



## **PUBLIC DISCLOSURE**

April 8, 2019

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

Commonwealth National Bank  
Charter Number 16553

2214 St. Stephens Road  
Mobile, AL 36617

Office of the Comptroller of the Currency

3838 North Causeway Boulevard  
Suite 2890  
Metairie, LA 70002

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>3</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>4</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>8</b>
<b>SCOPE OF THE EVALUATION.....</b>	<b>9</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>10</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....</b>	<b>11</b>
<b>LENDING TEST .....</b>	<b>11</b>
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## **Overall Community Reinvestment Act (CRA) Rating**

**This institution is rated: Satisfactory.**

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

The major factors supporting this institution's rating include:

- Commonwealth National Bank (CNB) originated a substantial majority of loans in its assessment area.
- The overall borrower distribution of loans by income level for mortgage, small business, and consumer loans reflects excellent penetration of borrowers of different income levels.
- The overall geographic distribution of mortgage, small business, and consumer loans reflects excellent lending penetration in the assessment area.
- Management did not receive any CRA related complaints during the review period.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. 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 in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under the U.S. Department of Housing and Urban Development (HUD) Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** The statute that requires the Office of the Comptroller of the Currency (OCC) to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 U.S. Census Bureau 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 metropolitan area/assessment area.

**Median Family Income:** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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 (MSA):** 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 MSA 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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state MA. 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 area, the institution will receive a rating for the multi-state MA.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the call report instructions. These loans have original amounts of \$1 million or less and typically are 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 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.

## Description of Institution

CNB is a \$48 million minority-owned full-service community bank that is wholly-owned by CNB Bancorp Inc., of Alabama. CNB operates two branches in Mobile County, Alabama, both of which are located in low-income CTs. The City of Mobile is the county seat of Mobile County and is in the Mobile MSA. The City of Mobile is the third most populous city in the state of Alabama, the largest in Mobile County, and one of the largest cities on the Gulf Coast. Mobile is located at the head of Mobile Bay, and the port of Mobile continues to play a vital role in the health of the city and surrounding areas.

CNB's primary business strategy is to originate residential mortgage and commercial loans within its assessment area (AA). To assist low- and moderate-income (LMI) borrowers, as well as first time home purchasers, CNB offers auto, home equity, mortgage, home improvement, construction, and personal loans. CNB also offers a financial freedom loan product designed to assist borrowers build or reestablish credit. There are no financial or legal impediments preventing CNB from meeting the credit needs of the community. CNB has been operating under a Consent Order since December of 2015.

CNB's AA, in total, consists of 114 CTs with 19 of those CTs being located in low-income CTs, 27 in moderate-income CTs, 37 in middle-income CTs, 30 in upper-income CTs, and one CT that has not been assigned an income category. CNB did not select the entire MSA as its AA as the MSA was too large an area to be effectively served by the bank's two branches. No branches have been opened or closed since the last evaluation. CNB's AA meets regulatory guidelines by including whole geographies and not arbitrarily excluding LMI areas.

Banking hours reasonably meet the community needs with lobby hours Monday through Friday, extended Friday hours, and drive-through banking Monday through Saturday. The bank lobby is closed from 1:00 p.m. until 3:00 p.m. daily while the drive-through remains open during those hours. CNB operates with one automated teller machine (ATM), which is located at the Springhill Avenue branch.

The OCC conducted the previous CRA evaluation on July 8, 2014, which covered a period from January 1, 2012 through December 31, 2013. At the conclusion of that evaluation the OCC determined that CNB had a satisfactory record of meeting the credit needs of its community.



## **Scope of the Evaluation**

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

The assessment of CNB's CRA performance is evaluated using the Interagency Small Bank CRA procedures, which require the analysis of the bank's primary lending products. CNB's loan portfolio primarily comprised mortgage loans at 32 percent, followed by small business loans at 21 percent and consumer loans secured by certificates of deposit (CD) at 20 percent. The remaining 27 percent of the loan portfolio consisted of consumer auto loans, unsecured consumer loans, and lot loans that did not compose a significant percentage of the overall lending portfolio.

The OCC sampled primary products covering lending activities from January 1, 2016 through December 31, 2018. There were too few loans originated to select a sample of 20 loans for each product for the 2016 and 2017/2018 evaluation periods. In total 64 loans were reviewed including 20 mortgage loans, 23 small business loans, and 21 consumer CD-secured loans.

Additionally, the OCC contacted a community agency in the state to obtain feedback regarding the area's demographics, perceived credit needs, and the responsiveness of local banks with addressing those needs

### **Data Integrity**

CNB was a non-HMDA reporter, so the OCC did not perform a data Integrity validation. As part of the loan selection process all loans were reviewed to ensure they were coded accurately and that relevant data was accurate.

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

CNB has one AA consisting of Mobile County. This area received a full-scope review. See Appendix A for more information.

### **Ratings**

CNB's overall rating is based exclusively on the area that received a full-scope review.

## **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 assessment area 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# Conclusions with Respect to Performance Tests

## LENDING TEST

The overall Lending Test is rated as excellent. CNB originated a substantial majority of loans in its AA, and the overall borrower distribution of loans by income level for mortgage, small business, and consumer loans reflects excellent penetration of borrowers of different income levels. Additionally, the overall geographic distribution of mortgage, small business, and consumer loans reflects excellent lending penetration in the AA. Lastly, management did not receive any CRA related complaints during the review period.

### Loan-to-Deposit Ratio

CNB’s loan-to-deposit (LTD) ratio is reasonable given the credit needs of the AA and the bank’s size, financial condition, and location. This determination is based on the quarterly LTD ratios from September 30, 2014 to September 30, 2018, that averaged 47.86 percent. During this evaluation period, CNB’s LTD ratio ranged from a low of 43.47 percent to a high of 55.17 percent. While the bank’s LTD ratio can be considered low, it must be noted that there is significant competition in the bank’s AA for deposit and lending opportunities. A review of the AA’s market share reveals that the five largest banks command 70.25 percent of the total market share for deposits. These banks are either regional or national bank’s that have a significant presence in the area. Combined, these five banks have a total of 66 branches in the AA.

Management considers the three banks shown in the following table to be CNB’s competitors as all are of comparable size, actively offer residential loan products, and have at least one branch location within the same boundaries of CNB’s AA. The LTD ratio for these peer banks was 77.21 percent, which is significantly higher than CNB’s average during the same period of time. Their average LTD ratio for the same time period ranged from a low of 68.43 percent to a high of 82.96 percent.

Institution	Assets – As of September 30, 2018 (in thousands)	Average LTD
Commonwealth National Bank	\$46,771	47.86%
Merchants Bank	\$221,519	68.43%
Century Bank	\$316,574	80.23%
Bank of Commerce	\$482,857	82.96%

Source: Call Reports

### Lending in Assessment Area

CNB originated a substantial majority of loans in its AA during the review period. As shown in the following table, 90.63 percent of the bank’s loans by number and 92.23 percent by dollar amount were made in the bank’s AA. It is additionally worth noting that 100 percent of the bank’s home mortgage loans were made in the bank’s AA.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage	20	100	0	0	20	1,040	100	0	0	1,040
Small Business	20	86.96	3	13.04	23	2,171	88.72	276	11.28	2,447
Consumer – CD Secured	18	85.72	3	14.28	21	208	94.55	12	5.45	220
<b>Total</b>	58	90.63	6	9.37	64	3,419	92.23	288	7.77	3,707

*Source: 01/01/2016-12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0*

**Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

Please refer to Tables P, R, and V in appendix C for the facts and data used to evaluate the borrower distribution of the bank’s loan originations and purchases.

The overall borrower distribution of loans by income level reflects excellent penetration of borrowers of different income levels. For all products, there were too few loans in each time period to perform a meaningful distribution analysis based solely on demographic and aggregate percentages. As a result, the OCC also considered the distribution of the absolute number of loans originated.

Home Mortgage

The overall borrower distribution of home mortgage loans by income level reflects excellent penetration of borrowers of different income levels. The bank’s lending to low-income borrowers for 2016 exceeded both the percentage of housing units and aggregate lending for that period. While the bank did not make any loans to moderate-income borrowers in 2016, the bank’s lending to LMI borrowers in 2017 and 2018 exceeded both the percentage of housing units and aggregate lending for those years.

Small Business

The distribution of business loans reflects excellent penetration among businesses of different sizes. While the bank’s performance in 2016 was slightly less than the percentage of businesses with revenues of less than \$1 million in the AA, the bank’s performance significantly exceeded aggregate lending for that same period. Moreover, the bank’s penetration among businesses of different sizes for 2017 and 2018 exceeded both the percentages of businesses with revenues of less than \$1 million and aggregate lending.

### Consumer Loans – CD Secured

The overall borrower distribution of consumer loans by income level reflects excellent penetration of borrowers of different income levels. The bank's lending to both LMI borrowers in 2016 exceeded the percentage of households for the period. For 2017 and 2018, the bank's distribution of consumer loans to low-income borrowers was on par with the percentage of households and exceeded the percentage of households for moderate-income borrowers.

### **Geographic Distribution of Loans**

Please refer to Tables O, Q, and U in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The overall geographic distribution of mortgage, small business, and consumer loans reflects excellent dispersion in low- and moderate-income CTs. For all products, there were too few loans in each time period to perform a meaningful geographic analysis based solely on demographic and aggregate percentages. As a result, the OCC also considered the geographic distribution of the absolute number of loans originated.

### Home Mortgage

The overall geographic distribution of home mortgage loans reflects excellent penetration. The bank's geographic distribution of home mortgage loans in LMI CTs for 2016, 2017, and 2018 exceeded both the percentage of housing units in those tracts and aggregate data and is therefore considered excellent.

### Small Business

The bank's geographic distribution of business loans in LMI CTs for 2016, 2017, and 2018 exceeded both the percentage of businesses in the AA and aggregate lending and is therefore considered excellent.

### Consumer Loans – CD Secured

The overall geographic distribution reflects excellent penetration in LMI CTs. The bank's geographic distribution of consumer loans in 2016 for low-income CTs exceeded the percentage of households in those tracts and is considered excellent. While the bank did not make any loans in moderate-income CTs in 2016, the bank's lending in LMI CTs in 2017 and 2018 exceeded the percentage of households in both tracts and is considered excellent.

## **Responses to Complaints**

CNB did not receive any complaints during the review period related to its performance in meeting the credit needs within its AA.

## 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 metropolitan and nonmetropolitan areas 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>	Lending Test: 01/01/2016 to 12/31/2018	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Commonwealth National Bank Mobile, AL		Home Mortgage Small Business Consumer Loans – CD Secured
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Mobile County	Full Scope	N/A

## Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Mobile County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	114	16.67	23.68	32.46	26.32	0.87
Population by Geography	414,251	9.28	18.23	36.54	35.80	0.15
Housing Units by Geography	180,932	9.15	19.26	36.73	34.86	0.00
Owner-Occupied Units by Geography	102,608	5.66	14.97	38.52	40.85	0.00
Occupied Rental Units by Geography	51,580	13.13	24.84	33.35	28.67	0.00
Vacant Units by Geography	26,744	14.88	24.96	36.34	23.83	0.00
Businesses by Geography	22,634	7.19	20.49	31.37	40.76	0.18
Farms by Geography	499	4.21	9.22	42.48	43.89	0.20
Family Distribution by Income Level	103,554	7.47	17.28	37.44	37.80	0.00
Household Distribution by Income Level	154,188	8.16	18.27	36.79	36.78	0.00
Median Family Income Mobile County		\$57,287	Median Housing Value			\$125,900
			Median Gross Rent			\$781
			Households Below Poverty Level			18.60%

Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

CNB's AA is designated as Mobile County, Alabama, which is located in the Mobile, Alabama MSA. The AA meets regulatory guidelines by including whole geographies and not arbitrarily excluding LMI areas. The bank's AA includes 114 CTs with 19 low-income CTs, 27 moderate-income CTs, 37 middle-income CTs, 30 upper-income CTs, and one N/A CT. The bank did not select the entire MSA as its AA as the MSA was too large an area to be effectively served by the bank's two branches.

The FFIEC's updated 2015 median family income for the AA was \$57,287. The following table depicts income categories:

Income Categories – Mobile County			
Low	Moderate	Middle	Upper
<\$28,642	\$28,643 – \$45,828	\$45,829- \$68,171	>\$68,744

Source: US Census data

Low-income families earning a median family income less than \$28,642 represented 7.47 percent of families in the AA. Moderate-income families composed 17.28 percent of the AA population. In 2015, 18.60 percent of households in the AA earned wages below the poverty level.



Based on 2018 business demographic data, there were 22,634 non-farm businesses in the AA. Of these, 17,860 (78.91 percent) of the businesses had revenues of less than \$1 million, 1,604 (7.09 percent) had revenues greater than \$1 million, and 3,170 (14.01 percent) did not report revenue information. Major employers in Mobile County include education (Mobile County Public Schools and University of South Alabama), healthcare (Infirmity Health Systems), ship building (Austal USA), and government (City of Mobile). According to the Bureau of Labor Statistics, the Mobile MSA had a 4.7 percent unemployment rate in 2018, which was higher than the Alabama state average and national average of 3.9 percent.

Opportunities for residential lending remain limited within the 19 low-income and 27 moderate-income CTs. Of the 51,404 housing units within those 46 CTs, approximately 38 percent of the units are occupied rental units and another 40 percent are vacant.

Competition among financial institutions in the AA remains significantly strong with the bank vying for loans amongst other large regional and local banks. According to the June 30, 2018 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, CNB ranked 18th out of 32 deposit institutions, with approximately \$44 million in deposits within the AA and a market share of 0.58 percent. The top five institutions commanded 70.25 percent of the market share, and consequently, there was significant loan competition in the AA.

In conjunction with this examination, the OCC conducted an interview with a community leader in the Mobile County AA. The type of organization represented was community-based, with a goal of assisting small businesses in the community. The primary credit need in the community was identified as small business lending. According to this contact, local banks have been active in helping meet the credit needs of the AA.

## Appendix C: Tables of Performance Data

---

### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this performance evaluation. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

Data for year 2016 is separate from data for 2017 and 2018 because 2016 data is compared against 2010 census data while data beyond 2016 is compared against 2015 American Community Survey (ACS) data.

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 MA/AA. 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 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) throughout those geographies. Because small business data is 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 AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the

percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

**Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout 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 MA/AA.

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2016</b>
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
Mobile	5	195	100	9,677	4.0	40.0	0.8	19.6	20.0	10.4	40.7	20.0	40.2	35.6	20.0	48.5	0.0	0.0	0.0
<b>Total</b>	<b>5</b>	<b>195</b>	<b>100</b>	<b>9,677</b>	<b>4.0</b>	<b>40.0</b>	<b>0.8</b>	<b>19.6</b>	<b>20.0</b>	<b>10.4</b>	<b>40.7</b>	<b>20.0</b>	<b>40.2</b>	<b>35.6</b>	<b>20.0</b>	<b>48.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2017-18</b>
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
Mobile	15	845	100	9,421	5.7	20.0	1.5	15.0	26.7	8.3	38.5	40.0	36.5	40.9	13.3	53.7	0.0	0.0	0.0
<b>Total</b>	<b>15</b>	<b>845</b>	<b>100</b>	<b>9,421</b>	<b>5.7</b>	<b>20.0</b>	<b>1.5</b>	<b>15.0</b>	<b>26.7</b>	<b>8.3</b>	<b>38.5</b>	<b>40.0</b>	<b>36.5</b>	<b>40.9</b>	<b>13.3</b>	<b>53.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 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
Mobile	5	195	100	9,677	23.2	40.0	4.4	16.7	0.0	14.9	19.5	0.0	20.5	40.6	60.0	37.0	0.0	0.0	23.2
<b>Total</b>	<b>5</b>	<b>195</b>	<b>100</b>	<b>9,677</b>	<b>23.2</b>	<b>40.0</b>	<b>4.4</b>	<b>16.7</b>	<b>0.0</b>	<b>14.9</b>	<b>19.5</b>	<b>0.0</b>	<b>20.5</b>	<b>40.6</b>	<b>60.0</b>	<b>37.0</b>	<b>0.0</b>	<b>0.0</b>	<b>23.2</b>

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
Mobile	15	845	100	9,421	24.0	26.7	5.4	15.6	33.3	16.3	19.0	13.3	22.5	41.4	26.7	35.5	0.0	0.0	20.3
<b>Total</b>	<b>15</b>	<b>845</b>	<b>100</b>	<b>9,421</b>	<b>24.0</b>	<b>26.7</b>	<b>5.4</b>	<b>15.6</b>	<b>33.3</b>	<b>16.3</b>	<b>19.0</b>	<b>13.3</b>	<b>22.5</b>	<b>41.4</b>	<b>26.7</b>	<b>35.5</b>	<b>0.0</b>	<b>0.0</b>	<b>20.3</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Mobile	3	804	100	7,501	6.5	33.3	6.8	21.5	66.7	19.3	33.8	0.0	31.1	38.0	0.0	42.8	0.2	0.0	0.1
<b>Total</b>	<b>3</b>	<b>804</b>	<b>100</b>	<b>7,501</b>	<b>6.5</b>	<b>33.3</b>	<b>6.8</b>	<b>21.5</b>	<b>66.7</b>	<b>19.3</b>	<b>33.8</b>	<b>0.0</b>	<b>31.1</b>	<b>38.0</b>	<b>0.0</b>	<b>42.8</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Mobile	17	1,367	100	7,698	7.2	23.5	7.0	20.0	29.4	17.9	31.6	41.2	31.2	41.0	5.9	43.8	0.1	0.0	0.1
<b>Total</b>	<b>17</b>	<b>1,367</b>	<b>100</b>	<b>7,698</b>	<b>7.2</b>	<b>23.5</b>	<b>7.0</b>	<b>20.0</b>	<b>29.4</b>	<b>17.9</b>	<b>31.6</b>	<b>41.2</b>	<b>31.2</b>	<b>41.0</b>	<b>5.9</b>	<b>43.8</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mobile	3	804	100	7,501	78.3	66.7	44.3	7.2	33.3	14.5	0.0
<b>Total</b>	<b>3</b>	<b>804</b>	<b>100</b>	<b>7,501</b>	<b>78.3</b>	<b>66.7</b>	<b>44.3</b>	<b>7.2</b>	<b>33.3</b>	<b>14.5</b>	<b>0.0</b>

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Mobile	17	1,367	100	7,698	78.9	94.1	43.2	7.3	5.9	13.8	0.0
<b>Total</b>	<b>17</b>	<b>1,367</b>	<b>100</b>	<b>7,698</b>	<b>78.9</b>	<b>94.1</b>	<b>43.2</b>	<b>7.3</b>	<b>5.9</b>	<b>13.8</b>	<b>0.0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Mobile	6	111	100	6.2	33.3	24.0	0.0	38.5	16.7	31.3	50.0	0.0	0.0
<b>Total</b>	<b>6</b>	<b>111</b>	<b>100</b>	<b>6.2</b>	<b>33.3</b>	<b>24.0</b>	<b>0.0</b>	<b>38.5</b>	<b>16.7</b>	<b>31.3</b>	<b>50.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Mobile	12	97	100	8.2	41.7	18.3	33.3	36.8	25.0	36.8	0.0	0.0	0.0
<b>Total</b>	<b>12</b>	<b>97</b>	<b>100</b>	<b>8.2</b>	<b>41.7</b>	<b>18.3</b>	<b>33.3</b>	<b>36.8</b>	<b>25.0</b>	<b>36.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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



Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Mobile	6	111	100	26.3	33.3	14.7	50.0	16.8	16.7	42.2	0.0	0.0	0.0	
<b>Total</b>	<b>6</b>	<b>111</b>	<b>100</b>	<b>26.3</b>	<b>33.3</b>	<b>14.7</b>	<b>50.0</b>	<b>16.8</b>	<b>16.7</b>	<b>42.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Mobile	12	97	100	26.5	25.0	15.0	50.0	15.9	16.7	42.5	8.3	0.0	0.0	
<b>Total</b>	<b>12</b>	<b>97</b>	<b>100</b>	<b>26.5</b>	<b>25.0</b>	<b>15.0</b>	<b>50.0</b>	<b>15.9</b>	<b>16.7</b>	<b>42.5</b>	<b>8.3</b>	<b>0.0</b>	<b>0.0</b>	

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