



## **PUBLIC DISCLOSURE**

January 27, 2020

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

North Georgia National Bank  
Charter Number 23547

350 West Belmont Drive  
Calhoun, Georgia 30701

Office of the Comptroller of the Currency

Three Ravinia Drive  
Suite 1950  
Atlanta, Georgia 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:

- A reasonable penetration of lending to borrowers of different incomes and businesses of different income levels.
- A majority of the bank's loans are inside the assessment area (AA).
- Examiners did not identify discriminatory or other illegal credit practices at this institution.
- There were no consumer complaints regarding North Georgia National Bank's CRA performance.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable. The quarterly LTD ratio averaged 57.3 percent over the 18 quarters since the last CRA evaluation. During this time, the bank's LTD ratio ranged from a low of 45.7 percent in June 2017 to a high of 68.7 percent in September 2019. The LTD ratio declined since the prior evaluation when it was 65.8 percent. As of December 31, 2019, the LTD ratio was 64.3 percent. It is important to note that NGNB's average quarterly LTD ratio excludes residential mortgage loans originated through third party relationships. Through the Residential Lending Department, NGNB originates home loan applications and collects the corresponding requested material for submission to third-parties for underwriting, approval processing, and funding. Through this arrangement, 83 residential mortgage loans at approximately \$15 million, closed in Gordon County during the evaluation period.

The bank's quarterly LTD ratio is lower than the average of two similarly situated banks, Century Bank of Georgia and Greater Community Bank. These institutions have the same number of locations, offer similar lending products, and delineate Gordon County as part of their AA. Both banks designate two AAs. Century Bank of Georgia designates Gordon and Polk Counties AA, located in non-MSAs and Bartow County AA, which is part of the Atlanta-Sandy Springs-Roswell MSA. Greater Community Bank defines Gordon County AA and Floyd County AA, which is part of the Rome MSA. The quarterly LTD ratio for these banks averaged 74.3 percent.

### Lending in Assessment Area

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

The bank originated 68.3 percent of the number of loans made inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	48	80.00	12	20.00	60	5,380	71.65	2,129	28.35	7,509
Small Business	34	56.67	26	43.33	60	4,367	44.11	5,533	55.89	9,900
Total	82	68.33	38	31.67	120	9,747	55.99	7,662	44.01	17,409

## Description of Institution

North Georgia National Bank (NGNB) is a single state community bank wholly owned by North Georgia Community Financial Partners, Inc., a one-bank holding company. In addition to the main office, the bank operates two full-service branches. All locations are in Calhoun, GA and offer Automated Teller Machines (ATMs). The bank maintains one free standing ATM, also in Calhoun. None of the ATMs take deposits.

NGNB provides a full range of banking services to individual and business customers in its primary market area of Gordon County and the surrounding counties. Small business and home loans are the bank's primary loan products. The bank's CRA AA is Gordon County, a non-Metropolitan Statistical Area (MSA). Calhoun is the county seat of Gordon County. Manufacturing, primarily textile (carpet and flooring) mills, are the county's leading industry and employer.

As of December 31, 2019, the bank had total assets of \$134 million with \$74 million in net loans, \$112 million in core deposits, and tier one capital of \$15 million. Net loans to total assets were 55.2 percent. There was no merger, acquisition, or expansion activity since the prior CRA evaluation. NGNB has no affiliates. There have not been any significant changes to NGNB's corporate structure. There are no legal or financial impediments to NGNB's ability to meet the credit needs of its AA. The previous CRA evaluation, dated August 24, 2015, rated the bank's performance as "Satisfactory".

NGNB is the only bank with a main office in Calhoun, GA. Competition from state and regional banks is strong. NGNB has 12.8 percent of the deposit market share in Gordon County. Two larger regional banks have 37.1 percent and 16.4 percent market share, respectively.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC conducted this CRA performance review to evaluate NGNB's record of meeting the credit needs of the communities where the bank operates. Examiners performed this review using the Small Bank (SB) CRA procedures, which include a lending test to evaluate the distribution of the bank's

primary loan products among geographies and borrower characteristics. The evaluation period for the lending test is January 1, 2016 through December 31, 2018 and covers more than one census period. Therefore, data used for this analysis appears in two tables for each loan product. Data for calendar year 2016 is based on the 2006-2010 American Community Survey (ACS), which replaced the decennial census for CRA purposes. Data related to calendar years 2017 and 2018 is based on the 2011-2015 ACS.

During the evaluation period, business loans represented 43.4 percent of total loans by number of loans and 71.2 percent of dollar volume. Home loans accounted for 19.8 percent by number of loans and 22.1 percent by dollar volume. To evaluate the bank's lending performance, examiners selected random samples of 20 loans from each primary loan product for each full calendar year of the evaluation period. Therefore, the sampling encompassed 60 business loan originations and 60 home loan originations

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

Examiners conducted a full-scope review of the Gordon County AA. There are no limited-scope areas. *For more information regarding the scope of this examination, see Appendix A: Scope of Evaluation.*

### **Ratings**

The bank's overall rating is based on the full-scope review of the Gordon County AA. Since the number and volume of business loans is greater than the number and volume of home loans, examiners placed greater weight to the analysis of business lending.

## **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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Georgia

**CRA rating for the State of Georgia<sup>1</sup>:** Satisfactory

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

The major factors that support this rating include:

- A reasonable penetration of lending to borrowers of different incomes and businesses of different income levels.

### Description of Institution's Operations in Georgia

NGNB is a small community bank located in northwest Georgia. The bank operates three full-service locations, the main office and two branches, and one free-standing ATM in Calhoun, GA. Calhoun is the county seat of Gordon County. The bank's designated AA is Gordon County. NGNB offers a variety of traditional deposit and loan products. Commercial and real estate lending are NGNB's primary business focus.

Based on 2010 U.S. Census data, Gordon County has a population of 55,889. The average median family income was \$46,701. The unemployment rate was 4.96 percent, and 3,767 households live below the poverty level.

NGNB encounters strong competition from community, regional and large banks. As of June 30, 2019, NGNB had 12.8 percent of the deposit market share in Gordon County. Two regional banks had 37.1 percent and 16.7 percent, respectively. A large bank with a presence in the AA was slightly below NGNB with 9.9 percent market share.

Examiners interviewed the President/CEO of a local business organization. The individual noted a need for affordable housing in Gordon County and reported that small community banks are leading efforts to meet the credit needs of Gordon County residents.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

## Gordon County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Gordon County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.00	11.11	77.78	11.11	0.00
Population by Geography	55,889	0.00	11.63	77.93	10.44	0.00
Housing Units by Geography	22,220	0.00	12.00	77.75	10.25	0.00
Owner-Occupied Units by Geography	12,786	0.00	8.20	77.39	14.41	0.00
Occupied Rental Units by Geography	6,753	0.00	18.06	78.97	2.95	0.00
Vacant Units by Geography	2,681	0.00	14.81	76.39	8.80	0.00
Businesses by Geography	2,824	0.00	23.34	65.37	11.30	0.00
Farms by Geography	139	0.00	7.91	84.17	7.91	0.00
Family Distribution by Income Level	14,403	0.00	10.44	77.97	11.59	0.00
Household Distribution by Income Level	19,539	0.00	11.61	77.94	10.45	0.00
<b>Median Family Income MSA - \$48,900</b>			\$	Median Housing Value		\$112,995
				Median Gross Rent		\$655
				Families Below Poverty Level		17.5%

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

## Scope of Evaluation in Georgia

NGNB designates one AA in Georgia consisting of Gordon County. The AA has 9 census tracts (CTs) consisting of 1 moderate-, 7 middle-, and 1 upper-income geographies.

## LENDING TEST

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

## Conclusions for Area Receiving Full-Scope Review

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

## Distribution of Loans by Income Level of the Borrower

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

### *Home Mortgage Loans*

In 2016, NGNB had a reasonable distribution of home loans to low- and moderate-income borrowers. The percent of home loans made to low-income borrowers exceeded the percent of families reporting



low income and the aggregate percentage of loans reported by all lenders. Home loans made to moderate-income borrowers was significantly lower than the number of families reporting moderate income and the aggregate lending percent.

During 2017 and 2018, home loans made to low-income borrowers was significantly lower than the number of families reporting low income and higher than the aggregate lending. Twenty percent of families reported low income while only 8 percent of the bank's home loans were made to low-income borrowers. The number of home loans made to moderate-income borrowers was below the number of families reporting moderate income and the aggregate percentage. This is reasonable considering over 50 percent of families reported middle and upper income and are more likely to obtain mortgage loans. Owner-occupied properties account for most of the total occupied housing units in the AA. Thirty-four percent of the total housing units are rental properties and only 30 percent of those are occupied.

Refer to Table P of Appendix D-2 for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

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

Lending to businesses of different sizes reflects an excellent penetration with performance higher than the AA demographic comparators and aggregate lending. In 2016, Dunn and Bradstreet reported 81 percent of businesses with annual revenues of less than \$1 million. Aggregate lending to businesses with annual revenues of less than \$1 million was 49.1 percent. Ninety percent of NGNB's loan originations were to businesses with annual revenues of less than \$1 million.

During 2017-2018, 80 percent of businesses reported total revenues less than \$1 million. Aggregate lending was 50.0 percent. Ninety-five percent of the bank's loan originations were to businesses with annual revenues of less than \$1 million.

Refer to Table R in Appendix D-3 for the facts and data used to evaluate the borrower distribution of the bank's originations of small loans to businesses.

### **Responses to Complaints**

Neither NGNB nor the OCC received complaints related to the bank's CRA performance since the prior CRA examination.

# 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 non-MSA that received comprehensive examination review, designated by the term “full-scope”.

<b>Time Period Reviewed:</b>	January 1, 2016 to December 31, 2018	
<b>Bank Products Reviewed:</b> North Georgia National Bank	Home mortgage and small business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Non-MSA</b>		
Gordon County	Full-scope	All geographies in Gordon County, GA.
<b>State: Georgia</b>		
Gordon County	Full-scope	All geographies in Gordon County, GA

## Appendix B: Summary of State Rating

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RATINGS	North Georgia National Bank
Overall Bank:	Lending Test Rating
Satisfactory	Satisfactory
State: Georgia	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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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:** 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

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### 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 30<sup>th</sup> 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.

**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.



<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2016</b>
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Gordon County	20	1,941	100.00	19.5	25.0	2.7	15.5	5.0	16.9	20.3	10.0	20.7	44.6	60.0	38.1	0.0	0.0	21.7	
<b>Total</b>	<b>20</b>	<b>1,941</b>	<b>100.00</b>	<b>19.5</b>	<b>25.0</b>	<b>2.7</b>	<b>15.5</b>	<b>5.0</b>	<b>16.9</b>	<b>20.3</b>	<b>10.0</b>	<b>20.7</b>	<b>44.6</b>	<b>60.0</b>	<b>38.1</b>	<b>0.0</b>	<b>0.0</b>	<b>21.7</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-18</b>
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Gordon County	40	5,342	100.00	20.2	7.5	3.2	19.0	12.5	16.4	19.2	12.5	22.3	41.7	67.5	39.6	0.0	0.0	18.4	
<b>Total</b>	<b>40</b>	<b>5,342</b>	<b>100.00</b>	<b>20.2</b>	<b>7.5</b>	<b>3.2</b>	<b>19.0</b>	<b>12.5</b>	<b>16.4</b>	<b>19.2</b>	<b>12.5</b>	<b>22.3</b>	<b>41.7</b>	<b>67.5</b>	<b>39.6</b>	<b>0.0</b>	<b>0.0</b>	<b>18.4</b>	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank 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</b>											<b>2016</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Gordon County	20	2,765	100.00	632	80.5	90.0	49.1	5.6	10.0	13.9	0.0
<b>Total</b>	<b>20</b>	<b>2,765</b>	<b>100.00</b>	<b>632</b>	<b>80.5</b>	<b>90.0</b>	<b>49.1</b>	<b>5.6</b>	<b>10.0</b>	<b>13.9</b>	<b>0.0</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017-2018</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Gordon County	40	5,187	100.00	594	79.9	95.0	50.0	5.3	5.0	14.8	0.0
<b>Total</b>	<b>40</b>	<b>5,187</b>	<b>100.00</b>	<b>594</b>	<b>79.9</b>	<b>95.0</b>	<b>50.0</b>	<b>5.3</b>	<b>5.0</b>	<b>14.8</b>	<b>0.0</b>

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