



PUBLIC DISCLOSURE

September 16, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

TC Federal Bank
Charter Number 703293

131 South Dawson
Thomasville, GA 31792

Office of the Comptroller of the Currency

Three Ravinia Drive
Suite 550
Atlanta, GA 30346

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**

The lending test is rated: Satisfactory

The major factors that support this rating include:

- Thomas County Federal Bank (TCFB) originated substantial majority of loans within its assessment areas (AAs).
- The loan to deposit ratio is more than reasonable, considering the bank's size, financial condition and meeting the credit need of its assessment areas.
- TCFB exhibits a reasonable geographic distribution of loans in the AAs

Loan-to-Deposit Ratio

The bank's loan-to-deposit ratio (LTD) is more than reasonable considering the bank's size, financial condition, and credit needs of the AAs. TCFB's average LTD ratio of 93.9 percent is more than reasonable, and demonstrates the bank's commitment to lend within its AAs. This determination is based on the quarterly LTD ratios from January 31, 2016 to December 31, 2018. The bank's quarterly LTD ratio ranged from a high of 97.9 percent as of December 31, 2016, to a low of 89.8 percent as of March 31, 2016.

There are six competitor banks in the designated Thomas County Georgia AA, with a combined nine branch offices. Among the competitor banks, four are much larger than TCFB with respect to branch networks, total deposits, and asset size. There are two similarly situated banks in this AA.

The Leon County Florida AA has 27 competitor banks with a combined 78 branches. Among the competitor banks, 14 are much larger than TCFB with respect to branch networks total deposits, and assets size. There are two similarly situated banks in this AA.

The similarly situated banks have a combined average LTD ratio of 90.5 percent for the 16 business quarters since the last CRA examination, which is lower than TCFB's average LTD ratio for the same period.

Lending in Assessment Area

A substantial majority of the bank's loans were originated inside its AAs.

The bank originated 72.2 percent by number and 66.6 percent by dollar of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage 2018	109	72.2	42	27.8	151	21,638	66.6	10,855	33.4	32,493
Total	109	72.2	42	27.8	151	21,638	66.6	10,855	33.4	32,493

Description of Institution

TC Federal Bank (TCFB) is a federally chartered mutual savings association headquartered in Thomasville, GA having one other branch in Tallahassee, FL. As of December 31, 2018, total assets were \$297.2 million and net loans totaled \$238 million with Tier 1 Capital of \$38 million. The bank does not have a holding company, any affiliates, or subsidiaries.

Established in 1934, TCFB is a traditional community thrift institution that accepts local retail deposits and primarily originates single-family residential mortgage loans. The bank offers a variety of fixed-rate residential mortgage loan products, with longer-term loans typically sold in the secondary market and short-term loans featuring balloon payments held in the bank's portfolio. TCFB operates a Loan Production Office (LPO) in Savannah, GA, which primarily services residential mortgage loans.

The bank's net loans total \$238 million and represent 79.1 percent of total assets as of December 31, 2018. Total real estate loans were \$228.2 million and represented 96 percent of total loans and 76.8 percent of total assets. Total commercial loans were \$4.8 million and represent 2 percent of total loans and 1.6 percent of total assets. Total retail/consumer loans were \$5 million and represent 2 percent of total loans and 1.7 percent of total assets. Tier 1 Capital was \$38 million as of December 31, 2018.

The bank offers drive-up automated teller machines at both of its branches for customers to inquire and access their account balances, make deposits and withdraw funds. Telephone banking is also available 24 hours, seven days per week, which allows customers to make account balance inquiries, determine whether checks have cleared, deposits were credited and place stop- payments on checks. Additionally, TCFB offers on-line banking and mobile banking services for both deposit and loan transactions via its website.

TCFB has designated Thomas County, GA and Leon County, FL as its AAs. The AAs meets the requirements of the CRA regulation and does not arbitrarily exclude low-or moderate-income CTs. Thomas County is located in a Micropolitan Statistical Area, which is a Non- Metropolitan Statistical Area (Non-MSA) and Leon County is located in the Tallahassee Metropolitan Statistical Area (MSA).

According to the 2015 ASC Census data, the Thomas County, GA AA includes 11 CTs, zero low-income, three moderate-income, seven middle-income, and one upper-income CTs. According to the 2015 ASC Census data, the Leon County, FL AA includes 68 CTs, 13 low-income, 16 moderate-income, 18 middle-income, 19 upper income CTs and two non-descript.

According to the 2015 US ACS Census data, the population of the Thomas County, GA AA was 44,824 with 11,520 families. Approximately 24 percent of the families in the AA are low-income and 17 percent are moderate-income. Approximately 19.5 percent of the families live below the poverty level. The median family income in the AA is \$45,816 for the evaluation period.

Thomas County, GA is located in southwest Georgia bordering the State of Florida. Thomas County is a thinly populated, largely rural area. Thomasville, GA, the county seat and largest municipality, is located approximately 25 miles north of Tallahassee, Florida, and 40 miles west of Valdosta, GA. The Georgia Department of Labor states that as of December 2018, the unemployment rate in Thomas County was 4.3 percent. The unemployment rate for the state of Georgia is lower at 3.7 percent. Thomasville is home to several Fortune 500 companies such as Caterpillar and Flowers Food, and its largest employer, John D. Archibold Memorial Hospital, was named one of the top 50 hospitals in the nation by US News & World Report magazine.

TCFB competition is from other financial institutions and mortgage loan providers within its assessment area. Besides TCFB, six FDIC-insured financial institutions have nine branch locations throughout Thomas County. As of December 31, 2018, the top three banks based on total deposits in Thomas County were Thomasville National Bank (\$632 million), Synovus Bank (\$284 million), and TCFB (\$207 million). Overall, TCFB ranks third in total deposits out of the FDIC-insured financial institutions operating in the Thomas County AA.

The Leon County, FL AA had a population of 282,940 with 60,921 families according to the 2015 US ACS Census Data. Approximately 21 percent of the families in the AA are low-income and 16 percent are moderate-income. Approximately 10.9 percent of the families live below the poverty level. The median family income in the AA is \$64,055.

Leon County, FL is located in the Florida panhandle bordering the state of Georgia. Leon County is densely populated and is included in the Tallahassee Metropolitan area. Tallahassee is the county seat and the capital of Florida. The Bureau of Labor Statistics states as of December 2018 the unemployment rate for Leon County, Florida was 3.3 percent, while the unemployment rate for the state of Florida was also at 3.3 percent. The largest employer in Tallahassee is the State of Florida, followed by Florida State University.

In Leon County, FL, TCFB's competition is from other financial institutions and mortgage loan providers within its AA. Besides TCFB, 27 FDIC-insured financial intuitions have 78 branches. As of December 31, 2018, the top three banks based on total deposits in Leon County were Wells Fargo, NA (\$1.2 Billion), SunTrust (\$1.2 Billion), and Capital City Bank (\$948 million). Overall, TCFB ranks 24th in total deposits out of the FDIC-insured financial institutions operating in the Leon County AA area, due to the bank's new entry into this large market in September 2017.

TCFB's last CRA examination was dated September 13, 2015 and the institution was rated Satisfactory. There are no legal, financial, or other factors impending the bank's ability to help meet the credit needs in its AAs during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluation

We completed a review of TCFB CRA performance under the Small Bank CRA procedures. We reviewed the bank's record of meeting the needs of its AAs through lending activities. The evaluation period for the lending test is January 1, 2016 through December 31, 2018. TCFB did not have any mortgage loan activity for 2016 and 2017. The bank became a HMDA reporter in 2018, after opening a branch office in the Tallahassee, Florida MSA. Bank operations in the Tallahassee, Leon County, FL MSA was for 15 months of the three year evaluation period.

Based on both the number and dollar volume of loan origination data supplied by the bank, TCFB primary lending product is residential mortgage loans. Residential mortgage and multi-family dwelling loans represented 78.56 percent of the number and 64.8 percent of the dollar volume of loan originations during the evaluation period. Mortgage loans, 1-4 family and multi-family, were sampled for this evaluation.

Loan Type	Percentages
Construction & Land Development	8.06
Secured by Farmland	4.6
1-4 Family Residential	75.11
Loans for Agricultural Production	0
Secured by Multifamily Dwellings	3.45
Secured by Non-farm / Nonresidential	4.6
Commercial and Industrial Loans	1.87
Loans to Individuals	6.9
Total Loans	100

Source Consolidated Report of Condition and Income and bank records

For analysis purposes, we compared the bank's lending performance with demographic data from the 2010 United States (U.S.) Census, the 2015 American Community Survey (ACS) U.S. Census, and 2016 and 2018 Dun and Bradstreet (D&B) Data. The income designation of some CTs in the AAs changed in 2017, based upon the 2015 ASC. No affiliate activity was included in this analysis. Refer to the table in Appendix A for more information on the scope of the review.

Selection of Areas for Full-Scope Review

TFCB AAs are in the states of Georgia, Thomas County and Florida, Leon County. The Thomas County, Georgia AA is designated as a Micropolitan Statistical Area, which is a Non-MSA. The states of Georgia, Thomas County Non-MSA and Florida, Leon County, in the Tallahassee, Florida MSA were selected for full-scope reviews. Community profiles for the AAs are provide in the “Scope” sections for the States of Georgia and State of Florida. Refer to appendix A, Scope of Examination, for a list of full-scope AAs. There are no limited-scope AAs in the bank’s AAs.

Ratings

The bank’s overall rating is based primarily on the State of Georgia. The State of Georgia rating is based on the Thomas County Non-MSA and the State of Florida rating is based on the Tallahassee, Florida MSA. We placed significant weight on performance in the Thomas County Non-MSA, as a higher percentage of loan originations (66.1 percent) come from this AA compared to the Tallahassee MSA AA. Also, during the evaluation period bank operations in Florida did not begin until September 2017, which is 15 months out of the three year evaluation period. We placed more weight on the bank’s performance for residential loans, given the higher volume of loan originations in both number and dollar. Refer to the “Scope” section under the state rating section for details regarding how the AAs and loan products were weighted in arriving at the respective ratings.

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 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: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- Thomas County Federal Bank (TCFB) mortgage lending is reasonable in the AA
- Lending to borrowers of different income levels in the state show a reasonable borrower distribution

Description of Institution's Operations in Georgia

TCFB has one branch in Georgia, which is its headquarters in Thomasville located in the Thomas County Non-MSA. The branch has one automated teller machine (ATM). The total dollar volume of deposits is \$207 million, which is 15.44 percent share in the Thomas County, GA market giving the bank a ranking of number three out of seven in the market by deposits. The Thomas County, GA AA has the majority of the bank's deposits totaling 88 percent of the bank's total deposits. There are six competitor banks in the bank's Thomas County, GA AA, with a combined nine branch offices. Among the competitor banks in the AA, four are much larger than TCFB with respect to branch networks, total deposits, and asset size. There are two similarly situated banks in this AA.

We reviewed one recent community contact with an affordable housing organization. The identified credit needs include support for affordable housing, including down payment and closing cost assistance programs. The community contact also identified the need to support organizations, which provide social services, including homelessness prevention, job training, and financial literacy education.

Thomas County GA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Thomas County GA AA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	27.3	63.6	9.1	0.0
Population by Geography	44,824	0.0	30.3	60.8	8.9	0.0
Housing Units by Geography	20,306	0.0	30.0	61.5	8.5	0.0
Owner-Occupied Units by Geography	10,420	0.0	26.1	63.1	10.8	0.0
Occupied Rental Units by Geography	6,965	0.0	33.5	60.1	6.3	0.0
Vacant Units by Geography	2,921	0.0	35.5	59.2	5.3	0.0
Businesses by Geography	2,920	0.0	32.9	61.4	5.7	0.0
Farms by Geography	185	0.0	19.5	72.4	8.1	0.0
Family Distribution by Income Level	11,520	23.8	16.7	19.3	40.2	0.0
Household Distribution by Income Level	17,385	26.1	15.1	16.1	42.7	0.0
Median Family Income Non-MSAs - GA		\$45,816	Median Housing Value			\$122,613
			Median Gross Rent			\$720
			Families Below Poverty Level			19.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in State of Georgia

This analysis reflect a full-scope review of the Thomas County, GA Non-MSA.

Refer to the table in Appendix A: Scope of Examination for additional information.

LENDING TEST

The bank's performance under the Lending Test in the State of Georgia is rated Satisfactory. Based on a full-scope review the geographic distribution of mortgage lending is reasonable. The geographic distribution is reasonable, considering there are no low-income CTs in the Thomas County AA. We compared the bank's performance with both demographic comparators and aggregate lender information.

The bank originated a minimal number of small business loans, therefore, a meaningful analysis could not be performed for the product type.

Distribution of Loans by Income Level of the Geography

The bank exhibits a reasonable geographic distribution of loans in the Thomas County, GA AA. More weight was placed on the geographical distribution of mortgage loans in the three moderate-income CTs in the Thomas County AA.

Home Mortgage Loans

There are no low-income CTs in the AA. The geographic distribution of mortgage lending in moderate-income tracts reflects excellent performance compared to the demographic proportions and aggregate proportions in the Thomas County, GA AA.

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

Lending Gap Analysis

We reviewed summary reports and maps to analyze TCFB's lending activity over the evaluation period and to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the state of Georgia. The bank's primary product originations are in moderate income CTs within the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The distribution of home mortgage loan originations in the Thomas County, GA AA shows mortgage loan originations to borrowers of different income levels in the AA. Bank mortgage lending to low-income and moderate-income borrowers was reasonable compared to the demographic proportions and aggregate proportions in the AA.

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

Responses to Complaints

TCFB has not received any complaints regarding its CRA performance in the State of Georgia during the evaluation period.

State Rating

State of Florida

CRA rating for the State of Florida: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A reasonable geographic distribution of home mortgage loans in the bank's AA.
- A reasonable distribution of home mortgage loans to individuals of different income levels

Description of Institution's Operations in Florida

TCFB has one branch in Florida, which is located in the Tallahassee, FL MSA in Leon County. The branch has one automated teller machine (ATM). The total dollar volume of deposits is \$29 million which is only a 0.33 percent share in the Leon County, FL market giving the bank a ranking of 24th of 28 financial institutions in the market. The Leon County, FL AA has 27 competitor banks with a combined 78 branches. Among the competitor banks, 14 are much larger than TCFB with respect to branch networks total deposits, and assets size. There are two similarly situated banks in this assessment area.

We reviewed one recent community contact with an affordable housing organization. The identified credit needs include support for affordable housing, including down payment and closing cost assistance programs. The community contact also identified the need to support organizations, which provide social services, including homelessness prevention, job training, and financial literacy education.

Leon County FL AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Leon County FL AA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	68	19.1	23.5	26.5	27.9	2.9
Population by Geography	282,940	16.4	20.6	26.4	31.8	4.8
Housing Units by Geography	125,915	17.7	20.8	28.7	29.7	3.1
Owner-Occupied Units by Geography	58,008	5.0	14.3	30.7	49.2	0.8
Occupied Rental Units by Geography	52,826	29.1	26.3	26.9	12.1	5.6
Vacant Units by Geography	15,081	26.2	27.0	27.4	16.7	2.7
Businesses by Geography	29,919	8.1	20.2	33.6	36.6	1.6
Farms by Geography	787	5.0	15.8	31.0	47.8	0.5
Family Distribution by Income Level	60,921	21.1	15.6	18.4	45.0	0.0
Household Distribution by Income Level	110,834	25.1	14.4	16.6	43.9	0.0
Median Family Income MSA - 45220 Tallahassee, FL MSA		\$64,055	Median Housing Value			\$163,333
			Median Gross Rent			\$923
			Families Below Poverty Level			10.9%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Florida

The bank's performance under the Lending Test in the State of Florida is rated Satisfactory. Based on a full-scope review, lending on mortgage loans is reasonable. The State of Florida was selected for full-scope review, because the bank originates loans and operates a full service branch in the state. The geographic distribution is reasonable, considering the bank has been operating for 15 months out of the three year evaluation period. We compared the bank's performance with both demographic comparators and aggregate lender information.

The bank originated a minimal number of small business loans, therefore, a meaningful analysis could not be performed for the product type.

Refer to the table in Appendix A: Scope of Examination for additional information.

LENDING TEST

The bank's performance under the Lending Test in the State of Florida is rated Satisfactory. Based on a full-scope review, lending for mortgage loans is reasonable. The geographic distribution is reasonable. We compared the bank's performance with both demographic comparators and aggregate lender information.

Distribution of Loans by Income Level of the Geography

The bank exhibits a reasonable geographic distribution of loans in the Leon County, FL AA.

Home Mortgage Loans

TCFB's geographic distribution of the mortgage loan originations in the evaluation period was reasonable for low-income and moderate-income tracts in the Tallahassee, FL AA. Bank mortgage lending performance is reasonable in comparison to the demographic proportions and the aggregate proportions in the AA.

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

Lending Gap Analysis

We reviewed summary reports and maps to analyze TCFB's lending activity over the evaluation period and to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the state of Florida. The bank's primary product originations are in moderate income CTs within the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The distribution of home mortgage loan originations in the Leon County, FL AA shows no home mortgage loans were originated to low-income borrowers. A review of the demographics of Leon County shows the bank's performance is poor. The demographics show 54.14 percent of the households live below the poverty limit in the low-income CTs in the AA. Home mortgage loan originations to moderate-income borrowers are reasonable when compared to the demographic proportions and the aggregate proportions in the AA.

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

Responses to Complaints

TCFB has not received any complaints regarding its CRA performance in the State of Florida during the evaluation period

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/31/2016 to 12/31/2018	
Bank Products Reviewed:	Home Mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Georgia		
Thomas County Non-MSA AA	Full-Scope	
State of Florida		
Tallahassee MSA AA	Full-Scope	

Appendix B: Summary of State Ratings

TC Federal Bank Ratings	
Overall Bank:	Lending Test Rating
TC Federal Bank	Satisfactory
State:	
Georgia	Satisfactory
State:	
Florida	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. 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

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

State of Georgia

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Thomas County GA AA/Leon County AA 2016	--	--	--	1,126	2.8	--	0.8	0.0	--	0.0	76.1	--	81.6	21.1	--	17.6	0.0	--	0.0
Total	--	--	--	1,126	2.8	--	0.8	0.0	--	0.0	76.1	--	81.6	21.1	--	17.6	0.0	--	0.0

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

State of Georgia and Florida

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-2018	
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		
Leon County FL AA 2018	37	13,009	33.9	6,890	5.0	5.4	3.8	14.3	8.1	12.0	30.7	37.8	31.8	49.2	48.6	51.2	0.8	0.0	1.2		
Thomas County GA AA 2018	72	8,629	66.1	917	0.0	0.0	0.0	26.1	27.8	21.6	63.1	68.1	66.0	10.8	4.2	12.4	0.0	0.0	0.0		
Total	109	21,638	100.0	7,807	4.3	1.8	3.3	16.1	21.1	13.2	35.6	57.8	35.9	43.3	19.3	46.6	0.7	0.0	1.0		

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

State of Georgia

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
Thomas County GA AA 2016	--	--	--	1,126	23.3	--	3.5	15.2	--	9.8	18.5	--	16.2	43.0	--	48.5	0.0	--	22.1
Total	--	--	--	1,126	23.3	--	3.5	15.2	--	9.8	18.5	--	16.2	43.0	--	48.5	0.0	--	22.1
<i>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</i>																			

State of Georgia and Florida

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018		
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		
Leon County FL AA 2018	37	13,009	33.9	6,890	21.1	0.0	6.1	15.6	8.1	16.8	18.4	8.1	20.0	45.0	64.9	39.6	0.0	18.9	17.4		
Thomas County GA AA 2018	72	8,629	66.1	917	23.8	6.9	3.2	16.7	9.7	8.6	19.3	13.9	15.5	40.2	50.0	46.9	0.0	19.4	25.8		
Total	109	21,638	100.0	7,807	21.5	4.6	5.8	15.7	9.2	15.8	18.5	11.9	19.5	44.2	55.0	40.5	0.0	19.3	18.4		
<i>Source: 2015 ACS Census ; 01/01/2017- 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>																					