

# **PUBLIC DISCLOSURE**

September 01, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Southeast First National Bank Charter Number: 15651

10144 Commerce Street Summerville, GA 30747

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.

# **Table of Contents**

Overall CRA Rating	1
Description of Institution	
Scope of the Evaluation	
Discriminatory or Other Illegal Credit Practices Review	
State Rating	
State of Georgia	
State of Florida	
Appendix A: Scope of Examination	Appendix A-1
Appendix B: Summary of State Ratings	Appendix B-1
Appendix C: Definitions and Common Abbreviations	Appendix C-1
Appendix D: Tables of Performance Data	Appendix D-1

# **Overall CRA Rating**

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

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and business strategy.
- The bank originated a majority of loans within its assessment areas (AAs) of Chattooga County Georgia and Bay County Florida.
- The distribution of loans is reasonable across income levels.
- The distribution of loans is reasonable across businesses of different sizes.
- The Lending Test rating is based primarily on Satisfactory performance in the Chattooga County AA and state of Georgia.

#### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AAs, SEFNB's loan-to-deposit (LTD) ratio is reasonable. The bank's quarterly LTD ratio averaged 32.9 percent over the 18 quarters since the last CRA evaluation. While SEFNB has several competitors, there are no similarly situated financial institutions in terms of asset size, loan portfolio competition and business strategy. At \$62.2 million in total assets, SEFNB is significantly smaller than other financial institutions with locations in the Chattooga County AA and is the only bank headquartered in the AA.

SEFNB's average LTD was compared to its peer group as defined by the Uniform Bank Performance Report (UBPR). SEFNB's peer group comprises eleven insured commercial banks with assets between \$50 and \$100 million, with three or more full-service banking offices not located in an MSA. Based on the December 31, 2021, UBPR, peer group averages were above SEFNB ranging from 72.4% to 58.7% over the prior five quarters. However, SEFNB and the peer banks reflected a declining LTD ratio primarily due to COVID-19 stimulus payments. SEFNB's average LTD ratio is reasonable considering its financial condition, local economic environment, and level of competition in the AAs.

# **Lending in Assessment Area**

A majority of the bank's loans are inside its AAs.

The bank originated 72.5 percent of its total loans by number and 69.6 percent by dollar, 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													
		Number o	f Loans			Dollar							
Loan Category	Inside		Outside		Total	Inside		Outside		Total			
	#	%	#	%	#	\$	%	\$ %		\$(000s)			
Home Mortgage	16	80.00	4	20.00	20	1,235,871	79.25	323,647	20.75	1,559,518			
Small Business	13	65.00	7	35.00	20	1,298,242	62.29	785,991	37.71	2,084,233			
Total	29	72.50	11	27.50	40	2,534,113	69.55	1,109,638	30.45	3,643,751			

# **Description of Institution**

SEFNB is a community bank headquartered in Summerville, GA. Chartered in 1968, the bank is wholly owned by Summerville/Trion Bancshares, Inc., a one-bank holding company. SEFNB operates three full-service branches. The main office is in a moderate-income census tract (CT). The other two full-service branches, located in Trion, Georgia and Panama City Beach, Florida, are in middle-income CTs.

SEFNB offers a full range of traditional deposit and loan products. Automated Teller Machines (ATMs) are available at the Panama City Beach location and a stand-alone terminal in Summerville, GA. The bank's business plan shows a continued commitment to offer residential mortgages, small business and consumer loan products. SEFNB is not a Small Business Administration (SBA) lender. However, during the COVID-19 crisis, the bank originated loans through the SBA's Paycheck Protection Program (PPP). In 2020 and 2021, the bank originated 158 PPP loans totaling \$6.2 million which provided financial relief to businesses in their AAs. As of December 31, 2021, the bank has no outstanding PPP loans in the portfolio.

The bank designates two AAs. Chattooga County GA, a non-metropolitan statistical area (MSA) and Bay County FL, an MSA. The AAs comply with the CRA regulation and do not arbitrarily exclude low- or moderate-income CTs. As of December 31, 2021, SEFNB reported total assets of \$62.2 million, net loans of \$14.4 million, and total deposits of \$54.9 million. Net loans represented 23 percent of total assets. Tier-one capital totaled \$7.3 million.

SEFNB is a Minority-Owned Depository Institution (MDI). During the evaluation period, the United States' Department of Treasury's Community Development Financial Institutions (CDFI) Fund certified the bank as a CDFI. The CDFI Fund awarded the bank two Technical Assistance awards of \$125 thousand each.

There was no merger, acquisition, or expansion activity, or significant changes to the bank's corporate structure since the prior CRA evaluation. There are no financial conditions, legal constraints, or other factors hindering the bank's ability to meet the credit needs of the community. SEFNB received an overall "Satisfactory" rating at its prior CRA review dated March 12, 2018.

# **Scope of the Evaluation**

**Evaluation Period/Products Evaluated** 

The Office of the Comptroller of the Currency (OCC) evaluated the CRA performance of SEFNB using Small Bank performance criteria, which includes the lending test, to determine the distribution of the bank's primary loan products among different geographies and borrower characteristics within the AAs. The evaluation period covered January 1, 2019, to December 31, 2021.

To determine SEFNB's primary lending products, examiners assessed the composition of loan originations during the three-year time frame. Home loan originations represented 20 percent in number of loans and 24 percent in dollar volume. Small business loan originations represented 14 percent in number of loans and 67 percent in dollar volume. Therefore, examiners reviewed home mortgage and small business loans, consistent with the bank's lending focus. Examiners selected a random sample of 40 loan originations, representing 20 home mortgage and 20 small business loans for each loan type for the AA under review.

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

Examiners selected each state where the bank has an office for a full-scope AA. The Chattooga County AA in Georgia and the Bay County AA in Florida were evaluated. Examiners placed most weight on the Chattooga County AA given the majority of SEFNB's lending and deposit activity is within this AA. Lending activity in the Bay County AA was not at a level where the geographic and borrower distribution tests would be meaningful. Deposits in the Bay County AA account for less than 1 percent of total deposits. Refer to appendix A, Scope of Examination, for a list of full-scope AAs. There were no limited-scope AAs.

#### **Ratings**

The bank's overall rating is satisfactory. Refer to the "Scope" section under the State of Georgia for details regarding how the areas 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:

- A majority of loans were originated inside its AA,
- A reasonable distribution of lending to borrowers of different incomes,
- A reasonable distribution of loans to businesses of different sizes.

# **Description of Institution's Operations in Georgia**

SEFNB is a small community bank which operates two full-service locations in Georgia: the main office in Summerville and a branch in Trion. Summerville is the County Seat and the largest city in Chattooga County. The bank offers a variety of traditional deposit and loan products, with a primary lending focus of home mortgage and small business loans.

The bank's AA is Chattooga County, a non-MSA. The AA contains six CTs comprising one moderateand five middle-income geographies. There are no low-income CTs. No middle-income CTs are distressed or underserved geographies as of December 31, 2021.

Twenty-three percent of the families in the AA report low-income and 21.0 percent report moderate-income. Eighteen percent of families live below the poverty level. As of December 31, 2021, the Georgia Department of Labor reported the unemployment rate for Chattooga County was 4.8 percent and was the highest unemployment rate of the three counties closest to and surrounding Chattooga County. The unemployment rate for the state was lower at 3.9 percent. Prominent industries are goods producing and service providing companies. The largest employers include local and state government, carpet manufacturers, and retail services.

In addition to SEFNB, there are three other FDIC-insured financial institutions with four branch locations in the AA. As of June 30, 2021, SEFNB ranked third with total deposits of \$68.0 million, representing a 13.9 percent market share. Competition is strong from larger financial institutions. United Community Bank is the leading competitor with \$179.5 million in deposits and 47.7 percent market share. Truist Bank was ranked second with \$76.2 million in deposits and 20.3 percent market share.

For this examination, examiners interviewed an organization comprised of business owners in the AA. The organization promotes local business and economic development. The contact expressed the need for moderate- and low-income housing.

## Chattooga County AA

Table A – Demographic Information of the Assessment Area												
Assessment Area: Chattooga County												
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	6	0.0	16.7	83.3	0.0	0.0						
Population by Geography	25,241	0.0	21.4	78.6	0.0	0.0						
Housing Units by Geography	10,903	0.0	20.8	79.2	0.0	0.0						
Owner-Occupied Units by Geography	6,209	0.0	19.0	81.0	0.0	0.0						
Occupied Rental Units by Geography	3,155	0.0	26.8	73.2	0.0	0.0						
Vacant Units by Geography	1,539	0.0	15.7	84.3	0.0	0.0						
Businesses by Geography	1,131	0.0	27.0	73.0	0.0	0.0						
Farms by Geography	67	0.0	14.9	85.1	0.0	0.0						
Family Distribution by Income Level	6,303	23.3	21.0	21.7	34.0	0.0						
Household Distribution by Income Level	9,364	27.9	17.6	18.5	36.1	0.0						
Median Family Income Non-MSAs - GA		\$45,886	Median Housi	ng Value		\$67,224						
	Median Gross Rent											
			Families Belo	w Poverty Le	vel	18.1%						

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

# Scope of Evaluation in Georgia

This analysis reflects a full-scope review of SEFNB's non-MSA Chattooga County AA.

Examiners placed equal weight on the bank's primary loan products: home mortgage and small business loans. Refer to the table in appendix A: Scope of Examination for additional information on the AA.

# **Lending Test**

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

While SEFNB is not a Small Business Administration (SBA) lender, during the COVID-19 crisis, the bank originated loans through the SBA's Paycheck Protection Program (PPP). In 2020 and 2021, the bank originated 107 PPP loans totaling \$4.1 million, which provided financial relief to businesses in the Chattooga County AA.

Based on the performance context under Description of the Institution and demographic data reflected in appendix D, SEFNB's distribution of loans to borrowers of different incomes is reasonable.

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

## **Conclusions for Area Receiving a Full-Scope Review**

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

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

A geographic distribution was not meaningful. The AA has only one moderate-income CT, no low-income CTs, and none of the middle-income geographies are designated distressed or underserved areas.

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

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

#### Home Mortgage Loans

Home loan originations to low-income borrowers was significantly lower than the number of families reporting low-income. Twenty-three percent of families reported low-income, while only five percent of the sampled loans were made to low-income borrowers. The bank's five percent lending activity compares favorably to aggregate lending of 4.7 percent by all lenders to families in this income level. High poverty and rising home costs limits homeownership affordability to low-income borrowers. According to the 2015 American Community Survey (ACS) census data, 18.1 percent of families in the AA live below the poverty rate. Home loans made to moderate-income borrowers was equal to the number of families reporting moderate-income, and slightly above the aggregate lending of 18 percent.

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.

#### Small Loans to Businesses

The bank's originations of loans to small businesses by revenue reflect reasonable distribution. The proportion of bank loans to small businesses was comparable to the proportion of small businesses in the assessment area and exceeded the aggregate industry percentage of loans to small businesses.

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

#### **Responses to Complaints**

Neither SEFNB nor the OCC Customer Assistance Group received complaints related to the bank's CRA performance during this 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:

• The number of loans originated in Bay County, Florida during the evaluation period were not at a level to produce a meaningful analysis.

#### **Description of Institution's Operations in Florida**

SEFNB is a small community bank that operates one full-service location in Panama City Beach, Bay County, Florida. Panama City Beach is a waterfront town located on the Gulf of Mexico in the Panhandle region of Northwest FL. The city is best known for white-sand beaches. Panama City is the county seat and the largest city in Bay County. The bank offers a variety of traditional deposit and loan products, with a primary lending focus of home mortgage and consumer loans.

The AA is Bay County, an MSA. The AA has 43 CTs comprising two low-, nine moderate-, 22 middle-, and 10 upper-income geographies.

During the evaluation period, SEFNB originated four loans totaling \$524 thousand and had approximately \$106 thousand in deposits. In addition, during the COVID-19 crisis, the bank originated loans through the U.S. Small Business Administration's PPP. In 2020 and 2021, the bank originated four PPP loans totaling \$58.6 thousand which provided financial relief to businesses in the Bay County AA.

According to the 2015 ACS, 21 percent of the families in the AA report low-income and 18 percent report moderate-income. Eleven percent of families live below the poverty level. As of December 31, 2021, the unemployment rate for Bay County was 5.2 percent. Fishing, shipbuilding and manufacturing, and tourism are the leading industries.

According to the FDIC Branch/Deposit Market Share Report, SEFNB has less than 1 percent market share in Bay County. Competition is strong from a variety of financial institutions including large banks, credit unions, and mortgage lenders. As of June 30, 2021, Tyndall Federal Credit Union had the highest market share with \$1.6 billion in deposits and 25 percent market share. Regions Bank and Trustmark NB were ranked second and third with deposits of \$811 million and \$617 million, respectively.

Examiners contacted a local organization which supports new and existing small businesses in the Bay County AA. The representative noted the primary credit needs include affordable housing and small business development.

### **Bay County AA**

Table A – Demographic Information of the Assessment Area											
Assessment Area: Bay County											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #					
Geographies (Census Tracts)	44	4.5	20.5	50.0	22.7	2.3					
Population by Geography	175,353	3.6	16.7	52.2	27.5	0.0					
Housing Units by Geography	100,109	3.2	15.6	54.2	26.9	0.0					
Owner-Occupied Units by Geography	41,737	2.5	13.3	52.4	31.8	0.0					
Occupied Rental Units by Geography	26,185	5.3	22.7	50.6	21.5	0.0					
Vacant Units by Geography	32,187	2.5	12.9	59.5	25.1	0.0					
Businesses by Geography	22,148	3.2	17.8	53.4	25.6	0.0					
Farms by Geography	580	3.1	15.2	54.1	27.6	0.0					
Family Distribution by Income Level	43,485	21.1	17.7	19.9	41.3	0.0					
Household Distribution by Income Level	67,922	22.4	16.7	19.1	41.8	0.0					
Median Family Income MSA - 37460 Panama City, FL MSA		\$57,635	Median Housi	ng Value		\$160,962					
			Median Gross	Rent		\$958					
			Families Belo	w Poverty Le	vel	10.7%					

Source: 2015 ACS and 2020 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.

## Scope of Evaluation in Florida

For the state of Florida, examiners conducted a full-scope review of the Bay County AA.

#### **LENDING TEST**

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

# **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, SEFNB's performance in the Bay County AA is adequate. Management originated an insufficient number of loans in the State of Florida to allow for a meaningful analysis.

### **Responses to Complaints**

Neither SEFNB nor the OCC Customer Assistance Group received complaints related to the bank's CRA performance during this 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:	January 1, 2019 through	January 1, 2019 through December 31, 2021						
Bank Products Reviewed:	Home mortgage, small b	usiness						
Affiliate(s)	Affiliate Relationship	<b>Products Reviewed</b>						
None	NA	NA						
Rating and Assessment Areas	Type of Exam	Other Information						
State of Georgia								
Chattooga County	Full-scope	Lending test of geographic distribution not meaningful.						
State of Florida								
Bay County	Full-scope	Insufficient number of loans for meaningful lending analysis.						

# **Appendix B: Summary of State Ratings**

RATINGS Southeast First National Bank									
Overall Bank:	Lending Test Rating								
Southeast First National Bank	Satisfactory								
State:									
Georgia	Satisfactory								
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 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.
- 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 P:	Assessment A	Area Distribution	of Home Mort	gage Loans by	Income Category	of the Borrower

2019-21

	Total Home Mortgage Loans										Middle-Income Borrowers Upper-Income Borrowers			Borrowers	Not Available-Income Borrowers				
AA	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chattooga	20	1,960,421	100	602	23.3	5.0	4.7	21.0	20.0	17.9	21.7	20.0	22.3	34.0	50.0	36.2	0.0	5.0	18.9
Total	20	1,960,421	100	602	23.3	5.0	4.7	21.0	20.0	17.9	21.7	20.0	22.3	34.0	50.0	36.2	0.0	5.0	18.9

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

2019-21

		Total Los Bus	ans to Si inesses	mall	Businesses	s with Re 1MM	venues <=	Businesses Revenues >		Businesses with Revenues Not Available			
AA	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Chattooga	20	2,076,762	100.0	243	85.5	80.0	48.1	2.2	0.0	12.3	20.0		
Total	20	2,076,762	100.0	243	85.5	80.0	48.1	2.2	0.0	12.3	20.0		

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%