



## **PUBLIC DISCLOSURE**

March 08, 2019

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

First National Bank Northwest Florida  
Charter Number 18214

101 East 23rd Street  
Panama City, FL 32405-4501

Office of the Comptroller of the Currency

3595 Grandview Parkway  
Suite 655  
Birmingham, AL 35243

**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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>1</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>2</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>6</b>
<b>SCOPE OF EVALUATION.....</b>	<b>7</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>7</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA.....</b>	<b>8</b>
<b>LOAN-TO-DEPOSIT RATIO.....</b>	<b>8</b>
<b>LENDING IN ASSESSMENT AREA.....</b>	<b>8</b>
<b>GEOGRAPHIC DISTRIBUTION OF LOANS .....</b>	<b>9</b>
<b>RESPONSES TO COMPLAINTS.....</b>	<b>9</b>
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## **Overall CRA Rating**

**This bank is rated: Satisfactory.**

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

The major factors supporting this rating include:

- A reasonable loan-to-deposit ratio given the First National Bank Northwest Florida's size, financial condition, and assessment area (AA) credit needs,
- An adequate level of responsiveness to AA credit needs,
- A reasonable penetration of loans among AA businesses of different sizes, and
- A reasonable dispersion of loans among AA census tracts of different income levels.
- First National Bank Northwest Florida did not receive any consumer complaints regarding Community Reinvestment Act (CRA) performance during the 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 re-financings, 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

At December 31, 2018, First National Bank Northwest Florida (FNB or Bank) was a \$155 million community bank located in Panama City, Florida. FNB is wholly owned by First Northwest Florida Holding Company, a one-bank holding company. The Bank operates two full-service offices in Panama City, Florida. Both locations include drive-up facilities and non-deposit taking automated teller machines (ATM). FNB's primary loan product is commercial real estate loans. The Bank also originates 1-4 family, retail, and construction loans. The below chart depicts the Bank's loan portfolio composition at December 31, 2018.

Loan Portfolio Summary by Product December 31, 2018		
Loan Category	Dollar Volume \$ (000)	% of Outstanding Dollars
Commercial Real Estate	\$44,461	63%
RE Residential (1-4 Family)	\$16,464	23%
Construction and Land Development	\$5,590	8%
Commercial and Industrial	\$2,568	4%
Farmland	\$1,039	2%
Consumer	\$123	0%
<b>Gross Loan Portfolio</b>	<b>\$70,463</b>	<b>100%</b>

Source: Call Report data as of December 31, 2018

At December 31, 2018, net loans represented 48 percent of average assets. Total equity was \$17.4 million. FNB's financial position enables it to meet the community's credit needs. The Bank has no legal impediments that affect its ability to meet the community's credit needs. FNB's last CRA examination, as of June 30, 2014, resulted in a "Satisfactory" rating.

FNB has one assessment area consisting of Bay County, Florida, which is part of the Panama City Metropolitan Statistical Area (MSA). We performed a full-scope review of this AA to determine FNB's overall rating. See Appendix A for additional information.

The table below details FNB's branch and ATM locations by census tract (CT) income level.

Distribution of Bank Offices and ATMs by Census Tract						
Census Tract Income Level	Tracts		Full-Service Branches		Automated Teller Machines	
	#	%	#	%	#	%
Low	1	2.33%	0	0.00%	0	0.00%
Moderate	11	25.58%	1	50.00%	1	50.00%
Middle	22	51.16%	1	50.00%	1	50.00%
Upper	2	20.93%	0	00.00%	0	00.00%
<b>TOTAL</b>	<b>18</b>	<b>100.00%</b>	<b>2</b>	<b>100.00%</b>	<b>2</b>	<b>100.00%</b>

## **SCOPE OF EVALUATION**

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

We evaluated FNB's CRA performance using the lending test criteria for small bank examinations. The lending test evaluates an institution's record of meeting the credit needs of its AA through lending activities.

The evaluation period is from July 1, 2014 through December 31, 2018. We determined that FNB's primary loan product during the evaluation period were loans to business. To evaluate lending test performance, we pulled a judgmental sample of sixty (60) commercial loans originated between January 1, 2016 and December 31, 2018, which is representative of the Bank's business strategy since the last CRA examination.

### **Data Integrity**

We did not perform a data integrity review, as FNB is not a Home Mortgage Disclosure Act (HMDA) reporter.

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

The one AA of Bay County, FL, which is located within a MSA, received a full-scope review.

### **Ratings**

The Bank's overall rating is based on the Bank's business lending performance in the one AA of Bay County, FL.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

FNB's CRA performance is satisfactory based on the results of the lending test.

### Loan-to-Deposit Ratio

The Bank's loan-to-deposit (LTD) ratio is reasonable and meets the standards for satisfactory performance, given the Bank's size, financial condition, and lending opportunities within the AA. FNB's average LTD ratio ranks third among eight (8) other peer institutions in the Bay County and surrounding area. During the evaluation period (July 2014 to December 2018), FNB's quarterly average LTD ratio was 58.13%, while peer institutions averaged 47.14% during the same period.

Institution	Assets as of 4Q18 (in thousands)	Average LTD Ratio
Summit Bank, National Association	472,448	70.06%
First City Bank of Florida	157,934	65.73%
<b>FNB Northwest Florida</b>	<b>\$154,960</b>	<b>58.13%</b>
First Florida Bank	410,097	57.45%
Peoples Bank of Graceville	99,478	43.62%
Bank of Pensacola	83,970	39.61%
FNBT Bank	436,190	36.90%
Warrington Bank	83,425	35.13%
Bank of the South	83,612	28.67%

Source: UBPR and Call Report Data

### Lending in Assessment Area

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		
	#	%	#	%		\$	%	\$	%	
Business Loans	31	51.67%	29	48.33%	60	\$24,707	68.38%	\$11,423	31.62%	\$36,130
Total	31	51.67%	29	48.33%	60	\$24,707	68.38%	\$11,423	31.62%	\$36,130

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

During the review period, FNB originated a majority of business loans inside its AA. Our sample of 60 business loans showed the Bank originated 51.67 percent of the number of loans, and 68.38 percent of the dollar amount, inside the AA.

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

FNB's borrower distribution reflects reasonable penetration among businesses of different sizes within the AA, meeting the standard for satisfactory performance. Refer to Table R in Appendix C for the facts and data we used to evaluate the borrower distribution of the Bank's business loans. The table separates 2016 lending information from 2017-2018 due to census data changes.

In 2016, FNB made 95 percent of its businesses loans to AA small businesses, those with annual revenues of \$1 million or less. Bank performance exceeds the 86 percent of businesses in the AA are small business for excellent penetration. In 2017-2018, FNB made 62 percent of its businesses loans to AA small businesses, lower than the 86 percent of AA businesses classified as small businesses. However, the Bank exceeded aggregate peer performance of 44 percent. As such, the Bank achieved reasonable penetration in 2017-2018.

### **Geographic Distribution of Loans**

The Bank's geographic distribution of business loans reflects reasonable dispersion throughout the AA, meeting the standard for satisfactory performance. Refer to Table Q in Appendix C for the facts and data we used to evaluate the geographic distribution of the Bank's business loans. The table separates 2016 lending information from 2017-2018 due to census data changes.

In 2016, the Bank originated zero percent of its business loans to small businesses located in low-income tracts, lower than the 3.3 percent of small businesses located in low-income census tracts. However, because only 3.3 percent of small businesses are located in low-income tracts, this limits the Bank's lending opportunities. In addition, the Bank's AA consists of only one low-income census tract. As such, Bank performance is reasonable. In 2016, the Bank made 30 percent of its business loans to small businesses located in moderate-income tracts, exceeding the 15.1 percent of small business located in moderate-income tracts. This reflects excellent penetration.

In 2017-2018, FNB made 8 percent of its businesses loans to small businesses located in low-income tracts, exceeding the 2.5 percent of small businesses located in low-income tracts. This reflects excellent penetration. In 2017-2018, FNB made 13 percent of its business loans to small businesses located in moderate-income tracts, lower than the 17 percent of small businesses located in moderate-income tracts, and below peer aggregate performance of 16.5 percent.

### **Responses to Complaints**

FNB did not receive any CRA-related complaints during the review period.

## Appendix A: Scope of Examination

---

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/16 to 12/31/18	
<b>Financial Institution</b>		<b>Products Reviewed</b>
First National Bank of Northwest Florida		Business loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Bay County ,FL	Full-Scope	See Appendix B

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: MSA Bay County, FL 2016-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	25.6	51.2	20.9	0.0%
Population by Geography	168,852	2.2	19.6	56.8	21.4	0.0%
Housing Units by Geography	98,291	2.0	20.6	52.5	25.0	0.0%
Owner-Occupied Units by Geography	45,433	1.3	16.3	58.4	24.0	0.0%
Occupied Rental Units by Geography	23,374	3.8	29.5	46.9	19.8	0.0%
Vacant Units by Geography	29,484	1.6	20.2	47.7	30.6	0.0%
Businesses by Geography	16,253	3.3	15.1	54.0	27.6	0.0%
Farms by Geography	357	1.1	12.6	61.9	24.4	0.0%
Family Distribution by Income Level	44,480	19.3	18.3	21.6	40.9	0.0%
Household Distribution by Income Level	68,807	21.4	17.2	19.7	41.8	0.0%
Median Family Income Non-MSAs - FL		\$56,277	Median Housing Value			\$196,858
			Median Gross Rent			\$920
			Families Below Poverty Level			9.1%
<i>Source: 2010 US Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Bank has one AA, consisting of Bay County, FL, which is part of the Panama City MSA. The AA consists of one low-, eleven moderate-, twenty-two middle-, and nine upper-income census tracts. The AA complies with regulatory requirements and does not arbitrarily exclude low-or moderate-income geographies. FNB is ranked ninth in market share among the 17 depository institutions in Bay County. Major banking competitors include branches of large regional institutions: Regions Bank, Trustmark National Bank, Hancock Whitney Bank, in addition to community banks: Summit Bank, and Centennial Bank. At June 30, 2018, FNB’s market share was 4.18 percent.

In addition to the main branch office, FNB Northwest Florida has one additional full-service branch location in Bay County FL. Each of the two locations has a 24-hour accessible ATM that adjoins each location. Since the last Community Reinvestment Act (CRA) evaluation dated June 30, 2014, FNB has not opened or closed any branches. FNB’s primary lending focus continues to be business loans. There are no legal or financial impediments to FNB’s ability to meet AA credit needs. At December 31, 2018, the AA’s unemployment rate of 6 percent is higher than the state of Florida unemployment rate of 3.3 percent and the U.S.

unemployment rate of 3.9 percent. The impact of Hurricane Michael heightened the AA's fourth quarter 2018 unemployment rate. The military and tourism industries are an essential component of Bay County's economy. The Bay County Tourist Development Council (TDC) reported that 17.2 million visitors spent \$1.7 billion in Bay County on lodging, food, and entertainment in 2017. Tyndall Air Force Base is the major AA employer. Other major employers include Naval Support Activity – Panama City, Bay District Schools, Bay Medical Center, and Walmart.

We discussed AA credit needs with a local community contact who noted credit counseling as a primary financial need in the AA.

## Appendix C: Tables of Performance Data

---

### *Content of Standardized Tables*

A separate set of tables is provided for 2016 and 2017/2018. 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 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 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bay County AA	20	4,246,217	100	3,888	3.3	0	2.6	15.1	30	14.1	54	45	53.9	27.6	25	29.3
<b>Total</b>	<b>20</b>	<b>4,246,217</b>	<b>100</b>	<b>3,888</b>	<b>3.3</b>	<b>0</b>	<b>2.6</b>	<b>15.1</b>	<b>30</b>	<b>14.1</b>	<b>54</b>	<b>45</b>	<b>53.9</b>	<b>27.6</b>	<b>25</b>	<b>29.3</b>

Source: 2016 D&B Data; 01/01/2016- 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2018**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bay County AA	40	20,461,039	100	4,102	2.5	8	1.8	17	13	16.5	54.8	48	53.7	25.7	33	28.1
<b>Total</b>	<b>40</b>	<b>20,461,039</b>	<b>100</b>	<b>4,102</b>	<b>2.5</b>	<b>8</b>	<b>1.8</b>	<b>17</b>	<b>13</b>	<b>16.5</b>	<b>54.8</b>	<b>48</b>	<b>53.7</b>	<b>25.7</b>	<b>33</b>	<b>28.1</b>

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016</b>											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bay County AA	20	4,246,217	100	3,888	86.3	95	44.4	3.9	5	9.8	0
<b>Total</b>	<b>20</b>	<b>4,246,217</b>	<b>100</b>	<b>3,888</b>	<b>86.3</b>	<b>95</b>	<b>44.4</b>	<b>3.9</b>	<b>5</b>	<b>9.8</b>	<b>0</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018</b>											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bay County AA	40	20,461,039	100	4,102	86.2	62.5	43.9	4.1	37.5	9.7	0
<b>Total</b>	<b>40</b>	<b>20,461,039</b>	<b>100</b>	<b>4,102</b>	<b>86.2</b>	<b>62.5</b>	<b>43.9</b>	<b>4.1</b>	<b>37.5</b>	<b>9.7</b>	<b>0</b>

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