed:</b>	Small business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Georgia		
Atlanta-Sandy Springs-Alpharetta MSA	Full scope	Clayton, Cobb, Dekalb, Forsyth, Fulton, Gwinnett, and Hall Counties

## **Appendix B: Summary of State of Georgia Rating**

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RATINGS: EMBASSY NATIONAL BANK	
Overall Bank:	Lending Test Rating
Embassy NB	Satisfactory
State:	
Georgia	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

**Table 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.

<b>Table Q: Assessment Area Distribution of Loans to Businesses by Income Category of the Geography</b>																			<b>2017-2019</b>		
<b>AA:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>				
	<b>#</b>	<b>\$ 000</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>		
Embassy NB	60	17,773	100	124,299	7.1	3.7	5.9	20.8	19.8	18.6	25.9	24.1	24.5	45.6	52.4	50.5	0.7	0.00	0.4		
<b>Total</b>	<b>60</b>	<b>17,773</b>	<b>100</b>	<b>124,299</b>	<b>7.1</b>	<b>3.7</b>	<b>5.9</b>	<b>20.8</b>	<b>19.8</b>	<b>18.6</b>	<b>25.9</b>	<b>24.1</b>	<b>24.5</b>	<b>45.6</b>	<b>52.4</b>	<b>50.5</b>	<b>0.7</b>	<b>0.00</b>	<b>0.4</b>		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-2019</b>	
<b>AA:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>			
	<b>#</b>	<b>\$ 000</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>		
Embassy NB	60	17,773	100	124,299	89.6	38.5	46.7	3.8	61.5	6.7	0.00		
<b>Total</b>	<b>60</b>	<b>17,773</b>	<b>100</b>	<b>124,299</b>	<b>89.6</b>	<b>38.5</b>	<b>46.7</b>	<b>3.8</b>	<b>61.5</b>	<b>6.7</b>	<b>0.00</b>		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.*