

# PUBLIC DISCLOSURE

October 1, 2018

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Grand Bank, National Association. Charter Number 24268

> 2297 State Highway 33 Hamilton, NJ 08690

Office of the Comptroller of the Currency

343 Thornall Street, Suite 610 Edison, NJ 08837

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**

Grand Bank, National Association (Grand or bank) has a satisfactory record of meeting community credit needs based on the following:

- Grand's quarterly loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's lending is inside its assessment area (AA) by number of loans originated or purchased.
- The overall geographic distribution of loans reflects reasonable dispersion in lowand moderate-income (LMI) census tracts.
- The overall borrower distribution of loans by income level of the borrower reflects excellent penetration of businesses of different sizes.
- The bank did not receive any CRA-related complaints during the evaluation 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 MA/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 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 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 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, 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 refinancings, 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 MA/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. 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:** 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.

**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 metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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**

Grand Bank, National Association (Grand) is a single-state community bank headquartered Hamilton, New Jersey. The bank was first established on March 1, 2002 at One Edinburg Road, Hamilton, New Jersey. The bank operates as a banking entity for local small businesses and professionals. The bank has no holding company.

The bank operates two retail branches within its local market of Mercer, Middlesex and the western portion of Monmouth Counties in NJ. The locations are One Edinburg Road and 2265 Highway 33, both in Hamilton, NJ. Both branches are located in upper-income census tracts in Mercer County. There is a Loan Production Office at 76 West Main Street, Suite 102 in Freehold, NJ located in a middle-income census tract. Both branches are open normal business hours Monday through Friday, while the 2265 Highway 33 branch is also open on Saturdays.

Grand is primarily a commercial and small business lender who offers a full range of deposit products. Retail services include checking accounts, savings accounts, certificates of deposit, residential mortgages, and consumer loans. Commercial services include business checking accounts, savings accounts, certificates of deposits, trust and escrow accounts, commercial loans, and SBA loans. The bank also offers modern services such as remote deposit and mobile banking.

Grand had \$213 million in total assets as of June 30, 2018. Total loans amounted to \$168.7 million, while total deposits totaled \$186.8 million. The bank's loan portfolio consists of \$142.8 million in real estate loans, \$20.5 million in commercial loans, and \$5.4 million in individual and other loans.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2017, Grand had deposits of \$183.8 million, which represents 0.25 percent of deposit market share among depository institutions in the rating area.

There are no financial or legal impediments to hinder the bank's ability to help meet the credit needs of the communities it serves. The bank received a "Satisfactory" rating on its prior CRA Performance Evaluation dated July 22, 2013.

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

We completed a review of Grand's CRA performance in its AA under the Small Bank examination procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The bank did not include any CD activities in this CRA Evaluation. The bank's lending performance for the years 2015 and 2016 were evaluated on a combined basis. Due to changes in census data effective in 2017, the 2017 lending performance was evaluated separately.

The evaluation period for the lending test is January 1, 2015 through December 31, 2017 and includes business loans as the bank's primary loan category during this period. We performed revenue and geographic distribution analyses on all loans originated or purchased inside the AA. Grand has one assessment area that consists of three contiguous counties in central NJ. These counties include: Mercer, Middlesex, and the Western section of Monmouth.

#### **Data Integrity**

Prior to this evaluation, in August 2018, we completed a data integrity review of information collected by management for business loans for years 2015, 2016, and 2017. The business loan data was found to be reliable for all three years.

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

The New York-Newark-Bridgeport, N.Y.-N.J.-Conn.-Pa. Combined Statistical Area (CSA) received a full-scope review. There are no limited-scope areas.

#### Ratings

As there is only one CSA in the bank's AA, the bank's overall rating is based solely on the 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 [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.

## **Conclusions with Respect to Performance Tests**

### LENDING TEST

Grand's performance under the lending test is satisfactory.

#### Loan-to-Deposit Ratio

Grand's average loan-to-deposit ratio (LTD) is reasonable. The bank's quarterly average LTD ratio during the evaluation period was 92.34 percent and ranged from a low of 87.21 percent on March 31, 2017 and a high of 100.66 percent on December 31, 2015. Grand's ratio is comparable to their two local peer group banks in its assessment area. The peer group bank's average LTD ratio over the same period was 96.22 percent, with a low average ratio of 83.12 percent and a high of 104.17 percent.

#### Lending in Assessment Area

Based on the data in table D below, we concluded the inside/outside ratio of the bank's originations and purchases of loans is reasonable and meets the standard for satisfactory performance. By number, a majority of the loans were inside the bank's AA. The following table details the bank's lending inside and outside its AA by number and dollar amount:

Loan Category		Nun	nber of L	.oans		Dollars of Loans (000\$)								
		ide	Outside Total			Insie	de	Outs	Total					
Small Business	#	%	#	%		\$	%	\$	%					
2015	49	62.8	29	37.2	78	\$8,972	55.4	\$7,223	44.6	\$16,195				
2016	39	50.0	39	50.0	78	\$4,193	35.9	\$7,482	64.1	\$11,675				
2017	47	54.7	39	45.3	86	\$8,544	35.3	\$15,693	64.7	\$24,237				
Totals	135	55.8	107	44.2	242	\$21,709	41.7	\$30,398	58.3	\$52,107				

### Table D Lending Inside and Outside of the Assessment Area

#### Geographic Distribution of Loans

#### Small Loans to Businesses

Based on the data in tables 2a and 2b, in Appendix A, and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses reflects reasonable dispersion.

In years 2015 and 2016, the distribution of the bank's small loans to businesses in LMI geographies reflects reasonable penetration. The proportion of loans originated in low-income census tracts was comparable to the proportion of small businesses and was

stronger than the aggregate distribution of loans. The proportion of loans originated in moderate-income tracts was poor compared to the proportion of small businesses and the aggregate distribution of loans.

In 2017, the geographic distribution of the bank's originations and purchases of small loans to businesses reflects reasonable penetration. The proportion of loans originated in low-income census tracts was poor compared to the proportion of small businesses and the aggregate distribution of loans. The proportion of loans originated in moderate-income tracts was significantly stronger compared to the proportion of small businesses and the aggregate distribution of loans.

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

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

Based on the data in tables 2a and 2b, in Appendix A, and the following performance context considerations, we concluded the borrower distribution of the bank's originations of small loans to small businesses by revenue is excellent.

In years 2015 and 2016, the distribution of the bank's small loans to small businesses by revenue reflect excellent penetration. The proportion of loans exceeds the proportion of small businesses, and was significantly stronger than the aggregate distribution of loans to those businesses.

In 2017, the distribution of the bank's small loans to small businesses by revenue reflect excellent penetration. The proportion of loans exceeds the proportion of small businesses, and was significantly stronger than the aggregate distribution of loans to those businesses.

#### **Responses to Complaints**

The bank did not receive any CRA-related complaints during the evaluation period.

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").

Time Period Reviewed	Lending Test: (01/01/15 to 12/31/17)						
Financial Institution: Grand Bank	κ, Ν.Α.	Products Reviewed					
Grand Bank, N.A., Hamilton, NJ		Small Business					
Affiliate(s)	Affiliate Relationship	Products Reviewed					
None List of Assessment Areas and Ty	/pe of Examination						
Assessment Area	Type of Exam	Other Information					
New York-Newark-Bridgeport, N.YN.JConnPa. Combined Statistical Area (CSA)	Full-Scope						

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

	Assessmen		of the Assessi and AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	298	8.7	9.1	23.2	58.7	0.
Population by Geography	1,426,399	6.8	8.8	24.0	60.3	0.
Housing Units by Geography	523,715	6.9	9.3	25.3	58.6	0.
Owner-Occupied Units by Geography	331,998	2.5	5.8	22.9	68.8	0.
Occupied Rental Units by Geography	157,416	13.8	15.4	30.6	40.3	0.
Vacant Units by Geography	34,301	17.0	15.3	23.9	43.8	0.
Businesses by Geography	92,682	4.1	7.9	23.2	64.9	0.
Farms by Geography	2,025	2.9	5.6	20.0	71.6	0.
Family Distribution by Income Level	353,461	16.2	13.1	17.1	53.5	0.
Household Distribution by Income Level	489,414	19.5	12.5	15.6	52.4	0.
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047	Median Hous	ing Value		\$332,42
Median Family Income MSA - 45940 Trenton, NJ MSA		\$94,908	Median Gross	Rent		\$1,27
			Families Belo	w Poverty Le	vel	6.3%

(\*) The NA category consists of geographies that have not been assigned an income classification.

Grand has one AA in the state of New Jersey, which meets the requirements of the regulation. The bank's AA is comprised of the New York-Newark-Bridgeport, N.Y.-N.J.-Conn.-Pa Combined Statistical Area (CSA). The CSA includes the Trenton, NJ MSA (45940) that includes Mercer County and the New York-Jersey City-White Plains, NY-NJ MD (35614) that includes Middlesex and Western portions of Monmouth Counties. The AA includes a combined total of 298 census tracts (CTs). Within the three counties, there are a total of 26 low-income CTs (8.7 percent), 27 moderate-income CTs (9.1 percent), 69 middle-income CTs (23.2 percent), 175 upper-income CTs (58.7 percent), and 1 CTs (0.3 percent) that have no income designations. Grand has two branches in the AA, both in Mercer County.

The 2015 U.S. Census reported the total population of the AA living within 298 census tracts at 1,426,399. The AA comprises 489,414 households and 92,682 businesses by geography. 16.2 percent of the families are categorized as low-income, 13.1 percent as moderate-income, 17.1 percent as middle-income, and 53.5 percent as upper-income. 6.3 percent of households are below the poverty level. The FFIEC estimated median family income (MFI) for the New York-Jersey City-White Plains, NY-NJ MD was \$72,047 and for the Mercer County MSA was \$94,908.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2017, Grand had deposits of \$183.8 million, which represents 0.25 percent of deposit market share among depository institutions in the rating area, which ranked 34<sup>th</sup> out of 55 financial institutions in the AA. PNC Bank, Bank of America and Wells Fargo, held the top three deposit market shares of about 47 percent.

As of June 2018, the Bureau of Labor Statistics reported the unemployment rate in the AA as 4.1 percent, compared to the state rate of 4.6 percent and the national rate of 4.0 percent.

Based on Moody's Analytics, New Jersey's economy will strengthen in 2018 and the state will outperform the Northeast in job growth for a few quarters. Job gains in Healthcare, scientific/technical services, and logistics are more than making up for the lack of job growth in other areas. Growth in average hourly earnings is accelerating, as are gains in wage and salary income. NJ strengths are many high tech and research operations, diverse industrial base that limits volatility, well-educated workforce with above average per capita income. However, among the area's weaknesses are the high cost structure which limits growth, lingering foreclosure problems, state budgetary pressures, and persistent domestic out-migration. The state's housing market is struggling to make headway because of lingering foreclosure problems. House price appreciation is weak, and housing starts are down year over year.

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan areas 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 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/assessment area. 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 PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 This table is not applicable and not included.
- Table P.
   Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower This table is not applicable and not included.
- 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 assessment area.
- 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 S.Assessment Area Distribution of Loans to Farms by Income Category of the<br/>Geography This table is not applicable and not included.
- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual RevenuesThis table is not applicable and not included.

- Table U.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Geography This table is not applicable and not included.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower This table is not applicable and not included.

	Total Loans to Small Businesses			usinesses	Low-]	Income T	Tracts	Moderat	e-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate										
Grand AA	88	13,165	225.6	45,275	3.1	3.4	1.6	8.9	3.4	7.6	18.0	38.6	15.3	69.9	54.5	75.6	0.0	0.0	0.0	
Total	88	13,165	225.6	45,275	3.1	3.4	1.6	8.9	3.4	7.6	18.0	38.6	15.3	69.9	54.5	75.6	0.0	0.0	0.0	

Table Q: A	Asses	ssme	ent Ar	ea Distr	ibution (	of Loa	ins to Sr	nall Bus	inesse	es by Ind	come Ca	tegory	y of the	Geograp	ohy				2017
	Total	Loans	to Small	Businesses	Low-	Income T	fracts	Moderat	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Grand AA	47	4	100.0	45,275	4.1	0.0	2.7	7.9	12.8	5.7	23.2	48.9	20.9	64.9	38.3	70.7	0.0	0.0	0.0
Total	47	4	100.0	45,275	4.1	0.0	2.7	7.9	12.8	5.7	23.2	48.9	20.9	64.9	38.3	70.7	0.0	0.0	0.0
Source: 2017 D& Due to rounding,					Bank Data; 2	016 CRA	Aggregate l	Data, "" da	ta not av	ailable.									

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

	1	Cotal Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Grand AA	88	13,165	100.0	45,275	78.9	84.1	41.2	7.5	13.6	13.7	2.3	
Total	88	13,165	100.0	45,275	78.9	84.1	41.2	7.5	13.6	13.7	2.3	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment A	Cable R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues       2017													
	г	Cotal Loans to S	Small Businesse	s	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses with Revenues Not Available				
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans			
Grand AA	47	4	100.0	45,275	81.9	74.5	41.2	7.7	19.1	10.3	4.3			
Total	47	4	100.0	45,275	81.9	74.5	41.2	7.7	19.1	10.3	4.3			

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

#### 2015-16