



PUBLIC DISCLOSURE

June 24, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Woodforest National Bank
Charter Number: 16892

1330 Lake Robbins Drive
The Woodlands, TX 77380

Office of the Comptroller of the Currency

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Houston, TX 77010-3031

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 **Outstanding**.

The following table indicates the performance level of Woodforest National Bank (WNB or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Woodforest National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a substantial majority of the bank's loans originated in the Assessment Areas (AAs). The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments across all states.
- The Service Test rating is based on overall excellent service activity across 18 of 23 states/multi-states. The bank demonstrated good service activity in one state and adequate service activity in two multi-states and two states. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong alternative delivery systems (ADS), which are accessible to all portions of the bank's AAs.
- Community Development (CD) loans and services had a significantly positive impact on the overall Lending and Service Test ratings in all states/multi-states.
- The bank had innovative, flexible, and responsive CD loans and investments.

Lending in Assessment Area

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

The bank originated 86.57 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed in the bank defined AAs.

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		
	#	%	#	%		\$	%	\$	%	
Consumer	41,364	86.49	6,460	13.51	47,824	119,790	90.01	13,292	9.99	133,082
Small Business	5,474	87.17	806	12.83	6,280	184,828	84.80	33,125	15.20	217,953
Total	46,838	86.57	7,266	13.43	54,104	304,618	86.78	46,417	13.22	351,035

Description of Institution

WNB is an interstate financial institution headquartered in The Woodlands, Texas with total assets of \$5.9 billion as of December 31, 2018. WNB was founded in 1980 and has become one of the largest independently owned banks in the Houston AA metropolitan statistical area (MSA). The bank operates in 17 states encompassing 142 AAs including Alabama, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Mississippi, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Texas, Virginia and West Virginia (and six multistate AAs including Charlotte-North-Carolina-South-Carolina, Chicago-Illinois-Indiana, Cincinnati-Ohio-Kentucky-Indiana, Louisville-Kentucky-Indiana, Myrtle-Beach-North-Carolina-South-Carolina, and Washington-D.C.-Virginia-Maryland). As of December 31, 2018, WNB employed 4,700+ people and operated 748 branches, of which 190 were in low- and moderate-income (LMI) geographies. WNB branches are predominantly in-store (inside of Walmart), highly accessible, and open later than most of its competitors. During the evaluation period, the bank operated 864 automated teller machines (ATM), 97 percent of which were in WNB branches. Many of the bank's ATMs are inside Walmart stores, making them highly accessible and available in a safe location even outside of branch banking hours.

WNB is a wholly owned subsidiary of WNB Financial Group (WFG), which is also headquartered in The Woodlands, Texas. WFG had assets of \$6 billion as of December 2018 and WNB represented 99 percent of WFG's assets. In addition to the bank, WFG also owns three non-bank subsidiaries including WNB Financial Services Inc. (WFS), WNB Leasing, Inc. (WFL) and Par Real Estate Holdings II LLC (Par II). WFS provides non-deposit investment products such as mutual funds and annuities and provides comprehensive employee benefit plans to small- and medium-sized businesses. WFL provides capital and operating leases on leasehold improvements and equipment to the bank. Par II is a real estate asset holding company. The activities of these affiliates were not considered in this Performance Evaluation nor did the activities of these subsidiaries hamper the bank's ability to meet the credit needs of the community.

The bank focuses on retail and commercial banking customers offering a variety of products, including consumer small dollar loans, small business lines of credit (LOC), home improvement and auto loans; and although not a mortgage lender, WNB has an established agreement with Quicken Loans (Quicken) where WNB customers are referred to Quicken for home purchase loan products. In addition to the partnership with Quicken, WNB has enabled down payment and closing cost assistance through a partnership with Texas Department of Housing and Community Affairs (TDHCA). The bank also purchased home mortgage disclosure act (HMDA) reportable loans during the early portion of the examination period. These purchases were targeted to LMI individuals and loans located in LMI geographies. As of the December 31, 2018 WNB call report, home mortgage loans represented 15 percent by dollar amount and 19 percent by number of loans of the bank's portfolio. Home mortgage loans were not considered as a primary product during this examination.

The bank's primary product has been the Unsecured Consumer ReLi Line of Credit (ReLi LOC), which originates amounts ranging from \$500 to \$2,500 over a 24-month draw period at a non-predatory fixed rate of 15.99 percent with no processing or annual fees. This product is considered an innovative small dollar loan product. The consumer applicant population for this product has an average FICO score of 574 (representative sample from November 2017 through November 2018) which is significantly lower than the national average of 704 as reported by FICO in September 2018. This product offers alternative affordable financing to LMI consumers who might otherwise be interested in "pay day" and other types of predatory loan products. The ReLi product also offers customers an opportunity to rebuild their credit as their performance on the LOC is reported to the credit bureaus. This product is included in this Performance Evaluation as consumer loans. Starting in October 2017, WNB piloted a new small dollar-lending product across five states. The Re-Starter product features a 12-month, no-fee, \$500 term loan with a fixed rate of 15.99 percent as of December 31, 2018. Re-Starter is a consumer term loan created to help customers with no FICO score establish good credit. This product is considered an innovative small dollar loan product.

WNB offers a responsive financing option for small business owners to meet their needs (e.g., seasonal cash flow, potential startup capital needs, etc.) with its Unsecured Business ReLi LOC. This LOC ranges from \$500 to \$10,000 with a maximum rate of 11.99 percent and no fees. A personal credit check is performed to qualify for this product, and it is underwritten potentially down to an average FICO score of 600 with no minimum years in business to qualify for the initial \$500 loan. The bank does not always require revenue information, which enables it to lend to startups by leveraging other underwriting criteria such as personal credit history. If an applicant applies as a new business, then reapplies for an increase, and the company is less than one-year old, financial documentation may be requested to verify revenues. These Business ReLi loans are included in this Performance Evaluation as CRA small business loans. This product is considered responsive to small business needs of WNB business customers.

Another innovative aspect of WNB's small dollar loan program is the referral relationship with Association for Enterprise Opportunity (AEO) and the myWay to Credit (MWTC) platform. When the bank is unable to approve a small business loan application, it sends applications through AEO's MWTC platform to take a "second-look" to help get borrowers the funds or the trusted guidance they need. This platform matches borrowers to participating Community Development Financial Institutions (CDFIs) across the country.

To date, results of the bank's participation in MWTC show many businesses received trusted guidance, and it also validated that WNB is extending credit to small business owners who typically only qualify for CDFI underwriting standards.

Additionally, WNB innovatively responded to CDFIs' need for patient capital through its partnership with Opportunity Finance Network (OFN) and their creation of the CDFI Community Investment Fund (CCIF) an Equity Equivalent (EQ2) Fund. CCIF invested \$5 million in 14 different CDFIs across 13 different states. WNB made two additional direct EQ2 investments in CDFIs, LiftFund and National Association for Latino Community Asset Builders (NALCAB).

The bank's delivery systems are readily accessible to geographies and individuals of different income levels through extended operating hours and ATM access in secure store lobbies. Services and business hours are tailored to the convenience and needs of the AA and bank customers. WNB locations that are located inside of Walmart retail centers offer lobby hours of 10:00 AM – 6:00 PM Monday through Friday, Saturday hours of 10:00 AM – 5:00 PM, and Sunday hours from 12:00 PM – 4:00 PM. The bank provides ATM access, 24 hours per day, seven days per week.

All branches offer the following retail services: consumer and small business loan applications, debit card services, federal tax payments, merchant services applications, new account opening, teller transactions, mobile banking and access to the bank's innovative Cash in at Checkout money transfer program. Additional services offered at select branches include: coin machine, commercial night deposit, deposit taking ATM, night deposit, notary services, postal services (the sale of stamps), temporary checks, western union bill pay, and western union money transfer. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products.

WNB's Financial Education program provides individuals with valuable information on the basics of banking and personal finance. All courses are provided free of charge to customers, and all WNB branch managers can teach the Federal Deposit Insurance Corporation's (FDIC) Money Smart curriculum. Money Smart is a comprehensive financial education curriculum designed to help LMI individuals enhance their financial skills. During this evaluation period, the impact across WNB's footprint utilizing Money Smart included 18,972 courses with 67,884 participants and 26,171 hours taught.

WNB staff are very active with Junior Achievement. This national nonprofit organization empowers young people to own their economic success. WNB Junior Achievement volunteers delivered financial literacy skills. During this evaluation period, the impact across the bank's footprint for Junior Achievement included 2,456 courses with 65,054 participants from LMI qualifying schools and 9,624 hours taught.

In 2014, WNB and Family Promise, the leading national organization fighting against homelessness in the U.S., teamed up to create the *New Beginnings* program, which, serves families across 43 states including all states and multi-states in which the bank operates. This curriculum provides a comprehensive approach to achieving financial sustainability, from basic banking concepts to budgeting and managing credit. The program is flexible and was designed to meet people where they are located. It can be taught to an individual in a homeless shelter or in a classroom setting. During this exam period, the impact across WNB's footprint for this program included 946 classes with 4,776 participants where 1,528 hours were taught. In addition, 50 employees served on board and committee positions.

The bank offers online and classroom courses. Banking GPS is an online resource developed by WNB providing a valuable three-module course covering banking basics, checking account tips, and debit card information to better manage personal finances. Customers and non-customers can access the courses from the WNB website.

WNB customers can provide evidence of course completion to any retail banker for a one-time convenience refund of an overdraft charge on their WNB account. During the exam period, there were 207,525 Banking GPS participants of which 186,696 were issued a courtesy overdraft refund. Total overdraft fees refunded related to Banking GPS in the evaluation period were \$7,309,502.

Financial education at WNB includes, not just banking basics, but also support for entrepreneurs and small businesses. WNB responded to issues hindering entrepreneurship by launching the Woodforest Foundry program. This foundry approach is considered innovative and responsive to small business owners. The Woodforest Foundry is facilitated by entrepreneurs for entrepreneurs as mentors to enhance local entrepreneurial ecosystems, which revitalizes underserved communities, and helps grow businesses. This is a WNB proprietary ecosystem and entrepreneur activation program launched in 2017. The Woodforest Foundry program was a recipient of the Consumer Bankers Association's 2019 Joe Belew Award, for the most innovative and impactful small business initiatives. From May 2017 through May 2019, in partnership with the Maestro Entrepreneur Center, 40+ entrepreneurs have graduated from this mentorship program. This program was provided to over 85 small businesses by the mentors from the ecosystem. Mentored small businesses have shown revenue growth from 10-75 percent. In addition, 125 new jobs were created in a historically underutilized business (HUB) area of town and the poorest zip code in San Antonio. WNB continues to expand the Woodforest Foundry program. During the first quarter 2019, the program launched in Aurora, IL, and Louisville, KY. Additionally, Entrepreneurship 4 All, the first step in the Woodforest Foundry curriculum, was piloted in select WNB branches across Texas. These branches were predominately located inside Walmart stores, which provided entrepreneurs resources in convenient and safe locations. In total, WNB has held 15 Entrepreneurship 4 All events since launching the Woodforest Foundry, impacting over 100 early stage entrepreneurs.

There are no legal or financial factors impeding the bank's ability to meet the credit and CD needs of its AAs. WNB was rated "Satisfactory" at the last CRA evaluation dated July 13, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending, Investment, and Service Tests is July 1, 2015 through December 31, 2018. The evaluation period for CD loans, investments and services is the same. The primary products reviewed were consumer and business loans. The December 31, 2018 bank call report reflected consumer loans represented 75 percent of the loan portfolio by number of loans and business loans represented 72 percent of the loan portfolio by dollar volume of loans.

In evaluating the bank's lending performance, we reviewed small loans to businesses. We compared WNB's performance to peer performance using 2017 Peer Small Business Data (2017 peer data) to analyze small business loans reportable under CRA. We also reviewed consumer loans. No peer data is available for this product.

We used separate analysis periods for 2015 – 2016 and 2017 – 2018 for geographic and borrower distribution in the Lending Test due to the 2015 U.S. Census American Community Survey (ACS) update that went into effect on January 1, 2017.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA or AA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the Scope section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings. Texas will carry the most weight, as it has 27 percent of branches, 84 percent of deposits institution wide, and 34 percent of reviewed loans. Aside from Texas, North Carolina and Ohio will receive slightly more weight than other states, as these two states had approximately 9 percent of the institution branches, 2 percent of the total institution deposits, and 10 percent of the reviewed loans. All other states and multi-state areas were weighted equally.

The state ratings are based on performance in all bank AAs. Refer to the Scope under each State Rating section 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 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 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 Texas

CRA rating for the State of Texas: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive impact on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Texas

WNB has a physical presence in 21 AAs in Texas with 37 traditional standalone branches and 168 in-store branches, which opened between September 1980 and December 2018. The Houston AA is home to WNB's national headquarters, which was founded in 1980 in The Woodlands, TX (a suburb of Houston). WNB possesses a limited deposit market share of 0.57 percent and ranks 22nd out of 524 financial institutions doing business in the state (Source: 2018 FDIC Summary of Deposits). WNB deposits in Texas make up 84 percent of total WNB deposits. Deposits in the Houston AA make up 77 percent of total WNB deposits. In 2018, the top three financial institutions in the MSA were JPMorgan Chase Bank, N.A., Bank of America, N.A., and USAA Federal Savings Bank, which collectively make up 45 percent of deposit market share (Source: 2018 FDIC Summary of Deposits).

The largest industries by number of workers in the state are healthcare and social assistance (1.5 million workers), retail trade (1.3 million workers), accommodation and food services (1.1 million workers), administrative, support and waste management (950,248 workers) and manufacturing (811,053 workers; Source: U.S. Small Business Administration (SBA) Office of Advocacy). The mining, quarrying, and oil and gas extraction industry has served as a historic, major economic driver in Texas. As of December 31, 2018, the Texas unemployment rate of 3.7 percent was lower than that of the U.S. rate of 3.9 percent (Source: U.S. Bureau of Labor Statistics).

The Texas median household income (MHI) of \$57,051 nearly matches the U.S. MHI of \$57,652 (U.S. Census 2013-2017 American Community Survey 5-Year Estimates). The 2017 Texas poverty rate of 14.7 percent is higher than the U.S. poverty rate of 12.3 percent (Source: U.S. Census QuickFacts).

Existing LMI community challenges relating to financial education, homelessness, hunger, affordable housing, access to affordable credit for consumers and small business, and more, were greatly intensified by the historic Hurricane Harvey, in August 2017. The storm was the second costliest tropical cyclone to ever hit the mainland of the U.S., taking nearly 100 lives and resulting in estimated property damages of \$125 billion (Sources: South Texas Economic Development Center and National Hurricane Center). WNB's performance strategy was based on responding to these needs.

Community Contacts

To help identify needs and opportunities in the Houston AA, the OCC utilized a regulatory agency contact with a small business technical assistant provider. The community contact indicated that there are numerous opportunities for small business loans in the Houston market area, especially those businesses impacted by Hurricane Harvey. The contact pointed out that banks that are SBA lenders are willing to lend to Small Business Development Center (SBDC) clients and that financial institutions that partner with SBDCs have been helpful and continue to work with SBDCs to originate loans to small businesses.

To help identify needs and opportunities in the Austin AA, the OCC's Community Affairs Officer performed a community contact with an affordable housing organization that serves the state of Texas. An identified community credit need is program-related investments to help nonprofit developers create affordable housing. Additional identified community development needs were, donation of lender-owned real estate to re-develop as affordable housing and increased bank participation in state down payment assistance and mortgage credit programs.

Houston AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Houston-The Woodlands-Sugar Land TX MSA (Houston AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,069	14.9	29.1	25.6	29.6	0.8
Population by Geography	6,346,653	11.6	25.9	27.9	34.2	0.4
Housing Units by Geography	2,402,507	12.2	25.3	27.2	35.1	0.3
Owner-Occupied Units by Geography	1,314,631	5.2	21.3	29.4	44.1	0.1
Occupied Rental Units by Geography	854,011	20.9	30.2	24.6	23.7	0.6
Vacant Units by Geography	233,865	19.5	29.6	24.0	26.6	0.3
Businesses by Geography	478,600	9.8	19.1	23.6	47.3	0.2
Farms by Geography	8,021	5.3	17.1	31.6	45.9	0.1
Family Distribution by Income Level	1,530,226	24.4	16.1	17.1	42.4	0.0
Household Distribution by Income Level	2,168,642	24.9	15.9	16.8	42.4	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housing Value			\$172,974
Source: 2015 ACS Census and 2017 D&B Data; Due to rounding, totals may not equal			Median Gross Rent			\$972

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

Families Below Poverty Level	12.8%

Austin AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Austin-Round Rock TX MSA (Austin AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	342	10.8	20.8	37.1	29.5	1.8
Population by Geography	1,849,747	10.3	20.9	37.8	29.8	1.1
Housing Units by Geography	733,295	10.3	19.4	38.7	30.7	0.9
Owner-Occupied Units by Geography	391,279	3.9	16.7	40.9	38.4	0.2
Occupied Rental Units by Geography	285,548	18.7	22.9	35.9	20.8	1.8
Vacant Units by Geography	56,468	12.3	20.3	38.7	27.2	1.5
Businesses by Geography	166,230	6.9	13.5	34.0	44.3	1.3
Farms by Geography	3,563	4.8	15.6	41.5	37.9	0.2
Family Distribution by Income Level	419,620	22.3	16.7	19.8	41.2	0.0
Household Distribution by Income Level	676,827	23.5	16.5	18.0	42.0	0.0
Median Family Income MSA - 12420 Austin-Round Rock, TX MSA		\$78,997	Median Housing Value			\$235,980
Source: 2015 ACS Census and 2017 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.			Median Gross Rent			\$1,071
			Families Below Poverty Level			9.4%

Scope of Evaluation in Texas

The Houston and Austin AAs received a full scope review. The Amarillo, Beaumont-Port Arthur, Brownsville-Harlingen, Dallas-Plano-Irving, Fort Worth-Arlington, Longview, San Antonio-New Braunfels, Sherman-Denison, Texarkana, Tyler and TX-Non MSA AAs received limited scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in Texas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Houston and Austin AAs is excellent.

Lending Activity

Lending levels reflects excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Houston	1,916	7,821	27	9,764	60.24	91.36
Austin	106	535	11	652	4.02	0.93
Amarillo	9	95	6	110	0.68	0.12
Beaumont-Port Arthur	13	77	7	97	0.60	0.18
Brownsville-Harlingen	21	202	5	228	1.41	0.09
Dallas-Plano-Irving	125	1,174	10	1,309	8.08	2.23
Fort Worth-Arlington	89	741	5	835	5.15	1.25
Longview	8	146	6	160	0.99	0.15
San Antonio-New Braunfels	174	1,141	12	1,327	8.19	1.16
Sherman-Denison	7	100	5	112	0.69	0.15
Texarkana	3	47	6	56	0.35	0.05
Tyler	15	80	5	100	0.62	0.11
TX-Non MSA	122	1,288	48	1,458	9.00	2.22

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loan* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Houston	145,861	58,994	83,079	287,934	86.81	91.36
Austin	2,049	2,137	4,370	8,556	2.58	0.93
Amarillo	35	168	256	459	0.14	0.12
Beaumont-Port Arthur	28	139	217	384	0.12	0.18
Brownsville-Harlingen	211	332	181	724	0.22	0.09
Dallas-Plano-Irving	677	2,385	2,480	5,542	1.67	2.23
Fort Worth-Arlington	5,813	1,454	2,712	9,979	3.01	1.25
Longview	16	276	124	416	0.13	0.15
San Antonio-New Braunfels	2,075	2,351	7,685	12,111	3.65	1.16
Sherman-Denison	20	182	204	406	0.12	0.15
Texarkana	11	79	122	212	0.06	0.05
Tyler	33	126	103	262	0.08	0.11
TX-Non MSA	875	2,393	1,428	4,696	1.42	2.22

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is less than the proportion of bank deposits in the Houston and Austin AAs. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. By number, the bank's small business lending market share in the Houston AA of 0.32 percent is less than the bank's deposit market share of 1.53 percent.

The same holds true in the Austin AA. The bank's small business lending market share in the Austin AA is 0.02 percent, while the deposit market share in this AA is 2.31 percent. According to 2017 peer data by number, WNB ranks 26th of 220 small business lenders in the Houston AA. The five largest business lenders held 60 percent of the market and include banks that are issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs. WNB ranks 81st of 183 small business lenders in the Austin AA. The top five business lenders held 64 percent of the total market share by number of loans.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

For the Houston AA, the bank originated an adequate volume of loans in low-income geographies and an excellent volume of loans in moderate-income geographies. During the evaluation period, the proportion of loans in low-income geographies was consistent with the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was significantly stronger than the proportion of businesses located in those geographies.

For the Austin AA, the bank originated an adequate volume of loans in low-income geographies and an excellent volume of loans in moderate-income geographies. The proportion of loans in low-income geographies was significantly stronger in 2015-16 than the proportion of businesses located in those geographies and the aggregate distribution of loans; however, it was weaker in 2017-18. The proportion of loans in moderate-income geographies was significantly stronger than the proportion of businesses located in those geographies for both periods.

Consumer Loans

Refer to Table U in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of consumer loans.

For the Houston AA, the bank originated an adequate volume of loans in low-income geographies and an excellent volume of loans in moderate-income geographies. During the evaluation period, the proportion of loans in low-income geographies was weaker than the proportion of households located in those geographies. The proportion of loans in moderate-income geographies was significantly stronger than the proportion of households located in those geographies.

For the Austin AA, the distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of loans in LMI geographies was significantly stronger than the proportion of households located in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

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

For the Houston and Austin AAs, the distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was significantly stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of consumer loans.

For the Houston and Austin AAs, the distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB is a leader in making CD loans in the state of Texas.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Houston AA

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Houston AA. During the evaluation, WNB originated 27 CD loans totaling \$83.1 million. This volume of CD lending was equivalent to 20.9 percent of tier 1 capital allocated to the AA, based on the June 30, 2018 call report. WNB's CD loans were primarily responsive to identified community needs, specifically affordable housing, revitalization, and stabilization of LMI geographies. Of the 27 CD loans, 21 loans totaling \$54.4 million were associated with the identified needs of the AA. Other loans benefitted economic development. Some notable examples of CD loans are as follows:

- WNB in collaboration with TDHCA initiated an innovative and responsive partnership that resulted in a capital pool for Texas LMI homeownership. In 2016, the bank originated a \$10 million loan (with a \$2.8 million allocation to this AA), to TDHCA for down payment and closing costs assistance to first-time homebuyers. The program was so successful, that in 2018, WNB was selected as the lead and agent bank to syndicate an additional \$12 million (with a \$788,967 loan allocation to this AA) of closing costs assistance for first-time homebuyers.
- WNB in participation with the Bank of Texas made a \$9 million loan to finance the construction of a charter school, located in a low-income census tract (CT). Of the 610 students enrolled, 540 or 88 percent are eligible to receive free lunch.
- The bank made a \$10.8 million loan to purchase and make improvements to a 234 multi-unit family apartment building, located in a moderate-income CT in Southwest Houston.
- WNB made an \$18.5 million loan with a purpose of economic development, originated for construction of a mixed-use building, located in a moderate-income CT.

Austin AA

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Austin AA. During the evaluation, WNB originated 11 CD loans totaling \$4.4 million. This volume of CD lending was equivalent to 109 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of affordable housing and economic development. Of the 11 CD loans, six totaling \$4 million were associated with the identified needs of the AA. Other loans benefitted LMI services. Some notable examples of CD loans are as follows:

- WNB in collaboration with the TDHCA initiated an innovative and responsive partnership that resulted in a capital pool for Texas LMI homeownership. In 2016, the bank originated a \$10 million loan (with a \$1.6 allocation to this AA), to TDHCA for down payment and closing costs assistance to first-time homebuyers. The program was so successful, that in 2018, WNB was selected as the lead and agent bank to syndicate an additional \$12 million (with a \$1.9 allocation to this AA) of closing costs assistance for first-time homebuyers.
- The bank made a loan for \$2 million (with a \$300,000 allocation to this AA), to Raza Development Fund (RDF) Inc. to be dispersed among 21 AAs. RDF is a non-profit Latino CDFI where loan proceeds are specifically targeted for affordable housing, community centers, charter schools, and healthcare centers.

Broader Statewide

During the evaluation period, the bank made one broader statewide CD loan. A \$10 million loan (with a \$2.1 allocation to the broader Texas statewide area) to TDHCA for down payment and closing costs assistance to first-time homebuyers. The \$2.1 million loan does not have a purpose, mandate, or function to serve the AA.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

While the San Antonio AA was reviewed utilizing limited scope procedures, one CD loan is worth noting:

WNB originated a \$2.3 million loan within this AA, for construction and expansion of Maestro Entrepreneur Center, which is home of the Woodforest Foundry. The center's mission is to serve as an educational leading force in economic development of small, minority, women and veterans-owned businesses, throughout San Antonio. The center is in a low-income CT, which is an empowered zip code in a HUB zone. Additionally, at least 35 percent of the workforce must be hired from this area.

Based on a limited scope review, the bank's performance under the Lending Test in the Beaumont-Port Arthur, Brownsville-Harlingen, Dallas-Plano-Irving, Fort Worth-Arlington, San Antonio-New Braunfels, Sherman-Denison, Texarkana, Tyler and TX-Non MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in the Amarillo and Longview AAs was slightly weaker than the bank's overall performance. CD loans in all areas had a significant positive impact on the final ratings.

Refer to the lending tables in the Texas section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Texas is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Houston AA and the Austin AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Houston	119	13,735	33	53,468	68	19,849	220	29.14	87,052	78.81
Austin	17	1,000	6	5,699	27	25	50	6.62	6,724	6.09
Amarillo	2	21	3	255	17	9	22	2.91	284	0.26
Beaumont – Port Arthur	4	73	5	554	20	29	29	3.84	656	0.59
Brownsville-Harlingen	0	0	2	20	19	9	21	2.78	29	0.02
Dallas-Plano-Irving	26	2,063	5	2,135	26	22	57	7.55	4,220	3.82
Fort Worth-Arlington	13	557	6	4,325	20	22	39	5.17	4,904	4.44
Longview	2	89	2	150	19	13	23	3.05	252	0.23
San Antonio-New Braunfels	7	395	4	2,231	30	171	41	5.43	2,796	2.53
Sherman-Denison	2	74	2	217	16	9	20	2.65	300	0.27
Texarkana	2	52	3	181	14	7	19	2.52	241	0.22
Tyler	5	181	3	192	15	9	23	3.05	382	0.35
TX-Non MSA	14	362	23	2,152	154	109	191	25.29	2,623	2.37

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

Houston AA

During the evaluation period WNB made 152 investments totaling approximately \$67.6 million, including 119 prior period investments totaling \$13.7 million and 33 current period investments totaling \$53 million. Prior period investments include \$600,000 minority depository institution (MDI) certificate of deposits. One certificate of deposit had an original purchase amount of \$200,000 in 2015, and the bank renewed it three times each during the evaluation period. Additionally, 68 grants totaling approximately \$19.9 million were made for a total investment in the AA of approximately \$87.1 million. WNB's total investments represented 22 percent of tier 1 capital allocated to the AA.

The bank's qualified investments included a \$5 million investment into an equity equivalent investment in the CCFI managed by OFN. OFN provides long-term capital for CDFIs, so those organizations can assist LMI entrepreneurs. PeopleFund, a 25-year-old Texas based CDFI, was awarded \$204,545 in the AA to assist businesses affected by Hurricane Harvey, by providing small business mentoring, technical assistance, and loans. Approximately 89 percent of the firm's loans have been originated to minorities, women and/or LMI-based entrepreneurs seeking greater financial stability and independence through entrepreneurship.

WNB made additional investments in response to Hurricane Harvey including a \$1 million investment in LiftFund; a CDFI specialized in enabling startup small businesses to gain access to capital for continued growth and economic impact, with \$200,000 directly targeted to the AA via the Texas Small Business Rebuild Initiative.

Another \$400,000 investment was made as part of a capital pool that focused exclusively on rebuilding efforts to flood-damaged homes in underserved communities using small and minority owned businesses. Lastly, the bank made a \$500,000 investment in the NALCAB to help finance rebuilding efforts. The fund attracted approximately \$5 million in total capital and is contracting with small and minority owned businesses to create approximately 275 LMI jobs.

The bank invested a total of \$12.5 million in 11 municipal bonds to assist independent school districts (ISD) in the AA. All school districts had more than 51 percent of their student populations eligible for the free/reduced lunch program. The schools impacted included \$1 million each to Lamar, New Caney, Pasadena, and Spring ISD; \$2 million each to Aldine, Alief, and Goose Creek ISD; and \$2.5 million to Sheldon ISD.

To address affordable housing needs in the AA, WNB executed \$35 million in Fannie Mae Delegated Underwriting and Servicing Bonds for the multifamily apartments including a \$16.7 million and an \$11 million bond for two separate apartment complexes where 100 percent of the units were reserved for households with incomes under 60 percent of the area medium income in the AA.

The bank made six grants to the WNB Charitable Foundation totaling \$19.5 million. The foundation supports 501(c)(3) charitable organizations in the bank's AA with a \$1 million to the Montgomery County Food Bank, \$500,000 to Children Safe Harbor, \$240,000 to Habitat for Humanity of Northwest Harris County, \$150,000 to Salvation Army, and \$20,000 to Harris County Food Bank as noteworthy examples.

Austin AA

During the evaluation period, WNB made 23 investments totaling approximately \$6.7 million, including 17 prior period investments totaling \$1 million and six current period investments totaling \$5.7 million. Prior period investments include \$522,510 in two MDI certificate of deposits, with an original purchase amount of \$270,379 in 2015, with the bank renewing it three times each during the evaluation period. Additionally, 27 grants totaling \$25,000 were made for a total investment in the AA of approximately \$7 million. WNB's total investments represented 167 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included an equity equivalent investment into Small Business Community Capital (SBCC) of which \$125,000 was allocated to the AA. This investment was targeted at small businesses with operations in LMI geographies in the AA. The fund is unique as it was licensed by the SBA as an impact fund and is one of the few Hispanic led and Latina managed SBIC funds in the history of the SBA. The SBCC focuses primarily on women and Latino small businesses either based in or primarily serving LMI geographies and individuals.

WNB made an additional noteworthy investment of \$407,370 in CDs with a national minority-owned community bank with a branch in the AA. The bank made a \$5 million investment in a Fannie Mae Delegated Underwriting and Servicing Bank for a 156-unit multifamily complex with 60 percent of the units reserved for LMI tenants. The bank also provided a \$1 million CD equity investment to LiftFund with \$10,000 allocated to the AA.

Lastly, WNB's grants included \$5,000 to the Greater Austin Hispanic Chamber of Commerce, \$3,000 allocated to the national Council of La Raza, \$2,500 to the Bastrop County Food Pantry, and \$2,000 to the Texas Association of African American Chambers of Commerce. These local nonprofits support economic development, LMI services, and affordable housing throughout the AA.

Texas Statewide

We also considered investments in the broader Texas statewide area. WNB holds two prior period affordable housing investments totaling \$130,202 and 21 grants totaling \$29,964 in Texas that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Amarillo, Beaumont–Port Arthur, Brownsville-Harlingen, Dallas-Plano-Irving, Fort Worth-Arlington, Longview, San Antonio-New Braunfels, Sherman-Denison, Texarkana, Tyler, and the TX-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

WNB's performance in San Antonio is particularly noteworthy with the bank's establishment of the innovative Woodforest Foundry in 2017. The Woodforest Foundry is a collaborate space where entrepreneurs can collaborate, create, test and launch their ideas. The bank worked with Sustainable Startups, the San Antonio Hispanic Chamber of Commerce, and the Maestro Entrepreneur Center (MEC) in San Antonio, TX to develop Woodforest Foundry programs. MEC offers mentorship, mindset development, business education, and incubation space. MEC brings together successful local small businesses to mentor and grow small business entrepreneurs. It is a collaborative partnership with the Maestro Leadership Foundation and the San Antonio Hispanic Chamber of Commerce's Hispanic Leadership Development Foundation.

WNB provided a \$130,050 grant for operational support for the MEC. The grant will allow MEC to open a facility in one of San Antonio's most improvised zip codes and to implement programs and provide resources. It will also allow MEC to host the inaugural Woodforest Foundry, with the intent to expand the foundry across the bank's entire footprint.

SERVICE TEST

The bank's performance under the Service Test in Texas is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on full scope reviews, the bank's retail banking service in the Houston and Austin AAs is excellent. WNB is also a leader in CD services.

Retail Banking Services

The bank's retail service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations in the AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Houston	91.36	103	50.24	6.80	21.36	31.06	40.78	11.61	25.89	27.92	34.22
Austin	0.93	11	5.36	9.09	18.18	63.64	9.09	10.27	20.92	37.85	29.85
Amarillo	0.12	2	0.98	0.00	50.00	0.00	50.00	2.18	29.40	36.73	31.69
Beaumont-Port Arthur	0.18	2	0.98	0.00	0.00	100.00	0.00	7.50	27.12	37.39	23.63
Brownsville-Harlingen	0.09	3	1.46	0.00	33.33	0.00	66.67	0.00	34.48	30.86	34.66
Dallas-Plano-Irving	2.23	26	12.68	3.85	11.54	53.85	30.76	12.48	26.84	24.81	35.67
Fort Worth-Arlington	1.25	13	6.34	7.69	30.77	0.00	61.54	10.06	23.08	36.17	30.68
Longview	0.15	2	0.98	0.00	0.00	50.00	50.00	2.31	12.12	66.15	19.41
San Antonio-New Braunfels	1.16	20	9.76	0.00	25.00	55.00	20.00	6.85	31.05	29.38	32.71
Sherman-Denison	0.15	2	0.98	0.00	0.00	100.00	0.00	0.00	24.39	48.30	27.31
Texarkana	0.05	1	0.48	0.00	0.00	100.00	0.00	0.00	17.94	59.73	22.33
Tyler	0.11	2	0.98	0.00	50.00	50.00	0.00	2.37	25.73	39.92	31.98
TX-Non-MSA	2.22	18	8.78	0.00	16.67	61.11	22.22	0.00	16.42	57.15	26.43

Note: 6.06% of area populations were in undesignated CTs.

WNB has seven branches (6.8 percent) in low-income CTs in the Houston AA and twenty-two branches (21.36 percent) in moderate-income CTs. This branch distribution is near to the population distributions in these areas. Austin AA branch distribution was similar to the Houston AA with one branch in low-income CTs and two branches in moderate-income CTs. As part of the performance context; however, it is important to note that WNB does not influence Walmart retail locations

The opening and closing of branches have not adversely affected the accessibility of the bank's delivery systems, particularly in LMI geographies and/or to LMI individuals. Branch openings and closings in Texas are summarized in the table below.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Houston	103	8	(9)	-	-	(2)	1
Austin	11	1	(1)	-	-	-	-
Amarillo	2	-	-	-	-	-	-
Beaumont-Port Arthur	2	-	-	-	-	-	-
Brownsville-Harlingen	3	2	-	-	1	-	1
Dallas-Plano-Irving	26	3	(2)	-	-	-	1
Fort Worth-Arlington	13	1	(2)	-	(1)	-	-
Longview	2	-	-	-	-	-	-
San Antonio-New Braunfels	20	1	-	-	-	-	1
Sherman-Denison	2	-	-	-	-	-	-
Texarkana	1	-	-	-	-	-	-
Tyler	2	1	-	-	-	1	-
TX-Non MSA	18	0	(1)	-	-	-	(1)
Total	205	17	15	0	0	(1)	3

The bank's delivery systems are readily accessible to geographies and individuals of different income levels through extended operating hours and ATM access in secure store lobbies. Services and business hours are tailored to the convenience and needs of the bank's AAs and customers. WNB locations that are located inside Walmart retail stores offer lobby hours of 10:00 AM – 6:00 PM Monday through Friday, with Saturday hours 10:00 AM – 5:00 PM, and Sunday hours from 12:00 PM – 4:00 PM. The bank provides 24-hour access, seven days per week through ATMs in 121 of 171 in-store branch locations. The remaining in-store branches offer ATM access 17-18 hours per day seven days per week. The 34 traditional standalone WNB branches offer ATM access 24-hour access seven days per week as well as drive-through services.

To increase access to banking services WNB developed a new innovative ADS money transfer service called Cash in at Checkout. This ADS service provides customers with the convenience of initiating cash-in credit transfers to their WNB checking accounts using debit cards at cashier terminals located in any Walmart retail location in 49 states. The Cash in at Checkout service is not available in Vermont, but the bank does not have a presence in this state. The program began in November of 2017 and as of October 2018, WNB customers had performed over 277,000 Cash in at Checkout transactions. There is no charge to the customer for this convenience.

WNB offers the following retail services in all branch locations: consumer and small business loan applications, debit card services, federal tax payments, merchant services applications, new deposit account opening, teller transactions, mobile and online banking, and access to the bank's new, innovative Cash in at Checkout program. Additional services offered at select branches include: coin machine, commercial night deposit, deposit taking ATM, night deposit, notary services, postal services (the sale of stamps), temporary checks, western union bill pay, and western union money transfers.

WNB offers traditional low-cost deposit and savings account products for consumers and small businesses as well as flexible loan products suitable for LMI individuals and small businesses. The bank has flexible underwriting standards on small loan products like the unsecured Consumer and Business ReLi products, with loan amounts ranging from \$500 - \$2,500.

These loan products are available in all AAs and provide an alternative financing option to pay day type loan products. To increase financing opportunities for small businesses, WNB partnered with CDFIs for reconsideration of all denied Business ReLi loan requests. Beginning in 2017, WNB submits applications for further consideration through the AEO's MWTC second look referral program.

Houston AA

WNB's branch distributions in low-income areas of the Houston AA was slightly below estimated population distributions in these areas; however, the bank's branch distributions in moderate-income areas more closely aligned with population distributions. As reflected in the table above, the institution's opening and closing of branches in the Houston AA has not adversely affected the accessibility of its delivery systems, in LMI geographies or to LMI individuals.

WNB also demonstrated in the Houston AA that mobile and online banking ADS were reasonably accessible to geographies and individuals of different income levels. The bank provided information demonstrating that 46 percent of its customers living in low-income tracts and 44 percent living in moderate-income tracts are using mobile banking in the Houston AA. Further demonstrating the effectiveness of ADS, the bank provided additional information indicating that 35 percent of customers living in LMI areas of Houston use online banking. The percentage of customers using the bank's ADS in the Houston AA was consistent with annual American Banker Association (ABA) studies evaluating use of mobile and online banking platforms. In the Houston AA, the bank also had a reasonable number of customers using the new, free Cash in at Checkout money transfer product. WNB provided information demonstrating that 12 percent of low-income customers and 28 percent of moderate-income customers using this service reside in LMI CTs. The percentages of customers using ADS in the Houston area significantly exceeded population distributions in LMI areas of the AA.

Austin AA

WNB's branch distributions in LMI areas of the Austin AA closely approximated population distributions. Branch openings and closings in this AA as reflected in the table above did not impact WNB's delivery of services in LMI geographies or to LMI individuals. WNB provided information demonstrating that mobile and online banking ADS were reasonably accessible to geographies and individuals of different income levels. The bank provided data demonstrating that 46 percent of their customers living in low-income tracts and 45 percent living in moderate-income tracts are using mobile banking services in the Austin AA. Further demonstrating the effectiveness of ADS, the bank provided additional information indicating that 36 percent of its customers living in LMI areas of Austin use online banking. The percentage of customers using the bank's ADS in the Austin area were consistent with annual ABA studies which evaluate use of mobile and online banking platforms.

In the Austin AA, the bank had also had a reasonable number of customers using the new, free Cash in at Checkout money transfer product. WNB provided information demonstrating that 11 percent of low-income customers and 28 percent of moderate-income customers using this service reside in LMI CTs. The percentages of customers using ADS in the Austin area significantly exceeded population distributions in LMI areas of the AA.

Community Development Services

WNB is a leader in providing CD services in Texas. CD services had a significantly positive impact on the overall Services Test rating.

WNB identified financial literacy and small business development as needs within Texas. WNB has responded in a significant way by providing more than 13,300 hours of financial and small business education to over 60,000 participants in Texas. WNB uses a library of five core financial education programs that include 1) Build Wealth, 2) New Beginnings, 3) Junior Achievement, 4) Money Smart – business and 5) Money Smart – personal. The courses have modules, which the bank uses to tailor the program to specific audiences. WNB provides courses to customers, groups, and organizations free of charge. Branch managers and other employees are accredited to teach the programs.

The Build Wealth program provides introductory guidance to individuals and families seeking help to develop plans for building personal wealth. The program includes modules for learning the language, budgeting, saving and investing, building credit and controlling debt, and protecting wealth. The Federal Reserve Bank of Dallas developed the program.

WNB developed a customized New Beginnings financial literacy program for affiliates of Family Promise, a national organization that helps low-income individuals and families experiencing homelessness. The Family Promise program is a network of faith communities and over 1,000 volunteers providing temporary housing and meals for families. While families are in the program they receive education and individual assistance designed to assist with overcoming the causes that led to homelessness. The bank's industry recognizes the New Beginnings program provides a comprehensive approach to achieving financial sustainability from basic banking concepts to budgeting and managing credit. During the evaluation period, WNB employees provided approximately 146 hours of New Beginnings programs through the Family Promise network in Texas.

WNB's Junior Achievement curriculums are tailored for high school, middle school, and elementary school students focusing on entrepreneurship, small businesses, career planning, personal finance, investing, global marketplace, and basic economics and banking services. WNB performs Junior Achievement training primarily in schools where the majority of students receive free or reduced lunches. WNB's involvement for their participation in Junior Achievement training has resulted in over 7,500 hours of training in Texas AAs during the evaluation period.

The Money Smart personal program was developed by the FDIC and is a comprehensive financial education curriculum designed to help LMI individuals enhance their financial skills. WNB uses several modules in the Money Smart curriculum which covers topics like deposit products, debit cards, overdrafts fees, borrowing basics, credit cards, financial recovery, insurance, avoiding predatory lending, budgeting, savings, building credit, home ownership, and other related banking services. WNB provided approximately 2,000 hours of the Money Smart personal program financial education in Texas AAs.

WNB's Money Smart business program is designed for small business owners and introduces topics related to starting and managing a business. The FDIC and the SBA developed the program jointly. The curriculum includes thirteen modules, covering topics such as; banking services; credit reporting, financial management, insurance, managing cash flow, organizational structure, business plans, recordkeeping, risk management, selling and succession planning, tax planning, and time management. WNB provided over 3,400 hours of this training program in Texas AAs during the evaluation period.

WNB also offers a free online financial education curriculum on its website called Banking GPS, which allows consumers to complete three online modules to earn a certificate of completion. The GPS course covers banking basics, checking account tips and debit card information to assist consumers in managing personal finances. Bank customers can provide evidence of course completion for a one-time convenience refund of an overdraft charge on their WNB account(s). During the evaluation period, there were 207,525 Banking GPS participants, of which 186,696 were issued a courtesy overdraft refund. Total customer overdraft fees refunded for participation in the Banking GPS course approximated \$7.3 million.

In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 234 employees in Texas serving on 160 boards or committees in 291 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs. The organizations in which WNB is involved provide various CD related services to LMI families and individuals and promote affordable housing and economic development.

WNB's CD services in Texas demonstrate an excellent responsiveness to identified financial literacy and small business needs. Further, WNB's development of the Woodforest Foundry is an innovative small business initiative. The Woodforest Foundry initiatives are primarily in the limited scope San Antonio AA, but they have also introduced the program in Austin and Houston AAs. Additional information on the Woodforest Foundry is further described in the Limited Scope section below.

Houston AA

WNB is a leader in providing CD services in the Houston AA. Bank employees provided approximately 8,650 hours of financial education to over 44,000 consumers and small business owners in this AA. Most the bank's training courses in this AA focused on the Junior Achievement and Money Smart programs. WNB devoted approximately 71 percent of their educational hours to Junior Achievement courses in community organizations and at least 90 areas schools where the majority of students qualified for free or reduced lunch programs. WNB provides a group of 15-20 employee volunteers each month to facilitate the Junior Achievement BizTown training in these schools. WNB provided approximately 20 percent of their financial education hours to small businesses using the Money Smart – business curriculum, and six percent on the Money Smart – personal curriculum. WNB provided the customized New Beginnings curriculum in 29 different venues, including the 46 sessions with Family Promise of Montgomery County.

In addition to financial education, 122 WNB employees served on 65 boards or committees in 139-member positions. The majority of organizations (94 percent) served by WNB provide essential services to LMI populations. Bank employees also served in 18 organizations supporting affordable housing initiatives and six organizations that promote AA economic development. WNB provided leadership and financial expertise on board or committees of nationally known organizations such as Family Promise, Habitat for Humanity, LiftFund, and Junior Achievement. WNB employees also served on boards or committees of local food banks and a Houston academy where the majority of students qualify for free or reduced lunch programs. Examples of WNB's leadership in providing CD services are summarized below:

- WNB serves annually on the Leadership Team and Advisory Board for the annual Houston Money Week (HMW) event. HMW is a free community-wide initiative serving individuals, families, veterans, and small business owners across the Houston area. The majority of participants are LMI individuals. The HMW event raises awareness of community resources and provides financial education. WNB staff volunteered at five Houston middle schools and hosted over 40 events in 2017. WNB was recognized locally for its participation in three HMW events. HMW survey results in 2017 indicated that there were over 14,000 attendees at the various HMW events.
- WNB and PeopleFund co-sponsored two events in 2017, Space City Biz Boost and PeopleSpring Houston, which focused on educating small businesses and entrepreneurs. The events were hosted in a community center, located in a low-income area of Houston. The Space City Biz Boost event included speakers from WNB and PeopleFund, as well as guest speakers from the SBA and NextSeed, a financial technology company that connects small business entrepreneurs with investors.
- In response to identified small business needs for capital and financing, WNB partnered with PeopleFund, Texas Black Business Council of Montgomery County, and Tri-County Regional Black Chamber of Commerce in 2017 to provide four educational events for small businesses and entrepreneurs. WNB and these organizations provided small business owners with information on access to capital, financing opportunities, and resources and tools to develop and grow successful businesses.
- In 2018, WNB conducted its first Foundry Entrepreneurship 4 All events in four AA branches located in Magnolia, Barker, Friendswood, and Willis with approximately 125 aspiring or existing entrepreneurs. Entrepreneurship 4 All is the introductory event or program for the Woodforest Foundry entrepreneurial education program, which is further described in the Limited Scope section below.

- During the aftermath of Hurricane Harvey in August of 2017, the Houston area was affected by widespread flooding. WNB engaged on multiple fronts to help combat loss and support victims. WNB opened all branches in the affected Houston areas within 72 hours after the disaster. WNB staff also collaborated with local partners such as NeighborWorks America, which provided training to 14 branch managers in five Houston AA counties impacted by flooding and the hurricane. This training enabled bank employees to assist hurricane victims in completing Federal Emergency Management Agency (FEMA) applications quickly. This type of assistance demonstrated responsiveness to needs of hurricane victims. Data from the National Hurricane Center estimated approximately \$125 billion in property damage, primarily from widespread flooding in the Houston AA.

Austin AA

WNB provides an excellent level of CD services in the Austin AA. Bank employees provided 408 hours of financial education to over 900 consumers and small businesses in this AA. The majority (89 percent) of financial educational courses in this AA focused on the Money Smart – personal and Money Smart – business programs. WNB employees provided the Money Smart training curriculums at Walmart branch locations, including five branches in LMI areas, the PeopleFund's small business center, Texas Workforce Solutions, and community organizations that provide shelter and services for LMI individuals and families. In 2018, WNB also performed its inaugural Foundry Entrepreneurship 4 All event in two Austin AA branches with 31 participants.

In addition to financial education, WNB had 15 employees serving on 13 boards or committees in 28-member positions in the Austin AA. The majority of board or committee positions (68 percent) involved support for organizations providing essential services for LMI persons. The bank partnered with several local organizations, including a local food pantry, organizations serving the homeless, and the local Alliance for Economic Inclusion. Bank employees also served in several positions supporting economic development and small business development. WNB employees provided leadership and financial expertise on boards and committees of two CDFIs in the Austin AA. The CDFIs focus on small business lending, as well as developing, and training entrepreneurs. Examples of WNB's involvement in the Austin AA are further summarized below.

- Two WNB employees in Austin served as board members for PeopleFund, a non-profit CDFI, which provides small business loans to underserved small businesses, minorities, women, and veterans in Texas. PeopleFund also provides essential business assistance services through workshops and mentorships and partner organizations.
- An Austin WNB manager serves on the board as Treasurer for the Business & Community Lenders of Texas (BCL). BCL is another non-profit CDFI and economic development organization providing lending, home ownership programs, community development and other programs supporting entrepreneurs. BCL supports businesses that create jobs and build local economies across Texas. BCL also works with Neighborhood LIFT's down payment assistance program in support of affordable housing.

- One Austin WNB employee served on the loan committee of a local non-profit organization, BIG Austin, which provides entrepreneurial education, business counseling, and flexible and micro lending. The organization is a city-funded, micro lender focused on business investment growth.
- WNB supported Hurricane Harvey disaster relief efforts in the Austin AA. WNB branches in the Austin area accepted donations for nonperishable food items and other basic needs items for Houston and other South Texas evacuees. WNB donated these items to the local food bank and the Austin Disaster Relief Network, which distributed donations to hurricane victims. WNB employees also collaborated with the local Salvation Army to provide relief and basic supplies. In January 2018, the Salvation Army organization had served almost one million meals, provided 13,000 clean up kits and 21,000 food boxes to evacuees across Texas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Service Test in the Amarillo, Brownsville-Harlingen, Dallas-Plano-Irving, Fort Worth-Arlington, San Antonio-New Braunfels, Tyler, and TX-Non MSA AAs is consistent with the bank's overall excellent performance in the full-scope AAs. WNB's CD service performance in the San Antonio AA is particularly noteworthy with the bank's establishment of the innovative Woodforest Foundry in 2017.

- The Woodforest Foundry is a WNB small business initiative focused on developing and mentoring entrepreneurs to take action. WNB has worked with the Sustainable Start-Ups organization, the San Antonio Hispanic Chamber of Commerce, and MEC in San Antonio to develop Woodforest Foundry programs. The MEC hosts foundry initiatives in San Antonio where entrepreneurs can collaborate, create, test, and launch their ideas. This program also provides new and existing entrepreneurs trusted guidance from WNB, peers, and community partners. The MEC is located in a low-income area, which is also a federally designated HUB zone in San Antonio.
- WNB introduced the Woodforest Foundry initiatives in communities and bank branches with a customized Entrepreneurship 4 All curriculum. WNB initially introduced the Entrepreneurship 4 All program in full scope AA branches and in San Antonio, with 56 participants. After the introductory Entrepreneurship 4 All events, interested entrepreneurs may continue development through the Woodforest Foundry's 10-12-week cohort training program, which involves mentoring and guidance for small businesses and entrepreneurs. Since establishment of the program, over 40 participants have graduated from the cohort program. Woodforest Foundry cohort participants have shown revenue growth from 10-75 percent. Collectively WNB, the Woodforest Foundry and MEC have reached over 2,200 entrepreneurs and other interested participants through educational workshops. WNB has provided additional support for foundry initiatives and the MEC through CD loans and investments, which are described in other sections of this Performance Evaluation. The positive impact of the Woodforest Foundry and MEC is evident in the creation of approximately 125 new jobs in the San Antonio HUB zone. The foundry's Entrepreneurship 4 All curriculum in Texas established the program foundation for utilization in other states where WNB branches are located.

The bank's performance under the Service Test in four AAs, Beaumont-Port Arthur, Longview, Sherman-Denison, and Texarkana, is weaker than the overall full scope performance. Performance in these AAs was weaker due to the lack of branches in LMI CTs in these AAs. However, WNB has a limited number of branches and deposits in these AA. As demonstrated in the full scope AAs, the bank's mobile and online banking services, and the new Cash in at Checkout money transfer service, help to provide reasonable accessibility across the bank's footprint. WNB's CD services in three of its AAs also was also relatively high, providing a positive impact on the bank's overall performance, except in the Texarkana AA, where the bank's level of CD services was only adequate. The bank's performance in these four AAs had no impact on the overall Service Test rating.

Multi-State Rating

Charlotte-Concord-Gastonia NC-SC (Charlotte AA)

CRA rating for the Charlotte AA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive impact on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Charlotte AA

WNB operates 18 branches in the Charlotte AA, which is a nine-county, Charlotte-centered metropolitan area located on the south-central border of North Carolina and the north-central border of South Carolina. The MSA is the largest metropolitan area between these two states with a population of 2.3 million (Source: 2010 U.S. Census and 2017 Dunn & Bradstreet). WNB possesses a very limited deposit market share at 0.02 percent and ranks 42 out of 50 financial institutions doing business in the AA (Source: CRA Wiz 2018 Peer Branch & Deposit Data). WNB opened its 18 branches in the AA between April 2005 and July 2013. In 2018, the top two financial institutions in the market were Bank of America, N.A. and Wells Fargo Bank, N.A., who collectively make up almost 88 percent of deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

As of December 31, 2018, the MSA unemployment rate was 3.5 percent, which was comparable to that of North Carolina (3.8 percent), South Carolina (3.2 percent) and the U.S. (3.9 percent; Source: U.S. Bureau of Labor Statistics). The region has many retirees and has a university network, technology infrastructure, and vast financial services industry. Affordable housing is a need in the AA. Additionally, in a local economy where small businesses employ most workers, access to affordable capital for early stage small businesses is also a critical challenge.

Community Contacts

To help identify needs and opportunities in the Charlotte AA, the OCC's Community Affairs Officer interviewed a housing organization that provides homeownership counseling, financial literacy, and home rehabilitation programs in the bank's AA. The contact indicated that there is a need for affordable housing financing, job training, and financial education, including basic banking, budgeting, savings, and investing to help the unbanked. The contact also stated that banks have been responsive to meeting community credit needs.

To further our understanding of the community's credit needs, we also utilized a regulatory agency contact knowledgeable about the areas served by the bank. The community contact indicated that the primary need is affordable housing. The contact believed that banks are supportive of the organization's mission to provide affordable housing.

Charlotte AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlotte-Concord-Gastonia NC-SC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	528	8.5	28.0	32.2	30.3	0.9
Population by Geography	2,306,236	7.1	26.7	33.5	32.4	0.3
Housing Units by Geography	947,350	7.3	27.3	33.7	31.6	0.1
Owner-Occupied Units by Geography	564,260	3.2	22.3	37.3	37.1	0.0
Occupied Rental Units by Geography	294,874	14.2	35.0	27.2	23.5	0.1
Vacant Units by Geography	88,216	11.0	33.6	31.7	23.6	0.2
Businesses by Geography	159,871	7.1	21.9	28.2	42.0	0.7
Farms by Geography	4,179	3.8	20.5	45.9	29.7	0.2
Family Distribution by Income Level	580,876	22.5	17.1	18.8	41.6	0.0
Household Distribution by Income Level	859,134	23.6	16.2	17.5	42.7	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,993	Median Housing Value			\$185,397
			Median Gross Rent			\$886
			Families Below Poverty Level			11.2%
Source: 2015 ACS Census and 2017 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 Charlotte multi-state AA (Charlotte AA)

The Charlotte AA received a full-scope review. The rating for Charlotte AA was based on the full-scope AA. As a multi-state AA, the Charlotte AA accounts for 100 percent of branches and deposits. This AA accounts for 2.41 percent of branches and 0.92 percent of deposits institution wide. Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLOTTE

LENDING TEST

The bank's performance under the Lending Test in Charlotte AA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charlotte AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Charlotte	85	470	18	573	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Charlotte	620	809	10,143	11,572	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 82.02 percent of total lending activity. By number, the bank's small business lending market share of 0.11 percent is greater than the bank's deposit market share of 0.02 percent.

According to 2017 peer data by number, WNB ranked 41st of 164 small business lenders in the Charlotte AA. The five largest business lenders held 55 percent of the market and are mostly national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the Charlotte section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in those geographies.

Consumer Loans

Refer to Table U in the Charlotte section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the Charlotte section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Charlotte AA. During the evaluation, WNB originated 18 CD loans totaling \$10.1 million. This volume of CD lending was equivalent to 213 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of LMI community services and revitalization and stabilization of moderate-income geographies. Of the 18 CD loans totaling \$10.1 million, eight loans or \$9.2 million were associated with the identified needs of the AA. Other loans benefitted affordable housing and economic development. Some notable examples of CD loans are as follows:

- The bank originated a \$4 million loan to construct a new Junior Achievement facility in a low-income CT. The CT is a part of the North End Smart District revitalization program and will be used to provide CD services to nine WNB's AAs. Junior Achievement provides students from grades four through six, solid foundations of business, economics and free enterprise education. Approximately 55 percent of participating students are on the free or reduced lunch program and/or attend schools located in LMI CTs.
- The bank made a \$4.4 million loan in a low-income CT to construct a gas station, an attached convenience store, and an express car wash. The property is part of a city plan to revitalize and stabilize the area for economic development, and is located in the Hidden Valley neighborhood, of Charlotte, NC. The loan is financed through the HUBZone program, which helps to provide federal contracting assistance for qualified Small Business Corporations, located in underutilized business zones. This program tries to increase employment opportunities, investments, and economic developments in such areas.
- WNB made a \$675,446 loan to a dental care provider. The practice services low-income children who are primarily covered by Medicaid and other governmental/non-governmental insurances. In addition, 83 percent and 86 percent, respectively, were reimbursed under arrangements with Medicaid programs.

Product Innovation and Flexibility

The bank does not make mortgage loans (See Quicken Mortgages), but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Charlotte AA.

Refer to the lending tables in the Charlotte AA section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Charlotte is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the institution's performance in the Charlotte AA is excellent.

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Charlotte	16	1,166	3	950	22	55	41	100	2,170	100

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the evaluation date.

During the evaluation period, WNB made 19 investments totaling approximately \$2.2 million, including 16 prior period investments totaling approximately \$1.2 million and three current period investments totaling \$950,000. Additionally, 22 grants totaling \$55,000 were also made for a total investment in the AA of approximately \$2.2 million. WNB's total investments represented 46 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond for \$500,000 for the construction of a new school building in a county where more than half of all students were eligible for free or reduced lunches. Additionally, WNB provided a grant for \$2,500 to an organization that focuses on affordable housing in the AA, which is directly responsive to the stated needs of the AA.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Charlotte AA.

SERVICE TEST

The bank's performance under the Service Test in the Charlotte AA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charlotte AA is excellent. WNB also provides an excellent level of CD services in this AA, which had a positive impact on the overall Service Test rating.

Retail Banking Services

The bank's retail service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Assessment Area	Distribution of Branch Delivery System										
	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charlotte	100.00	18	100.00	0.00	38.89	33.33	27.78	7.11	26.67	33.51	32.39

Note: 0.32% of area populations were located in undesignated CTs.

WNB does not have any branches in low-income CTs in this AA, but seven (39 percent) of the bank's branches are in moderate-income CTs. This branch distribution in moderate-income areas significantly exceeds population distributions in these areas. As part of the performance context; however, it is important to note that WNB does not influence Walmart retail locations.

WNB provided additional information, which demonstrated that ADS were also accessible to geographies and individuals of different income levels, including customers in LMI areas. WNB makes good use of ADS through mobile and online banking. The bank provided information, indicating that 44 percent of customers living in both LMI areas use mobile banking delivery systems. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 36 percent of its customers in both LMI areas use online banking services. The percentage of WNB mobile banking customers in the Charlotte AA exceeded comparable mobile benchmarks in the 2017 ABA study. The percentage of bank customers using online banking was just slightly below the 40 percent ABA study benchmark.

In the Charlotte AA, a reasonable number of customers were also using the bank's free, innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 12 percent of low-income customers and 36 percent of moderate-income customers using this product reside in LMI areas. These percentages exceed LMI population distributions in the AA.

The institution's opening and closing of branches in this full scope AA has not adversely affected the accessibility of its delivery systems. As reflected in the table below, the bank did not open or close branches during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Charlotte	18	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provided an excellent level of CD services in the Charlotte AA. CD services had a significantly positive impact on the overall Services Test rating.

In the Charlotte AA, WNB provided 961 hours of financial education to over 6,700 participants. The bank utilized the five core modules for financial education in this AA, which included: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is also available to consumers in this AA. The majority (42 percent) of the bank's training activities in this AA focused on Junior Achievement curriculums. Bank employees also provided a significant number of hours training the Money Smart programs with 189 hours for the personal course and 320 hours for the business course.

WNB employees in this AA provided leadership and financial expertise serving on boards or committees of 17 organizations which provide essential community services, affordable housing, and support economic development. WNB has 18 employees serving in 26 positions with national organizations such as Habitat for Humanity, Goodwill, Family Promise, and Junior Achievement. Employees also served in local organizations that provide services such as transitional housing, down payment assistance, urgent care, financial literacy training, and food pantries. Examples of the bank's involvement are summarized below.

- WNB's participation and service with Junior Achievement, is particularly noteworthy in this AA. Eight bank managers served as board members, advisory board members, or event chairpersons, with four Junior Achievement organizations in this AA. One employee served as the Chairman of the Board for Junior Achievement of Central Carolinas, and another employee served as the Vice Chairman of the Board for Junior Achievement of Cabarrus County. Numerous WNB employees also provided Junior Achievement training curriculums in at least 31 Charlotte AA schools where the majority of students qualified for free or reduced lunch programs. Employees provided Junior Achievement training on at least 156 different occasions.

- One WNB manager provided financial expertise as the Treasurer on the board of a local non-profit organization, Family Promise of Gaston County. An additional five employees also supported this organization through 16 training sessions of the New Beginnings curriculum. Family Promise of Gaston County provides shelter, meals, and support services for the homeless.
- WNB partnered with End the Digital Divide throughout the evaluation period. As part of this relationship, bank employees provided digital literacy and installation support to 82 residents in the AA at a local library. Over 85 percent of the residents also qualified for low cost internet service (\$10/month) through AT&T.

Multi-State Rating

Chicago IL-MD multi-state (Chicago AA)

CRA rating for the Chicago AA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Chicago AA

The Chicago AA consists of four Metropolitan Division's (MD) including Chicago-Naperville Arlington MD, Elgin MD and Lake County MD in Illinois as well as the Gary MD in Indiana. WNB has 16 branches overall in this AA with 13 branches in Illinois including Cook, Kendall, Lake, McHenry, Kane and Will counties; and three branches in Indiana including Lake, Porter Newton and Jasper.

WNB had \$25 million in deposits in the Chicago AA amounting to only 0.5 percent of WNB total deposits. WNB possessed 0.01 percent of total market share with a ranking of 226th out of 328 financial institutions as of June 30, 2018. The three largest financial institutions by deposit market share are JPMorgan Chase Bank, N.A., BMO Harris Bank, N.A., and Bank of America, N.A., which collectively accounted for 43 percent of deposit market share. (Source: 2018 FDIC Summary of Deposits)

Community Contacts

To help identify needs and opportunities in the Chicago AA, the OCC utilized two regulatory agency contacts with a nonprofit public housing agency, a nonprofit real estate developer, and lender to small businesses within the City of Chicago.

The community contacts indicated that access to affordable housing is a primary need, along with numerous opportunities for banks to support financing new affordable housing projects, small businesses, and 1-4 family rehab projects.

To further our understanding of the community's credit needs, the OCC's Community Affairs Officer reviewed the 2015 – 2019 Housing and Community Development Consolidated Plan that Lake County filed with the U.S. Department of Housing and Urban Development. The Consolidated Plan identified developing and preserving affordable housing, revitalizing older and low-income neighborhoods throughout the county, and job creation and retention as the county's three top priority initiatives.

Chicago AA

Chicago, IL

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago multi-state IL MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,175	14.2	23.4	29.7	31.8	0.8
Population by Geography	9,366,270	9.8	23.0	32.4	34.5	0.3
Housing Units by Geography	3,732,366	10.3	22.0	32.4	35.0	0.3
Owner-Occupied Units by Geography	2,188,063	4.4	17.2	35.9	42.4	0.1
Occupied Rental Units by Geography	1,198,106	17.5	29.1	27.8	25.0	0.6
Vacant Units by Geography	346,197	22.5	27.6	25.9	23.6	0.4
Businesses by Geography	528,941	4.9	15.2	31.3	48.1	0.5
Farms by Geography	10,021	2.8	13.5	43.7	40.0	0.0
Family Distribution by Income Level	2,232,458	23.2	16.3	18.8	41.7	0.0
Household Distribution by Income Level	3,386,169	25.2	15.3	17.1	42.5	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$75,350	Median Housing Value			\$237,628
Median Family Income MSA - 20994 Elgin, IL MD		\$79,687	Median Gross Rent			\$1,037
Median Family Income MSA - 23844 Gary, IN MD		\$64,075	Families Below Poverty Level			10.6%
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI MD		\$87,137				

Source: 2015 ACS Census and 2017 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 Chicago

The Chicago AA received a full-scope review. The rating for Chicago AA was based on the full-scope AA. As a multi-state AA, the Chicago AA accounts for 100 percent of branches and deposits. This AA accounts for 2.14 percent of branches and 0.48 percent of deposits institution wide. Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO

LENDING TEST

The bank's performance under the Lending Test in Chicago is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Chicago	113	822	28	963	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Chicago	4,913	1,487	4,722	11,122	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. By number, the bank's small business lending market share of 0.02 percent is in line with the bank's deposit market share of 0.01 percent, as consumer loans accounted for 85.36 percent of total lending activity.

According to 2017 peer data by number, WNB ranked 92nd of 200 small business lenders in the Chicago AA. The five largest business lenders held 60 percent of the market and are all national megabanks that are issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the Chicago section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in those geographies.

Consumer Loans

Refer to Table U in the Chicago section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was significantly stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the Chicago section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Chicago AA. During the evaluation, WNB originated 28 CD loans and loan allocations totaling \$4.7 million. This volume of CD lending was equivalent to 189 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of affordable housing and revitalization and stabilization of LMI geographies. Of the \$4.7 million, approximately, \$4.2 million were associated with the identified needs of the AA. Other loans benefitted economic development and LMI community services. Some notable examples of CD loans are as follows:

- WNB refinanced a \$1.8 million loan to a non-profit whose mission is to build affordable housing. In addition, 95 percent of the home building was dedicated to local affordable housing needs.
- The bank made a \$1.5 million loan to an organization for revitalization and stabilization of the AA. The mission of the organization primarily provides lending capital to real estate secured properties in LMI communities, and 95 percent of its loans serve low-income areas within the Chicago metropolitan area.
- The bank made a \$2 million revolving LOC (with a \$387,500 allocation to this AA) to a CDFI that is a mission-driven lender who helps communities thrive by creating opportunities for low-income communities.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Chicago AA.

Refer to the lending tables in the Chicago section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Chicago AA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago AA is excellent.

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Chicago	35	2,272	5	884	76	110	116	100	3,266	100
Chicago-BSRA						14			14	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made 40 investments totaling approximately \$3.2 million, including 35 prior period investments totaling approximately \$2.3 million and five current period investments totaling \$883,903. Additionally, 76 grants totaling \$110,000 were made for a total investment in the AA of approximately \$3.3 million. WNB's total investments represented 131 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond for \$250,000 backed by a mortgage on a multifamily apartment building where all units were targeted to LMI families. Additionally, WNB provided a grant for \$10,000 to an organization to assist in the revitalization of a building located in Chicago's uptown historic district. The building is intended to act as a catalyst for further development in the area.

Chicago IL-IN AA Statewide

We also considered investments in the broader Chicago IL-IN AA statewide area. WNB provided three grants totaling \$14,174 in the Chicago IL-IN AA that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Chicago AA.

SERVICE TEST

The bank's performance under the Service Test in the Chicago AA is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's retail banking service performance in the Chicago AA is good. WNB also provides a relatively high level of CD services, which had a positive impact on the overall Service Test rating.

Retail Banking Services

Retail service delivery systems are accessible to geographies and individuals of different income levels in the Chicago AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Assessment Area	Distribution of Branch Delivery System										
	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago	100.00	16	100.00	0.00	6.25	43.75	50.00	9.84	22.97	32.37	34.55

Note: 0.27% of area populations were located in undesignated CTs.

WNB did not have any branches in low-income CTs in this AA, but the bank does have one branch (6 percent) in a moderate-income CT. This distribution of branches is below AA population distributions. However, as previously noted, WNB does not influence Walmart retail locations.

WNB provided additional information, which demonstrated that ADS were accessible to geographies and individuals of different income levels, including customers in LMI areas. WNB makes good use of ADS through mobile and online banking. The bank provided information, indicating that 48 percent of customers living in low-income areas and 47 percent in moderate-income areas are using mobile banking delivery systems. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 39 percent of its customers in low-income areas and 36 percent in moderate-income areas of the Chicago AA use online banking services. The percentage of WNB customers using mobile banking in the Chicago AA exceeded comparable mobile benchmarks in the annual 2017 ABA study. The percentage of bank customers using online banking was consistent with the ABA study.

In the Chicago AA, a reasonable number of customers were also using the bank's free, innovative, Cash in at Checkout money transfer product. WNB provided information demonstrating that 16 percent of low-income customers and 33 percent of moderate-income customers using this product reside in LMI areas. These percentages exceed LMI population distributions in the AA.

The institution's opening and closing of branches in this full scope AA has not adversely affected the accessibility of its delivery systems. As reflected in the table below, the bank did not open or close branches during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Chicago	16	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provided a relatively high level of CD services in the Chicago AA with a positive impact on the overall Service Test rating.

In the Chicago AA, WNB provided 529 hours of financial education to over 3,500 participants. The bank utilized the five core modules for financial education, which included: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank’s free online financial education curriculum, Banking GPS, is also available to consumers in this AA. The majority of the bank’s training activities focused on the Money Smart programs with 231 hours for the personal course and 257 hours for the business courses.

WNB employees in this AA serve on boards or committees of at least 18 organizations, which provide community services and affordable housing for LMI individuals and families. WNB has 20 employees providing leadership and financial expertise in 26 board or committee positions with national organizations in this AA such as Habitat for Humanity, Salvation Army, Junior Achievement, Neighborhood Housing, as well as two local food banks. Examples of WNB CD services in this AA are summarized below:

- In 2018, WNB partnered with The Women’s Business Development Center (WBDC) to launch the Woodforest Foundry in Aurora, IL, a suburb of Chicago. During the initial start-up period, WNB employees have focused on training WBDC employees on the Woodforest Foundry curriculum, which focuses on developing entrepreneurs and small businesses.
- One bank employee serves as a committee member promoting financial literacy and affordable financial products for the LMI population through the “Bank On” initiative in Northern Indiana.

Multi-State Rating

Cincinnati OH-KY-IN multi-state (Cincinnati AA)

CRA rating for the Cincinnati AA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Cincinnati AA

WNB operates ten branches in the Cincinnati AA, consisting of seven counties throughout Ohio, Kentucky and Indiana. Eight in-store branches are in Ohio and one each in Indiana and Kentucky. WNB possesses a very limited deposit market share of 0.01 percent and ranks 73rd out of 94 financial institutions doing business in the AA (Source: CRA Wiz 2018 Peer Branch & Deposit Data). WNB opened its 10 branches in the AA between November 2006 and March 2009. In 2018, the top two financial institutions in the market were U.S. Bank, N.A. and Fifth Third Bank. These banks maintain a competitive advantage with over 74 percent deposit market share combined (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Cincinnati AA, the OCC utilized a community contact performed by the OCC's Community Affairs Officer that provides financing and technical assistance to community development projects primarily in the City of Cincinnati. The community contact indicated that primary needs include funding to finance real estate development, funding for nonprofit facility needs, and funding for micro-lending and small business development. The contact stated that large banks are limited in their ability to invest in local programs, making them less responsive to local community needs.

To further our understanding of the community's credit needs, we also utilized a regulatory agency contact knowledgeable about the areas served by the bank. The community contact indicated that the primary need is affordable housing. The contact believed that banks are adequately serving community credit needs.

Cincinnati AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati Multistate OH-KY-IN MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	419	13.6	23.2	36.5	24.8	1.9
Population by Geography	1,782,334	8.5	20.4	39.0	30.6	1.4
Housing Units by Geography	770,066	10.5	21.9	38.9	28.0	0.6
Owner-Occupied Units by Geography	453,932	4.0	16.6	43.5	35.8	0.1
Occupied Rental Units by Geography	236,380	18.9	30.6	32.2	17.0	1.3
Vacant Units by Geography	79,754	23.3	26.4	32.9	16.0	1.4
Businesses by Geography	104,997	7.0	19.5	35.6	36.8	1.1
Farms by Geography	3,150	2.7	17.1	51.5	28.4	0.2
Family Distribution by Income Level	447,491	22.3	16.5	19.7	41.5	0.0
Household Distribution by Income Level	690,312	25.6	15.4	16.9	42.1	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$70,589	Median Housing Value			\$157,978
			Median Gross Rent			\$760
			Families Below Poverty Level			10.4%
Source: 2015 ACS Census and 2017 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 Cincinnati

The Cincinnati AA received a full-scope review. The rating for Cincinnati AA was based on the full-scope AA. As a multi-state AA, the Cincinnati AA accounts for 100 percent of branches and deposits. This AA accounts for 1.34 percent of branches and 0.22 percent of deposits institution wide. Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI

LENDING TEST

The bank's performance under the Lending Test in Cincinnati AA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cincinnati AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Cincinnati	92	150	10	252	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Cincinnati	5,324	1,717	1,512	8,553	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 59.52 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.02 percent is in line with the bank's deposit market share of 0.01 percent.

According to 2017 peer data by number, WNB ranked 75th of 134 small business lenders in the Cincinnati AA. The five largest business lenders held 63 percent of the market and are all national megabanks that are issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the Cincinnati multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in those geographies.

Consumer Loans

Refer to Table U in the Cincinnati multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

Refer to Table R in the Cincinnati multistate of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the Cincinnati multistate section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Cincinnati AA. During the evaluation, WNB originated ten CD loans totaling \$1.5 million. This volume of CD lending was equivalent to 129 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of economic development and affordable housing. Of the ten CD loans, two loans totaling \$1.3 million or 87 percent were associated with the identified needs of the AA. Other loans benefitted revitalization and LMI services. Some notable examples of CD loans are as follows:

- WNB originated a \$1 million LOC to a CDFI that provides funding for real estate development in under-served markets in Cincinnati.
- The bank made a \$2 million revolving LOC (with a \$292,500 allocation to this AA) to a non-profit. The funds will enable the corporation to provide acquisition, predevelopment, or construction loans to offices expanding affordable housing opportunities for LMI communities.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Cincinnati AA.

Refer to the lending tables in the Cincinnati section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Cincinnati is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution's performance in the Cincinnati AA is excellent.

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Cincinnati	11	583	1	255	27	44	39	100	882	100

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made 12 investments totaling \$837,894, including 11 prior period investments totaling \$582,894 and one current period investment totaling \$255,000. Additionally, 27 grants totaling \$44,437 were made for a total investment in the AA of \$882,331. WNB's total investments represented 76 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond for \$255,000 for the construction of a 64-unit affordable housing apartment building located in a moderate-income CT where all units were allocated to LMI families. The apartment building also contained an on-site computer lab and business center, which allowed residents full access to the internet. Additionally, WNB provided a grant for \$5,000 to an organization that provided financial literacy and small business development in the AA, which is directly responsive to the stated needs of the AA.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Cincinnati AA.

SERVICE TEST

The bank's performance under the Service Test in Cincinnati is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Cincinnati AA is excellent. WNB also provides an excellent level of CD services, which had a positive impact on the overall Service Test rating.

Retail Banking Services

Retail service delivery systems are readily accessible to geographies and individuals of different income levels in the Cincinnati AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cincinnati	100.00	10	100.00	0.00	20.00	40.00	40.00	8.54	20.40	39.03	30.61

Note: 1.42% of area population were located in undesignated CTs.

WNB did not have any branches in low-income CTs in this AA, but the bank does have two branches (20 percent) in moderate-income CTs. This branch distribution in moderate-income areas is consistent with AA population distributions. As previously noted, WNB does not influence Walmart retail locations.

WNB provided additional information, which demonstrated that its ADS were accessible to geographies and individuals of different income levels, including customers in LMI areas. WNB makes excellent use of ADS through mobile and online banking.

The bank provided information, indicating that 42 percent of customers living in low-income areas and 45 percent in moderate-income areas actively use mobile banking delivery systems. Further demonstrating the effectiveness of ADS, the bank also provided additional information that shows 36 percent of its customers in low-income areas and 37 percent in moderate-income areas of the Cincinnati AA actively use online banking services. The percentage of WNB mobile banking customers in Cincinnati exceeded comparable mobile benchmarks in the aforementioned annual 2017 ABA study, while the percentage of online banking customers was just slightly below the ABA study benchmarks. Overall utilization of ADS by LMI customers was considered excellent.

In the Cincinnati AA, a reasonable number of customers were also using the bank's free, innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 18 percent of low-income customers and 30 percent of moderate-income customers using this product reside in LMI areas. These percentages exceed LMI population distributions in the AA.

The institution's opening and closing of branches in this full scope AA has not adversely affected the accessibility of its delivery systems. As reflected in the table below, the bank did not open or close branches during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Cincinnati	10	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provided an excellent level of CD services in the Cincinnati AA. CD services had a significantly positive impact on the overall Services Test rating.

In the multi-state AA, WNB provided 663 hours of financial education to over 3,100 participants. The bank utilized the five core modules for financial education in this AA, which included: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is also available to consumers in this AA.

The majority of the bank's training activities in this AA focused on the Money Smart and Junior Achievement curriculums with 296 hours of Money Smart – personal, 184 hours of the Money Smart - business, and 104 hours of Junior Achievement courses.

WNB employees in this AA provided leadership and financial expertise on boards or committees of 11 organizations in 12 positions. The majority of organizations served provide essential community services for LMI individuals, families, and small businesses. WNB employees in this AA served on boards of national and statewide organizations such as the Local Initiatives Support Corporation, Habitat for Humanity, and Junior Achievement. WNB provided industry recognized CD services for these national, state, and local organizations. WNB employees also served on boards of a local affordable housing foundation and CDC Association, which supports affordable housing needs, economic development, and revitalization in the AA. Examples of WNB's involvement are summarized below.

- Five employees provided the Junior Achievement curriculums on 75 occasions to approximately 1,251 participants in five AA schools where the majority of students qualified for free or reduced lunch programs.
- Eight employees provided the Money Smart – personal training to over 1,200 participants 147 times at the City of Gospel Mission. Employees also provided the customized New Beginnings curriculum on 48 occasions to 119 participants at the City of Gospel Mission. This organization provides food, shelter, addiction recovery programs, jobs training and youth programs for LMI individuals.
- An employee of WNB served on the executive board of the local Dearborn County Clearing House Food Pantry. This organization provides financial literacy as well as a food pantry for LMI clients. WNB provides leadership, financial and marketing expertise for literacy programs, and fundraising events for this organization.
- WNB provided second-look referral opportunities to small business applicants in the Cincinnati multi-state area, through the bank's innovative MWTC initiative. Referral opportunities from Ohio, Indiana, and Kentucky were presented to participating CDFIs, such as LiftFund. WNB referrals in this AA totaled 1,053 with 49 applicants opting for either credit or mentoring.

Multi-State Rating

Louisville KY-IN multi-state (Louisville AA)

CRA rating for the Louisville AA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall adequate service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Louisville AA

WNB operated six branches combined in the Louisville AA encompassing three counties – Jefferson, Oldham, and Harrison. WNB possesses \$8.5 million in AA deposits, which makes up 0.23 percent of WNB total deposits. The bank possesses 0.03 percent of deposit market share and ranks 44th out of 46 financial institutions doing business in the AA. The three largest financial institutions by deposit market share are PNC Bank, N.A., JPMorgan Chase Bank, N.A., and Fifth Third Bank, who collectively make up 49 percent of combined deposit market share (CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Louisville AA, the OCC utilized two regulatory agency contacts with a small business development center and an affordable housing organization serving Jefferson County. Identified community credit needs included an increase in small business access to credit by offering small dollar loans and providing affordable housing, including housing for the homeless.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Louisville	26	261	10	297	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Louisville	50	453	291	794	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 87.87 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.02 percent is in line with the bank's deposit market share of 0.03 percent.

According to 2017 peer data by number, WNB ranked 60th of 107 small business lenders in the Louisville AA. The five largest business lenders held 59 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the Louisville multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016. However, during 2017-2018, the proportion of bank loans was stronger than the proportion of businesses and the aggregate distribution of loans in those geographies.

Consumer Loans

Refer to Table U in the Louisville multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

Refer to Table R in the Louisville multistate of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016; however, the proportion of bank loans to small businesses during 2017-2018 was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the Louisville section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

WNB has made an excellent level of CD loans in the Louisville AA, which has a positive impact on lending performance in the AA. During the evaluation period, the bank originated 10 loans totaling \$291,123. This volume of CD lending was equivalent to 35 percent of tier 1 capital allocated to the AA. WNB effectively helped meet community credit needs through its CD lending. Of the \$291,123, two loans totaling \$52,123 or 18 percent of total CD lending was associated with affordable housing, a specific need of the AA.

Three loans totaling \$64,000 and the remaining five loans totaling \$175,000 were associated with economic development and LMI community services, respectively. Some notable examples of CD loans are as follows:

- The bank originated a \$2 million loan (with a \$36,498 allocation to this AA) and a \$500,000 LOC (with a \$15,625 allocation to this AA) to two CDFIs that provide affordable housing within the AA.
- The bank originated three loans totaling \$175,000 to fund crime prevention initiatives for at-risk seniors, to help ensure a safe and secure crime-free residence. The loans support community services to 81 percent of LMI residents.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Louisville AA.

Refer to the lending tables in the Louisville section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Louisville is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution's performance in the Louisville AA is excellent.

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Louisville	11	677	1	250	17	25	29	100	952	100

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period WNB made 12 investments totaling \$927,000, including 11 prior period investments totaling \$677,000 and 1 current period investments totaling \$250,000. Additionally, 17 grants totaling \$25,142 were made for a total investment in the AA of approximately \$951,881. WNB's total investments represented 114 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond for \$250,000 for the upkeep of several roofs and HVACs in several schools throughout the district, with 86 percent of students eligible for the free or reduced lunch program. Additionally, WNB provided a grant for \$5,000 to a small business assistance company in the AA that focused on low-income individuals in underserved areas in the AA.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Louisville AA

SERVICE TEST

The bank's performance under the Service Test in the Louisville AA is rated Low Satisfactory.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Louisville AA is adequate. WNB provides a relatively high level of CD services in this AA, which had a positive impact on the overall Service Test rating. WNB makes excellent use of ADS through mobile and online banking.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Louisville AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Louisville	100.00	6	100.00	0.00	0.00	66.67	33.33	11.04	18.69	36.82	33.02

Note: 0.43% of area populations were located in undesignated CTs.

WNB has six branches in three AA counties of this AA. The bank does not have any branches in low-or moderate-income CTs, although, as previously noted, WNB does not control or influence Walmart's retail locations. During the evaluation period, Walmart did not present any branch opportunities in LMI tracts in this AA. WNB's presence in this AA is minimal.

The bank's market share is only 0.03 percent, and the bank ranks 39th out of 40 depository financial institutions doing business in the Louisville AA. The bank's ADS help to mitigate the lack of physical branches in LMI areas. WNB provided additional information, which demonstrated that its ADS were accessible to geographies and individuals of different income levels in this AA, including customers in LMI areas. WNB makes excellent use of ADS through mobile and online banking.

The bank provided information, indicating that 45 percent of customers living in LMI areas are using mobile banking delivery systems. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 34 percent of its customers living in low-income areas and 36 percent in moderate-income areas use online banking services. The percentage of WNB customers actively using mobile banking in the Louisville AA exceeds comparable mobile benchmarks in the aforementioned 2017 ABA study. The percentage of bank customers actively using online banking was slightly below the 40 percent ABA study benchmark, but this still demonstrates that a good number of LMI customers are using the bank's ADS.

In the Louisville AA, a reasonable number of customers were also using the bank's free, innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 21 percent of low-income customers and 28 percent of moderate-income customers using this product reside in LMI areas. These percentages exceed LMI population distributions in the AA.

The institution's opening and closing of branches in this full scope AA has not adversely affected the accessibility of its delivery systems. As reflected in the table below, the bank did not open or close branches during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Louisville	6	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provided a relatively high level of CD services in the Louisville AA. CD services had a positive impact on the overall Services Test rating.

In this multi-state AA, WNB provided 118 hours of financial education to 171 participants. The bank utilized three of the five core modules for financial education in this AA, which included: 1) New Beginnings; 2) Money Smart – business; and 3) Money Smart – personal. The majority of the bank’s training activities focused on the Money Smart business course, with 110 hours. The bank’s free online financial education curriculum, Banking GPS, is also available to consumers in the Louisville AA.

WNB employees provide leadership and financial expertise serving on boards or committees of seven organizations in this AA. These organizations support AA needs for affordable housing, essential community services for LMI populations, as well as economic development. WNB has six employees serving in seven positions with national organizations such as Habitat for Humanity and non-profit YouthBuild USA, Inc. (YouthBuild).

WNB also participates in local food banks and organizations that provide after school, summer, and literacy programs to LMI individuals and families. Examples of WNB’s involvement are summarized below.

- A manager of WNB serves as a member of the finance committee for the local YouthBuild organization. YouthBuild provides opportunities for low-income individuals to learn construction skills through building community assets and affordable housing for the homeless and low-income people in their neighborhoods.
- In 2018, WNB co-hosted a community small business symposium at the Louisville Central Community Center. Six WNB employees participated in this event. All of the attendees reported revenues less than \$1 million and 70 percent were minority-owned. The symposium covered Money Smart – business topics such as; “How to Jump Start Your Business”, “Access to Capital”, “Site Identification”, “Marketing & Branding”, “Procurement”, and “Leveraging Technology”.
- WNB provided second-look referral opportunities to small business applicants throughout Kentucky, including those in the Louisville multi-state area, through the bank’s innovative MWTC initiative. Referral opportunities were presented to participating CDFIs, such as LiftFund. WNB referrals from this AA totaled 227 with eight applicants opting for credit, mentoring, or both.

Multi-State Rating

Myrtle Beach SC-NC multi-state (Myrtle Beach AA)

CRA rating for the Myrtle Beach AA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall adequate service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Myrtle Beach AA

WNB conducts operations in the Myrtle Beach AA across three branches in three counties. One branch is in Conway in Horry County, SC and two branches are in Leland and Southport in Brunswick County, NC.

WNB had \$9.4 million in deposits in the Myrtle Beach multi-state AA representing 0.27 percent of WNB total deposits. WNB possessed 0.11 percent of deposit market share and ranks 24th out of 25 financial institutions as of June 30, 2018. The three largest financial institutions by deposit market share are Branch Banking & Trust, Conway National Bank, and Bank of America, N.A., who collectively make up 41 percent of combined deposit market share (CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Myrtle Beach AA, the OCC utilized two regulatory agency contacts with affordable housing organizations serving the bank's AA. Identified community credit needs were affordable housing including the need for bank programs that better fit the needs of LMI borrowers and that would permit the use of Housing Choice vouchers for mortgage payments.

Myrtle Beach AA

Myrtle Beach AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Myrtle Beach-Conway-North Myrtle Beach SC-NC MSA (Myrtle Beach AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	19.0	56.2	19.0	3.8
Population by Geography	406,656	1.5	19.0	63.6	15.7	0.2
Housing Units by Geography	271,514	1.5	14.4	60.7	23.2	0.1
Owner-Occupied Units by Geography	119,389	0.4	16.1	64.9	18.4	0.2
Occupied Rental Units by Geography	48,542	3.6	20.6	61.7	13.9	0.2
Vacant Units by Geography	103,583	1.7	9.5	55.5	33.2	0.1
Businesses by Geography	27,232	4.3	15.8	57.9	21.5	0.5
Farms by Geography	905	1.1	25.2	59.2	14.0	0.4
Family Distribution by Income Level	110,740	20.1	18.4	21.2	40.3	0.0
Household Distribution by Income Level	167,931	23.1	16.4	19.1	41.4	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$53,695	Median Housing Value			\$194,604
			Median Gross Rent			\$849
			Families Below Poverty Level			12.8%
Source: 2015 ACS Census and 2017 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 Myrtle Beach

The Myrtle Beach AA received a full-scope review. All AAs that include non-MSA areas within the state are combined, analyzed, and presented as one AA for purposes of this evaluation. The rating for Myrtle Beach AA was based on the full-scope AA. As a multi-state AA, the Myrtle Beach AA accounts for 100 percent of branches and deposits. This AA accounts for 0.40 percent of branches and 0.18 percent of deposits institution wide. Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MYRTLE BEACH**LENDING TEST**

The bank's performance under the Lending Test in Myrtle Beach is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Myrtle Beach AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Myrtle Beach	33	195	6	234	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Myrtle Beach	173	337	531	1,041	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 83.33 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.17 percent is greater than the bank's deposit market share of 0.11 percent.

According to 2017 peer data by number, WNB ranked 35th of 87 small business lenders in the Myrtle Beach AA. The five largest business lenders held 53 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the Myrtle Beach section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. The bank originated no loans in low-income tracts or in moderate-income tracts during 2015-2016. However, during 2017-2018, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in moderate-income tracts.

Consumer Loans

Refer to Table U in the Myrtle Beach multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

Refer to Table R in the Myrtle Beach section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016; however, the proportion of bank loans to small businesses in 2017-2018 was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the Myrtle Beach multistate section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Myrtle-Beach AA. During the evaluation, WNB originated six CD loans totaling \$530,946. This volume of CD lending was equivalent to 56 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of affordable housing, economic development, and LMI community services. All six loans were associated with the identified needs of the AA.

One notable example was a loan for \$3 million (with a \$337,723 allocation to this AA) to a dental practice that assists LMI individuals. The dental provider cares for low-income children, primarily covered by Medicaid and other governmental and non-governmental insurances.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Myrtle Beach AA.

Refer to the lending tables in the Myrtle Beach section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Myrtle Beach is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution's performance in the Myrtle Beach AA is excellent.

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Myrtle Beach	6	283	2	227	21	12	29	100	523	100

* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made eight investments totaling \$510,665 including six prior period investments totaling \$283,268 and two current period investments totaling \$227,397. Additionally, 21 grants totaling \$11,921 were also made for a total investment in the AA of \$522,586. WNB's total investments represented 55 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond for approximately \$170,000 for the construction of an affordable housing apartment building where all units were allocated to LMI families.

Additionally, an investment through the CCFI, managed by OFN, originated an investment to South Carolina Community Loan Fund (SCCLF) where \$57,676 was allocated from a \$318,182 investment. The allocation allows SCCLF to finance acquisition, pre-development, infrastructure, construction, renovation, leasehold improvements, machinery and equipment, working capital, and permanent financing costs for affordable housing, healthy food, community facility, and community business development projects in the AA. WNB also provided a grant for \$1,000 to a CDFI to assist with the development of additional affordable housing units. Community contacts in the area affirmed that affordable housing was a significant need for the AA.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Myrtle Beach AA.

SERVICE TEST

The bank's performance under the Service Test in Myrtle Beach AA is rated Low Satisfactory.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Myrtle Beach AA is adequate. WNB provides a relatively high level of CD services in this AA, which had a positive impact on the overall Service Test rating. WNB makes excellent use of ADS through mobile and online banking.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Myrtle Beach AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Myrtle Beach	100.00	3	100.00	0.00	0.00	33.33	67.67	1.49	18.97	63.57	15.73

Note: 0.24% of area populations were located in undesignated CTs.

The bank does not have any branches in low- or moderate-income CTs in this AA. Although, as previously noted, WNB does not control or influence Walmart retail locations. During the evaluation period, Walmart did not present any opportunities to WNB for branches in LMI areas. WNB's presence in this AA is minimal. The bank's market share is only 0.11 percent and WNB ranks next to last in deposit share of 24 depository institutions doing business in the Myrtle Beach AA. The bank's ADS help to mitigate the lack of physical branches in LMI areas.

WNB provided additional information, which demonstrated that its ADS were accessible to geographies and individuals of different income levels in this AA, including customers in LMI areas. WNB makes good use of ADS through mobile and online banking.

The bank provided information, indicating that 40 percent of customers living in low-income areas and 43 percent living in moderate-income areas actively use mobile banking delivery systems. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 40 percent of its customers living in low-income areas and 38 percent in moderate-income areas use online banking services. The percentage of WNB customers using mobile banking in the Myrtle Beach AA exceeds comparable mobile benchmarks in the aforementioned 2017 ABA study. The percentage of bank customers using online banking was consistent with the 40 percent benchmark in the ABA study.

In the Myrtle Beach AA, a reasonable number of customers were also using the bank's free, innovative Cash in at Checkout money transfer product. WNB provided information that shows 23 percent of moderate-income customers using this product reside in LMI areas. The percentage of low-income customers using the service was minimal at 1 percent; however, these percentages are consistent with LMI population distributions in the AA.

The institution's opening and closing of branches in this full scope AA has not adversely affected the accessibility of its delivery systems. As reflected in the table below, the bank did not open or close branches during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Myrtle Beach	3	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provided a relatively high level of CD services in the Myrtle Beach AA. CD services has a positive impact on the overall Services Test rating.

In this multi-state AA, WNB provided 56 hours of financial education to roughly 42 participants in this AA. This level of activity is adequate when considering the number of branches in this AA and limited staff within the in-store branches. The bank's training activities focused primarily on the Money Smart – business curriculum. The bank's free online financial education curriculum, Banking GPS, was also available to consumers in this AA. WNB employees in this AA serve on boards or committees of four organizations, which support economic development and provide essential community services and affordable housing for LMI individuals and families.

WNB has five employees serving in five positions with these organizations, including Habitat for Humanity and other local organizations, which provide shelter, financial literacy, health, and other support services for LMI individuals and families. Notable examples of WNB's involvement are summarized below.

- In response to AA small business needs, a WNB officer provided financial expertise and leadership on the commercial loan committee and board of a non-profit CDFI, SCCLF, which provides small business resources, technical assistance, and loans in the state of South Carolina, which includes a portion of the multi-state Myrtle Beach AA. The organization's annual report indicates that they loaned over \$7 million in the state of South Carolina in 2018.
- One of the WNB managers in this AA has provided financial expertise for the past five years on the family selection committee of Habitat for Humanity of Horry County, which is one of two counties in this multi-state AA. While serving in this capacity, the manager analyzed financial information and met with applicants for potential affordable housing opportunities.
- WNB provided second-look referral opportunities to small business applicants throughout the multi-state AA, through the bank's innovative MWTC initiative. Referral opportunities were presented to participating CDFIs, such as LiftFund. WNB referrals from this multi-state AA totaled 1,202 with 53 applicants opting for credit, mentoring, or both.

Multi-State Rating

Washington-Arlington VA MD multi-state (Washington-Arlington AA)

CRA rating for the Washington-Arlington AA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Washington-Arlington AA

WNB operates nine branches in the Washington multi-state AA. One branch is in the Silver Spring-Frederick, MD AA in a moderate-income CT and the other eight branches are in the Washington-Arlington-Alexandria, MD AA of which four are in moderate-income CTs. The Washington multi-state AA is composed of 18 counties across Maryland and Virginia. The counties include, Prince George's, Frederick, and Montgomery in Maryland along with Arlington, Clarke, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, Warren, Alexandria City, Fairfax City, Falls Church city, Fredericksburg City, Manassas City, and Manassas Park City in Virginia.

The bank possesses \$13.7 million in AA deposits representing 0.39 percent of WNB total deposits. WNB possessed less than 0.01 percent of deposit market share and ranks 112th out of 112 financial institutions as of June 30, 2018. The three largest financial institutions by deposit market share are Navy Federal Credit Union, E*TRADE Bank, and Capital One (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Washington-Arlington AA, the OCC utilized two regulatory agency contacts with a housing and economic development coalition and an affordable housing organization serving the bank's AA. Identified community credit needs were financial education and products for the unbanked, affordable housing including capital for development and bank programs that would permit the use of Housing Choice vouchers for mortgage payments, and bank support for small business development. The contact stated that there are many opportunities within the metropolitan area for banks to become involved.

Washington-Arlington AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington DC VA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,105	6.2	23.1	36.6	33.2	0.9
Population by Geography	4,947,982	6.4	22.6	37.0	33.8	0.2
Housing Units by Geography	1,844,908	6.4	23.1	37.6	32.8	0.1
Owner-Occupied Units by Geography	1,143,003	2.5	18.0	39.1	40.4	0.0
Occupied Rental Units by Geography	594,819	13.4	32.0	34.9	19.4	0.2
Vacant Units by Geography	107,086	8.9	28.1	36.8	26.0	0.1
Businesses by Geography	395,764	3.8	18.8	37.5	39.7	0.2
Farms by Geography	7,642	2.6	19.0	42.2	36.1	0.1
Family Distribution by Income Level	1,198,488	20.8	16.9	20.7	41.6	0.0
Household Distribution by Income Level	1,737,822	21.2	16.8	19.2	42.9	0.0
Median Family Income MSA - 43524 Silver Spring-Frederick-Rockville, MD		\$112,655	Median Housing Value			\$404,585
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV MD		\$106,762	Median Gross Rent			\$1,592
			Families Below Poverty Level			4.9%
Source: 2015 ACS Census and 2017 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 Washington-Arlington

The Washington-Arlington AA received a full-scope review. All AAs that include non-MSA areas within the state are combined, analyzed, and presented as one AA for purposes of this evaluation. The rating for Washington-Arlington AA was based on the full-scope AA. As a multi-state AA, the Washington-Arlington AA accounts for 100 percent of branches and deposits. This AA accounts for 1.20 percent of branches and 0.27 percent of deposits institution wide. Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON-ARLINGTON

LENDING TEST

The bank's performance under the Lending Test in Washington-Arlington is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Washington-Arlington AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Washington-Arlington	62	380	11	453	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Washington-Arlington	1,130	730	705	2,565	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 83.38 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.01 percent is in line with the bank's deposit market share of 0.01 percent.

According to 2017 peer data by number, WNB ranked 80th of 200 small business lenders in the Washington-Arlington AA. The five largest business lenders held 63 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the Washington-Arlington multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed in LMI tracts during 2015-2016, but the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in moderate-income tracts during 2017-2018.

Consumer Loans

Refer to Table U in the Washington-Arlington multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

Refer to Table R in the Washington-Arlington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016, but the proportion of bank loans to small businesses in 2017-2018 was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the Washington-Arlington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Washington-Arlington AA. During the evaluation, WNB originated ten CD loans totaling \$704,600. This volume of CD lending was equivalent to 51 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of economic development and affordable housing. Of the ten CD loans, five totaling \$242,000 or 34 percent were associated with economic development; two totaling \$312,600 or 44 percent were associated with affordable housing, and three loans totaling \$150,000 or 22 percent were associated with LMI community services. Some notable examples of CD loans are as follows:

- Two revolving LOCs for \$200,000 to an organization that promotes economic development by financing business or farm loans.
- A \$2 million revolving LOC (with a \$282,500 allocation to this AA) to a non-profit. The funds will enable the corporation to provide acquisition, pre-development, or construction loans to offices expanding affordable housing opportunities for LMI communities.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Washington-Arlington AA.

Refer to the lending tables in the Washington-Arlington section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in the Washington-Arlington AA is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution's performance in the Washington-Arlington AA is excellent.

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Washington-Arlington	5	309	5	464	39	61	49	100	834	100
Washington-Arlington BSRA						7			7	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made ten investments totaling \$773,201, including three prior period investments totaling \$309,138 and seven current period investments totaling \$464,063. Prior period investments include \$730,000 of MDI certificate of deposits, with an original purchase amount of \$240,000 in 2016, with the bank renewing the certificate of deposit three times during the evaluation period. Additionally, 39 grants totaling \$61,000 were made for a total investment in the AA of \$834,158. WNB's total investments represented 60 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond for \$250,000 for the construction of an affordable housing apartment building where all units were allocated to LMI families. Additionally, WNB provided a grant for \$15,000 to an organization that provided training and financial assistance to local organization focusing on affordable housing and community development.

Washington-Arlington VA-MD AA Statewide

We also considered investments in the broader Washington-Arlington VA-MD AA statewide area. WNB had two grants totaling \$6,649 in Washington-Arlington VA-MD AA that does not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope areas in the Washington-Arlington AA.

SERVICE TEST

The bank's performance under the Service Test in the Washington-Arlington AA is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on a full scope review, the bank's performance in the Washington-Arlington AA is excellent. WNB also provides an excellent level of CD services, which had a positive impact on the overall Service Test rating.

Retail Banking Services

Retail service delivery systems are readily accessible to geographies and individuals of different income levels in the Washington-Arlington AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations in the AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Washington-Arlington	100.00	9	100.00	0.00	55.56	33.33	11.11	6.36	22.62	37.03	33.84

Note: 0.15% of area populations were located in undesignated CTs.

WNB does not have any branches in low-income CTs in this AA, but five (56 percent) of the bank's branches are in moderate-income CTs. This branch distribution in moderate-income areas significantly exceeds AA population distributions in moderate-income geographies. As part of the performance context; however, we considered that WNB does not influence Walmart retail locations. WNB provided additional information, which demonstrated that its ADS were also accessible to geographies and individuals of different income levels, including customers in LMI areas. WNB makes excellent use of ADS through mobile and online banking.

The bank provided information, indicating that 47 percent of customers living in low-income areas and 48 percent in moderate-income areas actively use mobile banking delivery systems. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 42 percent of its customers in low-income areas and 38 percent in moderate-income areas of the AA actively use online banking services. The percentage of WNB mobile banking customers in the Washington-Arlington AA exceeded comparable mobile benchmarks in the aforementioned 2017 ABA study. The percentage of bank customers using online banking was consistent with the ABA study.

In the Washington-Arlington AA, a reasonable number of customers were also using the bank's free, innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 8 percent of low-income customers and 41 percent of moderate-income customers using this product reside in LMI areas. These percentages exceed LMI population distributions in the AA.

The institution's opening and closing of branches in this full scope AA has not adversely affected the accessibility of its delivery systems. As reflected in the table below, the bank did not open or close branches during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Washington-Arlington	9	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provided an excellent level of CD services in the Washington-Arlington AA. CD services had a positive impact on the overall Services Test rating.

In this multi-state AA, WNB provided 691 hours of financial education to over 5,800 participants. The bank utilized the five core modules for financial education in this AA, which included: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is also available to consumers in this AA. The majority of the bank's training activities in this AA focused on the Money Smart curriculums with 409 hours of Money Smart – personal and 201 hours of the Money Smart – business courses. WNB employees in this AA provided leadership and financial expertise on boards or committees of eight organizations in nine positions. The majority of organizations provide affordable housing and essential community services for LMI individuals, and families. WNB employees in this AA served on boards or committees of national organizations such as Boys and Girls Club, Family Promise, Habitat for Humanity, and a local food bank. Examples of WNB's involvement are summarized below.

- In response to AA needs for affordable housing, a WNB manager serves on the board of local non-profit, Housing Initiative Partnership, Inc. This organization is an affordable, green housing developer and counseling agency in the AA focusing on the revitalization of neighborhoods for LMI households.
- WNB employees serve on a small business taskforce, which provides technical assistance and financial expertise to CDFIs in the AA.

- During the evaluation period, at least six WNB managers provided financial education training to a local Boys and Girls Club eight times. WNB employees also provided training over 100 times in monthly meetings in another Boys and Girls Club affiliate. Bank training sessions covered Money Smart – personal and Building Wealth curriculums for budgeting and savings.
- WNB referred 571 loan applicants for a second look through the MWTC initiative in this multi-state AA. Of this total, 30 applicants opted into MWTC, mentoring or both.

State Rating

State of Alabama

CRA rating for the State of Alabama: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Alabama

With a physical presence in every geographic region of Alabama, WNB operates 41 branches in ten AAs, each of which opened between October 2007 and October 2012. The bank possesses a very limited 0.05 percent of deposit market share and ranks 104th out of 164 financial institutions in the state. State deposits equal 0.8 percent of total WNB deposits. In 2018, the largest depository institutions were Regions Bank, Compass Bank, and Wells Fargo Bank, N.A., making up 43 percent of state deposit share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Birmingham AA, the OCC utilized two regulatory agency contacts with a small business technical assistant provider/lender and an affordable housing provider. The community contacts indicated that there are numerous opportunities for banks to provide more government and state guaranteed small business loans and the need to create products geared to the unbanked, small-dollar programs to better compete with payday lenders and smaller dollar mortgage loans. The contacts reported that they had good relationships with area financial institutions.

Birmingham AA

Birmingham, AL

Table A – Demographic Information of the Assessment Area						
Assessment Area: Anniston-Oxford-Jacksonville AL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	9.7	22.6	45.2	9.7	12.9
Population by Geography	116,648	5.1	17.5	63.8	10.3	3.2
Housing Units by Geography	53,296	6.7	19.2	61.2	10.3	2.7
Owner-Occupied Units by Geography	31,179	3.2	15.2	69.3	11.8	0.5
Occupied Rental Units by Geography	13,975	10.4	26.6	48.5	7.7	6.8
Vacant Units by Geography	8,142	13.9	22.0	51.7	8.5	3.9
Businesses by Geography	5,571	5.0	31.4	54.0	7.7	1.9
Farms by Geography	156	1.9	14.7	73.1	9.6	0.6
Family Distribution by Income Level	30,581	22.9	16.2	20.9	40.0	0.0
Household Distribution by Income Level	45,154	25.5	15.7	16.8	41.9	0.0
Median Family Income MSA - 11500 Anniston-Oxford-Jacksonville, AL MSA		\$52,300	Median Housing Value			\$104,880
			Median Gross Rent			\$620
			Families Below Poverty Level			16.5%
Source: 2015 ACS Census and 2017 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 Birmingham

WNB operates eight branches in the Birmingham-Hoover AL MSA, which is a Birmingham-centered metropolitan area located in North Central AL. The eight local branches opened between October 2007 and October 2012. The MSA is the largest metropolitan area in AL. The WNB AA in this area includes three of the MSA's seven counties: Jefferson, Shelby, and Chilton, which collectively comprise a population of 906,375. WNB possessed \$10 million in deposits in the Birmingham-Hoover, AL MSA, representing 24 percent of state deposits but only 0.19 percent of total bank deposits. WNB possesses a very limited 0.02 percent of AA deposit market share and ranks 54th out of 66 financial institutions doing business in the AA. The top three financial institutions in the MSA are Regions Bank, Compass Bank, and Wells Fargo, N.A., who collectively make up 55 percent of combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA**LENDING TEST**

The bank's performance under the Lending Test in Alabama is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Birmingham AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Birmingham	27	354	9	390	22.11	23.76
Anniston-Oxford-Jacksonville	6	64	5	75	4.25	3.58
Daphne-Fairhope-Foley	4	50	6	60	3.40	6.05
Decatur	3	63	4	70	3.97	3.60
Huntsville	16	187	5	208	11.79	11.85
Mobile	14	246	4	264	14.97	14.08
Montgomery	18	236	7	261	14.80	12.86
Tuscaloosa	3	82	5	90	5.10	3.32
AL-Non MSA	26	310	10	346	19.61	20.90

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Birmingham	42	654	304	1,000	22.56	23.76
Anniston-Oxford-Jacksonville	7	113	71	191	4.31	3.58
Daphne-Fairhope-Foley	9	91	88	188	4.24	6.05
Decatur	5	104	65	174	3.93	3.60
Huntsville	51	316	159	526	11.87	11.85
Mobile	23	411	178	612	13.81	14.08
Montgomery	32	430	186	648	14.62	12.86
Tuscaloosa	5	129	75	209	4.72	3.32
AL-Non MSA	64	528	292	884	19.95	20.90

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 90.77 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.03 percent is in line with the bank's deposit market share of 0.02 percent.

According to 2017 peer data by number, WNB ranked 64th of 113 small business lenders in the Birmingham AA. The five largest business lenders held 49 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed in low- and moderate-income tracts during 2015-2016, but the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in LMI geographies during 2017-2018.

Consumer Loans

Refer to Table U in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016, but the proportion of bank loans to small businesses in 2017-2018 was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a positive impact on the Lending Test performance in the Birmingham AA. During the evaluation, WNB originated nine CD loans totaling \$304,231. This volume of CD lending was equivalent to 31 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Of the \$304,231, four of the nine loans, totaling \$144,000, and three of the nine loans, totaling \$120,000 were for economic development and to LMI services, respectively. The aforementioned are identified needs of the area. Some notable examples of CD loans are as follows:

- The bank originated three loans totaling \$120,000 to fund crime prevention initiatives for at-risk seniors, to help ensure a safe and secure crime-free residence. The loans support community services to 81 percent of LMI residents.
- WNB made four loans totaling \$144,000 to organizations who primarily originate loans to small businesses, underserved businesses, and entrepreneurs in underserved communities.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank did not have enough small business loans to perform a meaningful analysis in all limited scope AAs. For consumer loans, the bank's performance under the Lending Test in the Anniston-Oxford-Jacksonville, Decatur, Huntsville, Montgomery, and Tuscaloosa AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in the Daphne-Fairhope-Foley, Mobile, and AL-Non MSA was slightly weaker than the bank's overall performance. CD loans in all areas had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Alabama section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Alabama is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Birmingham AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Birmingham	3	102	4	205	21	26	28	13.86	334	14.46
Anniston-Oxford-Jacksonville	2	38	3	169	15	7	20	9.90	214	9.26
Daphne-Fairhope-Foley		0	3	149	15	11	18	8.91	160	6.93
Decatur	2	52	2	89	14	8	18	8.91	149	6.45
Huntsville	5	219	3	117	13	8	21	10.40	344	14.89
Mobile		0	4	208	15	11	19	9.41	219	9.48
Montgomery	2	28	3	172	19	12	24	11.88	212	9.18
Tuscaloosa		0	3	274	15	7	18	8.91	281	12.16
AL-Non MSA	4	95	4	287	28	15	36	17.82	397	17.19
AL BSRA	2	125				1	2		126	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made seven investments totaling \$307,728 including three prior period investments totaling \$102,430 and four current period investments totaling \$205,298. Prior period investments include \$151,433 of MDI certificate of deposits, with an original purchase amount of \$50,000 in 2015, with the bank renewing it three times during the evaluation period. Additionally, 21 grants totaling \$26,130 were made for a total investment in the AA of \$333,858. WNB's total investments represented 34 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included \$60,000 for an equity equivalent investment in a CDFI that supports small businesses through capital, businesses services, and policy research, as well as a \$145,298 investment in a mortgage security backed by affordable housing loans to LMI families in the AA.

Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included \$2,696 to a CDFI focusing on economic development in rural Alabama, a combined \$3,000 to three organizations providing housing and educational services to LMI families, and \$1,000 to an organization focused on affordable housing in the AA.

Alabama Statewide

We also considered investments in the broader Alabama statewide area. WNB holds two prior period investments totaling \$124,898 and four grants totaling \$1,325 in Alabama that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered this investment as it demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Anniston-Oxford-Jacksonville, Daphne-Fairhope-Foley, Decatur, Huntsville, Mobile, Montgomery, Tuscaloosa, and the AL-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Alabama is rated Outstanding. Excellent performance in all limited scope AAs positively affected the overall rating.

Conclusion for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Birmingham AA is excellent. The bank's excellent utilization of ADS, and excellent CD services, had a positive impact on the AA and overall Service Test rating.

Retail Banking Services

Retail service delivery systems are accessible to geographies and individuals of different income levels in the Birmingham AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Birmingham	23.76	8	19.51	0.00	12.50	62.50	25.00	10.49	22.05	28.17	38.77
Limited Scope											
Anniston-Oxford-Jacksonville	3.58	2	4.88	0.00	50.00	50.00	0.00	5.07	17.50	63.83	10.35
Daphne-Fairhope-Foley	6.05	3	7.32	0.00	33.33	66.67	0.00	0.00	16.43	64.58	18.99
Decatur	3.60	2	4.88	0.00	50.00	50.00	0.00	5.76	10.37	59.53	24.35
Huntsville	11.85	6	14.63	0.00	33.33	66.67	0.00	8.58	26.67	32.39	32.36
Mobile	14.08	4	9.76	0.00	25.00	50.00	25.00	9.28	18.23	36.54	35.80
Montgomery	12.86	6	14.63	0.00	33.33	16.67	50.00	9.53	21.65	36.14	32.55
Tuscaloosa	3.32	2	4.88	0.00	50.00	50.00	0.00	1.82	20.08	43.58	29.65
AL-Non MSA	20.90	8	19.51	0.00	25.00	37.50	37.50	0.00	14.20	58.48	27.32

Note: 8.91% of area populations were located in undesignated CTs.

The bank does not have any branches in low-income areas of the Birmingham AA, but WNB does have one branch in a moderate-income area. WNB's branch distribution in moderate-income areas was below the distribution of AA population; but as part of the performance context; we considered that WNB does not influence Walmart retail locations. Further, the bank provided additional information, which demonstrated that its ADS have expanded access to geographies and individuals of different income levels. WNB makes excellent use of mobile and online banking ADS. Bank provided information indicates that 35 percent of its customers living in low-income tracts and 49 percent of customers living in moderate-income tracts use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 39 percent of customers living in low-income and 40 percent in moderate-income tracts use online banking. These percentages of online banking users were consistent with benchmarks in the ABA study.

In the Birmingham AA, a number of customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 17 percent of low-income customers and 35 percent of moderate-income customers using this product reside in LMI CTs. These percentages exceed AA population distributions in LMI areas.

The opening and closing of branches have not adversely affected the accessibility of the bank's delivery systems. As reflected in the chart below, the bank did not open or close branches during the evaluation period in the Birmingham AA or any other AA in Alabama.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Birmingham	8	0	0	0	0	0	0
Limited Scope							
Anniston-Oxford-Jacksonville	2	0	0	0	0	0	0
Daphne-Fairhope-Foley	3	0	0	0	0	0	0
Decatur	2	0	0	0	0	0	0
Huntsville	6	0	0	0	0	0	0
Mobile	4	0	0	0	0	0	0
Montgomery	6	0	0	0	0	0	0
Tuscaloosa	2	0	0	0	0	0	0
AL-Non MSA	8	0	0	0	0	0	0
Total	41	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provided an excellent level of CD services in Alabama. CD services had a significantly positive impact on the overall Services Test rating.

Statewide, the bank provided 1,732 hours of financial education to over 4,000 participants. The bank utilized the five core modules for financial education in the Birmingham AA, which included 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank’s free online financial education curriculum, Banking GPS, is available to all consumers in Alabama. WNB’s board and committee involvement statewide is excellent with 40 employees serving on 33 boards or committees in 45 positions. The majority of organizations served provide affordable housing, and community services to LMI persons. In addition, WNB employees also served a few organizations that support economic development.

WNB provided an excellent level of CD services in the full scope Birmingham AA. Bank employees provided 316 hours of financial education to 710 participants in the AA. The majority of the bank’s training activities in this AA focused on the Money Smart programs, with 131 hours of Money Smart – personal, and 126 hours of the Money Smart - business curriculums. WNB provided the majority of financial education in the Birmingham branch located in a moderate-income CT. WNB also provided financial education to participants of two local housing agencies located in LMI CTs. Further, on six occasions, the bank provided financial education in two local libraries located in a low-income CT, and two local schools with students who qualified for free or reduced lunch programs.

In addition to financial education, WNB had ten employees in the Birmingham AA providing leadership and financial expertise on eight boards or committees in 11-member positions. The organizations provided services targeting LMI populations. Bank employees held seven positions in community service-related organizations, three positions on boards of affordable housing organizations, and one position on the board of an organization supporting economic development in the AA. Two WNB employees served on the board and one served on the family selection committee of Habitat for Humanity. Two employees also served on the board of Family Promise, while other bank employees served on boards of local organizations providing shelter, emergency, and transportation services for LMI individuals and veterans. Examples of WNB's involvement are summarized below.

- WNB referred 286 loan applicants for a second look through the MWTC initiative in Alabama. Ten of these applicants opted into MWTC, mentoring, or both.
- One WNB employee provides financial expertise serving as a board member for the local non-profit organization, Three Hots and a Cot. The organization provides emergency assistance to veterans in need, helping homeless veterans transition to a self-sustained lifestyle. The bank's employee aids with daily operations, fund raising, and investments. The organization has assisted approximately 1,100 veterans and family members, 78 percent of which have moved into independent living. WNB has also supported this organization through loans and grants.
- One WNB employee serves on the board of The Community Action Agency, which is a non-profit created by the government in 1964 to combat poverty in geographically designated areas. This organization works to direct state, private, and federal resources to assist low-income individuals and families through a comprehensive approach. WNB's employees assist with strategic planning and teaching financial literacy classes to LMI families.
- In 2018, WNB hosted a small business education and networking event for entrepreneurs in underserved communities. The event was hosted at Innovation Depot, located in a moderate-income area with 23 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in all limited scope AAs was consistent with excellent performance in the full scope AA. Limited scope AAs included Anniston-Oxford-Jacksonville, Daphne-Fairhope-Foley, Decatur, Huntsville, Mobile, Montgomery, Tuscaloosa, and AL-Non-MSA. WNB's mobile banking, online banking, ATMs, and the Cash in at Checkout money transfer product have all helped to expand access to the bank's delivery systems in geographies and to individuals across the bank's footprint.

State Rating

State of Florida

CRA rating for the State of Florida: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Florida

WNB operates three branches in the Jacksonville AA, which is found in the northeastern corner of the state facing the Atlantic Ocean. Jacksonville is the most populous city in the state and the largest city by land mass in the contiguous U.S. Jacksonville is the seat of Duval County, which is the only county in the MSA where WNB branches are located. The AA population is 890,673 (Source: CRA Wiz – Demographic Information of the AA). WNB possesses \$2.3 million in deposits in the Jacksonville, FL MSA representing 100 percent of the bank's state deposits but only 0.04 percent of bank's national deposits. WNB possesses less than 0.01 percent deposit market share and ranks 39th out of 39 financial institutions doing business in the AA (Source: 2018 FDIC Summary of Deposits). In 2018, the top three financial institutions in the MSA were Bank of America, N.A., TIAA Federal Savings Bank, and Vystar Credit Union, who collectively make up 74 percent of combined deposit market share (CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

Two community contacts, including contacts that provide affordable housing, foreclosure intervention and prevention, neighborhood revitalization, and financial counseling services in the Jacksonville AA were utilized in this evaluation.

Identified community credit needs are affordable housing, access to construction and development financing, and support for small nonprofit organizations. Per the contacts, banks are helpful in supporting community needs, but pointed out that banks could be more understandable of the challenges of small nonprofits.

Jacksonville AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Jacksonville FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	173	11.6	30.6	34.1	23.7	0.0
Population by Geography	890,673	8.1	28.1	39.4	24.4	0.0
Housing Units by Geography	393,571	9.1	28.3	37.4	25.2	0.0
Owner-Occupied Units by Geography	200,029	5.8	23.6	39.8	30.8	0.0
Occupied Rental Units by Geography	137,871	11.0	33.9	36.1	19.0	0.0
Vacant Units by Geography	55,671	16.1	31.3	31.7	20.9	0.0
Businesses by Geography	91,966	6.6	25.2	33.4	34.7	0.0
Farms by Geography	2,034	5.8	23.2	40.4	30.6	0.0
Family Distribution by Income Level	209,958	25.1	18.1	19.7	37.2	0.0
Household Distribution by Income Level	337,900	26.4	17.6	17.5	38.5	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA		\$64,042	Median Housing Value			\$151,543
			Median Gross Rent			\$954
			Families Below Poverty Level			13.4%
Source: 2015 ACS Census and 2017 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 Jacksonville

WNB operates three branches in the Jacksonville AA, which are found in the northeastern corner of the state facing the Atlantic Ocean. Jacksonville is the only AA in the state of Florida. Jacksonville will receive a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Jacksonville AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Jacksonville	17	106	8	131	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Jacksonville	35	182	156	373	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 80.92 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.02 percent is in line with the bank's deposit market share of 0.00 percent.

According to 2017 peer data by number, WNB ranked 67th of 110 small business lenders in the Jacksonville AA. The five largest business lenders held 57 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The bank had too few loans to analyze in the Jacksonville AA. However, small loans to businesses only represented 9 percent in the AA of total reported loans. Therefore, this rating will be based on performance for consumer loans.

Consumer Loans

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

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The bank had too few loans to analyze in the Jacksonville AA. However, small loans to businesses only represented 9 percent in the AA of total reported loans. Therefore, this rating will be based on performance for consumer loans.

Consumer Loans

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

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Jacksonville AA. During the evaluation, WNB originated eight CD loans totaling \$155,649. This volume of CD lending was equivalent to 67 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Of the \$155,649, two of the eight loans, totaling \$105,000 or 67 percent of total CD lending was associated with small business loans, which was an identified need of the AA. Other loans benefitted affordable housing and economic development. Some notable examples of CD loans are as follows:

- The bank originated a \$100,000 loan to a CDFI that provides loan capital and business development training to Florida businesses.
- WNB made a \$5,000 loan to a CDFI whose mission is to provide credit and services to small businesses and entrepreneurs who do not have access to loans from commercial sources.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope reviews performed in the state of Florida.

Refer to the lending tables in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Jacksonville AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Jacksonville	3	180	2	260	19	19	24	100	458	100
FL BSRA	5	256		0		0	5		256	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made five investments totaling \$439,521 including three prior period investments totaling \$179,521 thousand and two current period investments totaling \$260,000. Additionally, 19 grants totaling approximately \$19,000 were also made for a total investment in the AA of \$458,152. WNB's total investments represented 196 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included \$10,000 for an equity equivalent investment in a CDFI that offering credit and services to small businesses that lack access to traditional commercial loans and a \$250,000 investment in a bond backed by a 336-unit multifamily housing facility dedicated to LMI tenancy in a low-income tract. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included approximately \$5,000 to an organization assisting LMI families impacted by Hurricane Irma through financial education and mental health counseling and approximately \$2,696 to a CDFI focusing on economic development in the AA.

Florida Statewide

We also considered investments in the broader Florida statewide area. WNB holds five prior period investments totaling \$256,697 in Florida that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered this investment as it demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

There are no limited scope reviews for the state of Florida.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on a full scope review, the bank's performance in the Jacksonville AA is excellent. WNB also provides a relatively high level of CD services, which had a positive impact on the Service Test rating. The bank's excellent utilization of ADS also positively affected Service Test rating.

Retail Banking Services

Retail service delivery systems are readily accessible to geographies and individuals of different income levels in the Jacksonville AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Jacksonville	100.00	3	100.00	0.00	66.67	33.33	0.00	8.09	28.14	39.35	24.42

The bank does not have any branches in low-income areas of the Jacksonville AA; however, two of the bank's three branches in this AA are in moderate-income areas. WNB's branch distribution in moderate-income areas significantly exceeds the distribution of AA population. As part of the performance context, it is important to consider that WNB does not influence Walmart retail locations. The bank also provided information demonstrating that its ADS have expanded access to geographies and individuals of different income levels.

WNB makes excellent use of ADS through mobile and online banking. The bank provided information which indicates that 49 percent of its customers living in low-income tracts and 45 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 38 percent of customers living in low-income tracts and 36 percent in moderate-income tracts actively use online banking. These percentages of online banking users were just slightly below the 40 percent ABA study benchmark, but still demonstrate that a good number of LMI customers are using ADS.

In the Jacksonville AA, a number of customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 22 percent of low-income customers and 39 percent of moderate-income customers using this product reside in LMI areas. These percentages significantly exceed AA population distributions in LMI areas.

The opening and closing of branches have not adversely affected the accessibility of the bank's delivery systems in this AA. As reflected in the chart below, the bank did not open or close branches during the evaluation period in the Jacksonville AA.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Jacksonville	3	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution provides a relatively high level of CD services in Florida. CD services had a positive impact on the overall Services Test rating.

WNB provided 106 hours of financial education to 203 participants. The bank utilized three modules for financial education in this AA, which included 1) Junior Achievement; 2) Money Smart – business; and 3) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is available to all consumers in Florida. The majority of the Bank's training activities in this AA focused on the Money Smart programs, with 52 hours of the Money Smart – personal and 47 hours of the Money Smart – business curriculums. The bank provided the Junior Achievement curriculum in a local elementary school where the majority of students were on free or reduced lunch programs.

WNB's board and committee involvement statewide is relatively high with three employees serving on four boards or committees. The majority of organizations served provide community services targeting LMI individuals. In addition, WNB employees served on one organization that supports economic development. Bank employees provided leadership and financial expertise on the boards of national organizations such as The Women's Veteran's Association and Family Promise, as well as local organizations that provide financial and mental health counseling in the Jacksonville AA.

The bank's participation in the Northeast Florida Long-Term Recovery Organization is particularly noteworthy. A WNB branch manager in the Jacksonville AA serves on a committee of this organization, which is a collaborative network of governmental, business, faith-based, and non-profit organizations working together to assist individuals and families in Duval and Nassau counties recovering from the aftermath of Hurricane Irma in 2017. This organization participates and is involved with city and county revitalization plans.

State Rating

State of Georgia

CRA rating for the State of Georgia: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Georgia

WNB operates 11 branches in the Atlanta AA, serving a delineated AA of nine counties anchored by the state capitol of Atlanta. These counties include Clayton (two branches), Coweta (one branch), DeKalb (two branches), Fayette (zero branches), Fulton (two branches, Atlanta is county seat), Gwinnett (one branch), Douglas (one branch), Henry (one branch), and Walton (one branch). WNB possesses a very limited 0.01 percent of MSA deposit market share and ranks 82nd out of 85 financial institutions doing business in the AA. WNB had \$9.8 million in deposits in the Atlanta-Sandy Springs-Roswell, GA MSA representing 100 percent of its deposits in the state, but only 0.20 percent of the bank's total deposits. In 2018, the top three financial institutions in the delineated AA were SunTrust Bank, Bank of America, N.A., and Wells Fargo Bank, N.A., who collectively make up 65 percent of combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Atlanta AA, OCC's Community Affairs Officer interviewed an economic development organization and an affordable housing organization who serve the Atlanta metropolitan area. An identified community credit need is program-related investments to assist in affordable housing. Per the contacts, banks are meeting the credit needs of the community.

Atlanta AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta-Sandy Springs-Roswell GA MSA (Atlanta AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	612	14.5	27.1	25.2	31.9	1.3
Population by Geography	3,503,006	10.0	27.0	29.9	32.6	0.5
Housing Units by Geography	1,406,140	11.3	27.4	28.0	33.1	0.2
Owner-Occupied Units by Geography	744,423	4.6	21.2	33.7	40.5	0.0
Occupied Rental Units by Geography	500,079	18.3	34.8	21.2	25.2	0.4
Vacant Units by Geography	161,638	20.4	32.7	23.0	23.7	0.2
Businesses by Geography	333,237	7.3	23.1	27.1	41.7	0.9
Farms by Geography	5,374	5.2	21.0	36.2	37.4	0.2
Family Distribution by Income Level	811,672	24.2	16.7	17.9	41.2	0.0
Household Distribution by Income Level	1,244,502	24.7	16.7	17.5	41.2	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,322	Median Housing Value			\$191,102
			Median Gross Rent			\$1,009
			Families Below Poverty Level			13.0%
Source: 2015 ACS Census and 2017 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 Atlanta

WNB operates 11 branches in the Atlanta AA, serving a delineated AA of nine counties anchored by the state capitol of Atlanta. Atlanta is the only AA in the state of Georgia. Atlanta will receive a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA**LENDING TEST**

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Atlanta	67	330	13	410	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Atlanta	225	951	691	1867	100	100

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 80.49 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.01 percent is in line with the bank's deposit market share of 0.01 percent.

According to 2017 peer data by number, WNB ranked 75th of 178 small business lenders in the Atlanta AA. The five largest business lenders held 64 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

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

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed in low- and moderate-income tracts during 2015-2016, but the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in moderate-income tracts during 2017-2018.

Consumer Loans

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

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to 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 origination of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016, but the proportion of bank loans to small businesses in 2017-2018 was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

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

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Atlanta AA. During the evaluation, WNB originated 13 CD loans totaling \$691,147. This volume of CD lending was equivalent to 65 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Of the \$691,147, five of the 13 loans, totaling \$511,498 or 74 percent of total CD lending was associated with affordable housing, which was an identified need of the AA. Other loans benefitted economic development and LMI community services. Some notable examples of CD loans are as follows:

- The bank originated a \$250,000 loan to a partnership for a Foreclosure Redevelopment Program. The program aims to acquire, renovate and resell approximately 50 affordable, single-family homes to LMI borrowers.
- WNB made a \$200,000 revolving LOC to a Community Development Corporation. The sole purpose of the corporation is to develop and sell, single-family, affordable housing, utilizing federal grants to sell residences to LMI borrowers.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

There were no limited scope reviews performed in the state of Georgia.

Refer to the lending tables in the state of Georgia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Georgia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Atlanta	3	123	3	302	19	17	25	100	442	100
GA BSRA	1	34					1		34	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made six investments totaling \$425,199, including three prior period investments totaling \$123,381 and three current period investments totaling \$301,818. Prior period investments include \$151,433 of MDI certificate of deposits, with an original purchase amount of \$50,000 in 2015, with the bank renewing it three times during the evaluation period. Additionally, 17 grants totaling approximately \$17,000 were made for a total investment in the AA of \$442,329. WNB's total investments represented 42 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond backed by a mortgage for \$200,000 on a multifamily apartment building where 100 percent of the units were dedicated to LMI families. The investments additionally included approximately \$100,000 to a CDFI targeting small businesses and a \$50,000 deposit investment in a minority owned financial institution. Grants in the AA included \$2,000 to an organization that promotes economic development in LMI areas and \$2,500 for affordable housing for LMI families.

Georgia Statewide

We also considered investments in the broader Georgia statewide area. WNB holds one prior period affordable housing investment totaling \$34,048 in Georgia that does not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered this investment as it demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

There are no limited scope reviews for the state of Georgia.

SERVICE TEST

The bank's performance under the Service Test in Georgia is rated Outstanding.

Conclusions for Area Receiving Full-Scope Reviews

Based on a full scope review, the bank's retail banking service performance in the Atlanta AA is excellent. WNB also provides an excellent level of CD services. Utilization of ADS in this state and the full scope AA is excellent

Retail Banking Services

Retail service delivery systems are readily accessible to geographies and individuals of different income levels in the Atlanta AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Atlanta	100.00	11	100.00	0.00	54.55	45.45	0.00	10.03	27.03	29.92	32.56

Note: 0.06% of area populations were located in undesignated CTs.

The bank does not have any branches in low-income areas; however, WNB had six branches in moderate-income CTs, which is an excellent number of branches, significantly exceeding population distributions in these areas. As part of the performance context; however, it is important to note that WNB does not influence Walmart retail locations. WNB provided additional information, which demonstrated that its ADS were also accessible to geographies and individuals of different income levels, including customers in LMI areas.

WNB makes excellent use of ADS through mobile and online banking. The bank provided information, which indicates that 60 percent of its customers living in low-income tracts, and 57 percent in moderate-income tracts use mobile banking. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 49 percent of customers living in low-income tracts and 46 percent living in moderate-income tracts use online banking. The percentage of WNB mobile and online banking customers in the Atlanta AA exceeded comparable benchmarks in the 2017 ABA study.

In the Atlanta AA, a reasonable number of customers were also using the bank's free, innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 21 percent of low-income customers and 45 percent of moderate-income customers using this product reside in LMI tracts. These percentages exceed AA population distributions in LMI areas.

The institution's opening of branches in this AA has improved the accessibility of its delivery systems in moderate-income geographies. As reflected in the table below, the bank opened one new branch in a moderate-income area and two new branches in middle-income area. WNB did not have any branch closures in the Atlanta AA.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Atlanta AA	11	+3	0	0	+1	+2	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution provides an excellent level of CD services in the Atlanta AA. CD services had a significantly positive impact on the overall Service Test rating.

WNB provided 691 hours of financial education to over 900 participants in the Atlanta AA. WNB utilized four of the bank's financial education courses in this AA, which included; 1) Building Wealth; 2) New Beginnings; 3) Money Smart – business; and 4) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is also available to consumers in Georgia and the Atlanta AA. The majority of the bank's educational training in the Atlanta AA focused on the Money Smart programs with 368 hours of Money Smart – personal and 175 hours of Money Smart – business. WNB employees also provided 92 hours of the Building Wealth program to participants in six LMI branches and a local charitable organization. In addition, employees provided 56 hours of the New Beginnings course to Family Promise of Gwinnett and participants in LMI branches.

In addition to financial education, WNB's board and committee involvement is excellent, with 13 employees serving in 19 board or committee member positions. WNB employees provide leadership and financial expertise to organizations focused primarily on affordable housing and other community services for LMI populations. WNB also served on boards or committees of several organizations, which provide small business technical assistance, and economic development. WNB employees served on boards or committees of national organizations such as Family Promise, Habitat for Humanity, Atlanta LiftFund, Urban League of Greater Atlanta (ULGA), Atlanta Neighborhood Development Partnership, as well as local organizations that provide food pantries, homeless shelters, transitional housing, career, and after-school training programs or LMI individuals. Examples of WNB's involvement are summarized below.

- Participation with the national BankWork\$ organization through the Atlanta ULGA. The BankWork\$ organization partners with local financial institutions and organizations to provide career training programs in the financial services industry. The organization provides training opportunities in communities where underemployment is prevalent. The organization expanded into the Atlanta AA in 2018, providing training for young adults with a focus on low-income and minority communities. Three WNB managers provide training, leadership, and expertise as members of the Atlanta BankWork\$ Committee.
- Three WNB managers serve on the family selection committee of the Atlanta Habitat for Humanity. As committee members, bank employees review and analyze applications and conduct home visits. Committee members work together to make recommendations for applicants based upon the organizations guidelines and policies.
- One WNB manager serves on the Advisory Board of the Atlanta LiftFund office. LiftFund is a national CDFI with a mission to support communities through LMI economic development and small business lending. The local WNB manager provides leadership, financial expertise, and education to LiftFund's entrepreneur clients.

State Rating

State of Illinois

CRA rating for the State of Illinois: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs. This rating considers excellent performance in the full scope AA as well as weaker performance in 50 percent of the limited scope AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Illinois

With a physical presence in 16 AAs throughout Illinois, which excludes Chicago multi-state and combines the consolidated Non-MSAs, WNB operated 41 branches during the evaluation period. On January 28, 2018, WNB closed six in-store branches, one each in Crawford County and St. Louis, and two in Bloomington and Peoria. Four in-store branches were in middle-income CTs (Crawford, St. Louis, Bloomington) while two were in upper-income CTs (Peoria). All branches opened between March 2007 and January 2011, with one additional new branch opened in Peoria in July 2018. Following the 2018 closings, WNB currently operates 35 branches in 14 AAs in Illinois.

Community Contacts

To help identify needs and opportunities in the Illinois Non-MSA AA, the OCC's Community Affairs Officer interviewed a community contact with a community action agency that provides a variety of services to help low-income individuals and families. The community contact indicated that there are numerous opportunities for banks to assist with affordable housing development as well as business planning and financing assistance for small businesses.

Additional identified community development needs were job training and internships for parents of children in Head Start programs. Per the contact, banks are helpful in supporting community needs, but pointed out that banks could be more proactive in seeking volunteer and investment opportunities.

IL-Non MSA AA

LE NON-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSAs IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	208	2.9	16.3	62.0	18.3	0.5
Population by Geography	732,299	2.1	14.7	62.5	20.0	0.7
Housing Units by Geography	326,707	1.9	15.3	62.5	19.9	0.3
Owner-Occupied Units by Geography	209,500	0.8	13.0	64.1	21.9	0.1
Occupied Rental Units by Geography	81,388	4.0	20.2	58.9	15.9	0.9
Vacant Units by Geography	35,819	3.3	17.5	61.6	17.0	0.7
Businesses by Geography	34,894	3.9	17.4	59.4	19.2	0.2
Farms by Geography	3,926	0.3	4.6	72.9	22.2	0.0
Family Distribution by Income Level	185,622	20.3	18.0	21.2	40.5	0.0
Household Distribution by Income Level	290,888	24.5	16.2	17.5	41.8	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$99,983
			Median Gross Rent			\$623
			Families Below Poverty Level			10.5%

Source: 2015 ACS Census and 2017 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 Illinois

The bank possesses a very limited 0.05 percent of deposit market share and ranks 243rd out of 382 financial institutions in its AA. Through December 31, 2018, the largest eight depository institutions in the IL-Non MSA AA were State Farm Bank, Citizens Equity First, Busey Bank, PNC Bank, Morton Community, JPMorgan Chase, N.A., U.S. Bank, N.A., and Regions Bank, which collectively possess 37 percent of state deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data). The full scope AA for Illinois will be the IL-Non MSA area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the IL-Non MSA AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
IL-Non MSA	46	707	16	769	32.34	32.37
Bloomington	1	57	3	61	2.57	0.0
Carbondale-Marion	8	132	3	143	6.01	6.58
Champaign-Urbana	27	160	3	190	7.99	10.98
Danville	3	68	3	74	3.11	3.79
Davenport-Moline-Rock Island	14	125	3	142	5.97	4.24
Decatur	1	25	4	30	1.26	2.45
Kankakee	14	199	3	216	9.08	9.32
Peoria	14	192	6	212	8.92	10.48
Rockford	7	83	3	93	3.91	3.66
Springfield	13	161	3	177	7.44	6.62
St Louis	30	237	4	271	11.40	9.50

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
IL-Non MSA	78	1,219	724	2,021	30.67	32.37
Bloomington	1	87	138	226	3.43	
Carbondale-Marion	12	219	146	377	5.72	6.58
Champaign-Urbana	122	273	181	576	8.74	10.98
Danville	14	116	96	226	3.43	3.79
Davenport-Moline-Rock Island	22	236	101	359	5.45	4.24
Decatur	1	42	221	264	4.01	2.45
Kankakee	42	331	181	554	8.41	9.32
Peoria	30	340	283	653	9.91	10.48
Rockford	7	145	96	248	3.76	3.66
Springfield	19	271	101	391	5.93	6.62
St Louis	55	434	205	694	10.53	9.50

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 90.24 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.15 percent is in line with the bank's deposit market share of 0.09 percent.

According to 2017 peer data by number, WNB ranked 48th of 98 small business lenders in the IL-Non MSA AA. The five largest business lenders held 43 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed in low- and moderate-income tracts during 2015-2016, but the proportion of bank loans was stronger than the proportion of businesses and the aggregate distribution of loans in moderate-income tracts during 2017-2018.

Consumer Loans

Refer to Table U in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016, but the proportion of bank loans to small businesses in 2017-2018 was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Illinois Non-MSA AA. During the evaluation, WNB originated 16 CD loans totaling \$723,500. This volume of CD lending was equivalent to 46 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of revitalization and stabilization and affordable housing. All 16 CD loans were associated with the identified needs of the AA. Some notable examples of CD loans are as follows:

- WNB originated a \$1 million loan (with a \$595,000 allocation to this AA) to a mission-driven CDFI, real estate consultant and developer who helps communities thrive by creating opportunities in low-income communities.
- A \$2 million revolving LOC (with a \$66,000 allocation to this AA) to a non-profit. The funds will enable the corporation to provide acquisition, predevelopment, or construction loans to offices expanding affordable housing opportunities for LMI communities.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Bloomington, Carbondale-Marion, Champaign-Urbana, Danville, Davenport-Moline-Rock Island, Kankakee, Peoria, Springfield, and St. Louis AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area.

The performance in the Decatur and Rockford AAs was slightly weaker than the bank's overall performance. CD loans in all areas had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Illinois section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the IL-Non MSA AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
IL-Non MSA	11	199	12	495	70	36	93	31.10	730	21.89
Bloomington	2	26	3	189	14	6	19	6.35	221	6.63
Carbondale-Marion	2	28	2	65	14	6	18	6.02	99	2.97
Champaign-Urbana	2	66	3	139	14	6	19	6.35	211	6.33
Danville	2	22	1	255	13	6	16	5.35	282	8.46
Davenport-Moline-Rock Island	3	101	3	179	13	6	19	6.35	285	8.55
Decatur	3	96	2	44	15	10	20	6.69	150	4.5
Kankakee	3	133	4	382	15	11	22	7.36	526	15.77
Peoria	2	50	2	132	16	16	20	6.69	198	5.94
Rockford	2	10	2	99	14	6	18	6.02	114	3.42
Springfield		0	2	158	14	7	16	5.35	165	4.95
St Louis	3	66	2	282	14	6	19	6.35	354	10.61
IL BSRA	1	66				27	1			

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made a total of 23 investments totaling approximately \$694,000, including 11 prior period investments totaling \$199,000 and 12 current period investments totaling \$494,548. Additionally, 70 grants totaling \$36,000 were also made for a total investment in the AA of \$729,833. WNB's total investments represented 47 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included an equity investment in a CRA mutual fund for \$150,000 to help approximately 2,156 LMI families buy their first home in the AA and an investment of approximately \$102,000 to a proven CDFI focusing on micro and start-up businesses that provides financial and technical resources. Noteworthy grants included \$31,574 to five organizations promoting economic development throughout the AA, \$1,750 to a local food bank, and \$1,000 to an organization providing financial literacy to LMI families.

Illinois Statewide

We also considered investments in the broader Illinois statewide area. WNB holds one prior period affordable housing investment totaling \$66,015 as well as 18 grants totaling \$27,270 in Illinois that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the Bloomington, Carbondale-Marion, Champaign-Urbana, Danville, Davenport-Moline-Rock Island, Decatur, Kankakee, Peoria, Rockford, Springfield, and St Louis AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Illinois is rated High Satisfactory.

This rating considers excellent performance in the full scope AA as well as weaker performance in 50 percent of the limited scope AAs. CD services positively affected the overall rating.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the IL-Non MSA AA is excellent. WNB also provides an excellent level of CD services, which had a significantly positive impact on the Service Test rating. The bank's utilization of ADS was also good in this AA.

Retail Banking Services

Retail service delivery systems are readily accessible to geographies and individuals of different income levels in the IL-Non MSA AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Assessment Area	Distribution of Branch Delivery System										
	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
ILL-Non MSA	32.37	11	35.48	0.00	18.18	54.44	27.27	2.07	14.74	62.48	20.01
Limited Scope											
Bloomington	0.00	0	0.00	0.00	0.00	0.00	0.00	6.40	12.06	55.08	26.47
Carbondale-Marion	6.58	2	6.45	0.00	50.00	50.00	0.00	9.49	15.86	42.29	26.81
Champaign-Urbana	10.98	3	9.68	0.00	66.67	33.33	0.00	12.43	14.62	48.22	20.03
Danville	3.79	1	3.23	0.00	0.00	0.00	100.00	4.27	18.64	47.21	29.89
Davenport-Moline-Rock Island	4.24	2	6.45	0.00	0.00	100.00	0.00	2.13	26.95	63.25	7.67
Decatur	2.45	1	3.23	0.00	0.00	0.00	100.00	18.54	11.63	34.46	35.37
Kankakee	9.32	2	6.45	0.00	50.00	0.00	50.50	14.42	16.15	41.99	27.44
Peoria	10.48	3	9.68	0.00	33.33	0.00	66.67	8.24	16.83	47.41	27.52
Rockford	3.66	1	3.23	0.00	0.00	0.00	100.00	12.76	20.33	27.19	39.35
Springfield	6.62	2	6.45	0.00	50.00	50.00	0.00	14.92	13.71	44.36	27.00
St. Louis	9.50	3	9.68	0.00	0.00	100.00	0.00	9.69	17.37	50.10	22.83

Note: 11.32% of area populations were located in undesignated CTs.

The bank does not have any branches in low-income areas of the full scope AA, but WNB does have two branches in moderate-income tracts. WNB's branch distribution in moderate-income areas exceeded population distributions. As part of the performance context, we also considered that WNB does not influence Walmart retail locations. During this evaluation period, Walmart did not present any opportunities for branches in low-income areas of this AA. This could be due in part to lower population distributions in the lower-income tracts. However, WNB provided additional information that demonstrated its ADS have expanded access of delivery systems to geographies and individuals of different income levels in this AA. WNB makes good use of ADS through mobile and online banking.

The bank provided information, which indicates that 40 percent of its customers living in low-income tracts and 42 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating access and effectiveness of ADS, the bank provided additional information that shows 32 percent of customers living in low-income tracts and 33 percent in moderate-income tracts actively use online banking. The percentage of online banking users was slightly below benchmarks in the ABA study, but still demonstrates that a good number of LMI customers are using the bank's ADS.

A number of customers in the full scope ILL-Non MSA AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 3 percent of low-income customers and 28 percent of moderate-income customers using this product reside in LMI CTs. These percentages exceeded AA population distributions in LMI areas.

In the full scope AA, the opening and closing of branches have not adversely affected the accessibility of the bank's delivery systems, particularly in LMI areas. As reflected in the chart below, the bank closed one branch in the ILL-Non MSA AA. This branch was located in a middle-income area of Robinson, Crawford County, IL. WNB closed this branch for business reasons. The June 30, 2017 FDIC Summary of Deposits reports indicate that this branch office had less than \$1 million in deposits and WNB ranked last in this market with six other banks operating in this county. As further indicated in the table below, WNB opened one new branch in a moderate-income area of the Peoria limited scope AA, thereby increasing access to the bank's delivery systems in LMI geographies. The bank closed two offices in upper-income areas of this same limited scope AA.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
ILL-Non MSA	11	0	(1)	0	0	(1)	0
Limited Scope							
Bloomington	0		(2)			(2)	
Carbondale-Marion	2						
Champaign-Urbana	3						
Danville	1						
Davenport-Moline-Rock Island	2						
Decatur	1						
Kankakee	2						
Peoria	3	+1	(2)		1		(2)
Rockford	1						
Springfield	2						
St. Louis	3		(1)			(1)	
Total	31	+1	(6)	0	+1	(4)	(2)

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

In 2017, the bank launched an innovative pilot consumer loan product in Illinois. This product called "Re-Starter", is designed for WNB customers without a FICO credit score but have previous paid-as-agreed credit. The program offers a 12-month, small \$500 loan to help customers establish good credit histories.

Community Development Services

The institution provides a relatively high level of CD services in Illinois. CD services had a positive impact on the overall Services Test rating.

Statewide, the bank provided 1,755 service hours and had 5,329 participants for financial education. The bank utilized the five core modules for financial education, which included 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank’s free online financial education curriculum, Banking GPS, was available to all consumers in Illinois. WNB’s board and committee involvement statewide is relatively high with 34 employees serving on 30 boards or committees. The majority of the organizations served provide community services and affordable housing for LMI individuals and families.

WNB provided an excellent level of CD services in the full scope IL Non-MSA AA. Bank employees provided 552 hours of financial education to 1,043 participants throughout non-MSA counties in this AA. The majority of the bank’s training in this AA focused on the Money Smart programs with 253 hours of personal curriculum, and 245 hours of the business curriculum. The bank also provided 41 hours of the Building Wealth curriculum and 13 hours of the customized New Beginnings program.

In addition to financial education, 13 bank employees provided leadership and financial expertise serving in 13 board or committees positions. The organizations served by WNB provide essential services and affordable housing for LMI populations. WNB employees served on boards and committees of nationally known non-profit organizations such as Big Brothers Big Sisters of America, Habitat for Humanity, and Salvation Army. WNB employees also served on boards of local organizations that provide a food pantry, emergency assistance, and crisis intervention for local LMI individuals and families. Examples of WNB’s involvement are summarized below.

- WNB employees referred and provided a second look for 407 denied small business loan applicants through the bank’s new, innovative MWTC platform. In this AA, 17 applicants opted into either credit or mentoring from WNB lender partners such as the CDFI Accion.
- Two WNB employees serve on boards of local Habitat for Humanity affiliates and another employee provides financial expertise on the family selection committee. Board members assist with family counseling and provide guidance on building homes for LMI families. Two WNB employees have also provided training three times for thirteen participants at local Habitat for Humanity facilities. The training sessions covered New Beginnings modules for “Your Current Financial Situation” and Money Smart – personal curriculum for “Your Credit” and “Your Home”.
- Three WNB employees serve on boards in three divisions of the Salvation Army. One employee serves as the chairperson of the Central Illinois division, helping with financial literacy, and emergency services for LMI individuals and families. WNB employees also serve with fund raising events and camps sponsored by the organization. In addition, six WNB employees have provided training in Salvation Army venues 41 times to 174 participants. Training sessions have covered the Money Smart – personal topics such as, Financial Recovery, Credit, Consumer and Youth Borrowing Basics, “Pay Yourself First”, “Charge it Right”, “Business Banking Services”, and “Money Matters.”

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Champaign-Urbana, Carbondale-Marion, Kankakee, Peoria, and Springfield is consistent with the bank's excellent performance in the full-scope AAs. Further, the institution's opening of a branch in the Peoria AA improved the accessibility of its delivery systems in a moderate-income geography and to LMI individuals in this area.

The bank's performance in six of twelve limited scope AAs is weaker than the bank's overall performance in the full-scope AAs. These AAs included Bloomington, Danville, Davenport-Moline-Rock Island, Decatur, Rockford, and St Louis. Performance in these AAs was weaker due to the lack of branches in LMI areas. In addition, CD services in two AA areas, Bloomington and Decatur were limited. The bank had no board or committee involvement in these AA and employees provided few training hours during the three-year evaluation period. The limited CD activities in Bloomington resulted primarily from the bank's closure of two branches in this AA. However, as in the full scope AA, the bank offers mobile banking, online banking, and the Cash in at Checkout services in all branches across the state. The bank's ADS have helped to extend and provide reasonable accessibility of services across the bank's footprint.

State Rating

State of Indiana

CRA rating for the State of Indiana: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Indiana

WNB has a physical presence in every geographic region of Indiana. WNB operates 44 branches in 15 AAs, each of which opened between June 2007 and April 2010. The bank possesses a very limited 0.05 percent of deposit market share and ranks 113th out of 184 financial institutions in the state. In 2018, the largest depository institutions in Indiana were JPMorgan Chase, N.A., PNC Bank, and Fifth Third Bank that collectively makeup 28 percent of state deposit share (Source: 2018 FDIC Summary of Deposits).

Community Contacts

To help identify needs and opportunities in the Indianapolis AA, the OCC utilized a community contact with a state housing agency performed by the OCC's Community Affairs Officer and a regulatory agency contact with a statewide small business development center. Identified community credit need is affordable housing including lending for construction financing and land acquisition. Additional community development needs were identified as mixed-use development, economic development loans, as well as community development services.

Indianapolis AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis-Carmel-Anderson IN MSA (Indianapolis AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	397	16.9	26.4	33.2	22.9	0.5
Population by Geography	1,950,674	10.9	22.2	33.9	32.8	0.3
Housing Units by Geography	831,014	12.5	24.2	33.1	30.1	0.1
Owner-Occupied Units by Geography	483,243	6.2	17.0	37.9	38.8	0.1
Occupied Rental Units by Geography	258,574	19.6	35.1	26.7	18.4	0.2
Vacant Units by Geography	89,197	25.9	31.6	25.9	16.2	0.4
Businesses by Geography	125,297	8.5	18.9	33.9	38.5	0.1
Farms by Geography	4,289	3.7	11.8	49.9	34.6	0.1
Family Distribution by Income Level	482,734	21.9	17.3	19.7	41.1	0.0
Household Distribution by Income Level	741,817	23.7	16.4	17.8	42.2	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$143,432
			Median Gross Rent			\$827
			Families Below Poverty Level			10.6%
Source: 2015 ACS Census and 2017 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 Indianapolis AA

WNB operates eight branches in the Indianapolis AA, serving eleven counties anchored by the state capital of Indianapolis in Marion County. WNB possesses a very limited deposit market share of 0.02 percent and ranks 63rd out of 70 financial institutions doing business in the AA (Source: CRA Wiz 2018 Peer Branch & Deposit Data). WNB opened its eight branches in the AA between January 2008 and January 2010. In 2018, the top three financial institutions in the market were JPMorgan Chase, N.A., PNC Bank, and Fifth-Third whom collectively comprise 42 percent of deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Indianapolis	50	428	11	489	20.56	23.10
Bloomington	4	22	6	32	1.35	3.80
Columbus	5	74	5	84	3.53	5.47
Elkhart-Goshen	16	111	10	137	5.76	4.85
Evansville	18	159	7	184	7.74	8.79
Fort Wayne	19	186	6	211	8.87	7.35
Lafayette-West Lafayette	4	30	5	39	1.64	3.63
Michigan City-La Porte	11	97	6	114	4.79	4.50
Muncie	3	49	6	58	2.44	1.51
South Bend-Mishawaka	13	158	6	177	7.44	4.29
Terre Haute	9	92	6	107	4.50	5.54
IN-Non MSA	47	675	24	746	31.37	27.17

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Indianapolis	114	718	597	1,429	19.69	23.10
Bloomington	9	38	120	167	2.30	3.80
Columbus	22	135	167	324	4.46	5.47
Elkhart-Goshen	46	204	222	472	6.50	4.85
Evansville	42	298	197	537	7.40	8.79
Fort Wayne	130	321	165	616	8.49	7.35
Lafayette-West Lafayette	8	59	115	182	2.51	3.63
Michigan City-La Porte	17	190	147	354	4.88	4.50
Muncie	5	82	140	227	3.13	1.51
South Bend-Mishawaka	109	283	147	539	7.43	4.29
Terre Haute	38	173	130	341	4.70	5.54
IN-Non MSA	115	1,195	761	2,071	28.53	27.17

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 87.53 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.05 percent is in line with the bank's deposit market share of 0.02 percent.

According to 2017 peer data by number, WNB ranked 69th of 133 small business lenders in the Indianapolis AA. The five largest business lenders held 56 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Small Loans to Businesses

Refer to Table Q in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed in low- and moderate-income tracts during 2015-2016. During 2017-2018, the performance in low-income tracts was stronger than the proportion of businesses in the AA. The proportion of bank loans was near to the proportion of businesses and the aggregate distribution of loans in moderate-income tracts during 2017-2018.

Consumer Loans

Refer to Table U in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed during 2015-2016, but the proportion of bank loans to small businesses in 2017-2018 was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Indianapolis AA. During the evaluation, WNB originated 11 CD loans totaling \$597,292. This volume of CD lending was equivalent to 47 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of affordable housing and economic development. Of the 11 CD loans, seven totaling \$497,292 or 83 percent were associated with the identified needs of the AA. Other loans benefitted revitalization and LMI services. Some notable examples of CD loans are as follows:

- WNB originated a \$500,000 revolving LOC (with an \$119,116 allocation to this AA) to a CDFI that provides funding for small businesses. The CDFI's mission is to support economic development through nonprofit capacity building.
- A \$2 million revolving LOC (with a \$362,500 allocation to this AA) to a non-profit. The funds will enable the corporation to provide acquisition, pre-development, or construction loans to offices expanding affordable housing opportunities for LMI communities.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Bloomington, Columbus, Evansville, Fort Wayne, Michigan City-LaPorte, Muncie, South Bend-Mishawaka, Terre Haute, and IN-Non MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in the Elkhart-Goshen and Lafayette-West Lafayette AAs was slightly weaker than the bank's overall performance. CD loans in all areas had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Indianapolis AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Indianapolis	23	1,373	2	295	26	29	51	15.84	1,697	29.65
Bloomington	2	40	2	114	12	7	16	4.97	162	2.83
Columbus	2	24	2	104	14	8	18	5.59	135	2.36
Elkhart-Goshen	2	73	2	264	19	13	23	7.14	350	6.12
Evansville	4	149	2	195	14	11	20	6.21	355	6.20
Fort Wayne	8	367	2	302	16	10	26	8.07	679	11.86
Lafayette-West Lafayette	2	87	2	184	14	10	18	5.59	281	4.91
Michigan City-La Porte	2	82	2	79	14	7	18	5.59	168	2.94
Muncie	2	22	2	207	14	7	18	5.59	236	4.12
South Bend-Mishawaka	3	90	2	165	14	7	19	5.90	262	4.58
Terre Haute	2	38	2	131	12	7	16	4.97	175	3.06
IN-Non MSA	16	552	7	643	56	28	79	24.53	1,223	21.37
IN BSRA						8			8	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made 25 investments totaling approximately \$1.7 million, including 23 prior period investments totaling approximately \$1.4 million and two current period investments totaling \$295,455. Additionally, 26 grants totaling \$29,000 were also made for a total investment in the AA of approximately \$1.7 million. WNB's total investments represented 135 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included a \$250,000 municipal bond for the acquisition, construction, and land purchase for school buildings in the district. At the time of this investment, 75 percent of the students qualified for the federal free or reduced lunch program. The remaining investment was for approximately \$45,000 and was provided to a CDFI fund that promotes business and job growth by financing small businesses with a focus on low-income and other disadvantaged communities. Noteworthy grants included \$5,000 to an organization that supports small businesses in LMI areas, \$5,000 to an organization that provides financial literacy to LMI families, and \$1,923 to an organization focused on revitalizing and stabilizing LMI areas in the AA.

Indiana Statewide

We also considered investments in the broader Indiana statewide area. WNB holds nine grants totaling \$8,463 in Indiana that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington, Columbus, Elkhart-Goshen, Evansville, Fort Wayne, Lafayette-West Lafayette, Michigan City-La Porte, Muncie, South Bend-Mishawaka, Terre Haute, and IN-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in Indiana is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis AA is excellent. WNB also provides an excellent level of CD services, which had a significantly positive impact on the Service Test rating.

Retail Banking Services

Retail service delivery systems are readily accessible to geographies and individuals of different income levels in the Indianapolis AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)				Population % of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Indianapolis	23.10	8	20.00	12.50	25.00	12.50	50.00	10.87	22.15	33.92	32.77
Limited Scope											
Bloomington	3.80	1	2.50	0.00	0.00	100.00	0.00	9.66	18.48	34.81	32.45
Columbus	5.47	2	5.00	0.00	50.00	0.00	50.00	0.00	25.67	49.82	24.51
Elkhart-Goshen	4.85	2	5.00	0.00	0.00	100.00	0.00	1.00	19.30	59.45	20.25
Evansville	8.79	3	7.50	0.00	33.33	66.67	0.00	9.49	17.36	41.66	31.28
Fort Wayne	7.35	4	10.00	0.00	25.00	75.00	0.00	9.04	17.56	46.69	26.10
Lafayette-West Lafayette	3.63	1	2.50	0.00	0.00	0.00	100.00	6.06	18.67	31.01	35.10
Michigan City-La Porte	4.50	2	5.00	0.00	100.00	0.00	0.00	4.55	26.34	32.96	36.15
Muncie	1.51	1	2.50	0.00	0.00	100.00	0.00	5.74	25.03	27.31	33.76
South Bend-Mishawaka	4.29	2	5.00	0.00	50.00	50.00	0.00	8.93	17.94	41.83	31.30
Terre Haute	5.54	2	5.00	0.00	0.00	50.00	50.00	5.39	21.14	38.76	34.71
IN-Non MSA	27.17	12	30.00	0.00	33.33	66.67	0.00	0.00	9.77	70.80	19.43

Note: 23.03% of area populations were located in undesignated CTs.

WNB has an excellent distribution of branches in both low- and moderate-income areas of the full scope AA. The bank's branch distributions exceed LMI populations in these geographies. In addition, WNB provided information demonstrating that the bank's ADS expanded access to geographies and individuals of different income levels in this AA. WNB makes excellent use of ADS through mobile and online banking.

The bank provided information, which indicates that 43 percent of customers living in low-income tracts and 51 percent living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating access and effectiveness of ADS, the bank provided additional information that shows 37 percent of customers living in low-income tracts and 41 percent in moderate-income tracts actively use online banking. These percentages of online banking users are consistent with benchmarks in the ABA study.

A good number of customers in the full scope AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 22 percent of low-income customers and 35 percent of moderate-income customers using this product reside in low- or moderate-income CTs. These percentages exceeded AA population distributions in LMI areas.

The institution's opening and closing of branches in the full scope AA has not adversely affected the accessibility of its delivery systems. As indicated in the table below, the bank did not open or close any branches in the full scope AA.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Indianapolis	8	0	0	0	0	0	0
Limited Scope							
Bloomington	1	0	0	0	0	0	0
Columbus	2	0	0	0	0	0	0
Elkhart-Goshen	2	0	0	0	0	0	0
Evansville	3	0	0	0	0	0	0
Fort Wayne	4	0	0	0	0	0	0
Lafayette-West Lafayette	1	0	0	0	0	0	0
Michigan City- La Porte	2	0	0	0	0	0	0
Muncie	1	0	0	0	0	0	0
South Bend-Mishawaka	2	0	0	0	0	0	0
Terre Haute	2	0	0	0	0	0	0
IN-Non MSA	12	0	(1)	0	0	0	(1)
Total	40	0	(1)	0	0	0	(1)

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution provides an excellent level of CD services in Indiana. CD services had a significantly positive impact on the overall Services Test rating.

Statewide, WNB provided 1,782 service hours to over 3,300 participants for financial education. The bank utilized the five core modules for financial education, which included 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is also available to consumers in Indiana.

WNB's board and committee involvement statewide is excellent with 57 employees serving on 42 boards or committees. The majority of the organizations provide affordable housing, and community services targeting LMI persons. WNB employees are also involved with a few organizations that support small businesses and economic development.

WNB provided an excellent level of CD services in the full scope Indianapolis AA. Bank employees provided 383 hours of financial education to 559 participants. The majority of the bank's educational training in this AA focused on the Money Smart programs with 192 hours of Money Smart – personal curriculum and 139 hours of the Money Smart – business curriculum. The bank also provided 26 hours of the customized New Beginning financial education program, as well as 18 hours of Building Wealth and eight hours of Junior Achievement programs.

In addition to financial education, 11 bank employees provided leadership and financial expertise serving in 14 board or committees positions. The organizations served by WNB provide community services targeting LMI populations and economic development for small businesses. WNB employees served on boards or committees of national organizations such as Family Promise, United Way and Salvation Army. In addition, employees served on boards and committees of local organizations providing shelter, food banks, and essential community services to homeless and LMI populations. Examples of WNB's involvement are further summarized below.

- A WNB employee served on the finance committee of a local non-profit community development corporation. This organization, Westside Community Development Corporation, supports home improvement and affordable housing initiatives in this AA using HUD Community Development Block grant funds. The organization focuses on LMI populations.
- A WNB employee served on the board, finance, and governance committees of a statewide organization, The Indiana Association of Community Development d/b/a Prosperity Indiana, which promotes economic development. Members of the organization collaborate with state legislators in developing policies that respond to urgent human needs, expand economic opportunity, and improve the quality of life in communities of all sizes throughout the state. The organization offers and supports various programs such as Community Loan Centers of Indiana, which provides an alternative to pay day lenders through affordable small dollar loans and the Indiana Assets and Opportunity Corps which is an AmericCorp fellowship program matching leaders to work with community and economic revitalization efforts.
- One employee serves on the board of a local non-profit, Horizon House, Inc., which helps individuals experiencing homelessness through building relationships, providing life-sustaining supplies, and linking them with resources and services. At least 18 employees have provided 43 training sessions at the Horizon House using the Money Smart – personal curriculums to approximately 241 participants over the evaluation period. Training sessions have covered topics such as “Financial Recovery”, “Pay Yourself First”, “Money Matters”, and “Bank on It”.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Columbus, Evansville, Fort Wayne, Michigan City-La Porte, South Bend-Mishawaka, and IN-Non MSA AAs, is consistent with the bank's overall performance in the full-scope AA. The bank's performance in Bloomington, Elkhart, Lafayette-West Lafayette, Muncie, and Terre Haute is weaker than the bank's overall performance in the full-scope AAs due to the lack of branches in low- or moderate-income areas. However, all branches in these AAs and across the state offer mobile banking, online banking, and the Cash in at Checkout service. The bank's ADS help to extend and provide reasonable accessibility across the bank's footprint.

The bank's CD services in all of the bank's limited scope AAs was consistent with the full scope AA, having a positive impact on the overall Service Test rating, except in the Bloomington AA where CD activities were limited. Employees were involved with only one organization in this AA and provided only 19 hours of financial education and training hours. WNB's CD service performance in the Bloomington AA was neutral, having no impact on the Service Test rating.

State Rating

State of Kentucky

CRA rating for the State of Kentucky: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Kentucky

WNB operated 19 in-store branches in nine AAs during the evaluation period. All branches opened between February 2008 and October 2009. WNB did not open or close a branch during the evaluation period.

The bank possesses a very limited 0.06 percent of deposit market share and ranks 106th out of 126 financial institutions in its AA. Through December 31, 2018, the largest eight depository institutions in the KY-Non MSA were Branch Banking and Trust, JPMorgan Chase, N.A., U.S. Bank, N.A., Central Bank and Trust, PNC Bank, Fifth Third Bank, Fort Knox Federal Credit Union, and Independence Bank of Kentucky who collectively possessed 41 percent of state deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the KY-Non MSA, the OCC's Community Affairs Officer interviewed a community contact with a community action agency that provides a variety of services to help low-income individuals and families. The community contact indicated that there are numerous opportunities for banks to assist with affordable housing including permanent supportive housing and emergency shelters. Additional identified community development needs were general operating support, particularly for utility and emergency assistance, match funding to leverage federal funding, and community development services.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
KY–Non MSA	45	533	22	600	70.92	64.91
Bowling Green	3	47	4	54	6.38	7.13
Elizabethtown-Fort Knox	3	35	3	41	4.85	6.21
Lexington-Fayette	8	112	4	124	14.66	19.38
Owensboro	2	21	4	27	3.19	2.36

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
KY–Non MSA	79	881	699	1,659	75.17	64.91
Bowling Green	6	87	52	145	6.57	7.13
Elizabethtown-Fort Knox	6	62	11	79	3.58	6.21
Lexington-Fayette	18	181	67	266	12.05	19.38
Owensboro	4	36	18	58	2.63	2.36

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the KY-Non MSA AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 88.83 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.05 percent is in line with the bank's deposit market share of 0.10 percent.

According to 2017 peer data by number, WNB ranked 58th of 91 small business lenders in the KY-Non MSA AA. The five largest business lenders held 51 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in moderate-income geographies is excellent. During the evaluation period, there were no low-income tracts in 2017-2018, and there were only 1.8 percent of the businesses located in low-income tracts in 2015-2016. The bank did not originate any small loans to businesses in low-income tracts. The proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in moderate-income tracts for 2015-2016 and near to the proportion of businesses and aggregate in 2017-2018.

Consumer Loans

Refer to Table U in the State of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in moderate-income geographies is excellent. In 2015-2016, the bank did not originate any consumer loans in low-income tracts, however there were only 0.9 percent of the households located in low-income tracts. In 2017-2018, the proportion of bank loans was significantly stronger than the proportion of households in low-income tracts. In moderate-income geographies, the proportion of bank loans was significantly stronger than the proportion of households in those geographies in 2015-2016 and similar to the proportion of households in moderate-income geographies in 2017-2018.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Kentucky Non-MSA AA. During the evaluation, WNB originated 22 CD loans totaling \$699,000. This volume of CD lending was equivalent to 54 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Of the \$699,000, ten of the 22 loans, totaling \$595,000 or 85 percent of total CD lending was associated with affordable housing, which was an identified need of the AA. Other loans benefitted economic development and LMI services. Some notable examples of CD loans are as follows:

- The bank originated a revolving LOC for \$1.5 million (with a \$490,000 allocation to this AA) to a CDFI that offers two clusters of loan products. One product is to non-profit corporations who serve LMI populations and the other product is directly to low-income populations for home purchases.
- WNB made a \$2 million revolving LOC (with a \$105,000 allocation to this AA) to an organization that provides affordable housing and economic development to LMI individuals in rural markets.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Bowling Green, Elizabethtown-Fort Knox, and Lexington-Fayette, is consistent with the bank's overall performance under the Lending Test in the full-scope area. There were too few loans to analyze in the Owensboro AA; however, the bank made CD loans in this AA. These were consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to the lending tables in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Kentucky is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the KY-Non MSA AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
KY-Non MSA	12	421	16	821	80	46	108	56.54	1,289	52.38
Bowling Green	2	70	3	168	15	7	20	10.47	245	9.96
Elizabeth town-Fort Knox	2	33	2	16	13	7	17	8.90	55	2.23
Lexington-Fayette	8	391	3	298	17	9	28	14.66	698	28.36
Owensboro	2	91	3	76	13	7	18	9.42	174	7.07
KY BSRA						5			5	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made 28 investments totaling approximately \$1.2 million, including 12 prior period investments totaling \$421,133 and 16 current period investments totaling \$821,299. Prior period investments include \$100,000 of MDI certificate of deposits, with an original purchase amount of \$200,000 in 2015, with the bank renewing it two times during the evaluation period. Additionally, 80 grants totaling \$46,000 were also made for a total investment in the AA of approximately \$1.3 million. WNB's total investments represented 99 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included five investments totaling approximately \$136,635 to two CDFIs focusing on small business development as well as three mortgage backed securities totaling \$317,990 consisting of 100 percent LMI families. Additionally, WNB provided a grant for \$5,000 to an organization focused on affordable housing for LMI families and a grant for \$3,000 to an organization combating homelessness.

Kentucky Statewide

We also considered investments in the broader Kentucky statewide area. WNB holds three grants totaling \$5,404 in Kentucky that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered this investment as it demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bowling Green, Elizabethtown-Fort Knox, Lexington-Fayette, and Owensboro AA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in Kentucky is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the KY-Non MSA AA is excellent. WNB also provides an excellent level of CD services, which had a positive impact on the Service Test rating.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the KY-Non MSA AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
KY- Non MSA	64.91	12	63.16	0.00	25.00	50.00	25.00	0.24	13.05	50.97	35.74
Limited Scope											
Bowling Green	7.13	1	5.26	0.00	100.00	0.00	0.00	6.16	21.86	30.96	39.14
Elizabethtown-Fort Knox	6.21	1	5.26	0.00	0.00	0.00	100.00	0.00	16.73	57.08	25.33
Lexington-Fayette	19.38	4	21.05	25.00	25.00	25.00	25.00	9.86	27.20	35.77	27.16
Owensboro	2.36	1	5.26	0.00	0.00	0.00	100.00	3.74	24.21	46.45	25.60

Note: 2.75% of area populations were located in undesignated CTs.

As reflected in the table above, the bank does not have any branches in low-income areas of the full scope AA, but a very small percentage of the population resides in these areas. The bank has three AA branches in moderate-income areas.

WNB's branch distribution in moderate-income areas significantly exceeds the distribution of AA population in these areas. As part of the performance context, we considered that WNB does not influence Walmart retail locations. During the evaluation period, Walmart did not present any opportunities to WNB for branches in the full scope AA.

WNB makes good use of ADS through mobile and online banking. WNB provided additional information demonstrating that its ADS have expanded access to geographies and individuals of different income levels. The bank's information indicates that 33 percent of its customers living in low-income tracts and 37 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 23 percent of customers living in low-income tracts and 30 percent in moderate-income tracts actively use online banking. The percentage of online banking users was below the 40 percent ABA study benchmark, but still demonstrates that a good number of LMI customers are using the bank's ADS.

In the KY-Non MSA AA, a number of customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 18 percent of moderate-income customers using this service resided in low- or moderate-income CTs. There were no low low-income customers using this service in this AA. The percentage of moderate-income customers using the service exceeded population distributions in both low- and moderate-income CTs.

The opening and closing of branches have not adversely affected the availability of delivery systems in this AA or the state of Kentucky. As summarized in the table below, the bank did not open or close branches in the full scope AA or limited scope AAs during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
Full Scope				Low	Mod	Mid	Upp
KY- Non MSA	12	0	0	0	0	0	0
Limited Scope							
Bowling Green	1	0	0	0	0	0	0
Elizabethtown-Fort Knox	1	0	0	0	0	0	0
Lexington-Fayette	4	0	0	0	0	0	0
Owensboro	1	0	0	0	0	0	0
Total	19	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution provides an excellent level of CD services in Kentucky. CD services had a significantly positive impact on the overall Services Test rating.

Statewide, the bank provided 903 hours of financial services education to 5,171 participants. The bank utilized the five core modules for financial education in this state including; 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank’s free online financial education curriculum, Banking GPS, was available to all consumers in Kentucky. WNB’s board and committee involvement statewide is excellent with 27 employees serving on 22 boards or committees in 31 positions. The majority of organizations served by WNB provide affordable housing and community services to LMI persons. In addition, WNB employees served in a few organizations that support economic development in Kentucky AAs.

WNB provided an excellent level of CD services in the full scope KY-Non MSA AA. Bank employees provided 549 hours of financial education to over 3,500 participants. The majority of the bank’s financial education in this AA focused on Junior Achievement curriculums. WNB provided 252 hours of Junior Achievement training programs in local schools with students who qualified for free or reduced lunch programs. The bank also provided a significant amount of time training the Money Smart programs, with 187 hours of the Money Smart – business and 92 hours of Money Smart – personal curriculums. The bank also provided ten hours of the customized New Beginnings and eight hours of Building Wealth curriculums in bank branches and local non-profit community service organizations.

In addition to financial education, 21 bank employees provided leadership and financial expertise on boards or committees of 17 organizations in 22-member positions in the KY-Non MSA AA. The majority of organizations served by WNB provided essential community services and affordable housing solutions. Employees also served on boards of two organizations supporting local economic development needs. Some of these organizations included four different Habitat for Humanity affiliates, four different affiliates of Junior Achievement, and local non-profit organizations, which supports financial literacy, food bank, and other programs for low-income and underserved members of the community. Examples of WNB’s involvement are further detailed below:

- A WNB manager serves as the treasurer on the board and on the Family Selection Committee for Habitat for Humanity in Madison and Clark counties. WNB personnel provided the Money Smart – personal training curriculum to 19 participants in two sessions with this Habitat for Humanity affiliate. WNB employees also provided 19 other training sessions to Habitat for Humanity affiliates on modules of the Money Smart business curriculums such as “Managing Cash Flow”, “Planning for a Healthy Business”, “Tax Preparation”, “Is Owning a Business a Good Fit”, “Business Banking Services”, and “Business Financial Management.”

- Five WNB managers provide leadership and financial expertise on boards and on the Action and Family Resource Committees of four different Junior Achievement affiliates. A WNB employee serves as the county coordinator for training in Muhlenberg and Hopkins counties. Employees also coordinate and execute fund raising events and train volunteers to teach the Junior Achievement curriculums and financial literacy courses. During the evaluation period, WNB employees provided 108 training sessions on Junior Achievement curriculums to approximately 3,206 students in 22 AA elementary, middle, and high schools, where the majority of students qualified for free or reduced lunch programs.
- In 2018, two WNB managers provided the Money Smart – business course on financial management to 20 small business participants at the Marion County Economic Development Center.
- A WNB manager serves on the local non-profit Midsprings Community Action Corporation, which provides financial literacy programs, a food bank, GED classes, and career training.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Bowling Green and Lexington-Fayette AAs is consistent with the bank's excellent performance in the full-scope AAs. Performance in Elizabethtown-Fort Knox and Owensboro is weaker than the bank's overall performance in the full-scope AAs, but in all AAs across the state, the bank's ADS extended the availability of banking services, helping to provide reasonable accessibility across the bank's footprint. In addition, in the Owensboro AA, CD activities were relatively high, resulting in a positive impact to the overall Service Test rating. CD services in Elizabethtown-Fort Knox were limited with no impact on the Service Test rating. The bank's performance in the Elizabethtown-Fort Knox AA was weaker because the bank was not involved in local boards or community organizations and the bank provided a limited amount of financial education during the evaluation period.

State Rating

State of Louisiana

CRA rating for the State of Louisiana: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Louisiana

WNB operated 20 branches in 12 AAs, each of which opened between October 2008 and November 2018. Two branches in upper-income geographies closed during the evaluation period and one new branch opened in a low-income geography, bringing the current number of open branches and AAs to 19 and 11, respectively. The bank possesses a very limited 0.02 percent of deposit market share and ranks 144th out of 198 financial institutions in the state. In 2018, Louisiana's largest depository institutions were JPMorgan Chase Bank, N.A., Capital One, and Hancock Whitney Bank, making up 47 percent of state deposit share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the New Orleans AA, the OCC's Community Affairs Officer interviewed a community contact with an affordable housing developer. The community contact indicated that there are numerous opportunities for banks to assist with affordable housing development as well as homebuyer subsidies, construction lending with flexible interest rates, investment dollars for matching closing cost, and down payment assistance programs. Per the contact, additional member banks are needed to sponsor participation in the Dallas Federal Home Loan Bank's Affordable Housing Programs.

	Median Gross Rent	\$595
	Families Below Poverty Level	21.6%
Source: 2015 ACS Census and 2017 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 New Orleans AA and LA-Non MSA

The seven-parish (county) New Orleans AA is located on the southeastern corner of Louisiana and includes six WNB branches within the following four parishes: Orleans, St. Bernard, St. Tammany and St. John the Baptist. WNB possesses a very limited deposit market share of 0.02 percent, which ranks 58th out of 70 financial institutions doing business in the AA. WNB entered the market in September 2009 and opened its most recent branch in November 2018. In 2018, the top three financial institutions in the AA were Capital One, Hancock Whitney Bank, and JPMorgan Chase Bank, N.A., who collectively make up 61 percent of combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

WNB operates two branches in the LA-Non MSA, serving an AA consisting of Jefferson Davis, Evangeline, and St. Landry Parishes. Located in south-central Louisiana and approximately 150 miles west of New Orleans, the two WNB branches are in Jefferson Davis Parish to the west and St. Landry Parish to the east, respectively, while Evangeline Parish (which is not home to a branch) lies in the center of the AA. The total population of the AA is 148,815, though Lafayette, Louisiana (a city of approximately 500,000) lies just south of the AA border (Source: CRA Wiz 2010 U.S. Census). Lafayette is the largest city in the region and is a significant source of jobs for the rural communities of Southern Non-MSA LA. WNB possesses a very limited 0.08 percent of total deposit market share and ranks 22nd out of 25 financial institutions doing business in the delineated AA. In 2018, the top five financial institutions in the market were JD Bank, St. Landry Bank & Trust Co., The Evangeline Bank & Trust Co., Investar Bank, and JPMorgan Chase Bank, N.A., who collectively make up 46 percent of combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

The bank's performance under the Lending Test in Louisiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New Orleans AA and LA-Non MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
New Orleans-Metairie	25	218	8	251	30.17	29.72
LA-Non MSA	7	135	9	151	18.15	14.98
Alexandria	1	29	3	33	3.97	4.63
Baton Rouge	15	58	3	76	9.13	10.84
Hammond	6	57	4	67	8.05	6.32
Houma-Thibodaux	3	34	3	40	4.81	5.33
Lafayette	5	62	3	70	8.41	5.32
Lake Charles	5	30	6	41	4.93	10.29
Monroe	4	56	3	63	7.57	8.83
Shreveport-Bossier City	3	34	3	40	4.81	3.74

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
New Orleans-Metairie	45	352	177	574	25.14	29.72
LA-Non MSA	24	201	120	345	15.11	14.98
Alexandria	15	40	37	92	4.03	4.63
Baton Rouge	58	98	49	205	8.98	10.84
Hammond	23	90	39	152	6.66	6.32
Houma-Thibodaux	116	70	34	220	9.64	5.33
Lafayette	5	115	36	156	6.83	5.32
Lake Charles	205	50	66	321	14.06	10.29
Monroe	8	76	36	120	5.26	8.83
Shreveport-Bossier City	8	55	35	98	4.29	3.74

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the New Orleans AA and LA-Non MSA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 86.85 percent of total lending activity in the New Orleans AA and 89.40 percent in the LA-Non MSA. By number, the bank's small business lending market share of 0.02 percent in the New Orleans AA and 0.05 percent in the LA-Non MSA is in line with the bank's deposit market share of 0.02 and 0.08 percent, respectively.

According to 2017 peer data by number, WNB ranked 64th of 114 small business lenders in the New Orleans AA and 54th of 62 in the LA-Non MSA AA. The five largest business lenders held 63 percent and 48 percent, respectively, of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its full scope AAs.

Small Loans to Businesses

Refer to Table Q in the state of Louisiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The bank had too few loans to analyze in both full scope AAs. However, small loans to businesses only represented 10 percent in the New Orleans AA and 5 percent in the LA-Non MSA of total reported loans. Therefore, this rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table U in the state of Louisiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

In the New Orleans AA, the distribution of consumer loans in LMI geographies is excellent. In LMI geographies, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

In the LA-Non MSA, the distribution of consumer loans in low-income geographies needs to improve. The proportion of bank loans was weaker than the proportion of households in those geographies. However, in the moderate-income geographies, the distribution of consumer loans is excellent. The proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The bank had too few loans to analyze in both full scope AAs. However, small loans to businesses only represented 10 percent in the New Orleans AA and 5 percent in the LA-Non MSA of total reported loans. Therefore, this rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table V in the state of Louisiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent for both full scope AAs. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the full scope AAs.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

New Orleans AA

The volume of CD loans was excellent and had a positive impact on the Lending Test performance in the New Orleans AA. During the evaluation, WNB originated eight CD loans totaling \$177,498. This volume of CD lending was equivalent to 27 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Of the \$177,498, three of the eight loans, totaling \$75,000 or 42 percent of total CD lending were to LMI services; four of the eight loans totaling \$66,000 were for economic development, and one loan totaling \$36,498 or 20 percent of total CD loans was for affordable housing. All were identified needs of the area. Some notable examples of CD loans are as follows:

- The bank originated three loans totaling \$75,000 to fund crime prevention initiatives for at-risk seniors, to help ensure a safe and secure crime-free residence. The loans support community services to 81 percent of LMI residents.
- WNB made a \$700,000 loan (with a \$36,000 allocation to this AA) to an organization that primarily originates loans to small businesses, underserved businesses, and entrepreneurs in underserved communities.
- A \$2 million loan (with a \$36,498 allocation to this AA) to a CDFI who provides affordable housing.

LA-Non MSA AA

The volume of CD loans was good and had a positive impact on the Lending Test performance in the Non-MSA AA. During the evaluation, WNB originated nine CD loans, totaling \$120,000. This volume of CD lending was equivalent to 37 percent of tier 1 capital allocated to the AA. These nine loans were to a CDFI, in which the proceeds were used to provide micro-loans and small business loans to local small businesses and entrepreneurs.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Baton Rouge, Hammond, Lafayette, Lake Charles, Monroe, and Shreveport-Bossier City AAs is consistent with the bank's overall performance under the Lending Test in the full-scope areas. There were too few consumer and business loans to analyze in all limited scope areas for 2015-2016. There were also too few business loans to analyze in 2017. Additionally, there were too few consumer or business loans to analyze in the Alexandria AA. The performance in the Houma AA was slightly weaker than the bank's overall performance for consumer loans. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Louisiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Louisiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New Orleans AA and the LA-Non MSA AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
New Orleans	14	861	3	370	21	17	38	13.01	1,248	30.69
LA-Non MSA	2	20	9	387	49	24	60	20.55	431	10.6
Alexandria	2	18	3	160	19	12	24	8.22	189	4.65
Baton Rouge	5	175	3	44	17	13	25	8.56	232	5.71
Hammond		0	3	197	18	9	21	7.19	207	5.09
Houma-Thibodeaux	3	109	3	174	15	7	21	7.19	290	7.13
Lafayette	6	344	3	284	19	12	28	9.59	640	15.74
Lake Charles	2	43	3	138	18	10	23	7.88	190	4.67
Monroe	2	31	3	262	21	14	26	8.90	307	7.55
Shreveport-Bossier City	4	169	4	154	18	9	26	8.90	332	8.17
LA BSRA	2	123		0		4	2		127	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

New Orleans AA

During the evaluation period, WNB made 17 investments totaling approximately \$1.2 million, including 14 prior period investments totaling \$861,056 and 3 current period investments totaling \$370,000. Additionally, 21 grants totaling \$17,567 were also made for a total investment in the AA of approximately \$1.2 million. WNB's total investments represented 192 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included a municipal bond for \$250,000 for the school district in Jefferson Parish where 81 percent of the students are eligible for free or reduced lunches. This investment supported facility and technology upgrades, acquisition of security cameras, and other improvements in a district of 85 schools. Another investment included an equity investment of \$100,000 in a CDFI fund that promotes business and job growth by financing small businesses. Noteworthy grants included \$5,000 to support a neighborhood development foundation to revitalize LMI areas within the New Orleans Parish. Another \$2,000 grant was provided to an organization promoting economic development in LMI areas.

LA-Non MSA AA

During the evaluation period, WNB made 11 investments totaling approximately \$407,000 including two prior period investments totaling \$20,000 and 9 current period investments totaling \$386,846. Prior period investments include \$600,000 of MDI certificate of deposits, with an original purchase amount of \$40,810 in 2016, with the bank renewing it two times during the evaluation period. Additionally, 49 grants totaling \$24,000 were also made for a total investment in the AA of \$431,110. WNB's total investments represented 131 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included a municipal bond for \$200,000 for the school district in Lincoln Parish where a majority of the students are eligible for free or reduced lunches. Another example included six independent investments across various non MSA AAs for \$93,454 to promote economic development. Another investment included a mortgage security for \$89,892 backed by affordable housing loans to LMI families in the AA. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included \$3,000 to an organization that supports small businesses in LMI areas, \$1,000 to an organization that provides financial literacy to LMI families, and \$777 to assist with recent flooding in the AA.

Louisiana Statewide

We also considered investments in the broader Louisiana statewide area. WNB holds two prior period affordable housing investments totaling \$123,000 as well as 11 grants totaling \$4,000 in Louisiana that does not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Alexandria, Baton Rouge, Hammond, Houma-Thibodaux, Lafayette, Lake Charles, Monroe, and Shreveport-Bossier City AA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in Louisiana is rated Outstanding.

We placed the most weight on the bank's performance in the New Orleans AA, where the bank has the most branches and deposits in this state. The bank's excellent branch distributions in most of the limited scope AAs, excellent utilization of ADS, and CD services positively affected the rating.

Conclusion for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's overall performance is excellent. CD services and ADS positively affected performance in both full scope AAs.

Retail Banking Services

New Orleans AA

The bank's retail service delivery systems are readily accessible to geographies and individuals of different income levels in the New Orleans AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
New Orleans-Metairie	29.72	6	33.33	33.33	16.67	50.00	0.00	10.06	24.43	34.68	29.95
LA Non MSA	14.98	3	16.67	0.00	0.00	66.67	33.33	8.37	26.53	35.41	26.69
Limited Scope											
Alexandria	4.63	1	5.56	0.00	0.00	100.00	0.00	6.79	10.06	53.39	29.73
Baton Rouge	10.84	2	11.11	0.00	50.00	0.00	50.00	13.43	27.04	23.39	36.14
Hammond	6.32	1	5.56	0.00	100.00	0.00	0.00	0.00	20.37	49.08	30.55
Houma-Thibodaux	5.33	1	5.56	0.00	100.00	0.00	0.00	0.00	16.50	62.94	20.56
Lafayette	5.32	1	5.56	0.00	0.00	100.00	0.00	4.64	24.13	42.59	28.63
Lake Charles	10.29	1	5.56	0.00	100.00	0.00	0.00	4.85	24.90	35.48	34.77
Monroe	8.83	1	5.56	0.00	0.00	0.00	100.00	17.56	13.88	33.42	35.15
Shreveport-Bossier City	3.74	1	5.56	0.00	100.00	0.00	0.00	12.62	18.74	27.80	40.85

Note: 3.9% of area populations were located in undesignated CTs.

WNB had two branches in low-income areas of the New Orleans AA. This distribution of branches significantly exceeded population distributions in low-income areas. The bank had an additional branch in a moderate-income area of the New Orleans AA. The branch distribution in moderate-income areas, was below population distributions, but this distribution was considered reasonable with the bank's alternative delivery products. WNB does not influence the location of branch store openings and WNB did not close any branches in either low- or moderate-income areas. WNB also demonstrated that mobile and online banking utilization in the AA is excellent. ADS, mobile, and online banking delivery systems have extended access to banking services in LMI geographies and to individuals of different income levels areas.

The bank provided information, which indicates that 42 percent of its customers living in low-income tracts and 45 percent of customers living in moderate-income tracts actively use mobile banking in the New Orleans AA. These excellent percentages of mobile banking users exceed benchmarks in the 2017 ABA study. Further demonstrating access and effectiveness of ADS, the bank provided additional information that shows 34 percent of customers living in low-income tracts and 37 percent living in moderate-income tracts actively use online banking. The percentage of online banking users is slightly below benchmarks in the ABA study but demonstrates that a good number of LMI customers are using the bank's ADS.

A reasonable number of customers in the New Orleans AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 19 percent of low-income customers and 39 percent of moderate-income customers using this product reside in low- or moderate-income CTs. These percentages exceeded AA population distributions in low- and moderate-income areas.

The bank's opening of a branch in the New Orleans AA improved the accessibility of its delivery systems in low-income geographies. As reflected in the table below, the bank opened one new branch in a low-income area and closed one branch in an upper-income area. Closure of the upper-income branch was a business decision and did not affect accessibility of banking services for LMI individuals.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
New Orleans-Metairie	6	1	1	+1	0	0	(1)
LA Non MSA	3	0	1	0	0	0	(1)
Alexandria	1	0	0	0	0	0	0
Baton Rouge	2	0	0	0	0	0	0
Hammond	1	0	0	0	0	0	0
Houma-Thibodaux	1	0	0	0	0	0	0
Lafayette	1	0	0	0	0	0	0
Lake Charles	1	0	0	0	0	0	0
Monroe	1	0	0	0	0	0	0
Shreveport-Bossier City	1	0	0	0	0	0-	0
Total	18	1	2	+1	0	0	(2)

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

In 2017, the bank launched an innovative pilot consumer loan product in the state of Louisiana. This product called “Re-Starter” is designed for WNB customers without a FICO credit score but have previous paid-as-agreed credit. The program offers a 12-month, small \$500 loan to help customers establish good credit histories.

LA-Non MSA AA

The bank’s retail service delivery systems in the LA-Non MSA AA are accessible to geographies and individuals of different income levels. This assessment was based upon branch distributions as reflected in the table above, *Distribution of Branch Delivery System*, and performance context considerations, which included review of services, the bank’s inability to influence branch openings of Walmart stores, and the demonstrated availability and excellent utilization of ADS by the LMI populations in this AA.

WNB did not have any branches in low- or moderate-income areas of the LA- Non MSA AA, but during the evaluation period, Walmart did not present any opportunities to WNB for opening new branches in this AA. The bank also demonstrated excellent utilization of ADS in this AA, which resulted in our conclusion that retail delivery systems in this AA were accessible.

WNB provided additional information demonstrating that its ADS have expanded access of banking services to geographies and individuals of different income levels in this AA. The bank’s information indicated that 33 percent of its customers living in low-income tracts and 42 percent of customers living in moderate-income tracts actively use mobile banking in the LA-Non MSA AA. These percentages of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating access and effectiveness of ADS, the bank provided additional information showing 25 percent of customers living in low-income tracts and 32 percent in moderate-income tracts actively use online banking. The percentage of online banking users was below the ABA study benchmark, but well above population distributions in low- and moderate-income areas and demonstrated that a good number of LMI customers are using the bank’s ADS.

A reasonable number of customers in the LA-Non MSA AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 8 percent of low-income customers and 43 percent of moderate-income customers using this product reside in low- or moderate-income CTs. The percentage of low-income customers using the product in this AA was consistent with population distributions in low- areas, while the percentage of moderate-income customers exceeded population distributions in moderate-income areas.

As reflected in the table above, *Distribution of Branch Openings/Closings*, the opening and closing of branches in this AA did not adversely affect the accessibility of banking services in LMI areas. The bank closed one branch in an upper-income area of Lincoln Parish. WNB did not have any other branches in this county, but there were nine other banks in this market and WNB was last in terms of market share with only 0.05 percent of the parish deposits.

Banking services in the LA-Non MSA AA are the same as those described above in the New Orleans AA.

Community Development Services

WNB provided a relatively high level of CD services in Louisiana, which had a positive impact on the overall Service Test rating.

Statewide, the bank provided 954 hours of financial education to 2,285 participants. WNB personnel utilized the five core modules for financial education in this state including; 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is available to all consumers in Louisiana. WNB's board and committee involvement statewide is excellent, with 17 employees providing leadership and financial expertise on 19 boards or committees. The majority of these organizations provide community services targeting LMI persons. In addition, there were a few organizations that support economic development.

New Orleans AA

WNB provided an excellent level of CD services in the New Orleans AA. Bank employees provided 375 hours of financial education to over 1,000 participants through its five core training modules. The majority of the bank's training activities focused on the Money Smart programs with 54 percent devoted to Money Smart – business and 36 percent to Money Smart – personal curriculums.

Additionally, the bank had seven employees serving on eight boards or committee positions in the New Orleans AA. Bank employees provided leadership and financial expertise in seven positions, which provide community services to LMI populations, and one position that supports economic development. WNB employees served on boards of organizations such as the St. Bernard Parish Community Services Block Grant Program, Boys Town Louisiana, and the Historically Black College and University Community Development Action Coalition (HBCU-CDAC). Examples of WNB's CD services are further detailed below.

- WNB referred 178 denied small business applicants in Louisiana for a second look through the MWTC initiative. LiftFund is one of the participating CDFIs in the state of Louisiana. Five applicants opted into credit, while nine applicants opted for mentoring.
- In the aftermath of FEMA declared flood disasters in 2016, WNB provided a 90-day payment deferral option for its consumer home improvement loan product. This service was offered to assist residents impacted by the flooding disaster.
- A WNB manager serves on the board of HBCU-CDAC providing financial expertise and guidance on governance related issues. WNB's involvement with this organization has further demonstrated responsiveness to AA needs for development and technical assistance for small businesses and early stage entrepreneurs. WNB managers have collaborated and participated in HBCU-CDAC business incubator initiatives at the New Orleans campus of Southern University A&M. To demonstrate their commitment to these efforts, in 2016, WNB began paying rent at the university's Small Business Development & Management Institute (SBDMI). WNB has since provided two Small Business ReLi LOCs to tenants of the SBDMI. WNB and LiftFund, a U.S. Treasury-certified CDFI, have collaborated with Southern University A&M to provide financial education and a lender's perspective to aspiring small businesses in two events hosted on the New Orleans campus. WNB participated in another university event focusing on entrepreneurial opportunities in the arts community. Further, WNB managers have participated in the SBDMI semi-annual peer-to-peer business development series, providing guidance to a cohort of ten early stage businesses. Discussion topics have included government contracting, business management, finance, marketing, and networking.
- WNB managers also participate in quarterly meetings with the City of New Orleans "Claiborne Corridor One Table" revitalization initiative, which involves reviewing loan requests to the city from minority and women-owned businesses located or planning to relocate in the Claiborne area. The Claiborne area is targeted for development in the HousingNOLA's Community Development Finance Plan. HousingNOLA is a partnership between community leaders, public, private organizations, and non-profits working to solve affordable housing needs in New Orleans. The quarterly meetings have also resulted in seven entrepreneurs meeting with WNB to discuss small business financing options.

LA-Non MSA AA

WNB provided a relatively high level of CD services in the LA-Non MSA AA. Bank employees in these AA branches provided 90 hours of financial education to 370 participants through its five core educational modules. The majority of the bank's training activities in this AA focused on the Money Smart programs with 62 percent related to Money Smart – business and 30 percent related to Money Smart – personal. Additionally, the bank had four employees serving in four board or committee positions in the LA-Non MSA AA. Of the organizations, three provided services targeting LMI populations and one supported economic development. WNB employees provided leadership and financial expertise on boards of national organizations such as Family Promise, as well as local organizations that provide a food pantry and health care services for the uninsured and underinsured. Examples of WNB's CD services are further detailed below.

- In response to small business needs for credit and technical assistance, WNB collaborated with the University of Louisiana at the Lafayette chapter of the Louisiana Small Business Development Center (LSBDC). The LSBDC offers free technical assistance to existing and start-up small businesses in Louisiana. WNB branch managers provided banking perspective at five local business trainings conducted by LSBDC in 2017 and 2018. These training sessions were held in Lafayette and Eunice, Louisiana. Eunice is one of the cities in the LA-Non MSA AA. These trainings were primarily attended by small, early stage entrepreneurs who have the potential to create jobs throughout the AA.
- WNB's 90-day payment deferral option on consumer home improvement loans was also available to customer in this AA in the aftermath of FEMA declared flood disasters in 2016.
- WNB managers provided financial education to approximately 20 residents of an affordable housing complex located in a moderate-income area of Eunice, Louisiana.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Baton Rouge, Hammond, Houma-Thibodaux, Lake Charles, and Shreveport-Bossier City AAs is consistent with the bank's overall outstanding full scope performance. The bank's performance in Alexandria, Lafayette, and Monroe AAs was weaker than full scope performance due to the lack of branches in LMI areas. CD services had a positive influence in Lafayette and Monroe. CD services did not affect the Service Test rating in Alexandria where services were more limited. WNB provided only a limited level of financial education in this AA and had no board or committee involvement. The bank's mobile banking, online banking, and the Cash in at Checkout services also extend accessibility of services throughout the state and limited scope AAs.

State Rating

State of Maryland

CRA rating for the State of Maryland: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall good service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Maryland

WNB operates nine branches in three AAs in the state of Maryland, mostly located in the Greater Baltimore region and Maryland's Eastern Shore. They were opened over a 5-year period from October 2007 to October 2012.

WNB possesses a very limited 0.02 percent of deposit market share and ranks 77th out of 92 financial institutions in Maryland. Through December 31, 2018, Maryland's largest depository institutions were Bank of America, N.A., Manufacturers and Traders Trust Company, PNC Bank, and Wells Fargo Bank, N.A., making up 51 percent of state deposit share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Baltimore AA, two regulatory agency contacts with a county economic department agency and an affordable housing organization were utilized in this evaluation. The community contacts indicated that there are numerous opportunities for banks to assist with funding to support technical assistance to early stage and start-up businesses and bank investments to fund the affordable housing loan pools.

Additional identified community development needs were increased bank participation in state and county small loan programs to fund small businesses, increased bank referrals of business owners to local economic development agencies, capital for small developers to make more affordable housing stock available for low-income borrowers, and flexible bank products for low- and moderate-income borrowers.

To help identify needs and opportunities in the Salisbury AA, the OCC utilized a community contact with an economic development entity that helps businesses and entrepreneurs in Wicomico County. The community contact indicated that there are numerous opportunities for banks to assist with funding for revitalization efforts in localities that receive the Sustainable Community designation. Additional CD needs included assistance for businesses that provide job opportunities for college graduates, services and accommodations for the area aging population, and funding to improve the capacity of area infrastructure to help accommodate new residential and commercial growth and development.

Baltimore AA

Baltimore AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Baltimore-Columbia-Towson MD MSA (Baltimore AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	681	13.1	22.6	33.5	28.8	2.1
Population by Geography	2,769,818	9.0	22.0	35.3	32.8	0.8
Housing Units by Geography	1,145,512	10.7	22.9	35.5	30.6	0.3
Owner-Occupied Units by Geography	687,555	4.9	17.3	38.2	39.5	0.1
Occupied Rental Units by Geography	348,757	16.6	32.8	32.9	17.1	0.5
Vacant Units by Geography	109,200	28.2	26.7	26.7	17.6	0.8
Businesses by Geography	186,057	5.1	15.4	38.2	40.5	0.8
Farms by Geography	4,313	1.2	11.2	39.2	48.4	0.1
Family Distribution by Income Level	675,620	22.3	17.0	19.8	40.8	0.0
Household Distribution by Income Level	1,036,312	25.1	15.4	17.4	42.2	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$272,723
			Median Gross Rent			\$1,181
			Families Below Poverty Level			7.6%
Source: 2015 ACS Census and 2017 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.						

Salisbury AA

Salisbury AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Salisbury MD MSA (Salisbury AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	20.9	41.9	27.9	7.0
Population by Geography	178,681	1.8	24.1	41.7	29.9	2.5
Housing Units by Geography	108,615	1.6	17.1	45.4	35.9	0.0
Owner-Occupied Units by Geography	44,124	1.6	14.2	46.5	37.6	0.0
Occupied Rental Units by Geography	22,023	2.7	40.7	40.4	16.1	0.0
Vacant Units by Geography	42,468	1.1	7.8	46.7	44.3	0.0
Businesses by Geography	12,125	1.1	15.8	51.0	31.9	0.1
Farms by Geography	606	0.3	14.7	47.9	36.5	0.7
Family Distribution by Income Level	43,154	22.1	17.3	20.1	40.5	0.0
Household Distribution by Income Level	66,147	25.5	16.6	16.8	41.1	0.0
Median Family Income MSA - 41540 Salisbury, MD-DE MSA		\$63,091	Median Housing Value			\$217,196
			Median Gross Rent			\$961
			Families Below Poverty Level			11.1%
Source: 2015 ACS Census and 2017 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 Baltimore and Salisbury AAs

WNB operates five branches in two of the seven counties that comprise the Baltimore-Columbia-Towson-MD MSA AA, Anne Arundel and Baltimore counties. The remaining five counties include Baltimore City, Carroll, Harford, Howard, and Queen Anne's. The total MSA population is 2,769,818.

WNB had \$8.5 million in deposits in the Baltimore AA, representing 62 percent of its deposits in the state, but only 0.01 percent of total deposits. WNB's very limited presence of 0.01 percent deposit market share ranks it at 70th out of 78 depository financial institutions doing business in this AA. WNB has operated in the market since November 7, 2007. In 2018, the top three financial institutions in the market were Bank of America, N.A., M&T Bank, and PNC Bank. These banks maintain a competitive advantage with 59 percent deposit market share combined (Source: 2018 FDIC Summary of Deposits).

WNB operates three branches in the Wicomico and Worcester counties of the Salisbury AA. The total MSA population is 178,681. WNB had \$4.8 million in deposits in the Salisbury AA representing 33 percent of its deposits in the state, but only 0.13 percent of total deposits. WNB's very limited presence of 0.13 percent deposit market share ranks it at 16th out of 18 depository financial institutions doing business in this AA. WNB has operated in the market since April 21, 2007. In 2018, the top four financial institutions in the market were PNC Bank, Calvin B Taylor Banking Company, Hebron Savings Bank, and Branch Banking and Trust. These banks maintain a competitive advantage with over 49 percent deposit market share combined (Source: 2018 FDIC Summary of Deposits).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

LENDING TEST

The bank's performance under the Lending Test in Maryland is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Baltimore and Salisbury AAs is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Baltimore	18	245	9	272	64.00	59.94
Salisbury	7	103	2	112	26.35	34.13
California-Lexington Park	3	36	2	41	9.65	5.93

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Baltimore	44	445	1,106	1,595	84.44	59.94
Salisbury	23	170	33	226	11.96	34.13
California-Lexington Park	3	58	7	68	3.60	5.93

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the Baltimore and Salisbury AAs. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 90.07 percent of total lending activity in the Baltimore AA and 91.96 percent in the Salisbury AA. By number, the bank's small business lending market share of 0.01 percent in the Baltimore AA and 0.00 percent in the Salisbury AA is in line with the bank's deposit market share of 0.01 and 0.13 percent, respectively.

According to 2017 peer data by number, WNB ranked 89th of 153 small business lenders in the Baltimore AA and not ranked in the Salisbury AA. The five largest business lenders held 60 and 54 percent, respectively, of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its full scope AAs.

Small Loans to Businesses

Refer to Table Q in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The bank had too few loans to analyze in both full scope AAs. However, small loans to businesses only represented 7 percent in the Baltimore AA and 6 percent in the Salisbury AA of total reported loans. Therefore, the rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table U in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

In the Baltimore AA, the distribution of consumer loans in LMI geographies is excellent. In LMI geographies, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

In the Salisbury AA, the distribution of consumer loans in low-income geographies was adequate. The proportion of bank loans was slightly weaker than the proportion of households in those geographies. However, in the moderate-income geographies, the distribution of consumer loans is excellent. The proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The bank had too few loans to analyze in both full scope AAs. However, small loans to businesses only represented 7 percent in the Baltimore AA and 6 percent in the Salisbury AA of total reported loans. Therefore, the rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table V in the state of Maryland section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent for both full scope AAs. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the full scope AAs.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Baltimore AA

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Baltimore AA. During the evaluation, WNB originated nine CD loans, totaling \$1 million. This volume of CD lending was equivalent to 132 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs, specifically of affordable housing. Of the nine loans, four totaling \$770,892 were associated with the aforementioned identified need of the AA. Other loans benefitted economic development and LMI community services. One notable example includes four LOCs, totaling \$770,892 to an agency that works in partnership with the community for stability and self-sufficiency among low-income residents. Programs include two homeless shelters and affordable housing services to thousands of residents, located in Baltimore County.

Salisbury AA

The volume of CD loans was adequate and had a positive impact on the Lending Test performance in the Salisbury AA. During the evaluation, WNB originated two CD LOCs totaling \$32,765. This volume of CD lending was equivalent to 7 percent of tier 1 capital allocated to the AA. One LOC was primarily responsive to identified community needs, specifically of affordable housing. For example, WNB made a \$500,000 LOC (with a \$12,765 allocation to this AA) to a CDFI that provides funding to low-income individuals and communities in the forms of grants and loans. The other LOC was associated with economic development.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

WNB is not a mortgage lender, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the California-Lexington Park AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to the lending tables in the state of Maryland section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Maryland is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Baltimore AA and the Salisbury AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Baltimore	4	315	2	283	19	13	25	38.46	611	31.64
Salisbury	3	149	2	427	15	21	20	30.77	596	30.86
California-Lexington Park	4	322	2	395	14	7	20	30.77	724	37.49
MD BSRA						6			6	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

Baltimore AA

During the evaluation period, WNB made a total of six investments totaling \$598,032, including 4 prior period investments totaling \$314,850 and 2 current period investments totaling \$283,182. Additionally, 19 grants totaling \$13,000 were also made for a total investment in the AA of \$611,340. WNB's total investments represented 73 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA consisted of a \$265,000 investment in a bond backed by a 303-unit multifamily housing facility dedicated to LMI tenancy in a low-income tract and a \$18,181 investment in a CDFI that promotes economic development through financing of small businesses. Noteworthy grants included \$5,000 to an organization that focuses on LMI small business entrepreneurs and \$2,500 to an organization with a program that focuses on single mother entrepreneurship.

Salisbury AA

During the evaluation period, WNB made a total of five investments totaling \$575,816, including three prior period investments totaling \$149,048 and two current period investments totaling \$426,768. Additionally, 15 grants totaling \$20,642 were also made for a total investment in the AA of \$596,458. WNB's total investments represented 125 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA consisted of a \$250,000 mutual fund that invests in CRA qualifying investments and \$176,767 to a CDFI that makes affordable housing loans for LMI individuals. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included \$4,000 to a community association focused on economic development and \$7,500 to the only small business CDFI on the Eastern Shore. The grant helped launch an online entrepreneurship platform to help the CDFI increase their geographic reach and volume of small businesses served.

Maryland Statewide

We also considered investments in the broader Maryland statewide area. WNB holds six grants totaling \$6,315 in Maryland that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered this investment as it demonstrated a positive impact statewide.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the California-Lexington Park AA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in Maryland is rated Outstanding. CD services and the bank's ADS positively affected the rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Baltimore AAs is adequate and in the Salisbury AA is excellent. CD services and ADS positively affected performance in both of the full scope AAs.

Retail Banking Services

Baltimore AA

The bank's retail service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Baltimore	59.94	5	55.56	0.00	0.00	40.00	60.00	8.97	22.02	35.35	32.81
Salisbury	34.13	3	33.33	0.00	33.33	33.33	33.33	1.80	24.10	41.67	29.88
California-Lexington Park	5.93	1	11.11	0.00	0.00	100.00	0.00	4.73	12.70	65.54	17.02

Note: 3.41% of area populations were located in undesignated CTs.

WNB does not have any branches in low- or moderate geographies in the Baltimore AA. However, as part of the performance context, we considered that WNB does not influence Walmart retail locations. WNB may express interest in specific locations, but Walmart must still approve or accept the bank's offer. During the evaluation period, the bank did express interest in a new branch in a moderate-income area of the Baltimore AA. Walmart accepted the bank's proposal and the bank obtained appropriate regulatory approvals, but this branch did not open until after the evaluation period.

WNB makes excellent use of ADS in this AA through mobile and online banking. The bank provided additional information demonstrating that mobile banking services are accessible to geographies and individuals of different income levels in the Baltimore AA. Approximately 50 percent of the bank's customers living in low-income tracts and 53 percent of customers living in moderate-income tracts actively use mobile banking. Further demonstrating access and effectiveness of ADS, the bank provided additional information that shows 43 percent of customers living in low-income tracts and 44 percent living in moderate-income tracts of this AA actively use online banking. The percentage of mobile and online banking users in the Baltimore AA exceeded benchmarks in the 2017 ABA study.

A reasonable number of customers in the Baltimore AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 22 percent of low-income customers and 38 percent of moderate-income customers using this product reside in low- or moderate-income CTs. These percentages exceeded AA population distributions in LMI areas.

As reflected in the table below, the bank did not open or close any branches in this AA during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Baltimore	5	0	0	0	0	0	0
Salisbury	3	0	0	0	0	0	0
Limited Scope							
California-Lexington Park	1	0	0	0	0	0	0
Total	9	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

In 2017, the bank launched an innovative pilot consumer loan product in Maryland. This product called “Re-Starter” is designed for WNB customers without a FICO credit score but have previous paid-as-agreed credit. The program offers a 12-month, small \$500 loan to help customers establish good credit histories.

Salisbury AA

The bank’s retail service delivery systems are readily accessible to geographies and individuals of different income levels in the Salisbury AA. As indicated in the table above, *Distribution of Branch Delivery System*, WNB did not have any branches in low-income areas, but the bank did have one branch in a moderate-income area of this AA. The bank’s branch distribution exceeded population distributions in moderate-income areas.

The bank also demonstrated excellent utilization of mobile and online banking ADS in the Salisbury AA by extending access of services to LMI individuals. Approximately 44 percent of the bank’s customers living in low-income tracts and 46 percent of customers living in moderate-income tracts actively use mobile banking. These percentages exceeded benchmarks in the 2017 ABA study. Further demonstrating access and effectiveness of ADS, the bank provided additional information that shows 38 percent of customers in low-income tracts and 36 percent in moderate-income tracts actively use online banking in the Salisbury AA. The percentages of online banking users were slightly below the 2017 ABA study, but still demonstrates a good number of LMI customers are using the bank’s ADS.

A reasonable number of customers in the AA were also using the bank’s free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 1 percent of low-income customers and 47 percent of moderate-income customers using this product reside in LMI CTs. The percentage of low-income customers is consistent with AA population distributions in low-income tracts, while the percentage of moderate-income customers exceeds population distributions in moderate-income tracts.

The opening and closing of branches in this AA did not adversely affect accessibility of delivery systems. As reflected in the table above, *Distribution of Branch Openings/Closings*, the bank did not open or close any branches in the Salisbury AA. During the evaluation period, Walmart did not present any opportunities to WNB for opening new branches in this AA. Banking services in the Salisbury AA is the same as those described above for Baltimore AA.

Community Development Services

CD services in Maryland are Outstanding. The institution provides an excellent level of CD services, which had a positive impact on the overall Service Test rating.

Statewide, the bank provided 715 hours of financial education to 3,503 participants. WNB personnel utilized the five core modules for financial education in this state including: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is available to all consumers in Maryland. WNB's board and committee involvement statewide is excellent with ten employees serving on nine boards or committees in ten positions. The majority of organizations served provide affordable housing and community services targeting LMI persons. In addition, WNB employees served in two organizations that support economic development in Maryland AAs.

Baltimore AA

WNB provided an excellent level of CD services in the Baltimore AA. Bank employees provided 542 hours of financial education to 2,971 participants through its five training courses. The majority of the bank's training in this AA focused on Junior Achievement curriculums and small business assistance. WNB employees devoted 71 percent of their educational service hours to providing the Junior Achievement curriculum in 38 AA schools where the majority of students are eligible for the free or reduced lunch programs. In addition to financial education, the bank had six employees serving on five boards or committees in six-member positions in the Baltimore AA. The majority of organizations served by WNB provided essential community services for LMI populations. Bank employees provided leadership and financial expertise on three board and committee positions supporting community services, with one position supporting affordable housing, and one position supporting local economic development needs. Examples of WNB's CD services are further detailed below

- WNB demonstrated innovation and responsiveness in this AA with the bank's 2015-2017 partnership with Baltimore City Public Schools. WNB worked with the public-school system to deliver the Junior Achievement Biz Town, a one-day financial management and banking experience in AA schools where 70-99 percent of students receive free or reduced meals.
- WNB employees also focused 29 percent of their service hours on the Money Smart curriculums. WNB's provision of the Money Smart – personal course was particularly responsive to LMI individuals as the bank provided this curriculum in emergency shelters and assistance centers. In 2018, approximately 45 shelter clients had opened new checking account relationships with WNB.
- Additionally, WNB demonstrated responsiveness to AA needs for economic development by hosting a small business symposium in 2018 at the Maryland Food Bank with 15 participants. Further, WNB partnered with the Baltimore Chamber of Commerce, and two CDFIs, the Maryland Capital Enterprises and the Latino Economic Development Corporation to provide technical assistance to small businesses attending symposiums in 2017 and 2018.

- WNB staff served on the Finance Committee of Neighborhood Housing Services, Inc., a nationally known non-profit organization providing affordable housing solutions and financial coaching. WNB employees also served on local organizations that provide food banks, emergency assistance, and shelter for the homeless. Two WNB employees in this AA served on the board and a committee of Community Network Assistance, which operates one of the largest shelters in the Baltimore AA.
- WNB demonstrated responsiveness to AA needs for economic development through staff participation on the small business committee of the Maryland Bankers Community Reinvestment Group, a collaborative that provides comprehensive support to the small business sector and small business Community Development Fund in the Baltimore AA. The organization provided a small business summit for small and emerging businesses during the evaluation period as well as workshops for small business resource providers.

Salisbury AA

WNB provided a relatively high level of CD services in the full scope Salisbury AA. Bank employees provided 155 hours of financial education to 470 participants. The majority of the bank's educational training in this AA focused on the Money Smart programs with 67 hours of the Money Smart – personal curriculum and 58 hours of the Money Smart – business curriculum. Bank employees also provided 18 hours of the Building Wealth curriculum and 11 hours of Junior Achievement curriculums. In addition to financial education, the bank had three employees serving on three boards or committees in three-member positions. Bank employees provided leadership and financial expertise through their board or committee memberships in one community service related organization, one organization providing affordable housing solutions, and one organization focused on local economic development. These organizations included nationally recognized Habitat for Humanity, local organizations promoting community and small business development, and a local community center that provides free after school educational programs for at risk and LMI children.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance in the California-Lexington Park AA is weaker than the bank's Outstanding in the full scope AAs. The bank did not have any branches in LMI tracts of this AA, but all branches across the state offer mobile banking, online banking, and the Cash in at Checkout service, which extends bank delivery systems, providing reasonable accessibility across the bank's footprint.

CD activities were adequate in the limited scope AA but did not affect the overall Service Test rating. The bank provided only 18 hours of financial education during the entire evaluation period, and only one employee served in organizations providing services to LMI populations. Overall, performance in the limited scope AA did not affect the overall Service Test rating.

State Rating

State of Mississippi

CRA rating for the State of Mississippi: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, good geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Mississippi

WNB operated 23 branches in eight AAs during the evaluation period, which opened between October 2008 and January 2013. WNB possesses a very limited 0.12 percent of deposit market share and ranks 63rd out of 111 financial institutions in the AA. Through December 31, 2018, the AAs largest depository institutions were Trustmark National Bank, Regions Bank, and BancorpSouth making up 35 percent of state deposit share (Source: CRA Wiz 2018 Peer Branch & Deposits).

Community Contacts

To help identify needs and opportunities in the Gulfport-Biloxi AA, the OCC utilized a community contact with an economic development entity that helps businesses and entrepreneurs in Biloxi and surrounding Harrison County, Mississippi. The community contact indicated that there is a need for commercial loans, particularly those to small and minority-owned businesses, and for a special loan program for downtown revitalization and development.

Gulfport-Biloxi AA

Gulfport-Biloxi-PA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Gulfport-Biloxi-Pascagoula MS MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	80	8.8	16.3	52.5	20.0	2.5
Population by Geography	382,571	5.8	13.7	55.4	24.9	0.1
Housing Units by Geography	172,906	6.4	15.0	56.0	22.5	0.1
Owner-Occupied Units by Geography	92,124	3.6	10.8	58.2	27.4	0.0
Occupied Rental Units by Geography	52,591	10.5	19.2	54.4	15.7	0.3
Vacant Units by Geography	28,191	8.0	20.6	52.0	19.5	0.0
Businesses by Geography	20,731	8.5	13.7	55.1	22.4	0.4
Farms by Geography	454	3.7	8.1	60.6	27.5	0.0
Family Distribution by Income Level	96,585	23.0	16.4	19.4	41.2	0.0
Household Distribution by Income Level	144,715	24.5	15.8	17.8	41.9	0.0
Median Family Income MSA - 25060 Gulfport-Biloxi-Pascagoula, MS MSA		\$52,846	Median Housing Value			\$130,968
			Median Gross Rent			\$832
			Families Below Poverty Level			15.4%
Source: 2015 ACS Census and 2017 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 Gulfport-Biloxi AA

WNB operates six branches in the Gulfport-Biloxi AA, an AA consisting of Harrison, Hancock, and Jackson located along the Mississippi Gulf Coast. WNB possesses \$6.9 million in AA deposits, which amounts to 18 percent of state deposits but only 0.13 percent of WNB total deposits. The bank possesses 0.08 percent of deposit market share and ranks of 22nd out of 25 financial institutions doing business in the AA. The three largest financial institutions by deposit market share are Hancock Whitney Bank, Keesler Federal Credit Union, and The Peoples Bank, who collectively make up 55 percent of combined deposit market share (CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

LENDING TEST

The bank's performance under the Lending Test in Mississippi is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Gulfport-Biloxi AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Gulfport-Biloxi	23	309	10	342	23.68	18.11
Jackson	9	109	4	122	8.45	5.77
Memphis	4	30	4	38	2.63	4.18
MS-Non MSA	88	832	22	942	65.24	71.94

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Gulfport-Biloxi	51	508	280	839	23.73	18.11
Jackson	12	166	62	240	6.79	5.77
Memphis	8	53	51	112	3.17	4.18
MS-Non MSA	191	1,374	780	2,345	66.32	71.94

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the Gulfport-Biloxi AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 90.35 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.05 percent is in line with the bank's deposit market share of 0.08 percent.

According to 2017 peer data by number, WNB ranked 54th of 83 small business lenders in the Gulfport-Biloxi AA. The five largest business lenders held 53 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The bank had too few loans to analyze in the Gulfport-Biloxi AA. However, small loans to businesses only represented 7 percent in the AA of total reported loans. Therefore, the rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table U in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in low-income geographies is good. The distribution of consumer loans in moderate-income geographies is excellent. In low-income geographies, the proportion of bank loans was stronger than the proportion of households in those geographies for 2015-2016 and significantly weaker than the proportion of household in 2017-2018. In moderate-income geographies, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The bank had too few loans to analyze in the Gulfport-Biloxi AA. However, small loans to businesses only represented 7 percent in the AA of total reported loans. Therefore, the rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table V in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Gulfport-Biloxi MSA. During the evaluation, WNB originated ten CD loans totaling \$280,498. This volume of CD lending was equivalent to 41 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Of the \$280,498, five loans totaling \$175,000 or 62 percent of total CD lending was associated with LMI services, which was an identified need of the AA. Other loans benefitted affordable housing and economic development. Some notable examples of CD loans are as follows:

- The bank originated two revolving LOCs, totaling \$100,000 to an organization whose sole mission is to prevent and end homelessness. The organization has a homeless shelter and works with state and local sponsors to fill housing gaps.
- The bank originated three loans totaling \$75,000 to fund crime prevention initiatives for at-risk seniors, to help ensure a safe and secure crime-free residence. The loans support community services to 81 percent of LMI residents.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Jackson, Memphis, and MS-Non MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area for consumer loans. In the MS-Non MSA, the bank did have small business loans and exhibited performance consistent with the bank's overall performance. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Mississippi section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Mississippi is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Gulfport-Biloxi AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Gulfport-Biloxi		0	4	233	17	15	21	12.65	248	13.92
Jackson	3	69	3	147	17	7	23	13.86	224	12.57
Memphis	2	56	3	124	14	7	19	11.45	187	10.49
MS-Non MSA	6	108	17	967	80	48	103	62.05	1,123	63.02
MS BSRA	2	65				6	2		72	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made four current period investments totaling \$232,896. The bank did not make any prior period investment during the review period. Prior period investments include \$150,300 of MDI certificate of deposits, with an original purchase amount of \$50,000 in 2015, with the bank renewing it three times during the evaluation period. Additionally, 17 grants totaling approximately \$15,000 were made for a total investment in the AA of \$248,038. WNB's total investments represented 36 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included approximately \$63,000 to a loan fund providing small business lending capital to entrepreneurs from the LMI community. WNB also provided \$100,000 to a fund promoting economic development in the AA. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants include \$5,000 to the homeless coalition and \$1,000 to a CDFI that provides funding to small businesses.

Mississippi Statewide

We also considered investments in the broader Mississippi statewide area. WNB holds two prior period affordable housing investments totaling \$65,434 and six grants totaling \$6,476 in Mississippi that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Jackson, Memphis, and MS-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Mississippi is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Gulfport -Biloxi AA is excellent. CD services were also excellent and positively affected the Service Test rating.

Retail Banking Services

The bank's retail service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Gulfport-Biloxi	18.11	6	23.08	16.67	33.33	33.33	16.67	5.84	13.73	55.43	24.89
Limited Scope											
Jackson	5.77	2	7.69	0.00	50.00	50.00	0.00	14.54	36.95	32.45	16.06
Memphis	4.18	1	3.85	0.00	100.00	0.00	0.00	0.00	34.68	65.32	0.00
MS – Non MSA	71.94	17	65.38	0.00	5.88	58.82	29.41	4.22	21.76	44.00	29.26

Note: 0.87% of area populations were located in undesignated CTs.

As reflected in the table above, the bank's distribution of branches in both low- and moderate-income areas exceeds population distributions in those areas. WNB also makes good use of ADS through mobile and online banking.

The bank provided information indicating that 35 percent of its customers living in low-income tracts and 41 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 29 percent of customers living in low-income tracts and 34 percent in moderate-income tracts actively use online banking. The percentages of online banking users were below the 40 percent ABA study benchmark, but still demonstrates that a good number of LMI customers are using the bank's ADS.

A reasonable number of customers in the full scope Gulfport-Biloxi AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 7 percent of low-income customers and 24 percent of moderate-income customers using this product reside in low- or moderate-income CTs. The percentage of customers using this service exceeded population distributions in both low- and moderate-income CTs.

The opening and closing of branches have not adversely affected the availability of delivery systems in this AA or the state of Mississippi. As summarized in the table below, the bank did not open or close branches in the full scope AA or limited scope AAs during the evaluation period.

Distribution of Branch Openings/Closings							
Assessment Area	# Bank Branches	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
				Low	Mod	Mid	Upp
Full Scope							
Gulfport-Biloxi	6	0	0	0	0	0	0
Limited Scope							
Jackson	2	0	0	0	0	0	0
Memphis	1	0	0	0	0	0	0
MS – Non MSA	17	0	0	0	0	0	0
Total	26	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

In 2017, the bank also launched an innovative pilot consumer loan product in several states, including Mississippi. This product called "Re-Starter", is designed for WNB customers without a FICO credit score but have previous paid-as-agreed credit. The program offers a 12-month, small \$500 loan to help customers establish good credit histories.

Community Development Services

The institution provides an excellent level of CD services in Mississippi. CD services had a significantly positive impact on the overall Services Test rating.

Statewide, the bank provided 1,397 hours of financial education to 4,755 participants. WNB personnel utilized the five core modules for financial education in this state, which included 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is available to all consumers in Mississippi. WNB's board and committee involvement statewide is excellent with 26 employees serving on 22 boards or committees. The majority of organizations served provide affordable housing, and community services for LMI persons. In addition, WNB provided leadership and financial expertise to a few organizations that provide job creation and small business development.

WNB also provided an excellent level of CD services in the full scope Gulfport-Biloxi AA. Bank employees provided 394 hours of financial education to 1,566 participants. The majority of the bank's training activities focused on the Money Smart programs with 173 hours of the Money Smart – personal and 104 hours of the Money Smart – business curriculums. WNB provided the Money Smart – personal curriculum primarily in branch offices, community organizations, and in two local schools where the majority of students qualified for free or reduced lunch programs. In addition to financial education, the bank had six employees serving on five boards or committees in six-member positions in the Gulfport-Biloxi AA. The organizations focus primarily on community services and economic development. Bank employees served on boards or committees of several national organizations including Habitat for Humanity, Boys and Girls Clubs, The Salvation Army, as well as local organizations supporting food banks, economic development, and workforce training. Examples of WNB's involvement are further summarized below.

- WNB referred 245 loans applicants for a second look through the MWTC initiative in Mississippi. Fifteen of these applicants applied for credit, of which ten opted into credit or mentoring. Two of the referrals resulted in loan originations from the Texas-based CDFI, LiftFund.
- Local WNB staff served on the board and hiring committee of the Moore Community House, a low-income childcare center where five WNB employees also provided the Money Smart – personal financial education to approximately 336 parents, staff, and children on 26 different occasions during the evaluation period.
- A WNB manager serves on the economic development committee and is the chairperson for the diversity committee of the Mississippi Gulf Coast Chamber of Commerce. Through these committee positions, WNB has provided financial education to small businesses as well as financial expertise in developing a grant program to aid in the recovery of East Biloxi businesses challenged with infrastructure issues.
- Two WNB personnel serve on the Board of the Boys and Girls Club of the Gulf Coast. In these positions, WNB employees provide financial expertise for fundraising events and guidance for programs to develop LMI youth. In addition, during the evaluation period, at least ten employees provided the Money Smart – personal training to approximately 280 participants in 14 different sessions.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Jackson, Memphis, and MS-Non MSA AAs is consistent with the bank's excellent performance in the full-scope AA. All branches across the state offer mobile banking, online banking, and the Cash in at Checkout money transfer product. The bank's ADS expand accessibility of services across the entire footprint.

State Rating

State of New York

CRA rating for the State of New York: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in New York

WNB operates 16 branches in eight AAs, each of which opened between October 2007 and November 2009. The bank possesses a very limited 0.02 percent of deposit market share and ranks 131st of out 227 financial institutions in its delineated AA. Through December 31, 2018, the largest depository institutions in the AA were M&T Bank, KeyBank, and Citizens Bank, who collectively possessed 53 percent of state deposit market share (Source: CRA Wiz 2018 Peer Branch and Deposit Data).

Community Contacts

To help identify needs and opportunities in the Rochester AA, the OCC utilized two regulatory agency contacts with an affordable housing organization and a business development center serving Monroe County. Identified community credit needs were affordable housing including lending for construction financing and mortgage loans. Additional community development needs were identified as funding to nonprofits for general operational assistance, financial education, access to loans for start-up businesses, and bank support of CD services.

Rochester AA

Rochester, NY

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester NY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	265	16.6	16.6	41.1	23.0	2.6
Population by Geography	1,057,969	9.2	14.4	46.6	28.8	0.9
Housing Units by Geography	459,864	9.8	15.5	47.7	27.0	0.1
Owner-Occupied Units by Geography	282,578	3.4	11.6	51.9	33.0	0.0
Occupied Rental Units by Geography	138,156	20.1	22.2	38.9	18.6	0.1
Vacant Units by Geography	39,130	19.0	19.7	48.1	13.1	0.1
Businesses by Geography	56,422	9.2	13.7	44.7	32.1	0.3
Farms by Geography	2,248	1.6	8.1	66.2	24.1	0.0
Family Distribution by Income Level	262,179	21.9	17.1	19.9	41.2	0.0
Household Distribution by Income Level	420,734	24.4	16.0	17.4	42.1	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$67,757	Median Housing Value			\$130,495
			Median Gross Rent			\$812
			Families Below Poverty Level			10.4%

Source: 2015 ACS Census and 2017 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 Rochester AA

WNB operates four branches in the Rochester NY AA; encompassing six counties in the WNB delineated AA including Livingston, Monroe, Ontario, Orleans, Wayne, and Yates counties in the west central region of the state. The total MSA population is 1,057,969. WNB had \$5.4 million in deposits in the Rochester NY MSA representing 23 percent of its deposits in the state, but only 0.10 percent of total WNB deposits. WNB possesses 0.02 percent of total deposit market share and ranks 47th out of 49 financial institutions doing business in the AA (Source: CRA Wiz 2018 Peer Branch & Deposit Data). In 2018, the top three financial institutions in the delineated AA were Manufacturers and Traders Trust Co, KeyBank, N.A., and JPMorgan Chase, N.A., who collectively comprise over 48 percent of combined deposit market share (Source: 2018 FDIC Summary of Deposits).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK**LENDING TEST**

The bank's performance under the Lending Test in New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Rochester AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Rochester	18	350	2	370	27.74	22.99
Albany-Schenectady-Troy	6	93	0	99	7.42	10.37
Buffalo-Cheektowaga-Niagara Falls	18	267	1	286	21.44	20.64
Elmira	2	45	0	47	3.52	5.64
Syracuse	3	53	1	57	4.27	2.58
Utica-Rome	7	172	1	180	13.49	11.11
Watertown-Fort Drum	2	48	1	51	3.82	5.16
NY-Non MSA	21	219	4	244	18.29	21.52

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Rochester	84	574	55	713	26.38	22.99
Albany-Schenectady-Troy	10	164	0	174	6.44	10.37
Buffalo-Cheektowaga-Niagara Falls	37	476	30	543	20.09	20.64
Elmira	13	73	0	86	3.18	5.64
Syracuse	3	94	15	112	4.14	2.58
Utica-Rome	7	308	30	345	12.76	11.11
Watertown-Fort Drum	2	85	15	102	3.77	5.16
NY-Non MSA	79	384	165	628	23.23	21.52

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the Rochester AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 80.50 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.03 percent is in line with the bank's deposit market share of 0.02 percent.

According to 2017 peer data by number, WNB ranked 56th of 98 small business lenders in the Rochester AA. The five largest business lenders held 51 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The bank had too few loans to analyze in the Rochester AA. However, small loans to businesses only represented 5 percent in the AA of total reported loans. Therefore, the rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table U in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The bank had too few loans to analyze in the Rochester AA. However, small loans to businesses only represented 5 percent in the AA of total reported loans. Therefore, the rating will be based on performance for consumer loans.

Consumer Loans

Refer to Table V in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a positive impact on the Lending Test performance in the Rochester AA. During the evaluation, WNB originated two CD loans totaling \$55,000. This volume of CD lending was equivalent to 10 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Some notable examples of CD loans are as follows:

- The bank originated one loan totaling \$40,000 to an organization with a purpose to provide affordable housing to LMI individuals in rural markets.
- WNB made one loan totaling \$15,000 to organizations who primarily originate loans to small businesses, underserved businesses, and entrepreneurs in underserved communities.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Albany-Schenectady-Troy, Buffalo-Cheektowaga-Niagara Falls, Elmira, Watertown-Fort Drum and NY-Non MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in Syracuse and Utica-Rome Syracuse was slightly weaker than the bank's overall performance under the Lending Test. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Rochester AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Rochester	3	139	2	172	18	12	23	14.94	324	16.21
Albany-Schenectady-Troy	3	93	2	274	13	12	18	11.69	378	18.91
Buffalo-Cheektowaga-Niagara Falls	5	278	2	62	16	10	23	14.94	351	17.56
Elmira	2	16	3	128	12	7	17	11.04	150	7.50
Syracuse	2	44	2	212	14	7	18	11.69	263	13.16
Utica-Rome	5	160	2	108	14	7	21	13.64	274	13.71
Watertown-Fort Drum		0	2	85	14	7	16	10.39	92	4.6
NY-Non MSA	2	8	2	152	14	7	18	11.69	167	8.35
NY BSRA	2	83					2		85	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made five investments totaling \$311,624, including three prior period investments totaling \$139,167 and two current period investments totaling \$172,457. Additionally, 18 grants totaling approximately \$12,000 were made for a total investment in the AA of \$323,755. WNB's total investments represented 61 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a \$130,591 mortgage security backed by affordable home loans made to LMI families in the AA as well as \$40,866 to a CDFI that targets affordable housing for LMI individuals, community service facilities, and early care facilities targeted to low-income families. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants include approximately \$3,000 to an organization to help fight homelessness and \$1,225 to an organization that assists small businesses obtain needed capital.

New York Statewide

We also considered investments in the broader New York statewide area. WNB holds two prior period affordable housing investments totaling \$83,000 and provided \$2,000 in grants in New York that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany-Schenectady-Troy, Buffalo-Cheektowaga-Niagara Falls, Elmira, Syracuse, Utica-Rome, Watertown-Fort Drum, and the NY-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in New York is rated Outstanding. CD performance in all of the bank's AAs and ADS positively affected performance.

Conclusions for Area Receiving Full-Scope Review

Based on the full-scope review, the bank's performance in the Rochester AA is excellent. WNB also provides an excellent level of CD services, which had a positive impact on the Service Test rating.

Retail Banking Services

Retail service delivery systems are accessible to geographies and individuals of different income levels in the Rochester AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Rochester	22.99	4	25.00	0.00	50.00	50.00	0.00	9.22	14.43	46.63	28.79
Limited Scope											
Albany-Schenectady-Troy	10.37	2	12.50	0.00	0.00	50.00	50.00	11.11	19.66	40.63	27.18
Buffalo-Cheektowaga-Niagara Falls	20.64	2	12.50	0.00	0.00	50.00	50.00	12.72	13.47	39.95	32.51
Elmira	5.64	1	6.25	0.00	0.00	100.00	0.00	13.49	9.11	50.68	23.79
Syracuse	2.58	1	6.25	0.00	0.00	100.00	0.00	9.96	16.68	43.48	28.53
Utica-Rome	11.11	2	12.50	0.00	0.00	50.00	50.00	12.26	10.76	50.55	24.51

Watertown-Fort Drum	5.16	1	6.25	0.00	0.00	100.00	0.00	0.00	18.31	74.48	7.13
NY-Non MSA	21.52	3	18.75	0.00	0.00	100.00	0.00	1.62	8.47	86.64	3.26

Note: 9.99% of area populations were located in undesignated CTs.

As reflected in the table above, the bank does not have any branches in low-income areas of the full scope AA, but two of the bank's four branches, 50 percent, are in moderate-income CTs. This branch distribution significantly exceeds population distributions in moderate-income areas. WNB makes good use of ADS in this AA through mobile and online banking. WNB provided information demonstrating that its ADS have expanded access to geographies and individuals of different income levels in this AA. Information indicates that 39 percent of its customers living in low-income tracts and 45 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided information that shows 31 percent of customers living in low-income tracts and 35 percent in moderate-income tracts actively use online banking. These percentages of online banking users were below the 40 percent ABA study benchmark, but still demonstrate that a good number of customers are using the bank's ADS.

In the Rochester AA, a good number of customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB also provided information that shows 34 percent of low-income customers and 35 percent of moderate-income customers using this service resided in low-or moderate-income CTs. The percentage of LMI customers using the service exceeds population distributions in both low- and moderate-income CTs.

The opening and closing of branches have not adversely affected the availability of delivery systems in this AA or the state of New York. As summarized in the table below, the bank did not open or close branches in the full scope AA or limited scope AAs during the evaluation period. Walmart did not provide any opportunities for the bank's consideration in low-income CTs and only one opportunity in a moderate-income CT. The bank opted-out of the one opportunity for safety and soundness reasons.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
		# of Branch Openings	# of Branch Closings				
Full Scope				Low	Mod	Mid	Upp
Rochester	4	0	0	0	0	0	0
Limited Scope							
Albany-Schenectady-Troy	2	0	0	0	0	0	0
Buffalo-Cheektowaga-Niagara Falls	2	0	0	0	0	0	0
Elmira	1	0	0	0	0	0	0
Syracuse	1	0	0	0	0	0	0
Utica-Rome	2	0	0	0	0	0	0
Watertown-Fort Drum	1	0	0	0	0	0	0
NY-Non MSA	3	0	0	0	0	0	0
Total	16	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

WNB provides a relatively high level of level of CD services in New York. CD services had a positive impact on the overall Services Test rating.

Statewide, the bank provided 709 hours of financial education to 1,317 participants. WNB personnel utilized the five core courses for financial education in this state including; 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank’s free online financial curriculum, Banking GPS, is available to all consumers in New York. WNB’s board and committee involvement statewide is excellent with 18 employees serving on 12 boards or committees. The majority of organizations served provide community services and affordable housing for LMI individuals. WNB personnel are also involved in one organization that focuses on job creation and small business development.

WNB provided an excellent level of CD services in the full scope Rochester AA. Bank employees provided 217 hours of financial education to 377 participants. The majority of the bank’s training activities focused on the Money Smart programs with 105 hours of Money Smart – personal and 77 hours of the Money Smart – business curriculum. Bank employees also provided 25 hours of the Building Wealth curriculum in moderate-income branches and ten hours of the New Beginnings financial education curriculum in moderate-income branches and local community organizations. In addition to financial education, the bank had nine employees serving on five boards or committees in 11-member positions in the Rochester AA. The organizations focused on essential services for the LMI populations and affordable housing. Bank employees served on boards or committees of national organizations such as Habitat for Humanity, Family Promise of Wayne County, as well as other local charitable organizations. Examples of the bank’s involvement are summarized below.

- WNB referred 257 loans applicants for a second look through the MWTC initiative in New York. Eleven of these applications applied for credit of which nine opted into credit or mentoring.
- Two WNB employees serve on the board of the Rochester Interfaith Hospitality Network, an affiliate of Family Promise, a non-profit organization assisting the homeless with shelter and food. One employee provides additional financial expertise as the treasurer on the executive committee. A third WNB employee also serves on the event planning committee and provides financial literacy training to families in the shelter program approximately four times per year.
- WNB employees provide leadership and financial expertise on the board of The Community Place, which provides social, developmental, and educational programs to LMI families. WNB employees have provided at least eight training sessions during the evaluation period using the Money Smart – personal and Family Promise – New Beginnings curriculums.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in all of the limited scope AAs is weaker than the bank's excellent performance in the full scope AA. The weaker AAs included Albany-Schenectady-Troy, Buffalo-Cheektowaga-Niagara Falls, Elmira, Utica-Rome, Watertown-Fort Drum, and NY-Non MSA. CD service performance in all of these AAs, except Elmira, was relatively high with a positive impact on the Service Test rating. CD performance in Elmira was adequate and had no impact on the rating. The weaker performance in all of these AAs affected the overall state rating; however, it is important to consider that all branches across the state offer mobile banking, online banking, and the Cash in at Checkout service. The bank demonstrated that its ADS have expanded accessibility of services across the bank's entire footprint.

State Rating

State of North Carolina

CRA rating for the State of North Carolina: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in North Carolina

WNB operates 88 branches in twenty-one AAs, each of which opened between April 2005 and July 2013. The bank possesses a very limited 0.08 percent of deposit market share and ranks 59th of out 107 financial institutions in the AA. North Carolina is the second largest state market for WNB in number of branches and AAs. Through December 31, 2018, the largest depository institutions in North Carolina were Branch Banking and Trust, Wells Fargo Bank, N.A., and First Citizens Bank, who collectively made possessed 76 percent of state deposit market share (Source: 2018 FDIC Summary of Deposits).

Community Contacts

To help identify needs and opportunities in the Greensboro-Highpoint AA, the OCC utilized a community contact with an economic development entity that helps small businesses in Greensboro and the surrounding area. The community contact indicated that there is a need for bank lending and investment in CD projects as well as bank investment in micro-lending and angel investor organizations to provide alternative access to capital.

Greensboro-Highpoint AA

Greensboro Highpoint NA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Greensboro-High Point NC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	6.5	26.2	38.7	28.0	0.6
Population by Geography	741,433	5.7	23.3	42.8	28.1	0.0
Housing Units by Geography	326,899	5.7	23.7	42.9	27.6	0.0
Owner-Occupied Units by Geography	184,429	2.7	17.2	45.8	34.3	0.0
Occupied Rental Units by Geography	107,201	10.2	32.7	38.2	18.8	0.0
Vacant Units by Geography	35,269	8.2	30.5	42.1	19.2	0.0
Businesses by Geography	53,613	4.1	21.9	36.5	37.3	0.2
Farms by Geography	1,715	1.6	14.2	52.2	32.0	0.0
Family Distribution by Income Level	189,747	21.7	18.3	18.4	41.7	0.0
Household Distribution by Income Level	291,630	23.4	16.6	17.4	42.6	0.0
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA		\$55,218	Median Housing Value			\$145,143
			Median Gross Rent			\$747
			Families Below Poverty Level			13.3%
Source: 2015 ACS Census and 2017 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 Greensboro-High Point AA

WNB operates ten branches in the Greensboro-High Point AA, an AA that encompasses Guilford, Randolph and Rockingham counties in the north central region of the state. The ten WNB branches opened between July 2005 and October 2008. WNB possesses a very limited total deposit market share of 0.17 percent market share and ranks 25th out of 30 depository financial institutions doing business in the AA (Source: 2018 FDIC Summary of Deposits). In 2018, the top three financial institutions in the market were Wells Fargo Bank, N.A., Branch Banking and Trust Company, and Pinnacle Bank, who make up 50 percent combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in North Carolina is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greensboro-Highpoint AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Greensboro-High Point	72	652	7	731	15.71	15.40
Asheville	17	164	5	186	4.00	5.00
Burlington	15	117	4	136	2.92	3.40
Durham-Chapel Hill	42	192	7	241	5.18	3.17
Fayetteville	5	73	4	82	1.76	1.61
Goldsboro	20	117	5	142	3.05	3.93
Greenville	8	70	3	81	1.74	1.22
Hickory-Lenoir-Morganton	27	263	4	294	6.32	7.28
Jacksonville	16	58	3	77	1.66	0.96
New Bern	11	89	3	103	2.21	2.25
Raleigh	81	474	10	565	12.15	14.23
Rocky Mount	28	164	5	197	4.23	2.82
Winston-Salem	78	542	9	629	13.52	12.46
NC-Non MSA	119	1,032	37	1,188	25.54	26.27

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Greensboro-High Point	193	1,143	924	2,260	12.07	15.40
Asheville	29	285	527	841	4.49	5.00
Burlington	19	199	124	342	1.83	3.40
Durham-Chapel Hill	87	344	122	553	2.95	3.17
Fayetteville	7	124	399	530	2.83	1.61
Goldsboro	59	204	149	412	2.20	3.93
Greenville	13	107	47	167	0.89	1.22
Hickory-Lenoir-Morganton	83	469	269	821	4.38	7.28
Jacksonville	24	101	37	162	0.87	0.96
New Bern	33	151	85	269	1.44	2.25
Raleigh	341	866	884	2,091	11.17	14.23
Rocky Mount	107	270	116	493	2.63	2.82
Winston-Salem	282	935	5,194	6,411	34.23	12.46
NC-Non MSA	250	1,763	1,362	3,375	18.02	26.27

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is greater than the proportion of bank deposits in the AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. By number, the bank's small business lending market share of 0.01 percent is less than the bank's deposit market share of 0.17 percent.

According to 2017 peer data by number, WNB ranked 37th of 96 small business lenders in the Greensboro-High Point AA. The five largest business lenders held 53 percent of the market and include banks that are issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its full-scope AA.

Small Loans to Businesses

Refer to Table Q in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in those geographies.

Consumer Loans

Refer to Table U in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

Refer to Table R in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was significantly stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a positive impact on the Lending Test performance in the Greensboro-Highpoint AA. During the evaluation, WNB originated seven CD loans totaling \$924,428. This volume of CD lending was equivalent to 43 percent of tier 1 capital allocated to the AA. Of the \$924,428, one loan totaling \$337,723 or 37 percent, and a LOC totaling \$318,700 or 34 percent, were for LMI community services, revitalization, and stabilization (which are needs of the AA). The specific CD loans are as follows:

- WNB made a loan for \$3 million (with a \$337,723 allocation to this AA) to a dental practice that assists LMI individuals. The dental provider cares for low-income children, primarily covered by Medicaid and other governmental and non-governmental insurances.
- The bank originated a \$1.5 million LOC (with a \$318,700 allocation to this AA) to a CDFI, to fund small businesses in North Carolina for disaster recovery to those affected by recent hurricanes. The LOC will also provide support to underserved geographic markets throughout the state.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

WNB is not a mortgage lender, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Asheville AA, Durham-Chapel Hill AA, Fayetteville AA, Greenville AA, Hickory-Lenoir-Morganton AA, New Bern AA, Raleigh AA, Rocky Mount AA, Winston-Salem AA, and NC-Non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in the Burlington, Goldsboro, and Jacksonville AAs were slightly weaker than the bank's overall performance under the Lending Test. Burlington and Goldsboro AAs had good performance and the Jacksonville AA had adequate performance. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in North Carolina is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greensboro-Highpoint AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Greensboro-Highpoint		0	2	289	25	43	27	5.96	332	4.06
Asheville	4	150	2	265	16	10	22	4.86	425	5.20
Burlington	2	42	3	159	16	13	21	4.64	214	2.62
Durham-Chapel Hill	5	263	1	1,000	22	21	28	6.18	1,284	15.71
Fayetteville	3	94	2	145	17	13	22	4.86	252	3.08
Goldsboro	2	59	2	347	19	13	23	5.08	419	5.13
Greenville	3	128	2	130	15	10	20	4.42	268	3.28
Hickory-Lenoir-Morgantown	3	149	2	159	15	8	20	4.42	316	3.87
Jacksonville	2	37	1	165	15	8	18	3.97	210	2.57
New Bern	2	58	1	152	15	10	18	3.97	220	2.69
Raleigh	10	764	4	607	21	27	35	7.73	1,399	17.12
Rocky Mount	2	38	1	250	18	10	21	4.64	298	3.65
Winston-Salem	6	425	2	300	17	13	25	5.52	738	9.03
NC-Non MSA	16	509	13	1,214	124	76	153	33.77	1,799	22.01
NC BSRA	1	46				20	1		66	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made two current period investments totaling \$289,019. The bank did not make any prior period investments during the review period. An additional 25 grants totaling approximately \$43,000 were made for a total investment in the AA of \$331,681. WNB's total investments represented 16 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included \$189,019 for an equity equivalent investment in a CDFI that supports small businesses through capital, businesses services, and policy research, as well as a \$100,000 investment in a fund that provides longer-term equity and subordinated debt capital to growth-oriented small and lower middle market businesses. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included approximately \$16,334 to Habitat for Humanity, \$2,907 to an organization that helps fight homelessness, \$1,500 directly to the City of Greensboro to promote economic development, and \$1,667 to a state development fund targeted to the AA.

North Carolina Statewide

We also considered investments in the broader North Carolina statewide area. WNB holds one prior period affordable housing investment totaling \$46,000 and 22 grants totaling \$20,000 in North Carolina that does not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Asheville, Burlington, Durham-Chapel Hill, Fayetteville, Goldsboro, Greenville, Hickory-Lenoir-Morganton, Jacksonville, New Bern, Raleigh, Rocky Mount, Winston-Salem, and the NC-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in North Carolina is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greensboro-Highpoint AA is excellent. CD services were also excellent and positively affected the Service Test rating.

Retail Banking Services

The bank's retail service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope AA											
Greensboro-High Point	15.40	10	13.88	0.00	20.00	80.00	0.00	5.73	23.32	42.80	28.15
Limited Scope AAs											
Asheville	5.00	4	5.56	0.00	50.00	50.00	0.00	1.57	14.02	63.91	20.50
Burlington	3.40	2	2.78	0.00	50.00	0.00	50.00	0.00	28.91	46.05	25.04
Durham-Chapel Hill	3.17	3	4.16	0.00	33.33	33.33	33.34	9.79	21.94	35.24	31.74
Fayetteville	1.61	1	1.38	0.00	0.00	100.00	0.00	0.65	16.89	62.90	18.41
Goldsboro	3.93	3	4.17	0.00	33.33	66.67	0.00	0.00	31.59	55.99	12.42
Greenville	1.22	1	1.39	0.00	0.00	0.00	100.00	10.77	22.50	38.45	28.28
Hickory-Lenoir-Morganton	7.28	4	5.56	0.00	25.00	50.00	25.00	0.00	15.43	62.68	21.89
Jacksonville	0.96	1	1.39	0.00	0.00	100.00	0.00	0.00	12.02	68.54	15.02
New Bern	2.25	2	2.78	0.00	0.00	50.00	50.00	4.90	14.02	53.24	27.85
Raleigh	14.23	11	15.28	9.09	18.18	63.64	9.09	6.46	29.57	32.48	31.12
Rocky Mount	2.82	3	4.17	0.00	0.00	100.00	0.00	0.00	20.53	58.08	21.39
Winston-Salem	12.46	7	9.72	0.00	42.86	28.57	28.57	7.67	20.29	40.77	30.65
NC – Non MSA	26.27	20	27.78	5.00	0.00	60.00	35.00	1.67	23.27	55.84	19.23

Note: 7.83% of area populations were located in undesignated CTs.

The bank did not have branches in low-income areas, as reflected in the table above, but WNB had two branches in moderate-income CTs of the Greensboro-Highpoint AA. The branch distribution in moderate-income CTs was similar to AA population distributions; however, as mentioned above WNB, has no influence on where Walmart retail locations are opened. In addition, WNB provided information demonstrating that mobile and online banking ADS have expanded access to geographies and individuals of different income levels.

WNB makes good use of mobile and online banking delivery systems in this AA. The bank provided information, which indicates that 29 percent of its customers living in low-income tracts and 37 percent living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 26 percent of customers living in low-income tracts and 30 percent in moderate-income tracts actively use online banking. The percentage of online banking users is below the 40 percent ABA study benchmark, but still demonstrates that a good number of LMI customers are using the bank's ADS.

A good number of customers in the full scope AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 10 percent of low-income customers and 36 percent of moderate-income customers using this product reside in low- or moderate-income CTs. The percentage of customers using the service exceeded population distributions in both low- and moderate-income CTs.

The opening and closing of branches have not adversely affected the accessibility of the bank's delivery systems in the full scope Greensboro-High Point AA. As reflected in the chart below, WNB did not open or close any branches in the full scope AA.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
		# of Branch Openings	# of Branch Closings				
Full Scope AA				Low	Mod	Mid	Upp
Greensboro-High Point	10	0	0	0	0	0	0
Limited Scope AAs							
Asheville	4	0	0	0	0	0	0
Burlington	2	0	0	0	0	0	0
Durham-Chapel Hill	3	0	(1)	0	(1)	0	0
Fayetteville	1	0	0	0	0	0	0
Goldsboro	3	0	0	0	0	0	0
Greenville	1	0	0	0	0	0	0
Hickory-Lenoir-Morganton	4	0	0	0	0	0	0
Jacksonville	1	0	0	0	0	0	0
New Bern	2	0	0	0	0	0	0
Raleigh	11	0	0	0	0	0	0
Rocky Mount	3	0	0	0	0	0	0
Winston-Salem	7	0	0	0	0	0	0
NC – Non MSA	20	0	0	0	0	0	0
Total	72	0	(1)	0	0	0	0

The bank did close one branch in a moderate-income area of a limited scope AA, Durham-Chapel Hill; but Walmart closed the store where the bank's branch was located and WNB had no influence in this decision. The closing of this location generally did not adversely affect accessibility of banking services. Bank customers continued to have access to the aforementioned ADS, including ATMs and the Cash in at Checkout service in all Walmart stores. Walmart did not provide other opportunities to WNB for opening store branches in this AA.

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution provides an excellent level of CD services in North Carolina. CD services had a significantly positive impact on the overall Services Test rating.

Statewide, the bank provided 2,691 hours of financial education to over 8,700 participants. WNB personnel utilized the five core modules for financial education in this state, which included 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is available to consumers in North Carolina. WNB's board and committee involvement statewide is excellent with 77 employees serving on 64 boards or committees. The majority of organizations served provide affordable housing and community services targeting LMI persons. In addition, WNB employees provided leadership and financial expertise with a few organizations that support job creation and small business development.

WNB provided an excellent level of CD services in the full scope Greensboro-High Point AA. Bank employees provided 461 hours of financial education to 2,473 participants. The majority of the bank's training activities focused on the Money Smart programs with 147 hours of Money Smart – personal and 224 hours of Money Smart – business curriculums. WNB provided financial education in seven local schools where the majority of students qualified for free or reduced lunch programs. The bank also provided 80 hours training the Junior Achievement curriculum. In addition to financial education, the bank had ten employees serving on nine boards or committees in ten-member positions in the Greensboro-High Point AA. The majority of the organizations in which WNB participates provide affordable housing and community services. Some of the organizations included Habitat for Humanity, a local food pantry, and the Greensboro Community Development Fund, which is involved with economic development in this AA. Examples of WNB's involvement are summarized below.

- WNB referred 887 loans applicants for a second look through the MWTC initiative in North Carolina, of which 36 applicants applied for credit, mentoring, or both. Of the total referrals, 19 received offers for credit, mentoring or both.

- In 2016, the bank partnered with the Carolina Small Business Development Fund, a U.S. Treasury-certified CDFI, to provide small business financial training symposiums in the Greensboro-High Point AA as well as five other North Carolina cities including Asheville, Charlotte, Fayetteville, Greenville, and Raleigh.
- WNB personnel served on the board or family selection committee of three different affiliates of Habitat for Humanity in the bank's AA. Four WNB employees have provided ten training sessions to 26 participants in Habitat affiliates covering the Money Smart – personal and business curriculums such as “Pay Yourself First”, “Money Matters”, “Bank on It”, “Business Financial Management”, “Business Banking Services”, and “Business Credit Reporting.”
- In 2018, WNB partnered with the City of Greensboro to provide small business education during the Minority Enterprise Development week. Two WNB managers provided training during this event covering topics such as cash flow management and record keeping.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in, the Asheville, Burlington, Durham-Chapel Hill, Goldsboro, Hickory-Lenoir-Morgantown, Raleigh, Winston-Salem, and NC-Non MSA AAs is consistent with the bank's excellent performance in the full-scope AA. The performance in Fayetteville, Greenville, Jacksonville, New Bern, and Rocky Mount AAs is weaker than the bank's overall performance in the full-scope AAs. However, CD services had a positive impact in Fayetteville, New Bern, and Rocky Mount AAs. CD services in Greenville, and Jacksonville were limited, having no impact to the Service Test rating. CD service performance in the Greenville AA was weaker because the bank only provided 20 hours of financial education and employees were only involved in one organization. Performance in the Jacksonville AA was similar with only 15 hours of financial education and employees were involvement with only one organization. All branches across the state offer mobile banking, online banking, and the Cash in at Checkout money transfer product. The bank demonstrated that its ADS have expanded accessibility of services across the bank's entire footprint. Performance in the weaker limited scope AAs did not adversely affect the overall rating.

State Rating

State of Ohio

CRA rating for the State of Ohio: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, good geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Ohio

With a physical presence in every geographic region of Ohio, WNB operated 70 branches in 18 AAs during the evaluation period. All branches opened between August 2006 and November 2010. WNB closed two branches during the evaluation period. The first was on January 28, 2016 (in the Cleveland-Elyria, Ohio MSA) and the second was on January 28, 2018 (in the Northwest Non-MSA, Ohio). Each of the two closed branches were in a middle-income CT. Following the 2018 closings, WNB currently operates 68 branches in 18 AAs in Ohio.

The bank possesses a very limited 0.04 percent of deposit market share and ranks 137th out of 380 financial institutions in its AA. Through December 31, 2018, the largest four depository institutions in the AAs were Huntington National Bank, JPMorgan Chase, N.A, PNC Bank, and KeyBank, N.A., who collectively possess 50 percent of state deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data)

Community Contacts

To help identify needs and opportunities in the OH-Non MSA AA, the OCC utilized two regulatory agency contacts with an affordable housing organization and a business development center serving Monroe County. Identified community credit needs were affordable housing including low interest financing for home repair programs, mortgage loans, and short-term small dollar loans.

Additional CD needs were identified as funding to nonprofits for general operating support grants, low/no fee business checking accounts, deposit accounts with higher interest rates, grants for Individual Development Account programs, increased member bank participation in Federal Home Loan Bank programs, and CD services.

Ohio-Non MSA AA

Only Non-MSAs OH

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non MSAs OH						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	414	0.5	18.1	61.8	19.1	0.5
Population by Geography	1,758,667	0.3	16.1	63.8	19.7	0.1
Housing Units by Geography	771,327	0.4	16.9	63.0	19.7	0.0
Owner-Occupied Units by Geography	491,625	0.2	13.0	64.7	22.2	0.0
Occupied Rental Units by Geography	191,253	0.8	26.2	59.0	14.0	0.0
Vacant Units by Geography	88,449	0.5	18.6	62.2	18.6	0.0
Businesses by Geography	88,904	0.7	18.0	61.0	20.3	0.0
Farms by Geography	8,365	0.1	6.3	64.0	29.6	0.0
Family Distribution by Income Level	465,191	19.4	17.9	21.7	41.0	0.0
Household Distribution by Income Level	682,878	22.5	16.3	18.5	42.8	0.0
Median Family Income Non-MSAs - OH		\$56,217	Median Housing Value			\$115,978
			Median Gross Rent			\$650
			Families Below Poverty Level			11.3%
Source: 2015 ACS Census and 2017 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 Ohio-Non MSA

WNB operates 25 branches in the Ohio Non-MSA covering a vast 30 county area (34 percent of all counties in the state) from southern Scioto County abutting West Virginia; to northern Williams and Paulding counties along the Indiana border; and to eastern Guernsey County less than 40 miles from Pennsylvania. WNB possesses a very limited deposit market share of 0.14 percent of deposit market share and ranks 95th out of 142 financial institutions doing business in the Ohio-Non MSA (Source: CRA Wiz 2018 Peer Branch & Deposit Data). WNB opened its 25 local branches between August 2006 and October 2009. In 2018, the top seven financial institutions within the AA are Huntington National Bank, PNC Bank, Wells Fargo, N.A., National Cooperative Bank, Fifth Third Bank, Park National Bank, and the First Federal Bank of the Midwest who collectively make up 38 percent of combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank's performance under the Lending Test in the Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Ohio-Non MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
OH-Non MSA	143	1,643	40	1,826	44.36	47.08
Akron	20	207	5	232	5.64	5.98
Canton-Massillon	7	123	8	138	3.35	3.39
Cleveland-Elyria	28	357	9	394	9.57	7.52
Columbus	34	324	9	367	8.92	7.52
Dayton	17	252	7	276	6.71	5.9
Lima	5	38	5	48	1.17	1.46
Mansfield	5	42	5	52	1.26	2.08
Springfield	1	97	5	103	2.5	1.15
Toledo	24	411	10	445	10.81	11.23
Wheeling	6	49	4	59	1.43	3.02
Youngstown-Warren-Boardman	10	162	4	176	4.28	3.66

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
OH-Non MSA	309	2,850	2,005	5,164	37.88	47.08
Akron	34	363	196	593	4.35	5.98
Canton-Massillon	10	206	271	487	3.57	3.39
Cleveland-Elyria	972	584	476	2,032	14.91	7.52
Columbus	449	563	471	1,483	10.88	7.52
Dayton	29	435	267	731	5.36	5.9
Lima	10	57	211	278	2.04	1.46
Mansfield	11	77	181	269	1.97	2.08
Springfield	3	170	186	359	2.63	1.15
Toledo	57	726	719	1,502	11.02	11.23
Wheeling	13	89	176	278	2.04	3.02
Youngstown-Warren-Boardman	24	286	146	456	3.35	3.66

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the Ohio-Non MSA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 89.98 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.14 percent is in line with the bank's deposit market share of 0.14 percent.

According to 2017 peer data by number, WNB ranked 38th of 126 small business lenders in the Ohio-Non MSA. The five largest business lenders held 48 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in moderate-income geographies is excellent. During the evaluation period, there were no loans located in low-income geographies; however, there is only 1 percent of businesses located in these geographies. The proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in moderate-income tracts for all years.

Consumer Loans

Refer to Table U in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies. The bank's performance in low-income geographies in 2015-2016 was weaker than the performance in 2017-2018, but still adequate.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was significantly stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Ohio Non-MSA MSA. During the evaluation, WNB originated 40 CD loans totaling \$2 million. This volume of CD lending was equivalent to 40 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to the one identified community need of affordable housing. Of the \$2.1 million of loans, one loan totaling \$2 million was associated with affordable housing, which provides lending capital to members of the National Neighbor Works network of affordable housing organizations.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Akron, Canton-Massillon, Cleveland-Elyria, Columbus, Dayton, Lima, Mansfield, Springfield, Toledo, and Youngstown-Warren-Boardman AA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in Wheeling was slightly weaker than the bank's overall performance. CD loans in all AAs were consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the statewide OH-Non MSA AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
OH-Non MSA	22	567	19	1,847	103	66	144	38.71	2,480	36.08
Akron	3	66	5	543	14	10	22	5.91	619	9.0
Canton-Massillon	5	227	3	239	14	7	22	5.91	473	6.88
Cleveland-Elyria	9	553	1	260	17	10	27	7.26	824	11.99
Columbus	4	184	1	250	14	9	19	5.11	444	6.46
Dayton	6	365	1	250	19	12	26	6.99	627	9.12
Lima	3	126	2	64	14	7	19	5.11	197	2.87
Mansfield	2	78	2	59	14	7	18	4.84	145	2.11
Springfield	3	110	3	136	16	10	22	5.91	256	3.72
Toledo		0	1	240	18	15	19	5.11	255	3.71
Wheeling	2	43	2	128	12	7	16	4.30	178	2.59
Youngstown-Warren-Boardman	3	109	3	261	12	7	18	4.84	376	5.47
OH BRSA	1	48		0		16	1		64	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made 41 investments totaling approximately \$2.4 million including 22 prior period investments totaling approximately \$567,000 and 19 current period investments totaling approximately \$1.8 million. Additionally, 103 grants totaling approximately \$66,000 were made for a total investment in the AA of \$2.5 million. WNB's total investments represented 50 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included an equity equivalent investment of approximately \$253,915 in a CDFI that targets community service facilities for LMI individuals in various Non-MSA AAs, as well as \$335,000 for a municipal bond established to replace a temporary school with a permanent facility in which a majority of the students qualify for free or reduced lunch. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included approximately \$8,575 to an organization with reach throughout the state that focused on economic development; approximately \$2,000 to an organization whose focus is for economic revitalization and stabilization in LMI areas in the state; and \$2,000 for Habitat for Humanity.

Ohio Statewide

We also considered investments in the broader Ohio statewide area. WNB holds one prior period affordable housing investment totaling \$48,000 and 16 grants totaling \$16,000 in Ohio that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Akron, Canton-Massillon, Cleveland-Elyria, Columbus, Dayton, Lima, Mansfield, Springfield, Toledo, Wheeling, and Youngstown-Warren-Boardman AAs is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Ohio is rated Outstanding. CD services, in 11 of the 12 AAs, and the bank's ADS had a significantly positive impact on the rating.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the OH-Non MSA AA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the OH-Non MSA AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
OH-Non MSA	47.08	30	44.78	0.00	36.67	46.67	16.66	0.34	16.08	63.80	19.73
Limited Scope											
Akron	5.98	4	5.96	0.00	0.00	75.00	25.00	11.38	19.70	41.74	27.18
Canton-Massillon	3.39	3	4.48	0.00	33.33	66.67	0.00	6.31	10.66	65.73	17.04
Cleveland-Elyria	7.52	5	7.46	20.00	20.00	40.00	20.00	12.09	19.99	34.26	33.24
Columbus	7.52	6	8.96	0.00	33.33	50.00	16.67	10.07	21.23	35.28	32.56
Dayton	5.90	6	8.96	0.00	33.33	50.00	16.67	9.06	20.09	42.77	28.08
Lima	1.46	1	1.49	0.00	0.00	100.00	0.00	6.66	18.53	47.60	27.22
Mansfield	2.09	1	1.49	0.00	0.00	100.00	0.00	3.93	16.85	57.38	21.84
Springfield	1.15	1	1.49	0.00	0.00	100.00	0.00	7.37	27.03	40.93	24.67
Toledo	11.23	7	10.45	14.29	0.00	28.57	57.14	13.22	14.58	40.91	30.36
Wheeling	3.02	1	1.49	0.00	0.00	100.00	0.00	0.00	18.70	66.60	14.71
Youngstown-Warren-Boardman	3.66	2	2.99	0.00	0.00	100.00	0.00	9.68	16.48	46.45	27.39

Note: 2.5% of area populations were located in undesignated CTs.

As reflected in the table above, the bank does not have any branches in low-income areas of the full scope AA; but population distributions in the low-income areas of this AA were very low at 0.34 percent. The bank had eleven branches, 37 percent, in moderate-income CTs, which significantly exceeded population distributions in moderate-income areas. As part of the performance context, we also considered that during the evaluation period, Walmart did not present any opportunities to WNB for branches in low- or moderate-income CTs of this AA.

WNB makes excellent use of ADS through mobile and online banking. WNB provided additional information demonstrating that its ADS have expanded access to geographies and individuals of different income levels in this AA. The bank's information indicates that 39 percent of its customers living in low-income tracts and 40 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 32 percent of customers living in low-income tracts and 31 percent in moderate-income tracts actively use online banking. These percentages of online banking users were below the 40 percent ABA study benchmark, but still demonstrates that a good number of LMI customers are using the bank's ADS.

In the full scope OH- Non MSA AA, a reasonable number of moderate-income customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 26 percent of moderate-income customers using this service resided in moderate-income CTs. The percentage of moderate-income customers using the service exceeded population distributions in moderate-income CTs. The percentage of low-income customers using the service was minimal at 1 percent of low-income customers.

The institution's opening and closing of branches in Ohio has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. As reflected in the table below, during the evaluation period, WNB closed one branch in the full scope OH-Non MSA AA. This branch was located in Henry County, which is located in a middle-income CT. WNB closed this branch for business reasons.

The bank had no other branches in this county; but customers still had access to ADS, including ATMs and the Cash in at Checkout service. WNB's deposit market share in this county was minimal at 0.13 percent, with nine other financial institutions serving the market. WNB closed an additional branch in a limited scope AA, Cleveland-Elyria. This branch was also in a middle-income CT. Walmart closed the store in this AA, and WNB had no influence in this decision.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
Full Scope				Low	Mod	Mid	Upp
OH-Non MSA	30	0	(1)	0	0	(1)	0
Limited Scope							
Akron	4	0	0	0	0	0	0
Canton-Massillon	3	0	0	0	0	0	0
Cleveland-Elyria	5	0	(1)	0	0	(1)	0
Columbus	6	0	0	0	0	0	0
Dayton	6	0	0	0	0	0	0
Lima	1	0	0	0	0	0	0
Mansfield	1	0	0	0	0	0	0
Springfield	1	0	0	0	0	0	0
Toledo	7	0	0	0	0	0	0
Wheeling	1	0	0	0	0	0	0
Youngstown-Warren-Boardman	2	0	0	0	0	0	0
Total	67	0	2	0	0	(2)	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution is a leader in providing CD services in Ohio. CD services had a significantly positive impact on the overall Service Test rating.

Statewide, the bank provided 3,222 hours of financial education to 9,292 participants. The bank utilized five core modules for financial education in this state including; 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is available to all consumers in Ohio. WNB's board and committee involvement statewide is excellent with 65 employees serving on 49 boards or committees in 72 positions. The majority of organizations served provide affordable housing and community services to LMI persons. In addition, WNB employees served on a few organizations in Ohio that support economic development through job creation and small business development.

WNB provided an excellent level of CD services in the full scope Ohio Non MSA AA. Bank employees provided 1,342 hours of financial education to over 4,000 participants through its five educational programs.

The majority of the bank's training activities in this AA focused on the Money Smart programs with 47 percent devoted to Money Smart – business and 45 percent devoted to Money Smart - personal curriculums. In addition to financial education, WNB had 25 employees serving on boards or committees of 24 organizations in 27-member positions in the Ohio Non MSA AA. The majority of organizations served by WNB provide essential community services for LMI populations and affordable housing solutions. Bank employees provided leadership and financial expertise in 15 board or committees positions providing community services, and 11 positions supporting affordable housing needs. WNB employees served on boards and committees of national organizations operating in this AA such as The Salvation Army, nine affiliates of Habitat for Humanity, United Way, and Big Brothers Big Sisters. WNB employees also served on boards or committees of local organizations providing a food pantry and shelter for the homeless. Examples of WNB's involvement are summarized below.

- WNB referred 484 loan applicants for a second look through the MWTC initiative in Ohio. Twenty-four of these applicants applied for credit and all opted into credit or mentoring.
- Two WNB managers serve on the board and advisory board of Junior Achievement of Dayton, Ohio. WNB personnel have also provided two training sessions for Junior Achievement programs to 445 participants in one local elementary school where the majority of students qualify for free or reduced lunch programs.
- Two WNB managers also provided the Money Smart – personal programs in a local high school and middle school in four sessions with 22 participants. The majority of students in these schools qualified for free or reduced lunch programs. WNB employees also provide regular financial education for organizations in the AA, including the Nobel County Corrections and Multi-County Juvenile Detention Center.
- A WNB manager provides financial expertise on the board of Ashland Church Community Emergency Shelter Services (ACCESS) program. This organization is a coalition of Christian congregations providing safe, temporary emergency shelter, meals and other assistance for homeless women and families in Ashland County, which is part of the full scope AA. WNB's manager have worked with ACCESS on a grant to train local businesses and have facilitated financial literacy training at ACCESS with other WNB personnel.
- WNB staff have participated in 2017 and 2018 tax seasons assisting United Way and the Volunteer Income Tax Assistance program on super refund Saturdays where they average over \$2,000 annually in refunds for LMI households.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Canton-Massillon, Cleveland-Elyria, Columbus, Dayton, and Toledo AAs is consistent with the bank's excellent performance in the full-scope AA. The bank's performance in Akron, Lima, Mansfield, Springfield, Wheeling, and Youngstown-Warren-Boardman AAs is weaker than the full-scope AA due to branch distributions. The bank has no branches in LMI areas in these AAs.

CD services were either excellent or good in all of the limited scope AAs, which positively affected the overall Service Test rating, except in the Springfield AA, where CD services were adequate, having no impact on the overall Service Test rating. The weaker performance in six of the 12 AAs affected the overall state rating; however, it is important to consider that all branches across the state offer mobile banking, online banking, and the Cash in at Checkout money transfer product. The bank demonstrated that its ADS have expanded accessibility of services across the bank's entire footprint.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall adequate service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has good ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Pennsylvania

WNB operated 42 branches in 18 AAs during the evaluation period. Forty of the 42 branches opened between March 2007 and July 2011, while two additional branches opened in the fall of 2018. WNB closed two branches in January 2018 in Lebanon and Wayne counties. Each of the closed branches was in a middle-income CT. Following the 2018 closings, WNB currently operates 40 branches in 16 AAs in Pennsylvania.

The bank possesses a very limited 0.02 percent of deposit market share and ranks 176th of out 424 financial institutions in its delineated AA. Through December 31, 2018, the largest depository institutions in Pennsylvania were PNC Bank, Citizens Bank of Pennsylvania, and Wells Fargo, N.A., who collectively possessed 37 percent of state deposit market share (Source: 2018 FDIC Summary of Deposits).

Community Contacts

To help identify needs and opportunities in the Pittsburgh AA, the OCC utilized two regulatory agency contacts with an economic development entity that facilitates investments in new and existing businesses to promote job growth and a community-based organization that represents a coalition of leaders collaborating to revitalize Allegheny County.

The community contacts indicated that primary needs include bank products for startup and infant-stage businesses, small dollar consumer loans, flexible consumer loan underwriting, investments in CDFIs, and affordable housing, including mortgage and rehabilitation financing.

Pittsburgh AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh PA MSA (Pittsburgh AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	711	8.4	24.6	43.9	21.0	2.1
Population by Geography	2,358,926	5.0	20.6	47.6	26.3	0.5
Housing Units by Geography	1,104,684	5.8	22.6	47.6	23.9	0.1
Owner-Occupied Units by Geography	691,107	2.7	17.8	50.9	28.6	0.0
Occupied Rental Units by Geography	300,415	10.8	29.8	42.3	16.8	0.3
Vacant Units by Geography	113,162	12.1	32.3	41.8	13.6	0.2
Businesses by Geography	160,558	4.9	16.2	42.6	35.5	0.8
Farms by Geography	3,956	1.9	13.8	57.6	26.6	0.1
Family Distribution by Income Level	611,943	21.2	17.4	20.6	40.8	0.0
Household Distribution by Income Level	991,522	25.2	15.5	17.0	42.3	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$136,925
			Median Gross Rent			\$752
			Families Below Poverty Level			8.5%
Source: 2015 ACS Census and 2017 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 Pittsburgh AA

WNB operates nine branches in the Pittsburgh AA, a delineated AA that includes the seven counties of Allegheny, Beaver, Butler, Armstrong, Washington, Fayette and Westmoreland in the west central region of the state. Allegheny County is in the center of the region and is notably home to Pittsburgh, which is the population center and economic driver of the region. The total MSA population is 2,358,926.

WNB had \$17.6 million in deposits in the Pittsburgh PA MSA representing 24 percent of its deposits in the state, but only 0.33 percent of total deposits. WNB possesses a very limited 0.01 percent of total deposit market share and ranks 96th out of 187 financial institutions doing business in the delineated AA. (Source: CRA Wiz 2018 Peer Branch & Deposit Data). The top two financial institutions in the MSA are PNC Bank and The Bank of New York Mellon, who combined make up 66 percent of total MSA deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PITTSBURGH AA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Pittsburgh	34	578	9	621	26.85	24.33
Altoona	3	76	2	81	3.50	2.07
Chambersburg-Waynesboro	4	63	2	69	2.98	2.10
East Stroudsburg	17	105	2	124	5.36	8.09
Erie	17	120	2	139	6.01	4.91
Harrisburg-Carlisle	8	92	2	102	4.41	5.51
Johnstown	4	73	2	79	3.42	2.96
Lancaster	2	70	2	74	3.20	1.79
Lebanon	1	18	0	19	0.82	0.00
Montgomery Co-Bucks Co- Chester Co	24	97	2	123	5.32	5.35
Newark	7	78	1	86	3.72	3.27
Reading	12	144	2	158	6.83	10.46
Scranton-Wilkes-Barre-Hazleton	4	102	2	108	4.67	6.28
York-Hanover	7	93	2	102	4.41	5.95
PA-Non MSA	25	396	7	428	18.50	16.94

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Pittsburgh	76	1,010	861	1,947	25.01	24.33
Altoona	6	141	49	196	2.52	2.07
Chambersburg-Waynesboro	5	106	45	156	2	2.1
East Stroudsburg	126	200	173	499	6.41	8.09
Erie	42	196	103	341	4.38	4.91
Harrisburg-Carlisle	10	157	119	286	3.67	5.51
Johnstown	8	136	65	209	2.68	2.96
Lancaster	2	108	363	473	6.08	1.79
Lebanon	1	27	0	28	0.36	0

Montgomery Co- Bucks Co- Chester Co	76	154	410	640	8.22	5.35
Newark	18	135	81	234	3.01	3.27
Reading	38	255	388	681	8.75	10.46
Scranton-Wilkes- Barre-Hazleton	9	179	165	353	4.53	6.28
York-Hanover	36	164	378	578	7.43	5.95
PA-Non MSA	76	683	404	1,163	14.94	16.94

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the Pittsburgh AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 93.08 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.03 percent is in line with the bank's deposit market share of 0.01 percent.

According to 2017 peer data by number, WNB ranked 68th of 137 small business lenders in the Pittsburgh AA. The five largest business lenders held 63 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed in low- and moderate-income tracts during 2015-2016. During 2017-2018, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in LMI geographies.

Consumer Loans

Refer to Table U in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The bank did not originate enough loans during 2015-2016 to small businesses to be analyzed. During 2017-2018, the distribution of small loans to businesses by revenue is excellent. For these years, the proportion of bank loans to small businesses was significantly stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a positive impact on the Lending Test performance in the Pittsburgh AA. During the evaluation, WNB originated nine CD loans totaling \$860,923. This volume of CD lending was equivalent to 50 percent of tier 1 capital allocated to the AA. WNB's CD loans were primarily responsive to identified community needs of the area. Of the \$860,923, two of the nine loans, totaling \$525,000 or 61 percent of total loans, and four of the nine loans, totaling \$155,923 or 18 percent of total loans, were for economic development and affordable housing, respectively. The aforementioned are identified critical needs of the area. The remaining three loans were associated with LMI community services. Some notable examples of CD loans are as follows:

- The bank originated a loan for \$525,000 to a CDFI that provides loans to individuals who do not qualify for traditional financial institution's loans. The CDFI also stimulates business and job growth through small business lending.
- A \$3 million revolving LOC (with \$110,000 allocation to this AA) to a non-profit. The funds will enable the corporation to provide acquisition, pre-development, or construction loans to offices expanding affordable housing opportunities for LMI communities.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Altoona, East Stroudsburg, Erie, Harrisburg-Carlisle, Johnstown, Lancaster, Lebanon, Newark, Reading, Scranton-Wilkes-Barre-Hazleton, York-Hanover, and PA-Non MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in Chambersburg-Waynesboro was slightly weaker than the bank's overall performance. There were not enough loans for a meaningful analysis in the Montgomery Co-Bucks Co-Chester Co MD AA. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AA. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Pittsburgh	11	631	2	336	25	65	38	10.22	1,032	16.51
Altoona	3	71	2	153	14	7	19	5.11	230	3.68
Chambersburg-Waynesboro	2	65	2	187	14	7	18	4.84	259	4.14
East Stroudsburg	2	28	2	197	16	10	20	5.38	235	3.76
Erie	4	160	2	99	15	7	21	5.65	266	4.26
Harrisburg-Carlisle	3	121	1	39	16	10	20	5.38	170	2.72
Johnstown	3	154	2	152	14	7	19	5.11	312	4.99
Lancaster	5	243	2	288	14	7	21	5.65	538	8.61
Lebanon	2	95	2	154	12	7	16	4.30	256	4.10
Montgomery Co-Bucks Co-Chester Co MD	6	547	2	226	15	7	23	6.18	779	12.46
Newark	2	77	2	118	12	7	16	4.30	201	3.22
Reading	7	472	2	252	20	12	29	7.80	736	11.77
Scranton-Wilkes-Barre-Hazleton	2	8	2	105	14	7	18	4.84	120	1.92
York-Hanover	2	64	2	124	14	7	18	4.84	195	3.12
PA-Non MSA	8	162	11	733	57	27	76	20.43	922	14.75
PA BSRA	4	346				6	4		352	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made 13 investments totaling \$966,656, including 11 prior period investments totaling \$630,632 and two current period investments totaling \$336,024. Additionally, 25 grants totaling \$65,253 were made for a total investment in the AA of approximately \$1 million. WNB's total investments represented 60 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included an equity equivalent investment of \$181,818 in a CDFI fund that promotes business and job growth by financing small businesses with a focus on low-income and other disadvantaged communities. The remaining investment consisted of a mortgage security for \$154,206 backed by affordable housing loans to LMI families in the AA. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included \$35,000 to an organization that supports small businesses in LMI areas; \$5,000 to an organization that provides financial literacy to LMI families; and \$3,500 to an organization focused on revitalizing and stabilizing LMI areas in the AA.

Pennsylvania Statewide

We also considered investments in the broader Pennsylvania statewide area. WNB holds four prior period affordable housing investments totaling \$346,196 as well as 16 grants totaling \$5,531 in Pennsylvania that does not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Altoona, Chambersburg-Waynesboro, East Stroudsburg, Erie, Harrisburg-Carlisle, Johnstown, Lancaster, Lebanon, Montgomery-Bucks-Chester, Newark, Reading, Scranton-Wilkes-Barre-Hazleton, York-Hanover, and the PA-Non MSA AAs is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated Low Satisfactory.

The bank had excellent CD services in 14 of the 15 AAs, which had a significantly positive impact on the rating. The bank also demonstrated excellent utilization of ADS, which had a positive impact on the overall rating.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh AA is Low Satisfactory. The bank's excellent CD services had a significantly positive impact on the rating.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Pittsburgh AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Assessment Area	Distribution of Branch Delivery System										
	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Pittsburgh	24.34	9	22.50	0.00	0.00	66.67	33.33	4.98	20.62	47.56	26.30
Limited Scope											
Altoona	2.07	1	2.50	0.00	0.00	100.00	0.00	5.97	11.30	73.98	8.75
Chambersburg-Waynesboro	2.10	1	2.50	0.00	0.00	100.00	0.00	3.69	8.98	78.42	8.91
East Stroudsburg	8.09	2	5.00	0.00	50.00	50.00	0.00	0.00	11.25	83.44	5.31
Erie	4.91	2	5.00	0.00	0.00	0.00	100.00	9.58	12.92	46.26	30.42
Harrisburg-Carlisle	5.51	3	7.50	0.00	33.33	33.33	33.34	3.80	10.46	53.80	29.45
Johnstown	2.96	1	2.50	0.00	0.00	0.00	100.00	1.77	16.46	55.13	26.64
Lancaster	1.79	1	2.50	0.00	0.00	100.00	0.00	4.30	10.57	73.56	11.57
Lebanon	0.00	0	0.00	0.00	0.00	0.00	0.00	3.48	17.89	62.31	16.32
Montgomery Co-Bucks Co-Chester Co	5.35	4	10.00	25.00	50.00	25.00	0.00	3.52	18.98	47.89	29.27
Newark	3.27	1	2.50	0.00	100.00	0.00	0.00	0.00	74.56	25.44	0.00
Reading	10.46	2	5.00	0.00	0.00	100.00	0.00	15.53	5.48	55.65	23.33

Scranton-Wilkes-Barre-Hazleton	6.28	4	10.00	0.00	25.00	75.00	0.00	3.36	21.60	50.45	24.03
York-Hanover	5.95	3	7.50	0.00	0.00	100.00	0.00	7.94	6.48	67.97	17.62
PA-Non MSA	16.94	6	15.00	0.00	16.67	66.67	16.66	0.00	11.69	73.89	12.58

Note: 6.59% of area populations were located in undesignated CTs.

As reflected in the table above, WNB does not have any branches in low- or moderate-income geographies of the Pittsburgh AA. However, as part of the performance context, we considered that WNB does not influence Walmart retail locations. During the evaluation period, Walmart did not present any opportunities to WNB for branches in LMI areas. Walmart only presented two opportunities in the Pittsburgh AA for branches, none of which were in LMI areas. WNB expressed an interest in both locations, but Walmart only accepted the bank's request for the branch located in an upper-income CT.

WNB makes excellent use of ADS in this AA through mobile and online banking. WNB provided additional information demonstrating that its ADS have expanded access to geographies and individuals of different income levels in this AA. The bank's information indicates that 44 percent of its customers living in low-income tracts and 42 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the aforementioned 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 32 percent of customers living in both low- and moderate-income tracts actively use online banking. The percentage of online banking users was slightly below the 40 percent ABA study benchmark, but still demonstrates that a good number of LMI customers are using the bank's ADS.

In the full scope Pittsburgh AA, a reasonable number of LMI customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 13 percent of low-income customers, and 39 percent of moderate-income customers using this service resided in low or moderate-income CTs. The percentage of LMI customers using the service exceeded population distributions in both low- and moderate-income CTs.

The bank's opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. As reflected in the table below, WNB opened one new branch in the full scope-AA during the evaluation period. As mentioned previously, this branch was in an upper-income area and expanded the bank's delivery systems in this area.

In the limited scope AAs, WNB opened one new branch in a middle-income area of the Scranton-Wilkes-Barre-Hazleton AA, expanding service delivery in this AA. The bank closed two branches in middle-income areas of other limited scope AAs for business reasons. These branches were in the Lebanon and PA-Non MSA AAs. WNB ranked last in deposit market share in these areas with less than \$1 million in deposits, in each office. There were 10-12 other banks in these counties. WNB customers in these areas still had access to the bank's ADS, including the Cash in at Checkout service available in all Walmart locations.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
Full Scope				Low	Mod	Mid	Upp
Pittsburgh	9	1	0	0	0	0	+1
Limited Scope							
Altoona	1	0	0				
Chambersburg-Waynesboro	1	0	0				
East Stroudsburg	2	0	0				
Erie	2	0	0				
Harrisburg-Carlisle	3	0	0				
Johnstown	1	0	0	0	0	0	0
Lancaster	1	0	0				
Lebanon	0	0	(1)	0	0	(1)	0
Montgomery Co-Bucks Co-Chester Co	4	0	0	0	0	0	0
Newark	1	0	0	0	0	0	0
Reading	2	0	0	0	0	0	0
Scranton-Wilkes-Barre-Hazleton	4	1	0	0	0	+1	0
York-Hanover	3	0	0	0	0	0	0
PA-Non MSA	6	0	(1)	0	0	(1)	0
Total	40	2	(2)	0	0	(1)	+1

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution is a leader in providing CD services in Pennsylvania. CD services had a significantly positive impact on the overall Services Test rating.

Statewide, the bank provided 2,031 hours of financial education to over 4,600 participants. The bank utilizes five modules for financial education in this state including; 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is available to all consumers in Pennsylvania. WNB's board and committee involvement statewide is excellent with 44 employees serving on 37 boards or committees in 50 positions. The majority of organizations served provide affordable housing and community services to LMI individuals. In addition, there were a few organizations that provide job creation and small business development.

WNB provided an excellent level of CD services in the full scope Pittsburgh AA. Bank employees provided 609 hours of financial education to 1,893 participants. The majority of the bank's training activities focused on the Money Smart programs with 340 hours of Money Smart – personal and 240 hours of the Money Smart – business curriculums. WNB employees also provided 27 hours of the customized New Beginnings curriculum. In addition to financial education, the bank had eight employees serving on eight boards or committees in a like number of positions in the Pittsburgh AA.

The majority of organizations served provide essential services to LMI populations, including affordable housing. Bank employees also served on the board of one organization focused on local economic development. WNB staff served on boards or committees of national organizations operating in this AA, including Family Promise, two affiliates of Habitat for Humanity, as well as local food banks and organizations providing financial literacy and shelter for the homeless and LMI populations. Examples of WNB's involvement are summarized below.

- WNB referred 296 loan applicants for a second look through the MWTC initiative in Pennsylvania. Fifteen applicants opted into credit, mentoring, or both.
- One WNB employee provides financial expertise on the loan committee of Wesley Family Services. This non-profit organization provides a transportation loan program, Ways to Work. The vehicle loan program is designed to help LMI individuals develop financial stability and self-sufficiency by providing small loans at affordable rates. Members of the loan committee review applications for the "Ways to Work" program. In addition to loan assistance, the organization also provides support services including financial literacy, life-skill coaching, and credit education. Since in 2015, seven WNB employees have provided 85 regular training classes for 1,065 participants of Wesley Family Services and Ways to Work program. Bank employees have provided training using the Money Smart – personal curriculums, covering topics such as; "Financial Recovery", "To Your Credit", "Borrowing Basics", "Money Matters", and the New Beginnings curriculum "Borrowing and Credit".
- One WNB employee provided financial education on 16 occasions to 86 participants at the Beaver County job-training center. The bank employee provided training using the Money Smart – business curriculums, covering topics such as: "Business Banking Services", "Financial Management", and "Risk Management".

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in seven of the limited scope AAs, including Altoona, Chambersburg-Waynesboro, Erie, Johnstown, Lancaster, Reading, and York-Hanover is consistent with the bank's Low Satisfactory performance in the full-scope AA. The bank's performance in the Lebanon AA is weaker due to the bank's closure of this location. Performance in six of the 15 AAs was stronger than performance in the full scope AA. These stronger AAs included East Stroudsburg, Harrisburg-Carlisle, Montgomery Co-Bucks Co-Chester Co, Newark, Scranton-Wilkes-Barre-Hazleton, and the PA-Non MSA AA. Branch distributions in these AAs was more in line with AA population distributions and CD performance was either excellent or relatively high. The bank has demonstrated that its ADS have expanded accessibility of services across the bank's entire footprint.

State Rating

State of South Carolina

CRA rating for the State of South Carolina: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in South Carolina

With a physical presence in every geographic region of South Carolina, WNB operates 33 branches in 11 AAs, each of which opened between October 2007 and February 2010. The bank possesses a very limited 0.07 percent of deposit market share and ranks 75th out of 104 financial institutions in the state. In 2018, South Carolina's largest depository institutions were Wells Fargo, N.A., Bank of America, N.A., and Branch Banking and Trust Company that collectively makeup 43 percent of state deposit share (Source: CRA Wiz 2018 Peer Branch & Deposit Data)

Community Contacts

To help identify needs and opportunities in the Greenville AA, the OCC utilized two regulatory agency contacts that includes an economic development entity that facilitates investments in new and existing businesses to promote job growth and an affordable housing organization that assists with housing the homeless population. The community contacts indicated that primary needs include bank products for the unbanked, credit repair and financial literacy programs, and affordable housing, including loan programs to finance the construction/production of affordable housing.

Greenville AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Greenville-Anderson-Mauldin SC MSA (Greenville AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	195	7.7	27.2	40.5	24.6	0.0
Population by Geography	852,631	5.3	23.6	41.7	29.4	0.0
Housing Units by Geography	367,026	5.7	25.0	42.0	27.3	0.0
Owner-Occupied Units by Geography	220,754	3.1	20.9	43.6	32.4	0.0
Occupied Rental Units by Geography	102,937	10.3	30.7	38.7	20.3	0.0
Vacant Units by Geography	43,335	8.3	32.2	41.4	18.1	0.0
Businesses by Geography	48,037	6.0	18.9	39.8	35.4	0.0
Farms by Geography	1,297	2.5	20.0	49.7	27.8	0.0
Family Distribution by Income Level	218,963	22.9	17.1	18.8	41.2	0.0
Household Distribution by Income Level	323,691	24.9	15.9	16.7	42.4	0.0
Median Family Income MSA - 24860 Greenville-Anderson-Mauldin, SC MSA		\$58,097	Median Housing Value			\$141,154
			Median Gross Rent			\$744
			Families Below Poverty Level			12.3%
Source: 2015 ACS Census and 2017 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 Greenville AA

WNB conducts operations in the Greenville-Anderson-Mauldin, SC MSA across a four-county area centrally located within the “South Carolina Upstate” region bordering North Carolina and Georgia in the northwest corner of the state. These counties include Pickens, Anderson, Laurens, and Greenville. WNB operates ten branches out of this AA.

WNB possesses \$14.4 million in deposits in the AA representing 29.84 percent of the bank’s deposits in the state, but only 0.28 percent of WNB total deposits. WNB possessed 0.08 percent of total market share with a ranking of 44th out of 48 financial institutions as of June 30, 2018. The three largest financial institutions by deposit market share are Wells Fargo, N.A., Bank of America, N.A., and Branch Banking and Trust Company, who collectively make up 39 percent of combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA**LENDING TEST**

The bank’s performance under the Lending Test in South Carolina is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Greenville	46	443	11	500	31.00	29.84
Augusta-Richmond County	5	72	3	80	4.96	6.95
Charleston-North Charleston	15	123	8	146	9.05	7.55
Columbia	38	280	12	330	20.46	25.47
Hilton Head Island-Bluffton- Beaufort	5	28	5	38	2.36	1.84
Spartanburg	9	99	7	115	7.13	5.82
SC-Non MSA	43	336	25	404	25.05	22.53

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Greenville	104	743	428	1,275	10.92	29.84
Augusta-Richmond County	7	128	61	196	1.68	6.95
Charleston-North Charleston	43	205	541	789	6.76	7.55
Columbia	120	462	7,197	7,779	66.64	25.47
Hilton Head Island-Bluffton- Beaufort	8	43	64	115	0.99	1.84
Spartanburg	317	157	211	685	5.87	5.82
SC-Non MSA	89	549	196	834	7.14	22.53

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the Greenville AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 88.60 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.08 percent is in line with the bank's deposit market share of 0.08 percent.

According to 2017 peer data by number, WNB ranked 43rd of 109 small business lenders in the Greenville AA. The five largest business lenders held 49 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the bank did not originate enough loans to be analyzed in low- and moderate-income tracts during 2015-2016. During 2017-2018, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in LMI geographies.

Consumer Loans

Refer to Table U in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies. During 2015-2016, the proportion of bank loans was weaker than the overall performance in low-income geographies, but still adequate.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

During 2015-2016, the bank did not originate enough loans to small businesses to be analyzed. During 2017-2018, the distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was significantly stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a positive impact on the Lending Test performance in the Greenville AA. During the evaluation, WNB originated 11 CD loans totaling \$428,045. This volume of CD lending was equivalent to 29 percent of tier 1 capital allocated to the AA. Of the 11 loans, two totaling \$50,000 and three of the 11 loans, totaling \$210,000, were for affordable housing and LMI community services, which was the greatest needs of the AA. Some notable examples of CD loans are as follows:

- WNB originated a \$1.3 million (with two \$25,000 allocations to this AA) affordable housing participation loan for senior citizens. The 40-unit apartment complex was constructed with low-income housing tax credits where senior households will have income of 50 percent to 60 percent of the area median income.
- The bank made three loans totaling \$210,000 to a foundation whose objective is to reduce crime in the nation's senior housing facilities. Approximately 81 percent of residents are LMI individuals.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Augusta-Richmond, Columbia, Hilton Head Island-Bluffton-Beaufort, and SC-Non-MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area.

The performance in Charleston-North Charleston and Spartanburg AAs performance was slightly weaker than the bank's overall performances. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in South Carolina is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Greenville	3	174	3	453	31	43	37	10.91	671	21.49
Augusta-Richmond	3	130	3	176	22	9	28	8.26	315	10.09
Charleston-North Charleston	2	24	3	185	25	11	30	8.85	220	7.05
Columbia	9	472	2	72	29	24	40	11.80	569	18.23
Hilton Head Island-Bluffton-Beaufort	2	20	2	13	24	12	28	8.26	45	1.44
Spartanburg	2	23	3	261	27	28	32	9.44	311	9.96
SC-Non MSA	11	287	16	654	117	50	144	42.48	991	31.74
SC BSRA	2	130				35	2		165	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made six investments totaling \$627,348, including three prior period investments totaling \$174,284 and three current period investments totaling \$453,064. Additionally, 31 grants totaling approximately \$43,000 were also made for a total investment in the AA of \$670,673. WNB's total investments represented 46 percent of tier 1 capital allocated to the AA.

The bank's qualified investments in the AA included a bond for \$400,000 for the construction of a school building where approximately 76 percent of students are eligible to receive free or reduced lunches. Additionally, WNB provided a grant for \$10,000 to an organization that provided financial assistance and housing to low-income families, and another \$5,000 to an organization that focuses on providing temporary housing for LMI individuals recovering from addiction. Lastly, management provided a \$20,000 grant to an organization that works with the homeless and LMI individuals to help them achieve self-sufficiency through job and life skills training.

South Carolina Statewide

We also considered investments in the broader South Carolina statewide area. WNB holds two prior period affordable housing investments totaling \$130,255 and 31 grants totaling \$34,622 in South Carolina that do not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Augusta-Richmond County, Charleston-North Charleston, Columbia, Hilton Head Island-Bluffton-Beaufort, Spartanburg, and the SC-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full scope area.

SERVICE TEST

The bank's performance under the Service Test in South Carolina is rated Outstanding.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville AA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Greenville AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Assessment Area	Distribution of Branch Delivery System										
	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)				Population % of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Greenville	29.84	10	30.30	10.00	30.00	30.00	30.00	5.32	23.60	41.71	29.37
Limited Scope											
Augusta-Richmond County	6.95	2	6.06	0.00	0.00	50.00	50.00	0.00	33.96	43.40	22.65
Charleston-North Charleston	7.55	4	12.12	25.00	25.00	50.00	0.00	6.66	21.44	41.91	29.18
Columbia	25.47	6	18.18	0.00	33.33	16.67	50.00	5.82	27.21	33.60	31.14
Hilton Head Island-Bluffton-Beaufort	1.84	1	3.03	0.00	0.00	100.00	0.00	0.00	26.60	50.33	23.07
Spartanburg	5.82	3	9.09	0.00	33.33	66.67	0.00	4.42	23.51	44.02	28.05
SC-Non MSA	22.53	7	21.22	0.00	14.29	57.14	28.57	1.31	23.79	53.45	21.45

Note: 3.03% of area populations were located in undesignated CTs.

As reflected in the table above, the bank's distribution of branches in both low- and moderate-income areas exceeds population distributions in those areas. As part of the performance context, we considered that WNB does not influence Walmart retail locations. WNB may express interest in specific locations subject to Walmart approval processes.

WNB makes good use of ADS through mobile and online banking. WNB provided additional information demonstrating that its ADS have expanded access to geographies and individuals of different income levels in this full scope AA. The bank's information indicates that 37 percent of its customers living in low-income tracts and 42 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 30 percent of customers living in low-income tracts and 34 percent in moderate-income tracts actively use online banking. The percentage of online banking users was below the 40 percent ABA study benchmark.

In the Greenville AA, a reasonable number of customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 8 percent of low-income customers and 34 percent of moderate-income customers using this service resided in low- or moderate-income CTs. The percentages of low- and moderate-income customers using the service exceeded population distributions in these areas.

The bank's opening and closing of branches in the full scope AA has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. As reflected in the table below, the bank did expand services in middle- and upper-income areas of the Greenville AA. In addition, the bank opened branches, expanding access in three limited scope AAs, including one low-income tract in the Charleston-North Charleston AA.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings					
		# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
Full Scope				Low	Mod	Mid	Upp
Greenville	10	2	0	0	0	+1	+1
Limited Scope							
Augusta-Richmond County	2	0	0	0	0	0	0
Charleston-North Charleston	4	2	0	+1	0	+1	0
Columbia	6	1	0	0	0	0	+1
Hilton Head Island-Bluffton-Beaufort	1	0	0	0	0	0	0
Spartanburg	3	1	0	0	0	+1	0
SC-Non MSA	7	0	0	0	0	0	0
Total	33	6	0	+1	0	+3	+2

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution provides an excellent level of CD services in South Carolina. CD services had a significantly positive impact on the overall Service Test rating.

Statewide, the bank provided 1,662 hours of financial education to 3,530 participants. The bank utilized five core modules for financial education in this state including; 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is also available to consumers in South Carolina. WNB's board and committee involvement statewide is excellent with 40 employees serving in 58 board or committee positions. The majority of organizations provide community services and affordable housing for LMI individuals. In addition, WNB employees were involved with a few organizations that focus on job creation, small businesses, and economic development.

WNB provided an excellent level of CD services in the full scope Greenville AA. Bank employees provided 577 hours of financial education to 1,242 participants. The majority of the bank's training programs in this AA focused on the Money Smart and New Beginnings curriculums, with over 180 hours of Money Smart – personal training, 191 hours of Money Smart - business training, and 131 hours of the New Beginnings programs. Further, employees provided 40 hours of Junior Achievement training and 29 hours of the Building Wealth program. In addition to financial education, the bank had 12 employees serving on 14 boards or committees in 17-member positions in the Greenville AA. The organizations served provide services targeting LMI individuals and affordable housing. WNB participated in some of the nationally known organizations in this AA such as Habitat for Humanity and Family Promise. The bank also partnered with several local food banks and a CDFI that focuses on lending to small businesses. Examples of WNB's involvement are summarized below.

- WNB referred 315 loan applicants for a second look through the MWTC initiative in South Carolina. Eleven of these applicants opted into MWTC, mentoring, or both.
- Eight WNB personnel provided the New Beginning curriculum on 28 occasions to 288 participants of the local non-profit organization, The Turning Point of South Carolina, Inc. This organization maintains transitional sober living facilities. More than 90 percent of residents are homeless and nearly all have incomes below poverty levels. WNB personnel also provided the Money Smart – personal programs on four occasions to 42 residents of The Turning Point. WNB personnel have also provided the New Beginnings and Money Smart – personal curriculums on at least seven occasions to 71 residents at the Serenity Place, a residential treatment center for women and children in the Greenville AA.
- Seven WNB personnel provided the Junior Achievement curriculums on 13 occasions to 264 participants in three AA schools where the majority of students qualify for free or reduced lunch programs.
- Since 2016, a WNB manager has served on the loan committee and board for CommunityWorks, Inc., a Greenville-based CDFI that supports the entire state with affordable consumer and small business loans. The organization also offers community loans, homebuyer assistance, and individual development accounts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Charleston-North Charleston, Columbia, Spartanburg, and the SC-Non MSA AAs is consistent with the bank's excellent performance in the full-scope AA.

WNB's performance in the Columbia AA is particularly noteworthy and innovative. The bank established its first Community Development and Education Center (CDEC) in a high-poverty, moderate-income, urban location on Main Street near downtown Columbia, South Carolina. The bank renovated the CDEC facility, which is located in the heart of the historic Eau Clair Community, a neighborhood with limited banking services and designated city empowerment zone. The City of Columbia is striving to revitalize this area by fostering public-private partnerships. The population in this area consist of 83 percent minority with incomes of only 51 percent of MSA median family income and a poverty rate of 32 percent according to FFIEC 2017 ACS Demographic Data. The Center offers consumer and business financial education classes along with workshops to educate LMI individuals, entrepreneurs, and small businesses. WNB also makes meeting space in the facility available to LMI service organizations such as Habitat for Humanity, Harvest Hope Food Bank, and Midlands Fatherhood Coalition. The facility also includes a full-service ATM to increase financial services access.

Performance in Augusta-Richmond County and Hilton Head Island-Bluffton-Beaufort AAs is weaker than performance in the full scope AA. The weaker performance results from branch distributions in moderate-income AAs. The bank had no branches in moderate-income areas, and as a result was below population distributions. However, it is important to consider that all branches across the state offer mobile banking, online banking, and the Cash in at Checkout service. The bank has demonstrated that its ADS have expanded accessibility of services across the bank's entire footprint.

State of Virginia

CRA rating for the State of Virginia: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall excellent service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in Virginia

WNB operated 49 branches in 15 AAs during the evaluation period. Seven of the 15 AAs were rural single branches. Forty of the 49 branches opened between March 2006 and October 2007; eight of the branches opened between August 2009 and January 2011; while one additional branch opened more recently in September 2018. WNB closed three branches on January 28, 2018. Each was a rural single AA branch in Kingsport-Bristol, Accomack County, and Central non-MSA, Virginia. Each closed branch was in a middle-income CT. Following the 2018 closings, WNB currently operates 46 branches in 13 AAs.

The bank possesses a very limited 0.04 percent of deposit market share and ranks 85th out of 160 financial institutions in its delineated AA. Through December 31, 2018, the largest depository institutions in Virginia were Capital One Bank, Bank of America, N.A., and Wells Fargo Bank, N.A., who collectively possessed 59 percent of state deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the Virginia Beach-Norfolk AA, the OCC utilized a regulatory agency contact with an affordable housing organization that builds and renovates homes in the bank's AA. The demand for affordable housing is the primary community credit need with a focus on residential construction and down-payment assistance to make units affordable.

The contact stated the opportunity for banks to provide financial resources for affordable housing and other credit-related projects has increased. The contact added that the degree of involvement of local financial institutions of all sizes has remained steady.

Virginia Beach-Norfolk AA

Virginia Beach-Norfolk-VA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Virginia Beach-Norfolk-Newport News VA MSA (Virginia Beach-Norfolk AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	410	7.8	27.1	35.4	27.1	2.7
Population by Geography	1,670,662	6.1	26.7	35.8	31.1	0.3
Housing Units by Geography	681,382	6.2	26.6	36.3	30.5	0.4
Owner-Occupied Units by Geography	377,595	2.8	18.1	39.3	39.7	0.2
Occupied Rental Units by Geography	240,002	10.8	39.4	32.2	17.2	0.5
Vacant Units by Geography	63,785	8.8	29.4	34.0	26.8	1.0
Businesses by Geography	106,277	4.2	22.7	37.0	34.8	1.3
Farms by Geography	2,736	2.3	15.5	39.9	41.9	0.4
Family Distribution by Income Level	415,072	21.4	17.6	20.3	40.8	0.0
Household Distribution by Income Level	617,597	22.8	16.7	19.0	41.4	0.0
Median Family Income MSA - 47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA		\$70,501	Median Housing Value			\$237,250
			Median Gross Rent			\$1,097
			Families Below Poverty Level			9.5%
Source: 2015 ACS Census and 2017 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 Virginia Beach-Norfolk AA

WNB operates 15 branches in the Virginia Beach-Norfolk-Newport News VA MSA, which is a metropolitan area located principally along the eastern shoreline of Virginia at the mouth of the York and James Rivers. This MSA is the most densely populated metropolitan area in Virginia with Virginia Beach and Norfolk as the two most populated cities in the state. The WNB delineated AA in this area includes 14 counties of Gloucester, Isle of Wight, James City, Matthews, York, Chesapeake City, Hampton City, Newport News City, Norfolk City, Poquoson City, Portsmouth City, Suffolk City, Virginia Beach City, Williamsburg City. WNB operates branches in nine of these counties. The total MSA population is 1,670,662.

WNB had \$0.5 million in deposits in the Virginia Beach-Norfolk-Newport News, VA MSA representing 28 percent of its deposits in the state, but only 0.39 percent of total WNB deposits. WNB possesses a very limited 0.06 percent of total deposit market share and ranks 34th out of 51 financial institutions doing business in the delineated AA. The top three financial institutions in the MSA are TowneBank, Wells Fargo Bank, N.A., and SunTrust Bank, who collectively make up 57 percent of combined deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA BEACH-NORFOLK AA

LENDING TEST

The bank's performance under the Lending Test in Virginia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Virginia Beach-Norfolk AA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Virginia Beach-Norfolk	58	552	11	621	23.68	27.48
Blacksburg-Christiansburg-Radford	8	82	6	96	3.66	3.55
Harrisonburg	3	29	5	37	1.41	1.48
Kingsport-Bristol	1	20	4	25	0.95	-
Lynchburg	23	238	5	266	10.14	11.57
Richmond	59	343	6	408	15.56	18.79
Roanoke	16	235	5	256	9.76	9.55
Staunton-Waynesboro	5	72	5	82	3.13	3.55
VA-Non MSA	60	738	33	831	31.69	24.02

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
Virginia Beach-Norfolk	279	937	589	1,805	25.59	27.48
Blacksburg-Christiansburg-Radford	26	136	91	253	3.59	3.55
Harrisonburg	3	43	44	90	1.28	1.48
Kingsport-Bristol	3	33	21	57	0.81	-
Lynchburg	73	397	269	739	10.48	11.57
Richmond	248	594	403	1,245	17.65	18.79
Roanoke	28	403	203	634	8.99	9.55
Staunton-Waynesboro	7	120	89	216	3.06	3.55
VA-Non MSA	147	1,216	652	2,015	28.57	24.02

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the Virginia Beach-Norfolk AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 88.89 percent of total lending activity in the AA. By number, the bank's small business lending market share of 0.04 percent is in line with the bank's deposit market share of 0.06 percent.

According to 2017 peer data by number, WNB ranked 54th of 104 small business lenders in the Virginia Beach-Norfolk AA. The five largest business lenders held 53 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of businesses and the aggregate distribution of loans in LMI geographies. The performance in low-income tracts during 2015-2016 was weaker than the overall performance; however, it is adequate.

Consumer Loans

Refer to Table U in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies. During 2015-2016, the proportion of bank loans was weaker than the overall performance in low-income geographies, but still good.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans to small businesses was significantly stronger than the proportion of small businesses and the aggregate distribution of loans to those businesses.

Consumer Loans

Refer to Table V in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Virginia Beach-Norfolk AA. During the evaluation, WNB originated 11 CD loans totaling \$589,000. This volume of CD lending was equivalent to 29 percent of tier 1 capital allocated to the AA. Of the \$589,000, five loans totaling \$256,500 or 44 percent of the total dollar amount of CD loans were associated with affordable housing, which was the identified need in the AA. Other loans addressed the needs of economic development and LMI services. Some notable examples of CD loans are as follows:

- The bank originated a loan for \$139,000 to an organization to refinance an existing debt for its affordable housing program, which focuses on supporting low-income individuals and families with home repairs.
- WNB originated a \$ 1 million LOC (with a \$60,000 allocation to this AA) to a CDFI to allow borrowers to increase their lending practices and gain financial flexibility.
- The bank made a \$50,000 LOC to a non-profit whose mission is to provide housing repairs to low-income individuals, the elderly, and handicap households in various counties within this AA.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Blacksburg-Christiansburg-Radford, Kingsport-Bristol, Lynchburg, Roanoke, and Staunton-Waynesboro AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area. The performance in the Harrisonburg and Richmond AAs and VA-Non MSA was weaker than the bank's overall performance. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of Virginia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Virginia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Virginia Beach-Norfolk AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Virginia Beach-Norfolk		0	3	481	25	52	28	8.31	533	11.14
Blacksburg-Christiansburg-Radford	2	56	4	88	17	32	23	6.82	175	3.66
Harrisonburg	3	185	3	75	14	7	20	5.93	267	5.58
Kingsport-Bristol	2	31	3	84	18	10	23	6.82	125	2.61
Lynchburg	3	66	7	649	17	37	27	8.01	752	15.72
Richmond	2	64	3	217	26	112	31	9.20	393	8.22
Roanoke	3	153	6	432	16	10	25	7.42	595	12.44
Staunton-Waynesboro	3	115	5	277	14	7	22	6.53	398	8.32
VA-Non MSA	14	347	22	1,149	102	48	138	40.95	1,545	32.30
VA-BSRA		0				10				

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

During the evaluation period, WNB made three current period investments totaling \$480,914. The bank did not make any prior period investment in the AA during the review period. Additionally, 25 grants totaling approximately \$52,000 were made for a total investment in the AA of \$533,306. WNB's total investments represented 26 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included a \$250,000 Fannie Mae Delegated Underwriting and Servicing Mortgage Bond for the Aden Park Townhomes in an LMI CT in Virginia Beach, where 99 percent of the 126 units are reserved for households earning below 60 percent of the area median income and are rent restricted. Another investment included an equity investment of \$45,914 in a CDFI fund that promotes business and job growth by financing small businesses with a focus on low-income and other disadvantaged communities. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included \$25,000 to an organization that assists homeless families and individuals to recover from crisis situations, \$5,000 to an organization that provides mentoring, job readiness, General Education Development training and financial literacy for LMI individuals, and \$4,000 to an organization focused on economic development in LMI areas of the AA.

Virginia Statewide

We also considered investments in the broader Virginia statewide area. WNB holds 13 grants totaling \$10,140 in Virginia that does not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered these investments as they demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Blacksburg-Christiansburg-Radford, Harrisonburg, Kingsport-Bristol, Lynchburg, Richmond, Roanoke, Staunton-Waynesboro, and VA-Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Virginia is rated Outstanding.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Virginia Beach-Norfolk AA is excellent. CD services had a significantly positive impact on the Service Test rating. The bank's good utilization of ADS also positively influenced the Service Test rating.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Virginia Beach-Norfolk AA. This assessment was based upon branch distributions as reflected in the table below. There were also performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by the LMI populations.

Assessment Area	Distribution of Branch Delivery System										
	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)				Population % of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
Virginia Beach-Norfolk	27.48	15	32.61	0.00	20.00	53.33	26.67	6.14	26.66	35.83	31.09
Limited Scope											
Blacksburg-Christiansburg-Radford	3.55	2	4.35	0.00	0.00	50.00	50.00	0.00	4.16	68.76	19.25
Harrisonburg	1.48	1	2.16	0.00	100.00	0.00	0.00	4.57	15.07	66.33	14.03
Kingsport-Bristol	0	0	0.00	0.00	0.00	0.00	0.00	0.00	8.47	73.55	17.98
Lynchburg	11.58	4	8.70	0.00	25.00	75.00	0.00	1.86	18.40	61.11	18.63
Richmond	18.79	8	17.39	0.00	0.00	62.50	37.50	9.17	20.12	35.26	35.07
Roanoke	9.55	4	8.70	0.00	0.00	50.00	50.00	3.38	21.64	46.62	28.36
Staunton-Waynesboro	3.55	2	4.35	0.00	0.00	100.00	0.00	1.09	11.96	79.59	7.37
VA-Non-MSA	24.02	10	21.74	0.00	20.00	40.00	40.00	0.63	19.88	63.75	15.45

Note: 8.77% of area populations were located in undesignated CTs.

As reflected in the table above, WNB does not have any branches in low-income areas, but the bank does have three branches in moderate-income areas. This distribution of branches is just slightly below population distributions in moderate-income areas. As part of the performance context, we considered that WNB does not influence Walmart retail locations. WNB has the ability to express an interest in specific locations subject to Walmart's approval process. Walmart did not present any opportunities for branches in LMI areas for the bank's consideration during the evaluation period.

WNB makes good use of ADS through mobile and online banking. WNB provided additional information demonstrating that its ADS have expanded access to geographies and individuals of different income levels in the full scope AA. The bank's information indicates that 36 percent of its customers living in low-income tracts and 41 percent of customers living in moderate-income tracts actively use mobile banking. The percentage of mobile banking users exceeded benchmarks in the 2017 ABA study. Further demonstrating the effectiveness of ADS, the bank provided additional information that shows 32 percent of customers living in low-income tracts and 35 percent in moderate-income tracts actively use online banking. The percentage of online banking users was below the 40 percent ABA study benchmark, but still demonstrates that a good number of LMI customers are using the bank's ADS.

In the Virginia Beach-Norfolk AA, a reasonable number of customers were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 12 percent of low-income customers and 37 percent of moderate-income customers using this service resided in low- or moderate-income CTs. The percentages of LMI customers using the service exceeded population distributions in these areas.

The bank's opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In the full scope AA, WNB opened one new branch in a middle-income area. The bank closed three branches in limited scope AAs, all of which were in middle-income areas and closed for business reasons. The bank's deposits in each of these closed branches approximated \$1 million or less. There were six to seven other banks in these markets. WNB customers of the closed branches still had access to the bank's ADS, including the Cash in at Checkout service, which is available in all Walmart locations.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
		# of Branch Openings	# of Branch Closings				
Full Scope				Low	Mod	Mid	Upp
Virginia Beach-Norfolk	15	1	0	0	0	+1	0
Limited Scope							
Blacksburg-Christiansburg-Radford	2	0	0	0	0	0	0
Harrisonburg	1	0	0	0	0	0	0
Kingsport-Bristol	0	0	1	0	0	(1)	0
Lynchburg	4	0	0	0	0	0	0
Richmond	8	0	0	0	0	0	0
Roanoke	4	0	0	0	0	0	0
Staunton-Waynesboro	2	0	0	0	0	0	0
VA-Non-MSA	10	0	2	0	0	(2)	0
Total	46	1	(3)	0	0	(2)	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

Community Development Services

The institution has an excellent level of CD services in Virginia. CD services had a significantly positive impact on the overall Service Test rating.

Statewide, the bank provided 1,788 hours of financial education to approximately 3,800 participants. WNB utilized the five core modules for financial education in this state including: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The bank's free online financial education curriculum, Banking GPS, is also available to consumers in Virginia. WNB's board and committee involvement statewide is excellent, with 53 employees serving in 62 board or committee member positions. The majority of organizations served provide community services targeting LMI individuals and affordable housing. In addition, there were a few organizations that provide job creation, small business, and economic development.

WNB provided an excellent level of CD services in the full scope Virginia Beach-Norfolk AA. Bank employees provided 463 hours of financial education to 1,487 participants. The majority of the bank's training activities focused on Money Smart programs with 223 hours of Money Smart – business and 180 hours of Money Smart – personal curriculums. In addition to financial education, the bank had 13 employees serving on nine boards in 13 board or committee positions in the Virginia Beach-Norfolk AA. The organizations served provide services targeting LMI persons and affordable housing. Bank employees in the full scope AA are involved with boards or committees of nationally known organizations such as Big Brothers and Big Sisters, two affiliates of Habitat for Humanity, and The Salvation Army. WNB also partnered with several local organizations, including a local food bank. Examples of WNB's involvement are summarized below.

- WNB referred 457 loan applicants for a second look through the MWTC initiative in Virginia. Twenty-one of these applicants opted into credit, mentoring, or both.
- Four WNB employees provided the Junior Achievement curriculums to 152 participants on six occasions in two local elementary schools, a high school, an academy, and youth center where the majority of students were on free or reduced lunch programs.
- Six WNB employees provided the Money Smart – personal curriculum in two elementary schools, on two occasions to 140 students. Further, WNB employees provided this curriculum to ten participants in a local library, located in a moderate-income CT and to approximately eight residents of the Virginia Supporting Housing organization. This organization is a non-profit entity providing permanent supportive housing for homeless single adults.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Harrisonburg, Lynchburg, and the VA-Non MSA AAs is consistent with the bank's overall performance in the full-scope AA. Performance in Blacksburg-Christiansburg-Radford, Kingsport-Bristol AA, Richmond AA, Roanoke AA and Staunton-Waynesboro AA is weaker than the bank's overall performance in the full-scope AA. Weaker performance in these areas resulted from the lack of branches in low- and moderate-income areas. Performance in the Kingsport-Bristol AA was weaker due to the branch closure in this AA. All branches across the state offer mobile banking, online banking, and the Cash in at Checkout service. The bank has demonstrated that its ADS have expanded accessibility of services across the bank's entire footprint.

State of West Virginia

CRA rating for the State of West Virginia: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, good geographic distribution, excellent borrower distribution, and a vast majority of the bank's loans originated in the AAs. The bank had excellent responsiveness to AA credit needs.
- The Investment Test rating is based on an overall excellent level of investments.
- The Service Test rating is based on overall adequate service activity. Delivery systems are accessible to geographies and individuals of different income levels. The bank has strong ADS, which are accessible to all portions of the bank's AAs.
- CD loans and services had a significantly positive effect on the overall Lending and Service Test ratings.
- The bank had innovative, flexible, and responsive CD loans and investments.

Description of Institution's Operations in West Virginia

WNB operates nine branches in seven AAs during the evaluation period. All branches opened between March 2007 and April 2009. WNB did not open or close any branches during the evaluation period.

The bank possesses a very limited 0.10 percent of deposit market share and ranks 61st out of 94 financial institutions in its AA. Through December 31, 2018, the largest three depository institutions in the West Virginia AAs were Branch Banking and Trust, United bank, and City National Bank of West Virginia who collectively possessed 40 percent of state deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

Community Contacts

To help identify needs and opportunities in the WV-Non MSA AA, the OCC utilized a regulatory agency contact with an economic development entity that promotes business development in Randolph County. The community contact indicated that primary needs include working capital for small businesses. The contact believes financial institutions work to try to meet credit needs.

To help identify needs and opportunities in the Huntington AA, the OCC utilized two community contacts interviewed by the OCC's Community Affairs Officer including contacts from affordable housing and economic development organizations that serve Cabell and Wayne counties.

Scope of Evaluation in WV-Non MSA and Huntington AA

WNB operates two branches in the WV-Non-MSA that consists of Marion, Harrison, Taylor, Barbour, and Randolph counties. WNB possesses a very limited deposit market share of 0.21 percent and ranks 29th out of 32 financial institutions doing business in the AA (Source: CRA Wiz 2018 Peer Branch & Deposit Data). WNB opened its two branches in the AA between March 2007 and March 2007. In 2018, the top three financial institutions in the AA were MVB Bank, Branch Banking and Trust Company, and Huntington National Bank. These institutions maintain a competitive advantage with 40 percent deposit market share combined (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

WNB operates one branch in the Huntington-Ashland, WV MSA that is comprised of three counties – Cabell, Lincoln, and Putnam. WNB possesses an extremely limited deposit market share of 0.04 percent and ranks 31st out of 31 financial institutions doing business in the AA (Source: CRA Wiz 2018 Peer Branch & Deposit Data). WNB opened its one branch in the AA in March 2008. In 2018, the top three financial institutions in the market were Putnam County Bank, WesBanco Bank, and City National Bank of West Virginia whom collectively comprise 38 percent of deposit market share (Source: CRA Wiz 2018 Peer Branch & Deposit Data).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in West Virginia is rated Outstanding. CD lending had a significantly positive impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the WV-Non MSA is excellent and good in the Huntington AA.

Lending Activity

Lending levels reflect excellent responsiveness to the AAs credit needs. The products analyzed were small loans to businesses and consumer loans.

Number of Loans* (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
WV- Non MSA AA	24	175	22	221	41.15	52.39
Huntington AA	7	52	3	62	11.55	7.55
Beckley AA	14	83	5	102	18.99	19.54
Charleston AA	8	75	3	86	16.01	12.76
Hagerstown-Martinsburg AA	1	63	2	66	12.29	7.76

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*(\$000's) (2015-2018)						
Assessment Area	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
WV-Non MSA AA	60	288	1,094	1,442	58.79	52.39
Huntington AA	12	85	121	218	8.89	7.55
Beckley AA	32	117	146	295	12.03	19.54
Charleston AA	13	134	196	343	13.98	12.76
Hagerstown-Martinsburg AA	1	63	91	155	6.32	7.76

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans is equal to the proportion of bank deposits in the WV-Non MSA and the Huntington AA. While the bank has a substantial volume of consumer loans, market share information is not available for this primary product. Consumer loans accounted for 79.19 percent of total lending activity in the WV-Non MSA and 83.87 percent of total lending activity in the Huntington AA. By number, the bank's small business lending market share of 0.18 percent is in line with the bank's deposit market share of 0.21 percent in the WV-Non MSA and 0.05 percent is in line with the bank's deposit market share of 0.04 in the Huntington AA.

According to 2017 peer data by number, WNB ranked 43rd of 66 small business lenders in the WV-Non MSA. The five largest business lenders held 45 percent of the market and include national megabanks and issuers of small business credit cards.

According to 2017 peer data by number, WNB ranked 58th of 61 small business lenders in the Huntington AA. The five largest business lenders held 49 percent of the market and include national megabanks and issuers of small business credit cards. WNB is not an issuer of small business credit cards but does offer small business LOCs.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its full scope AAs.

Small Loans to Businesses

Refer to Table Q in the state of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

The bank had too few loans to analyze in the WV-Non MSA and the Huntington AA. However, small loans to businesses only represented 1 percent in the WV-Non MSA and 11 percent in the Huntington AA of all total reported loans. The Huntington AA only had seven loans; therefore, the rating will be based on performance for consumer loans

Consumer Loans

Refer to Table U in the state of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

WV-Non MSA

The distribution of consumer loans in low-income geographies is excellent. During the evaluation period, the proportion of bank loans was significantly stronger than the proportion of households in those geographies. The distribution of consumer loans in moderate-income geographies was adequate during 2015-2016 and good during 2017-2018.

Huntington AA

During 2017-2018, the distribution of consumer loans in low-and-moderate income geographies is poor. The bank did not make any loans in low-income geographies and the proportion of bank loans was weaker than the proportion of households in moderate-income geographies. The bank had too few loans to analyze during 2015-2016.

Lending Gap Analysis

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution.

Small Loans to Businesses

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

The bank had too few loans to analyze in the WV-Non MSA and the Huntington AA. However, small loans to businesses only represented 1 percent in the WV-Non MSA and 11 percent in the Huntington AA of all total reported loans. The Huntington AA only had seven loans; therefore, the rating will be based on performance for consumer loans

Consumer Loans

Refer to Table V in the state of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

WV-Non MSA

The distribution of consumer loans is excellent. During the evaluation period, the proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA.

Huntington AA

During 2017-2018, the distribution of consumer loans is excellent. The proportion of bank loans to LMI borrowers was significantly stronger than the proportion of LMI households within the AA. The bank had too few loans to analyze during 2015-2016.

Community Development Lending

WNB has made a relatively high level of CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

WV-Non MSA AA

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the WV-Non MSA AA. During the evaluation, WNB originated 22 CD loans totaling \$1.1 million. This volume of CD lending was equivalent to 116 percent of tier 1 capital allocated to the AA.

Of the \$1.1 million, 11 loans totaling \$435,000 or 40 percent of total CD lending was associated with affordable housing; five loans totaling \$396,429 or 36 percent were associated with economic development and six loans totaling \$262,571 or 24 percent were associated with LMI services. More importantly, four of the \$1.1 million, totaling \$514,287 or 47 percent of the total dollar amount of CD loans were to small businesses, which was an identified need within the AA. Some notable examples of CD loans are as follows:

- The bank originated a loan for \$300,000 to a CDFI that makes low-interest loans to small businesses.
- The bank originated three loans totaling \$500,000 (with a \$214,286 allocation to this AA) to a CDFI that provides loans to small businesses for working capital.

Huntington AA

The volume of CD loans was excellent and had a significantly positive impact on the Lending Test performance in the Huntington AA. During the evaluation, WNB originated three loans totaling \$121,429. This volume of CD lending was equivalent to 90 percent of tier 1 capital allocated to the AA. Of the \$121,429, two loans totaling \$50,000 or 41 percent of the total dollar amount of CD lending was associated with affordable housing, which was an identified need of the AA. Some notable examples of CD loans are as follows:

- WNB made a \$3 million LOC (with a \$30,000 allocation to this AA) to a CDFI that offers loans to non-profit corporations who serve LMI populations and directly to low-income persons for home purchases.
- A \$3 million revolving LOC (with a \$20,000 allocation to this AA) to an organization that provides affordable housing to LMI individuals in rural areas.

Broader Statewide

During the evaluation period, the bank did not make any broader statewide CD loans.

Product Innovation and Flexibility

The bank does not make mortgage loans, but makes extensive use of innovative, flexible programs, and CD loans to help meet the credit needs in its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Beckley, Charleston, and Hagerstown-Martinsburg AAs is consistent with the bank's overall performance under the Lending Test in the WV-Non MSA. CD loans in all AAs was consistent with the bank's overall performance under the Lending Test in the full scope AAs. CD loans had a significant positive impact on the final ratings.

Refer to the lending tables in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in West Virginia is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the WV-Non MSA and Huntington AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Grants		Total			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
WV-Non MSA	3	78	10	850	51	51	64	43.24	979	49.34
Huntington	2	31	2	149	16	22	20	13.51	202	10.18
Beckley	2	29	3	149	15	8	20	13.51	186	9.38
Charleston		0	2	114	22	37	24	16.22	151	7.61
Hagerstown-Martinsburg	3	172	3	287	14	7	20	13.51	466	23.49
WV BSRA		0				1			1	

* Prior period investments mean investments made in a previous evaluation period that are outstanding as of the examination date.

WV-Non MSA

During the evaluation period, WNB made 13 investments totaling \$928,043, including three prior period investments totaling \$78,271 and ten current period investments totaling \$849,772.

Additionally, 51 grants totaling approximately \$51,000 were also made for a total investment in the AA of \$979,470. WNB's total investments represented 104 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included \$78,802 for an equity equivalent investment in a CDFI that supports small businesses through capital, businesses services, and policy research, as well as a \$402,848 investment in a mortgage security backed by affordable housing loans to LMI families in the AA. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. Noteworthy grants included \$10,000 to a CDFI focusing on economic development in rural West Virginia, \$5,000 to an organization providing housing and educational services to LMI families, and a combined \$2,500 to an organization focused on affordable housing in the AA.

Huntington AA

During the evaluation period, WNB made a total of four investments totaling \$180,514, including two prior period investment for \$31,491 and two current period investments totaling \$149,023. Additionally, 16 grants totaling approximately \$22,000 were made for a total investment in the AA of \$202,155. WNB's total investments represented 149 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA included \$14,242 for an equity equivalent investment in a CDFI that supports small businesses through capital, businesses services, and policy research, as well as a \$134,781 investment in a mortgage security backed by affordable housing loans to LMI families in the AA. Grants in the AA were made to qualified CD organizations that provide community services to LMI families and small businesses. All grants made in the AA focused on economic development with focuses on micro lending to small business entrepreneurs or economic development in rural areas.

West Virginia Statewide

We also considered investments in the broader West Virginia statewide area. WNB holds one grant totaling \$1,443 in West Virginia that does not have a purpose, mandate, or function to serve the AA. Because the bank has been responsive to the needs and opportunities in its AA, we also considered this investment as it demonstrated a positive impact statewide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Beckley, Charleston, and Hagerstown-Martinsburg AAs is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in West Virginia is rated Low Satisfactory. CD services and the bank's ADS positively affected the rating. WNB makes excellent use of ADS through mobile and online banking.

Conclusions for Areas Receiving a Full-Scope Review

Based on the full-scope reviews, the bank's performance in the WV-Non MSA AA and Huntington AA and is Low Satisfactory. Retail delivery services were poor due to branch distributions; but CD services were relatively high in the full scope AAs having a positive impact in both AAs. The bank also demonstrated good utilization of ADS in both full scope AAs.

Retail Banking Services

WV-Non MSA AA

The bank's retail service delivery systems are reasonably accessible to geographies and individuals of different income levels in this full scope AA. This assessment was based on performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by LMI populations in this AA.

Assessment Area	Distribution of Branch Delivery System										
	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope											
WV-Non MSA	52.39	4	44.44	0.00	0.00	50.00	50.00	0.58	12.58	55.31	31.54
Huntington	7.55	1	11.11	0.00	0.00	0.00	100.00	6.73	11.31	47.75	32.60
Limited Scope											
Beckley	19.54	2	22.22	0.00	0.00	100.00	0.00	0.00	8.43	81.76	9.81
Charleston	12.76	1	11.11	0.00	0.00	100.00	0.00	1.62	19.10	55.26	24.03
Hagerstown-Martinsburg	7.76	1	11.11	0.00	100.00	0.00	0.00	0.00	13.13	77.77	9.11

Note: 1.58% of area populations were located in undesignated CTs.

As reflected in the table, WNB does not have any branches in LMI geographies in this AA; however, similar to the other full scope AA, Walmart did not present any opportunities for store branches in this AA during the evaluation period. Store branches are part of the bank's business model in this state. The bank's branch distribution was considered reasonable, given performance context considerations and WNB's demonstrated effective utilization of ADS in this AA.

The bank provided information, which indicates that 45 percent of its customers living in low-income tracts and 38 percent of customers living in moderate-income tracts use mobile banking in the WV-Non MSA AA. These percentages of mobile banking users exceed benchmarks in the 2017 ABA study and demonstrate reasonable utilization of ADS by customers in LMI areas. Further demonstrating access and effectiveness of ADS, the bank provided additional information that shows 33 percent of customers living in low-income and 32 percent living in moderate-income tracts use online banking. The percentage of online banking users is slightly below benchmarks in the ABA study but demonstrates that a reasonable number of LMI customers are using the bank's ADS.

A few customers in the WV-Non MSA AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information demonstrating that 2 percent of low-income customers and 16 percent of moderate-income customers using this product reside in LMI CTs. These percentages exceeded population distributions in LMI geographies.

Huntington AA

The bank's retail service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Huntington AA. This assessment was based on performance context considerations, including review of services, the bank's inability to influence branch openings, closings in Walmart stores, and the demonstrated availability and reasonable utilization of ADS by LMI populations in this AA.

As reflected in the table above, WNB does not have any branches in LMI geographies in this AA; however, similar to the other full scope AA, Walmart did not present any opportunities for store branches in this AA during the evaluation period. Store branches are part of the bank's business model in all states. The bank's branch distribution was considered reasonable, given performance context considerations and WNB's demonstrated excellent utilization of ADS in this AA.

The bank provided information, which indicates that 44 percent of its customers living in low-income tracts and 40 percent of customers living in moderate-income tracts actively use mobile banking in the Huntington AA. These percentages of mobile banking users exceed benchmarks in the aforementioned 2017 ABA study and demonstrate good utilization of ADS by customers in LMI areas. Further demonstrating access and effectiveness of ADS, the bank provided additional information that shows 38 percent of customers living in low-income tracts and 21 percent living in moderate-income tracts actively use online banking. The percentage of online banking users is slightly below benchmarks in the ABA study, but still demonstrates that a reasonable number of LMI customers are using the bank's ADS.

A few customers in the Huntington AA were also using the bank's free, new and innovative Cash in at Checkout money transfer product. WNB provided information that shows two percent of low-income customers and 10 percent of moderate-income customers using this product reside in LMI CTs.

The bank did not open or close branches in this state during the evaluation period, having no adverse effect on accessibility of delivery systems.

Distribution of Branch Openings/Closings							
Assessment Area	#Bank Branches	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
		# of Branch Openings	# of Branch Closings				
Full Scope				Low	Mod	Mid	Upp
WV-Non MSA	4	0	0	0	0	0	0
Huntington	1	0	0	0	0	0	0
Limited Scope							
Beckley	2	0	0	0	0	0	0
Charleston	1	0	0	0	0	0	0
Hagerstown-Martinsburg	1	0	0	0	0	0	0
Total	9	0	0	0	0	0	0

Services and business hours are tailored to the convenience and needs of the AA and bank customers. The bank also offers traditional deposit, savings, and flexible small dollar consumer and business loan products as further described in the Description of Institution section of this Performance Evaluation.

In 2017, the bank also launched an innovative pilot consumer loan product in several states, including West Virginia. This product called “Re-Starter”, is designed for WNB customers without a FICO credit score but have previous paid-as-agreed credit. The program offers a 12-month, small \$500 loan to help customers establish good credit histories.

Community Development Services

The institution has a relatively high level of CD services in West Virginia. CD services had a positive impact on the overall Services Test rating.

Statewide, the bank provided 347 hours of financial education to 918 participants. WNB utilized four of the five core modules for financial education in this state including 1) Building Wealth; 2) New Beginnings; 3) Money Smart – business; and 4) Money Smart – personal. The bank’s free online financial education curriculum, Banking GPS, is also available to consumers in West Virginia. WNB’s board and committee involvement statewide is excellent, with 12 employees serving in 14 board or committee member positions at 11 organizations. The majority of organizations provide community services targeting LMI persons and affordable housing.

WV Non-MSA AA

WNB provided a relatively high level of financial education services in the WV-Non MSA AAs. Bank employees provided 94 hours of financial education to 194 participants. The majority of the bank’s training activities in this AA focused on the Money Smart – business program with 75 hours in four local branches, a local high school, several small businesses, and a local community center. WNB employees also provided 10 hours of the Money Smart – personal, seven hours of New Beginnings, and a few hours of the Building Wealth curriculum. In addition to financial education, four WNB managers provided leadership and financial expertise in four board or committee positions with three organizations focused on affordable housing and essential community services for the LMI populations in the AA. Examples of WNB’s involvement are further summarized below.

- WNB referred 103 loan applicants for a second look through the MWTC initiative in West Virginia. Locally participating CDFIs included LiftFund and PeopleFund. Only three of the applicants applied for MWTC, but none were accepted.
- Two local WNB managers served on the board of The HomeOwnership Center as president and treasurer. The affordable housing organization is a private, non-profit lender, housing counselor, and education provider serving an eight-county region area in Northern West Virginia, including counties in the bank's AA.

Huntington AA

WNB provided a relatively high level of financial education services in the Huntington AA, where the bank provided 52 service hours to 224 participants. WNB personnel at the one branch office in this AA dedicated all training hours to the Money Smart – business and Money Smart – personal classes. WNB had one employee serving as a board member on a local non-profit organization that provides behavioral health care, addiction recovery services, and affordable housing for individuals and families. Examples of WNB's involvement are further summarized below.

- A WNB manager provided the Money Smart – personal, “Bank on It” curriculum on eight occasions to 62 participants in a local United Way affiliate organization.
- Another employee provided the “Money Matters” curriculum of the Money Smart program on nine occasions to 149 participants at a local non-profit organization, Recovery Point. The Recovery Point organization offers substance abuse recovery services at no cost to clients.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance in the Beckley and Charleston AAs is consistent with the bank's Low Satisfactory performance in the full-scope AAs. The performance in Hagerstown-Martinsburg AA is stronger than the performance in full-scope AAs, as the bank's only branch in this AA is located in a moderate-income CT.

WNB's involvement in the Charleston AA with non-profit organizations, CDFI CommunityWorks (CWWV) in West Virginia, Inc. and EnAct Community Action (EnAct), are also particularly noteworthy and had a positive impact on the overall rating. One WNB manager is on the board of EnAct and another employee is on the community-based services committee of CWWV. The organization CWWV is a member of the national NeighborWorks America organization and partners with local housing related agencies and organizations to provide safe and affordable housing for residents of West Virginia. The federally recognized EnAct organization works in partnership with West Virginia Regional Workforce Investment Boards, West Virginia employment programs, and West Virginia workforce centers to provide a wide variety of services to low-income individuals, such as job training, resume development, utility assistance, and food assistance.

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:	Lending Test: January 1, 2016 – December 31, 2018 CD Loans, Investments and Services: July 1, 2015 – December 31, 2018	
Bank Products Reviewed:	Consumer Loans and Small Business Loans Community Development Loans, Qualified Investments, Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
AA(s)		
None	NA	
Texas – Houston and Austin	Full Scope	
Charlotte NC-SC multi-state	Full Scope	
Chicago IL-IN multi-state	Full Scope	
Cincinnati OH-KY multi-state	Full Scope	
Louisville KY-IN multi-state	Full Scope	
Myrtle Beach SC-NC multi-state	Full Scope	
Washington-Arlington multi-state	Full Scope	
Alabama- Birmingham	Full Scope	
Florida – Jacksonville	Full Scope	
Georgia – Atlanta	Full Scope	
Illinois – IL-Non MSA	Full Scope	
Indiana – Indianapolis	Full Scope	
Kentucky – KY-Non MSA	Full Scope	
Louisiana – New Orleans and LA-Non MSA	Full Scope	
Maryland – Baltimore and Salisbury	Full Scope	
Mississippi – Gulfport-Biloxi	Full Scope	
North Carolina – Greensboro-Highpoint	Full Scope	
New York – Rochester	Full Scope	
Ohio – OH-Non MSA	Full Scope	
Pennsylvania – Pittsburgh	Full Scope	
South Carolina – Greenville	Full Scope	
Virginia – Virginia Beach-Norfolk	Full Scope	
West Virginia – WV-Non MSA and Huntington	Full Scope	

Appendix B: Summary of AA and State Ratings

RATINGS Woodforest National Bank (WNB)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
WNB	Outstanding	Outstanding	Outstanding	Outstanding
AA or State:				
Texas	Outstanding	Outstanding	Outstanding	Outstanding
Charlotte NC-SC multi-state	Outstanding	Outstanding	Outstanding	Outstanding
Chicago IL-IN multi-state	Outstanding	Outstanding	Outstanding	Outstanding
Cincinnati OH-KY-IN multi-state	Outstanding	Outstanding	Outstanding	Outstanding
Louisville KY-IN multi-state	Outstanding	Outstanding	Low Satisfactory	Outstanding
Myrtle Beach SC-NC multi-state	Outstanding	Outstanding	Low Satisfactory	Outstanding
Washington-Arlington VA-MD multi-state	Outstanding	Outstanding	Outstanding	Outstanding
Alabama	Outstanding	Outstanding	Outstanding	Outstanding
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Georgia	Outstanding	Outstanding	Outstanding	Outstanding
Illinois	Outstanding	Outstanding	High Satisfactory	Outstanding
Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Kentucky	Outstanding	Outstanding	Outstanding	Outstanding
Louisiana	Outstanding	Outstanding	Outstanding	Outstanding
Maryland	Outstanding	Outstanding	Outstanding	Outstanding
Mississippi	Outstanding	Outstanding	Outstanding	Outstanding
North Carolina	Outstanding	Outstanding	Outstanding	Outstanding
New York	Outstanding	Outstanding	Outstanding	Outstanding
Ohio	Outstanding	Outstanding	Outstanding	Outstanding
Pennsylvania	Outstanding	Outstanding	Low Satisfactory	Outstanding
South Carolina	Outstanding	Outstanding	Outstanding	Outstanding
Virginia	Outstanding	Outstanding	Outstanding	Outstanding
West Virginia	Outstanding	Outstanding	Low Satisfactory	Outstanding

*The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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.

AA (state): Any multistate metropolitan statistical area (MMSA) or multistate combined statistical area (MCSA), as defined by the Office of Management and Budget.

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 MMSA, 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 MMSA, 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 loans are treated the same 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 AA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30 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 Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Texas - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston	1,176	94,301	73.6	148,301	10.0	7.8	10.0	19.5	22.2	19.0	23.7	32.0	23.7	46.6	37.9	47.2	0.2	0.1	0.2
Austin-	65	1,930	4.1	49,373	6.8	3.1	7.1	13.5	40.0	13.9	34.1	32.3	35.1	44.2	23.1	43.1	1.3	1.5	0.9
Amarillo	5	26	0.3	4,881	5.9	20.0	5.6	25.7	60.0	21.4	31.5	20.0	30.0	36.7	0.0	42.9	0.3	0.0	0.1
Beaumont-Port Arthur	6	12	0.4	4,047	6.5	33.3	6.6	21.7	0.0	17.8	46.9	50.0	48.8	24.7	16.7	26.8	0.2	0.0	0.0
Brownsville-Harlingen	19	209	1.2	5,624	0.0	0.0	0.0	32.5	36.8	29.7	27.7	52.6	29.7	39.5	10.5	40.3	0.3	0.0	0.3
Dallas-Plano-Irving	71	527	4.4	101,908	7.6	8.5	7.9	19.4	18.3	19.5	24.5	38.0	23.2	47.7	33.8	48.4	0.9	1.4	1.0
Fort Worth-Arlington	54	3,486	3.4	41,962	7.3	9.3	7.6	20.4	13.0	21.0	31.8	33.3	31.2	40.4	44.4	40.2	0.1	0.0	0.1
Longview	2	2	0.1	4,299	7.6	0.0	7.4	9.6	0.0	8.7	60.4	100.0	60.8	22.1	0.0	22.5	0.2	0.0	0.6
San Antonio-New Braunfels	113	1,961	7.1	33,205	5.1	4.4	4.5	22.6	23.9	21.4	29.9	35.4	29.2	42.2	36.3	44.7	0.3	0.0	0.3
Sherman-Denison	4	15	0.3	2,149	0.0	0.0	0.0	22.3	50.0	21.3	50.2	25.0	45.5	27.5	25.0	33.3	0.0	0.0	0.0
Texarkana	2	5	0.1	1,799	0.0	0.0	0.0	22.5	0.0	20.3	53.3	100.0	51.1	24.2	0.0	28.5	0.0	0.0	0.0
Tyler	11	25	0.7	5,045	6.4	0.0	7.0	18.1	45.5	17.6	35.9	27.3	33.7	39.4	27.3	41.4	0.2	0.0	0.3
TX- Non MSA	69	745	4.3	11,099	0.0	0.0	0.0	16.6	13.0	14.7	53.7	56.5	52.7	29.6	30.4	32.6	0.0	0.0	0.0
Total	1,597	103,244	100.0	413,692	7.6	7.1	7.8	19.3	22.5	18.8	28.6	34.0	28.1	44.1	36.2	44.9	0.5	0.2	0.4

Source: 2017 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

Texas - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston	740	51,560	73.2	154,577	8.0	4.9	7.5	19.5	19.9	18.2	25.2	33.4	25.0	47.3	41.9	49.3	0.1	0.0	0.0
Austin-	41	119	4.1	52,241	6.3	7.3	6.3	17.3	31.7	16.4	30.7	48.8	30.5	45.7	12.2	46.8	0.1	0.0	0.1
Amarillo	4	9	0.4	4,905	20.2	50.0	17.3	11.1	0.0	8.6	34.9	25.0	33.3	33.6	25.0	40.7	0.2	0.0	0.1
Beaumont-Port Arthur	7	16	0.7	4,121	3.3	0.0	2.5	31.1	28.6	29.8	29.6	57.1	27.6	35.6	14.3	39.8	0.4	0.0	0.3
Brownsville-Harlingen	2	2	0.2	5,783	3.8	0.0	4.0	27.5	0.0	26.4	37.7	100.0	38.2	30.7	0.0	31.3	0.3	0.0	0.2
Dallas-Plano-Irving	54	150	5.3	108,622	8.2	5.6	8.1	17.8	13.0	17.0	24.5	38.9	22.2	49.3	42.6	52.6	0.2	0.0	0.2
Fort Worth-Arlington	35	2,327	3.5	45,546	5.0	11.4	5.1	21.2	14.3	21.0	34.8	37.1	33.3	38.9	37.1	40.5	0.2	0.0	0.1
Longview	6	14	0.6	3,773	0.5	0.0	0.5	27.9	50.0	25.6	50.2	33.3	50.4	21.2	16.7	23.4	0.2	0.0	0.2
San Antonio-New Braunfels	61	114	6.0	36,168	5.2	4.9	5.3	21.8	26.2	19.8	31.8	41.0	29.1	41.0	27.9	45.6	0.3	0.0	0.2
Sherman-Denison	3	5	0.3	2,170	0.0	0.0	0.0	25.1	0.0	22.5	59.1	66.7	58.5	15.7	33.3	19.0	0.0	0.0	0.0
Texarkana	1	6	0.1	1,590	6.7	0.0	6.0	6.5	0.0	5.7	51.1	100.0	44.9	35.6	0.0	43.3	0.0	0.0	0.0
Tyler	4	8	0.4	4,774	8.3	0.0	7.3	19.8	75.0	17.6	34.7	25.0	35.6	36.9	0.0	39.2	0.2	0.0	0.3
TX-Non MSA	53	130	5.2	11,176	0.0	0.0	0.0	14.7	17.0	11.2	57.4	62.3	57.4	27.9	20.8	31.4	0.0	0.0	0.0
Total	1,011	54,460	100	435,446	6.9	5.0	6.8	19.2	20.3	18.1	29.3	36.8	27.9	44.4	37.9	47.2	0.1	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Texas - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Houston	1,176	94,301	73.6	148,301	85.4	82.8	45.6	5.8	17.0	8.8	0.2
Austin	65	1,930	4.1	49,373	86.3	95.4	50.5	4.5	4.6	9.2	0.0
Amarillo	5	26	0.3	4,881	81.8	100.0	47.1	5.4	0.0	12.8	0.0
Beaumont-Port Arthur	6	12	0.4	4,047	79.8	100.0	39.8	5.9	0.0	14.3	0.0
Brownsville-Harlingen	19	209	1.2	5,624	81.1	100.0	43.3	5.0	0.0	14.0	0.0
Dallas-Plano-Irving	71	527	4.4	101,908	85.8	95.8	47.2	5.3	4.2	8.9	0.0
Fort Worth-Arlington	54	3,486	3.4	41,962	85.4	87.0	45.7	4.7	13.0	9.9	0.0
Longview	2	2	0.1	4,299	78.8	100.0	46.8	6.3	0.0	14.9	0.0
San Antonio-New Braunfels	113	1,961	7.1	33,205	84.5	96.5	46.4	5.0	3.5	10.6	0.0
Sherman-Denison	4	15	0.3	2,149	82.8	100.0	47.1	4.9	0.0	12.4	0.0
Texarkana	2	5	0.1	1,799	78.5	100.0	50.8	5.8	0.0	15.8	0.0
Tyler	11	25	0.7	5,045	83.1	100.0	45.6	5.5	0.0	11.4	0.0
TX-Non MSAs	69	745	4.3	11,099	82.3	95.7	45.9	4.9	4.3	12.8	0.0
Total	1,597	103,244	100.0	413,692	85.2	86.1	46.7	5.3	13.8	9.6	0.1

Source: 2017 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

Texas - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Houston	740	51,560	73.2	154,577	85.3	78.6	40.7	5.8	20.5	8.9	0.8
Austin	41	119	4.1	52,241	85.7	95.1	41.3	4.8	4.9	9.6	0.0
Amarillo	4	9	0.4	4,905	82.5	100.0	45.6	5.3	0.0	12.2	0.0
Beaumont-Port Arthur	7	16	0.7	4,121	80.1	85.7	39.2	5.7	14.3	14.2	0.0
Brownsville-Harlingen	2	2	0.2	5,783	81.3	100.0	39.7	5.0	0.0	13.8	0.0
Dallas-Plano-Irving	54	150	5.3	108,622	85.3	92.6	42.6	5.6	7.4	9.1	0.0
Fort Worth-Arlington	35	2,327	3.5	45,546	85.0	82.9	42.2	4.9	11.4	10.1	5.7
Longview	6	14	0.6	3,773	79.2	100.0	45.4	6.2	0.0	14.6	0.0
San Antonio-New Braunfels	61	114	6.0	36,168	84.2	98.4	40.7	5.1	1.6	10.7	0.0
Sherman-Denison	3	5	0.3	2,170	83.3	100.0	48.3	4.6	0.0	12.1	0.0
Texarkana	1	6	0.1	1,590	79.7	100.0	47.9	5.4	0.0	15.0	0.0
Tyler	4	8	0.4	4,774	83.1	100.0	44.2	5.6	0.0	11.4	0.0
TX-Non MSA	53	130	5.2	11,176	82.8	98.1	44.7	4.7	0.0	12.4	1.9
Total	1,011	54,460	100.0	435,446	84.9	82.9	41.7	5.4	16.2	9.7	0.9

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Texas - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Houston	5,345	36,909	0.0	11.4	8.0	24.8	27.4	27.5	35.3	36.0	29.2	0.3	0.1
Austin	357	1,692	0.0	10.1	11.8	19.3	28.3	38.8	45.1	31.0	14.6	0.9	0.3
Amarillo	55	97	0.0	2.1	0.0	28.4	32.7	36.3	41.8	33.2	25.5	0.0	0.0
Beaumont-Port Arthur	51	95	0.0	7.8	2.0	26.8	39.2	40.4	43.1	25.0	15.7	0.0	0.0
Brownsville-Harlingen	149	243	0.0	0.0	0.0	32.1	49.7	31.3	26.2	36.6	24.2	0.0	0.0
Dallas-Plano-Irving	747	1,487	0.0	12.4	10.6	24.7	30.3	25.7	34.5	37.0	24.2	0.3	0.4
Fort Worth-Arlington	499	987	0.0	9.3	9.0	22.6	27.3	37.3	41.1	30.8	22.6	0.0	0.0
Longview	96	177	0.0	2.1	1.0	11.3	4.2	65.3	76.0	21.3	18.8	0.0	0.0
San Antonio-New Braunfels	745	1,498	0.0	6.2	6.6	30.3	33.6	29.7	39.9	33.7	20.0	0.0	0.0
Sherman-Denison	70	128	0.0	0.0	0.0	22.7	40.0	50.4	40.0	26.9	20.0	0.0	0.0
Texarkana	32	55	0.0	0.0	0.0	19.2	18.8	60.5	68.8	20.3	12.5	0.0	0.0
Tyler	59	95	0.0	1.8	3.4	24.3	42.4	40.4	39.0	33.6	15.3	0.0	0.0
TX-Non MSA	897	1,668	0.0	0.0	0.0	15.3	20.2	58.3	58.3	26.3	21.5	0.0	0.0
Total	9,102	45,131	0.0	9.5	7.1	24.2	27.8	32.1	39.1	34.0	25.9	0.2	0.1

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

Texas - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Houston	2,476	22,085	0.0	9.6	5.8	25.3	24.9	28.5	37.0	36.7	32.2	0.0	0.0
Austin	178	445	0.0	10.3	11.8	22.3	23.6	36.0	45.5	31.4	19.1	0.0	0.0
Amarillo	40	71	0.0	11.5	5.0	17.7	22.5	39.9	52.5	30.9	20.0	0.0	0.0
Beaumont-Port Arthur	26	44	0.0	6.6	3.8	31.7	38.5	30.4	42.3	31.3	15.4	0.0	0.0
Brownsville-Harlingen	53	89	0.0	2.1	0.0	26.8	7.5	46.8	73.6	24.3	18.9	0.0	0.0
Dallas-Plano-Irving	427	898	0.0	11.8	8.4	23.6	22.0	27.4	38.9	37.2	30.7	0.0	0.0
Fort Worth-Arlington	242	467	0.0	6.0	9.1	25.9	28.9	39.8	39.7	28.2	22.3	0.0	0.0
Longview	50	99	0.0	1.6	2.0	19.8	16.0	57.1	64.0	21.5	18.0	0.0	0.0
San Antonio-New Braunfels	396	853	0.0	6.6	5.8	28.3	30.3	33.9	42.9	31.1	21.0	0.0	0.0
Sherman-Denison	30	54	0.0	0.0	0.0	24.4	36.7	59.2	50.0	16.4	13.3	0.0	0.0
Texarkana	15	24	0.0	2.7	0.0	8.8	0.0	61.4	66.7	27.2	33.3	0.0	0.0
Tyler	21	31	0.0	3.1	4.8	24.2	42.9	40.7	19.0	32.0	33.3	0.0	0.0
TX-Non MSA	391	725	0.0	0.0	0.0	12.4	19.4	61.0	58.8	26.7	21.7	0.0	0.0
Total	4,345	25,885	0.0	8.5	5.8	24.3	24.6	33.7	41.2	33.4	28.3	0.0	0.0

Source: 2010 U.S. Census; 07/15/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Texas Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Houston	5,345	36,909	58.7	24.9	33.9	15.9	24.8	16.8	20.1	42.4	17.9	0.0	3.4
Austin	357	1,692	3.9	23.5	54.1	16.5	26.6	18.0	12.9	42.0	4.8	0.0	1.7
Amarillo	55	97	0.6	25.1	43.6	16.0	23.6	17.8	14.5	41.1	9.1	0.0	9.1
Beaumont-Port Arthur	51	95	0.6	27.5	21.6	15.6	25.5	16.6	27.5	40.3	25.5	0.0	0.0
Brownsville-Harlingen	149	243	1.6	26.0	32.9	15.3	20.8	15.4	20.8	43.2	22.1	0.0	3.4
Dallas-Plano-Irving	747	1,487	8.2	24.0	36.7	16.6	32.5	17.4	19.1	41.9	9.9	0.0	1.7
Fort Worth-Arlington	499	987	5.5	23.8	34.5	16.5	27.3	18.4	23.8	41.3	12.4	0.0	2.0
Longview	96	177	1.1	25.5	39.6	15.6	31.3	17.4	21.9	41.4	6.3	0.0	1.0
San Antonio-New Braunfels	745	1,498	8.2	24.9	41.6	16.1	30.1	17.9	16.4	41.2	10.1	0.0	1.9
Sherman-Denison	70	128	0.8	24.6	44.3	16.0	22.9	16.7	21.4	42.7	7.1	0.0	4.3
Texarkana	32	55	0.4	24.6	25.0	15.2	43.8	16.6	18.8	43.5	12.5	0.0	0.0
Tyler	59	95	0.6	23.8	35.6	16.6	37.3	17.2	18.6	42.4	6.8	0.0	1.7
TX-Non MSA	897	1,668	9.9	23.0	33.1	16.0	25.3	17.0	22.4	44.0	16.6	0.0	2.6
Total	9,102	45,131	100.0	24.4	35.6	16.2	26.2	17.3	19.9	42.0	15.4	0.0	2.9

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

Texas - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Houston	2,476	22,085	57.0	24.2	28.2	16.4	26.5	16.9	21.8	42.5	19.7	0.0	3.8
Austin	178	445	4.1	23.0	46.1	16.8	32.6	18.1	12.4	42.1	6.7	0.0	2.2
Amarillo	40	71	0.9	24.8	47.5	16.3	27.5	17.4	7.5	41.5	10.0	0.0	7.5
Beaumont-Port Arthur	26	44	0.6	26.7	26.9	16.4	30.8	16.3	15.4	40.7	19.2	0.0	7.7
Brownsville-Harlingen	53	89	1.2	26.0	24.5	15.5	17.0	15.9	26.4	42.6	30.2	0.0	1.9
Dallas-Plano-Irving	427	898	9.8	23.5	35.1	16.9	32.3	17.5	20.1	42.0	9.6	0.0	2.8
Fort Worth-Arlington	242	467	5.6	22.9	36.0	17.1	26.9	18.5	21.5	41.5	13.2	0.0	2.5
Longview	50	99	1.2	23.7	30.0	15.9	30.0	18.4	32.0	42.0	8.0	0.0	0.0
San Antonio-New Braunfels	391	725	9.0	23.1	31.5	15.4	24.6	17.0	22.5	44.5	18.9	0.0	2.6
Sherman-Denison	396	853	9.1	25.0	39.6	16.3	28.3	18.0	16.4	40.8	13.1	0.0	2.5
Texarkana	30	54	0.7	23.2	33.3	16.5	30.0	18.6	20.0	41.7	10.0	0.0	6.7
Tyler	15	24	0.3	24.5	26.7	14.8	20.0	16.9	33.3	43.8	13.3	0.0	6.7
TX-Non MSA	21	31	0.5	23.7	47.6	16.6	28.6	17.6	9.5	42.1	9.5	0.0	4.8
Total	4,345	25,885	100.0	23.9	31.6	16.5	27.3	17.5	20.8	42.1	16.9	0.0	3.4

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.

Due to rounding, totals may not equal 100.0

Charlotte - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Charlotte	120	9,875	100.0	48,695	7.1	9.2	6.6	22.1	33.3	19.7	28.2	28.3	29.1	41.9	29.2	44.0	0.8	0.0	0.5
Total	120	9,875	100.0	48,695	7.1	9.2	6.6	22.1	33.3	19.7	28.2	28.3	29.1	41.9	29.2	44.0	0.8	0.0	0.5

Source: 2017 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

Charlotte - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography
2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Charlotte	75	598	100.0	49,622	7.8	6.7	7.6	18.3	21.3	15.1	32.6	48.0	32.2	40.4	24.0	44.3	0.9	0.0	0.8
Total	75	598	100.0	49,622	7.8	6.7	7.6	18.3	21.3	15.1	32.6	48.0	32.2	40.4	24.0	44.3	0.9	0.0	0.8

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Charlotte - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Charlotte	120	9,875	100.0	48,695	83.8	89.2	51.2	5.6	10.8	10.5	0.0
Total	120	9,875	100.0	48,695	83.8	89.2	51.2	5.6	10.8	10.5	0.0

Source: 2017 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

Charlotte Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Charlotte	75	598	100.0	49,622	83.6	94.7	49.5	5.8	4.0	10.6	1.3
Total	75	598	100.0	49,622	83.6	94.7	49.5	5.8	4.0	10.6	1.3

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Charlotte - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Charlotte	866	1,805	0.0	7.0	10.2	26.7	34.5	33.9	38.0	32.4	17.2	0.1	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Charlotte - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Charlotte	426	734	0.0	6.9	8.0	23.7	29.1	37.1	44.6	32.1	18.3	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Charlotte - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Charlotte	866	1,805	100.0	23.6	42.5	16.2	30.3	17.5	16.5	42.7	8.4	0.0	2.3
Total	866	1,805	100.0	23.6	42.5	16.2	30.3	17.5	16.5	42.7	8.4	0.0	2.3
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Charlotte - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Charlotte	426	734	100.0	23.2	39.9	16.2	33.6	18.7	15.3	41.9	8.7	0.0	2.6
Total	426	734	100.0	23.2	39.9	16.2	33.6	18.7	15.3	41.9	8.7	0.0	2.6
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Chicago - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago	71	4,763	100.0	201,018	4.9	9.9	4.0	15.2	32.4	15.8	31.4	33.8	32.5	48.0	23.9	47.5	0.5	0.0	0.3
Total	71	4,763	100.0	201,018	4.9	9.9	4.0	15.2	32.4	15.8	31.4	33.8	32.5	48.0	23.9	47.5	0.5	0.0	0.3

Source: 2017 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

Chicago - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography
2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago	42	150	100.0	228,670	4.4	9.5	3.3	15.1	16.7	14.3	34.5	52.4	34.4	45.8	21.4	47.9	0.1	0.0	0.1
Total	42	150	100.0	228,670	4.4	9.5	3.3	15.1	16.7	14.3	34.5	52.4	34.4	45.8	21.4	47.9	0.1	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Chicago - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Chicago	71	4,763	100.0	201,018	81.0	81.7	48.2	7.9	18.3	11.1	0.0
Total	71	4,763	100.0	201,018	81.0	81.7	48.2	7.9	18.3	11.1	0.0

Source: 2017 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

Chicago - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Chicago	42	150	100.0	228,670	80.8	97.6	39.6	8.1	0.0	11.1	2.4
Total	42	150	100.0	228,670	80.8	97.6	39.6	8.1	0.0	11.1	2.4

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Chicago - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago	595	1,066	0.0	9.0	8.9	21.4	26.7	33.0	44.2	36.2	20.2	0.3	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Chicago - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago	227	421	0.0	8.2	6.6	21.4	30.4	36.8	44.5	33.6	18.5	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Chicago - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago	595	1,066	100.0	25.2	50.4	15.3	24.2	17.1	15.6	42.5	6.7	0.0	3.0
Total	595	1,066	100.0	25.2	50.4	15.3	24.2	17.1	15.6	42.5	6.7	0.0	3.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Chicago - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago	227	421	100.0	24.3	49.8	15.8	23.3	18.0	15.0	41.9	7.0	0.0	4.8
Total	227	421	100.0	24.3	49.8	15.8	23.3	18.0	15.0	41.9	7.0	0.0	4.8
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Cincinnati - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cincinnati	18	1,484	100.0	31,047	6.9	16.7	6.8	19.5	22.2	18.4	35.7	50.0	34.7	36.7	11.1	39.2	1.1	0.0	0.8
Total	18	1,484	100.0	31,047	6.9	16.7	6.8	19.5	22.2	18.4	35.7	50.0	34.7	36.7	11.1	39.2	1.1	0.0	0.8

Source: 2017 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

Cincinnati - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography
2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cincinnati	21	561	100.0	33,540	6.1	9.5	5.8	20.4	23.8	17.4	39.8	61.9	37.3	33.6	4.8	39.4	0.0	0.0	0.0
Total	21	561	100.0	33,540	6.1	9.5	5.8	20.4	23.8	17.4	39.8	61.9	37.3	33.6	4.8	39.4	0.0	0.0	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Cincinnati - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Cincinnati	18	1,484	100.0	31,047	80.6	88.9	50.7	6.9	11.1	12.5	0.0
Total	18	1,484	100.0	31,047	80.6	88.9	50.7	6.9	11.1	12.5	0.0

Source: 2017 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

Cincinnati - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Cincinnati	21	561	100.0	33,540	80.6	95.2	46.6	7.1	4.8	12.3	0.0
Total	21	561	100.0	33,540	80.6	95.2	46.6	7.1	4.8	12.3	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Cincinnati - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cincinnati	282	482	0.0	9.1	10.3	21.4	35.5	39.6	41.8	29.4	12.4	0.5	0.0

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

Cincinnati - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cincinnati	132	233	0.0	7.1	8.3	20.8	32.6	43.8	50.8	28.2	8.3	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
 Due to rounding, totals may not equal 100.0

Cincinnati - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cincinnati	282	482	100.0	25.6	50.7	15.4	31.2	16.9	9.6	42.1	4.3	0.0	4.3
Total	282	482	100.0	25.6	50.7	15.4	31.2	16.9	9.6	42.1	4.3	0.0	4.3

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

Cincinnati - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cincinnati	132	233	100.0	24.7	41.7	16.0	34.8	17.5	12.9	41.9	8.3	0.0	2.3
Total	132	233	100.0	24.7	41.7	16.0	34.8	17.5	12.9	41.9	8.3	0.0	2.3

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Louisville - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Louisville	21	44	100.0	16,383	8.0	23.8	7.5	14.4	19.0	14.9	29.6	38.1	29.4	43.0	19.0	44.0	5.0	0.0	4.2
Total	21	44	100.0	16,383	8.0	23.8	7.5	14.4	19.0	14.9	29.6	38.1	29.4	43.0	19.0	44.0	5.0	0.0	4.2

Source: 2017 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

Louisville - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography
2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Louisville	5	6	100.0	17,046	13.6	20.0	11.4	12.2	0.0	12.1	31.3	60.0	28.5	42.5	20.0	47.6	0.4	0.0	0.4
Total	5	6	100.0	17,046	13.6	20.0	11.4	12.2	0.0	12.1	31.3	60.0	28.5	42.5	20.0	47.6	0.4	0.0	0.4

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Louisville - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Louisville	21	44	100.0	16,383	82.3	100.0	52.0	6.7	0.0	11.0	0.0
Total	21	44	100.0	16,383	82.3	100.0	52.0	6.7	0.0	11.0	0.0

Source: 2017 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

Louisville - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Louisville	5	6	100.0	17,046	82.4	100.0	46.5	6.7	0.0	11.0	0.0
Total	5	6	100.0	17,046	82.4	100.0	46.5	6.7	0.0	11.0	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Louisville - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography
2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Louisville	186	338	0.0	10.4	10.2	19.5	31.2	37.0	45.7	32.6	12.4	0.5	0.5

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

Louisville - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography
2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Louisville	75	115	0.0	12.6	6.7	14.8	34.7	40.2	44.0	32.4	14.7	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Louisville - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Louisville	186	338	100.0	25.4	41.4	15.8	33.3	17.3	16.1	41.5	6.5	0.0	2.7
Total	186	338	100.0	25.4	41.4	15.8	33.3	17.3	16.1	41.5	6.5	0.0	2.7

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

Louisville - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Louisville	75	115	100.0	24.6	54.7	16.0	28.0	17.7	10.7	41.7	4.0	0.0	2.7
Total	75	115	100.0	24.6	54.7	16.0	28.0	17.7	10.7	41.7	4.0	0.0	2.7

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Myrtle Beach - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Myrtle Beach	28	154	100.0	9,574	4.4	0.0	4.9	15.9	25.0	15.3	57.6	57.1	58.3	21.6	14.3	21.0	0.5	3.6	0.5
Total	28	154	100.0	9,574	4.4	0.0	4.9	15.9	25.0	15.3	57.6	57.1	58.3	21.6	14.3	21.0	0.5	3.6	0.5

Source: 2017 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

Myrtle Beach - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography
2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Myrtle Beach	5	19	100.0	10,837	4.4	0.0	4.3	14.3	0.0	11.4	56.1	80.0	57.4	24.7	20.0	26.6	0.4	0.0	0.2
Total	5	19	100.0	10,837	4.4	0.0	4.3	14.3	0.0	11.4	56.1	80.0	57.4	24.7	20.0	26.6	0.4	0.0	0.2

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Myrtle Beach - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018

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
Myrtle Beach	28	154	100.0	9,574	84.5	96.4	56.2	4.6	3.6	10.9	0.0
Total	28	154	100.0	9,574	84.5	96.4	56.2	4.6	3.6	10.9	0.0

Source: 2017 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

Myrtle Beach - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-2016

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
Myrtle Beach	5	19	100.0	10,837	83.9	80.0	49.6	4.9	20.0	11.3	0.0
Total	5	19	100.0	10,837	83.9	80.0	49.6	4.9	20.0	11.3	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Myrtle Beach - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Myrtle Beach	137	240	0.0	1.3	0.0	17.4	16.8	64.0	65.0	17.1	18.2	0.2	0.0

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

Myrtle Beach - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Myrtle Beach	58	97	0.0	1.6	1.7	16.0	22.4	61.1	44.8	21.3	31.0	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Myrtle Beach - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Myrtle Beach	137	240	100.0	23.1	32.8	16.4	29.9	19.1	17.5	41.4	16.1	0.0	3.7
Total	137	240	100.0	23.1	32.8	16.4	29.9	19.1	17.5	41.4	16.1	0.0	3.7

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

Myrtle Beach - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Myrtle Beach	58	97	100.0	22.6	37.9	17.2	25.9	19.1	19.0	41.2	13.8	0.0	3.4
Total	58	97	100.0	22.6	37.9	17.2	25.9	19.1	19.0	41.2	13.8	0.0	3.4

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Washington - Arlington - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Washington-Arlington	43	1,090	100.0	115,880	3.8	7.0	3.5	18.8	48.8	18.9	37.5	34.9	36.9	39.8	9.3	40.7	0.2	0.0	0.1
Total	43	1,090	100.0	115,880	3.8	7.0	3.5	18.8	48.8	18.9	37.5	34.9	36.9	39.8	9.3	40.7	0.2	0.0	0.1

Source: 2017 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

Washington - Arlington - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Washington-Arlington	19	40	100.0	132,983	3.2	5.3	3.1	19.7	36.8	18.8	37.9	52.6	37.4	39.2	5.3	40.6	0.1	0.0	0.1
Total	19	40	100.0	132,983	3.2	5.3	3.1	19.7	36.8	18.8	37.9	52.6	37.4	39.2	5.3	40.6	0.1	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Washington - Arlington - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

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
Washington-Arlington	43	1,090	100.0	115,880	86.2	95.3	55.2	5.5	4.7	8.3	0.0
Total	43	1,090	100.0	115,880	86.2	95.3	55.2	5.5	4.7	8.3	0.0

Source: 2017 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

Washington - Arlington - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2015-16**

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
Washington-Arlington	19	40	100.0	132,983	85.8	100.0	49.7	5.7	0.0	8.5	0.0
Total	19	40	100.0	132,983	85.8	100.0	49.7	5.7	0.0	8.5	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Washington - Arlington - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Washington-Arlington	260	498	0.0	6.2	10.0	22.8	45.0	37.7	36.5	33.2	8.5	0.1	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Washington - Arlington - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2015-2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Washington-Arlington	120	232	0.0	5.7	5.0	24.9	41.7	38.6	39.2	30.8	14.2	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Washington - Arlington - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Washington-Arlington	260	498	100.0	21.2	67.7	16.8	22.7	19.2	7.3	42.9	1.9	0.0	0.4
Total	260	498	100.0	21.2	67.7	16.8	22.7	19.2	7.3	42.9	1.9	0.0	0.4

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

Washington - Arlington - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Washington-Arlington	120	232	100.0	19.6	67.5	17.0	20.8	19.8	5.8	43.5	4.2	0.0	1.7
Total	120	232	100.0	19.6	67.5	17.0	20.8	19.8	5.8	43.5	4.2	0.0	1.7

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Alabama - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Birmingham	20	31	24.7	16,953	8.2	10.0	8.2	19.8	55.0	16.3	26.9	30.0	24.9	43.7	5.0	49.7	1.4	0.0	0.9
Anniston-Oxford-Jacksonville	6	7	7.4	998	5.0	0.0	2.7	31.5	50.0	31.5	53.8	50.0	55.5	7.7	0.0	9.0	2.0	0.0	1.3
Daphne-Fairhope-Foley	3	7	3.7	4,943	0.0	0.0	0.0	19.4	0.0	17.8	60.2	100.0	58.1	20.4	0.0	24.1	0.0	0.0	0.0
Decatur	2	2	2.5	1,860	5.3	0.0	5.2	10.9	0.0	10.8	60.4	100.0	57.3	23.4	0.0	26.7	0.0	0.0	0.0
Huntsville	12	44	14.8	6,621	10.5	8.3	12.2	26.4	41.7	21.2	29.9	8.3	29.5	33.1	41.7	37.1	0.0	0.0	0.0
Mobile	10	17	12.3	7,698	7.2	10.0	7.0	20.2	0.0	17.9	31.5	60.0	31.2	40.9	30.0	43.8	0.2	0.0	0.1
Montgomery	11	19	13.6	5,100	7.1	9.1	6.9	19.2	45.5	16.1	36.9	18.2	32.7	33.0	27.3	40.8	3.8	0.0	3.6
Tuscaloosa	1	1	1.2	2,953	1.5	0.0	1.3	26.8	100.0	25.9	42.6	0.0	44.2	26.2	0.0	27.3	2.9	0.0	1.3
AL-Non MSA	16	46	19.8	3,691	0.0	0.0	0.0	15.7	31.3	15.1	52.0	43.8	52.0	32.3	25.0	32.9	0.0	0.0	0.0
Total	81	174	100.0	50,817	6.2	6.2	6.4	20.7	37.0	17.9	37.2	37.0	35.4	34.7	19.8	39.6	1.2	0.0	0.8

Source: 2017 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

Alabama - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Birmingham	7	11	19.4	18,163	9.0	0.0	7.8	17.8	14.3	13.8	28.9	42.9	25.3	44.3	42.9	53.0	0.0	0.0	0.0
Anniston-Oxford-Jacksonville	0	0	0.0	984	5.1	0.0	4.2	28.0	0.0	27.3	43.1	0.0	39.9	23.4	0.0	28.5	0.4	0.0	0.1
Daphne-Fairhope-Foley	1	2	2.8	4,641	0.0	0.0	0.0	10.0	100.0	9.3	69.0	0.0	65.7	21.0	0.0	25.1	0.0	0.0	0.0
Decatur	1	3	2.8	1,939	1.1	0.0	1.0	20.5	0.0	20.2	55.9	100.0	51.5	22.5	0.0	27.3	0.0	0.0	0.0
Huntsville	4	7	11.1	8,114	10.4	0.0	10.6	25.5	0.0	17.8	33.2	50.0	31.9	30.8	50.0	39.6	0.0	0.0	0.0
Mobile	4	6	11.1	7,501	6.5	0.0	6.8	21.4	25.0	19.3	33.8	75.0	31.1	38.2	0.0	42.8	0.2	0.0	0.1
Montgomery	7	13	19.4	5,802	15.4	14.3	12.3	16.5	0.0	13.7	31.4	71.4	26.9	36.7	14.3	47.1	0.0	0.0	0.0
Tuscaloosa	2	4	5.6	2,886	7.7	0.0	6.3	23.3	0.0	24.2	36.8	50.0	33.9	32.2	50.0	35.6	0.0	0.0	0.0
AL-Non MSA	10	18	27.8	3,709	2.4	0.0	2.0	15.7	20.0	14.7	48.6	30.0	47.9	33.4	50.0	35.3	0.0	0.0	0.0
Total	36	64	100.0	53,739	7.8	2.8	7.1	19.1	13.9	15.9	37.4	50.0	34.0	35.7	33.3	43.0	0.0	0.0	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Alabama - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018
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
Birmingham	20	31	24.7	16,953	80.2	100.0	46.9	7.3	0.0	12.5	0.0
Anniston-Oxford-Jacksonville	6	7	7.4	998	77.0	100.0	50.4	6.1	0.0	16.9	0.0
Daphne-Fairhope-Foley	3	7	3.7	4,943	84.4	100.0	50.5	4.9	0.0	10.7	0.0
Decatur	2	2	2.5	1,860	78.5	100.0	50.1	6.5	0.0	15.0	0.0
Huntsville	12	44	14.8	6,621	81.8	91.7	51.4	5.8	8.3	12.4	0.0
Mobile	10	17	12.3	7,698	78.9	100.0	43.2	7.1	0.0	14.0	0.0
Montgomery	11	19	13.6	5,100	78.1	100.0	48.0	6.4	0.0	15.5	0.0
Tuscaloosa	1	1	1.2	2,953	80.9	100.0	43.3	6.5	0.0	12.7	0.0
AL-Non MSA	16	46	19.8	3,691	78.6	100.0	43.0	5.8	0.0	15.5	0.0
Total	81	174	100.0	50,817	80.1	98.8	47.1	6.5	1.2	13.4	0.0
Source: 2017 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											

Alabama - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Birmingham	7	11	19.4	18,163	79.7	100.0	45.7	7.5	0.0	12.8	0.0
Anniston-Oxford-Jacksonville	0	0	0.0	984	77.8	0.0	49.2	6.1	0.0	16.1	0.0
Daphne-Fairhope-Foley	1	2	2.8	4,641	83.4	100.0	48.7	5.1	0.0	11.4	0.0
Decatur	1	3	2.8	1,939	79.2	100.0	49.9	6.1	0.0	14.7	0.0
Huntsville	4	7	11.1	8,114	81.2	100.0	45.4	6.0	0.0	12.8	0.0
Mobile	4	6	11.1	7,501	78.3	100.0	44.3	7.2	0.0	14.5	0.0
Montgomery	7	13	19.4	5,802	78.3	100.0	46.6	6.4	0.0	15.3	0.0
Tuscaloosa	2	4	5.6	2,886	81.4	100.0	45.4	6.2	0.0	12.4	0.0
AL-Non MSA	10	18	27.8	3,709	79.6	100.0	45.1	5.6	0.0	14.8	0.0
Total	36	64	100.0	53,739	79.9	100.0	46.0	6.6	0.0	13.6	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Alabama - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Birmingham	241	473	0.0	10.7	10.0	22.4	39.8	28.3	34.0	38.2	15.8	0.4	0.4
Anniston-Oxford-Jacksonville	42	75	0.0	5.4	11.9	18.7	19.0	62.9	69.0	10.6	0.0	2.4	0.0
Daphne-Fairhope-Foley	29	53	0.0	0.0	0.0	16.9	24.1	63.9	65.5	19.2	10.3	0.0	0.0
Decatur	46	79	0.0	5.6	6.5	10.2	13.0	60.9	73.9	23.3	6.5	0.0	0.0
Huntsville	142	243	0.0	9.0	11.3	27.5	33.1	32.7	37.3	30.8	18.3	0.0	0.0
Mobile	159	274	0.0	8.2	16.4	18.3	17.0	36.8	41.5	36.8	25.2	0.0	0.0
Montgomery	172	322	0.0	8.9	6.4	22.4	26.2	36.3	38.4	32.2	29.1	0.2	0.0
Tuscaloosa	55	88	0.0	1.6	0.0	20.3	20.0	47.5	54.5	29.1	23.6	1.4	1.8
AL-Non MSA	222	380	0.0	0.0	0.0	14.2	17.6	58.1	62.6	27.7	19.8	0.0	0.0
Total	1,108	1,987	0.0	7.1	7.7	20.5	25.8	40.5	46.8	31.6	19.6	0.3	0.2
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Alabama - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Birmingham	113	181	0.0	8.9	15.0	20.4	25.7	33.5	44.2	37.2	15.0	0.0	0.0
Anniston-Oxford-Jacksonville	22	38	0.0	6.2	9.1	20.1	36.4	44.4	27.3	29.3	27.3	0.1	0.0
Daphne-Fairhope-Foley	21	38	0.0	0.0	0.0	14.7	9.5	62.8	66.7	22.5	23.8	0.0	0.0
Decatur	17	25	0.0	1.8	0.0	17.8	23.5	56.6	70.6	23.7	5.9	0.0	0.0
Huntsville	45	73	0.0	8.8	15.6	26.7	37.8	36.4	35.6	28.1	11.1	0.0	0.0
Mobile	87	137	0.0	6.2	4.6	24.0	28.7	38.5	44.8	31.3	21.8	0.0	0.0
Montgomery	64	108	0.0	10.0	9.4	19.5	14.1	38.1	51.6	32.5	25.0	0.0	0.0
Tuscaloosa	27	41	0.0	8.3	14.8	19.4	37.0	39.9	37.0	32.4	11.1	0.0	0.0
AL-Non MSA	88	148	0.0	1.2	1.1	15.6	19.3	53.0	48.9	30.2	30.7	0.0	0.0
Total	484	789	0.0	6.8	8.5	20.5	25.0	41.0	46.1	31.7	20.5	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Alabama - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Birmingham	241	473	21.8	25.3	30.7	15.2	29.5	15.9	22.4	43.6	12.9	0.0	4.6
Anniston-Oxford-Jacksonville	42	75	3.8	25.5	40.5	15.7	26.2	16.8	23.8	41.9	7.1	0.0	2.4
Daphne-Fairhope-Foley	29	53	2.6	24.0	37.9	16.2	27.6	18.6	27.6	41.2	6.9	0.0	0.0
Decatur	46	79	4.2	24.2	45.7	16.5	34.8	17.6	10.9	41.8	6.5	0.0	2.2
Huntsville	142	243	12.8	25.2	61.3	15.8	21.1	15.9	5.6	43.0	7.7	0.0	4.2
Mobile	159	274	14.4	26.5	35.2	15.0	28.9	15.9	20.1	42.5	15.1	0.0	0.6
Montgomery	172	322	15.5	25.4	40.1	15.2	29.1	16.9	22.7	42.6	8.1	0.0	0.0
Tuscaloosa	55	88	5.0	24.6	45.5	14.1	25.5	16.0	12.7	45.3	16.4	0.0	0.0
AL-Non MSA	222	380	20.0	23.6	27.9	15.5	30.6	16.5	21.6	44.4	18.0	0.0	1.8
Total	1,108	1,987	100.0	25.1	38.1	15.4	28.3	16.4	19.0	43.1	12.4	0.0	2.2
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Alabama - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Birmingham	113	181	23.3	24.2	42.5	15.4	25.7	17.5	15.9	43.0	15.0	0.0	0.9
Anniston-Oxford-Jacksonville	22	38	4.5	26.7	36.4	13.9	36.4	16.8	13.6	42.6	13.6	0.0	0.0
Daphne-Fairhope-Foley	21	38	4.3	22.8	28.6	16.7	14.3	20.2	33.3	40.4	19.0	0.0	4.8
Decatur	17	25	3.5	24.6	41.2	16.0	35.3	17.7	11.8	41.8	11.8	0.0	0.0
Huntsville	45	73	9.3	24.7	55.6	16.0	33.3	16.9	8.9	42.4	0.0	0.0	2.2
Mobile	87	137	18.0	26.3	43.7	14.7	24.1	16.8	20.7	42.2	9.2	0.0	2.3
Montgomery	64	108	13.2	24.6	40.6	15.7	32.8	17.3	21.9	42.3	4.7	0.0	0.0
Tuscaloosa	27	41	5.6	25.9	51.9	13.1	29.6	16.0	7.4	45.0	11.1	0.0	0.0
AL-Non MSA	88	148	18.2	24.2	33.0	15.0	28.4	16.3	13.6	44.5	18.2	0.0	6.8
Total	484	789	100.0	24.7	41.5	15.3	28.1	17.2	16.5	42.8	11.6	0.0	2.3
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Florida - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Jacksonville	10	23	100.0	18,780	6.6	20.0	6.8	25.4	30.0	24.5	33.4	20.0	31.8	34.6	30.0	36.9	0.0	0.0	0.0
Total	10	23	100.0	18,780	6.6	20.0	6.8	25.4	30.0	24.5	33.4	20.0	31.8	34.6	30.0	36.9	0.0	0.0	0.0
Source: 2017 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																			

Florida - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Jacksonville	7	12	100.0	19,670	5.2	14.3	5.0	24.7	57.1	23.1	37.3	28.6	33.9	32.8	0.0	38.1	0.0	0.0	0.0
Total	7	12	100.0	19,670	5.2	14.3	5.0	24.7	57.1	23.1	37.3	28.6	33.9	32.8	0.0	38.1	0.0	0.0	0.0
Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Florida - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018
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
Jacksonville	10	23	100.0	18,780	87.0	100.0	49.9	4.6	0.0	8.4	0.0
Total	10	23	100.0	18,780	87.0	100.0	49.9	4.6	0.0	8.4	0.0
Source: 2017 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											

Florida - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-2016
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
Jacksonville	7	12	100.0	19,670	86.9	100.0	47.4	4.6	0.0	8.5	0.0
Total	7	12	100.0	19,670	86.9	100.0	47.4	4.6	0.0	8.5	0.0
Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Florida - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Jacksonville	75	137	0.0	7.9	13.3	27.8	42.7	38.3	33.3	26.0	10.7	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Florida - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Jacksonville	31	45	0.0	7.2	22.6	25.6	54.8	39.8	16.1	27.4	6.5	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Florida - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Jacksonville	75	137	100.0	26.4	38.7	17.6	36.0	17.5	14.7	38.5	8.0	0.0	2.7
Total	75	137	100.0	26.4	38.7	17.6	36.0	17.5	14.7	38.5	8.0	0.0	2.7
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Florida - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Jacksonville	31	45	100.0	25.5	45.2	17.5	22.6	18.9	16.1	38.0	12.9	0.0	3.2
Total	31	45	100.0	25.5	45.2	17.5	22.6	18.9	16.1	38.0	12.9	0.0	3.2
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Georgia - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlanta	49	186	100.0	94,916	7.2	16.3	6.0	23.0	24.5	21.2	27.1	38.8	24.9	41.8	16.3	47.3	0.9	4.1	0.5
Total	49	186	100.0	94,916	7.2	16.3	6.0	23.0	24.5	21.2	27.1	38.8	24.9	41.8	16.3	47.3	0.9	4.1	0.5
Source: 2017 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																			

Georgia - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlanta	18	39	100.0	96,936	6.3	22.2	5.7	20.3	27.8	17.6	32.6	22.2	29.4	40.7	27.8	47.3	0.1	0.0	0.0
Total	18	39	100.0	96,936	6.3	22.2	5.7	20.3	27.8	17.6	32.6	22.2	29.4	40.7	27.8	47.3	0.1	0.0	0.0
Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Georgia - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018
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
Atlanta	49	186	100.0	94,916	87.3	98.0	52.5	4.6	2.0	8.1	0.0
Total	49	186	100.0	94,916	87.3	98.0	52.5	4.6	2.0	8.1	0.0
Source: 2017 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											

Georgia - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-2016
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
Atlanta	18	39	100.0	96,936	87.0	100.0	50.4	4.8	0.0	8.2	0.0
Total	18	39	100.0	96,936	87.0	100.0	50.4	4.8	0.0	8.2	0.0
Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Georgia - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Atlanta	238	781	0.0	10.1	21.0	26.7	44.1	28.7	26.5	34.3	8.4	0.2	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Georgia - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Atlanta	92	170	0.0	9.2	13.0	23.4	38.0	34.1	40.2	33.2	8.7	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Georgia - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Atlanta	238	781	100.0	24.7	37.4	16.7	31.9	17.5	20.2	41.2	9.2	0.0	1.3
Total	238	781	100.0	24.7	37.4	16.7	31.9	17.5	20.2	41.2	9.2	0.0	1.3
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Georgia - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Atlanta-	92	170	100.0	23.6	33.7	17.3	22.8	18.0	28.3	41.2	14.1	0.0	1.1
Total	92	170	100.0	23.6	33.7	17.3	22.8	18.0	28.3	41.2	14.1	0.0	1.1
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Illinois - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
IL-Non MSA	32	52	28.1	6,614	3.9	0.0	3.7	17.5	18.8	16.3	59.3	34.4	58.6	19.2	46.9	21.1	0.2	0.0	0.3
Bloomington	0	0	0.0	2,326	9.0	0.0	8.0	10.3	0.0	10.3	59.5	0.0	53.4	21.3	0.0	28.3	0.0	0.0	0.0
Carbondale-Marion	4	4	3.5	1,529	8.8	0.0	5.6	18.5	25.0	16.3	44.5	25.0	45.7	24.2	50.0	29.8	4.0	0.0	2.6
Champaign-Urbana	17	58	14.9	2,750	9.5	17.6	10.1	17.2	29.4	12.6	45.7	47.1	47.3	25.0	5.9	28.7	2.5	0.0	1.3
Danville	1	10	0.9	608	3.8	0.0	1.6	22.4	0.0	16.9	42.9	100.0	45.4	30.9	0.0	36.0	0.0	0.0	0.0
Davenport-Moline-Rock Island	11	16	9.6	1,727	4.0	0.0	5.4	31.6	45.5	31.0	57.9	54.5	54.9	6.6	0.0	8.7	0.0	0.0	0.0
Decatur	1	1	0.9	1,108	29.8	0.0	34.2	11.6	0.0	9.9	27.3	100.0	27.5	31.3	0.0	28.3	0.0	0.0	0.0
Kankakee	8	26	7.0	1,081	16.5	25.0	14.5	16.3	0.0	12.8	43.9	50.0	45.6	23.3	25.0	27.1	0.0	0.0	0.0
Peoria	10	16	8.8	4,950	11.1	0.0	9.0	14.9	30.0	13.2	46.8	40.0	46.8	27.2	30.0	31.0	0.0	0.0	0.0
Rockford	3	3	2.6	3,414	10.7	33.3	11.8	16.1	33.3	15.3	25.9	33.3	26.2	44.7	0.0	43.8	2.6	0.0	2.8
Springfield	6	7	5.3	2,389	15.1	16.7	13.1	17.2	33.3	16.3	40.8	50.0	39.8	27.0	0.0	30.8	0.0	0.0	0.0
St Louis	21	45	18.4	9,037	7.4	14.3	7.7	18.2	0.0	16.5	51.8	61.9	50.0	22.5	23.8	25.8	0.0	0.0	0.0
Total	114	238	100.0	37,533	8.9	8.8	8.8	17.6	20.2	15.6	48.6	46.5	47.5	24.3	24.6	27.6	0.6	0.0	0.5

Source: 2017 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

Illinois - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
IL-Non MSA	14	26	21.9	6,816	3.3	21.4	3.1	16.2	14.3	14.1	63.5	57.1	63.9	17.1	7.1	18.9	0.0	0.0	0.0
Bloomington	1	1	1.6	2,388	6.0	0.0	4.9	9.7	0.0	9.0	64.1	100.0	59.9	19.6	0.0	25.9	0.6	0.0	0.3
Carbondale-Marion	4	8	6.3	1,534	2.7	0.0	1.1	42.5	75.0	37.5	35.3	25.0	37.5	19.5	0.0	23.9	0.0	0.0	0.0
Champaign-Urbana	10	64	15.6	2,733	9.7	10.0	8.7	17.9	30.0	15.3	51.7	60.0	52.2	19.9	0.0	23.1	0.8	0.0	0.7
Danville	2	4	3.1	692	3.3	0.0	2.3	32.8	0.0	30.6	44.0	100.0	45.2	19.9	0.0	21.8	0.0	0.0	0.0
Davenport-Moline-Rock Island	3	6	4.7	1,810	7.7	0.0	8.0	21.0	33.3	22.8	62.9	66.7	60.5	8.4	0.0	8.7	0.0	0.0	0.0
Decatur	0	0	0.0	1,194	14.3	0.0	16.4	23.8	0.0	25.0	31.2	0.0	28.1	30.7	0.0	30.4	0.0	0.0	0.0
Kankakee	6	16	9.4	1,209	9.5	16.7	8.6	16.2	33.3	14.1	57.7	50.0	55.3	16.5	0.0	22.0	0.0	0.0	0.0
Peoria	4	14	6.3	5,451	7.5	0.0	5.8	15.0	0.0	11.4	54.1	100.0	55.2	23.4	0.0	27.6	0.0	0.0	0.0
Rockford	4	4	6.3	3,461	7.3	0.0	7.1	21.5	50.0	19.9	43.9	50.0	44.1	26.9	0.0	28.6	0.5	0.0	0.4
Springfield	7	12	10.9	2,444	10.9	42.9	8.8	20.4	14.3	16.9	35.3	42.9	37.9	29.4	0.0	33.3	4.0	0.0	3.0
St Louis	9	10	14.1	9,510	5.2	0.0	4.7	16.5	0.0	14.1	56.6	55.6	53.7	21.7	44.4	27.5	0.0	0.0	0.0
Total	64	165	100.0	39,242	6.4	12.5	5.8	18.7	21.9	16.1	53.7	57.8	52.9	20.8	7.8	24.9	0.4	0.0	0.3

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Illinois - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018

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
IL-Non MSA	32	52	28.1	6,614	74.7	100.0	49.3	6.4	0.0	18.9	0.0
Bloomington	0	0	0.0	2,326	76.6	0.0	48.5	6.6	0.0	16.8	0.0
Carbondale-Marion	4	4	3.5	1,529	76.3	100.0	47.2	6.2	0.0	17.5	0.0
Champaign-Urbana	17	58	14.9	2,750	75.8	100.0	51.4	6.0	0.0	18.2	0.0
Danville	1	10	0.9	608	73.3	100.0	41.9	6.5	0.0	20.3	0.0
Davenport-Moline-Rock Island	11	16	9.6	1,727	74.5	90.9	48.6	7.4	0.0	18.1	9.1
Decatur	1	1	0.9	1,108	72.8	100.0	44.1	7.6	0.0	19.7	0.0
Kankakee	8	26	7.0	1,081	77.4	100.0	45.7	6.8	0.0	15.8	0.0
Peoria	10	16	8.8	4,950	75.1	100.0	47.0	7.7	0.0	17.2	0.0
Rockford	3	3	2.6	3,414	77.6	100.0	45.1	8.4	0.0	14.1	0.0
Springfield	6	7	5.3	2,389	74.6	100.0	49.1	7.1	0.0	18.3	0.0
St Louis	21	45	18.4	9,037	77.4	100.0	51.4	6.3	0.0	16.3	0.0
Total	114	238	100.0	37,533	75.7	99.1	48.7	6.8	0.0	17.4	0.9

Source: 2017 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

Illinois - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-2016

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
IL-Non MSA	14	26	21.9	6,816	75.7	100.0	45.5	6.0	0.0	18.2	0.0
Bloomington	1	1	1.6	2,388	77.1	100.0	44.8	6.2	0.0	16.6	0.0
Carbondale-Marion	4	8	6.3	1,534	77.0	100.0	45.4	5.8	0.0	17.2	0.0
Champaign-Urbana	10	64	15.6	2,733	75.6	100.0	44.8	6.1	0.0	18.3	0.0
Danville	2	4	3.1	692	75.5	100.0	43.9	6.0	0.0	18.5	0.0
Davenport-Moline-Rock Island	3	6	4.7	1,810	75.6	100.0	42.5	7.1	0.0	17.4	0.0
Decatur	0	0	0.0	1,194	73.6	0.0	43.5	7.4	0.0	19.0	0.0
Kankakee	6	16	9.4	1,209	78.0	100.0	43.0	6.3	0.0	15.7	0.0
Peoria	4	14	6.3	5,451	75.8	100.0	41.9	7.4	0.0	16.9	0.0
Rockford	4	4	6.3	3,461	78.5	100.0	41.7	8.0	0.0	13.4	0.0
Springfield	7	12	10.9	2,444	75.6	100.0	43.6	6.8	0.0	17.6	0.0
St Louis	9	10	14.1	9,510	78.6	100.0	47.2	6.1	0.0	15.3	0.0
Total	64	165	100.0	39,242	76.7	100.0	44.6	6.5	0.0	16.8	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Illinois - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
IL-Non MSA	506	879	0.0	1.7	3.6	15.0	26.9	62.7	49.4	20.3	20.2	0.3	0.0
Bloomington	36	60	0.0	5.2	13.9	13.2	16.7	56.9	52.8	24.6	16.7	0.0	0.0
Carbondale-Marion	98	163	0.0	7.7	4.1	16.6	26.5	42.9	50.0	26.9	17.3	5.9	2.0
Champaign-Urbana	119	208	0.0	12.5	9.2	14.8	29.4	51.6	52.9	19.5	8.4	1.6	0.0
Danville	46	81	0.0	4.1	8.7	15.5	10.9	48.7	60.9	31.7	19.6	0.0	0.0
Davenport-Moline-Rock Island	83	158	0.0	1.9	0.0	26.0	45.8	64.4	50.6	7.6	3.6	0.0	0.0
Decatur	18	30	0.0	18.7	50.0	11.6	5.6	34.3	22.2	35.4	22.2	0.0	0.0
Kankakee	153	253	0.0	13.8	24.8	14.6	19.6	44.4	39.2	27.2	16.3	0.0	0.0
Peoria	127	232	0.0	7.7	11.0	17.8	33.1	48.7	41.7	25.7	14.2	0.0	0.0
Rockford	53	89	0.0	11.9	9.4	20.2	26.4	27.8	39.6	39.5	20.8	0.6	3.8
Springfield	116	195	0.0	14.7	37.9	14.9	19.0	44.0	36.2	26.4	6.9	0.0	0.0
St Louis	177	324	0.0	9.6	12.4	18.0	29.9	51.1	52.0	21.3	5.7	0.0	0.0
Total	1,532	2,672	0.0	7.9	11.4	17.0	26.6	50.9	47.2	23.7	14.6	0.5	0.3

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

Illinois - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
IL-Non MSA	201	340	0.0	1.7	6.0	15.4	19.9	65.5	61.7	17.3	12.4	0.0	0.0
Bloomington	21	27	0.0	2.0	0.0	14.2	33.3	60.4	38.1	23.0	28.6	0.3	0.0
Carbondale-Marion	34	56	0.0	3.2	0.0	26.5	41.2	47.5	44.1	22.7	14.7	0.0	0.0
Champaign-Urbana	41	65	0.0	9.5	7.3	16.4	34.1	55.6	53.7	16.6	4.9	1.9	0.0
Danville	22	35	0.0	4.2	18.2	27.8	36.4	47.7	40.9	20.3	4.5	0.0	0.0
Davenport-Moline-Rock Island	42	78	0.0	2.7	0.0	21.1	52.4	66.9	45.2	9.3	2.4	0.0	0.0
Decatur	7	12	0.0	8.3	0.0	24.8	71.4	34.5	0.0	32.5	28.6	0.0	0.0
Kankakee	46	78	0.0	7.3	17.4	16.8	17.4	57.5	56.5	18.4	8.7	0.0	0.0
Peoria	65	108	0.0	5.1	4.6	16.2	16.9	57.8	66.2	21.0	12.3	0.0	0.0
Rockford	30	56	0.0	8.8	6.7	25.4	40.0	41.8	33.3	24.0	20.0	0.0	0.0
Springfield	45	76	0.0	9.8	33.3	19.3	31.1	42.1	26.7	28.1	8.9	0.6	0.0
St Louis	60	110	0.0	7.3	8.3	17.9	21.7	55.8	55.0	19.0	15.0	0.0	0.0
Total	614	1,041	0.0	5.5	8.5	18.6	27.4	55.9	52.3	19.9	11.9	0.2	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Illinois - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
IL-Non MSA	506	879	33.0	24.5	46.0	16.2	29.6	17.5	17.0	41.8	4.3	0.0	3.0
Bloomington	36	60	2.4	25.4	55.6	14.9	33.3	17.4	8.3	42.3	2.8	0.0	0.0
Carbondale-Marion	98	163	6.4	27.7	44.9	13.7	29.6	16.5	13.3	42.2	10.2	0.0	2.0
Champaign-Urbana	119	208	7.8	27.3	53.8	14.4	26.1	15.6	12.6	42.7	1.7	0.0	5.9
Danville	46	81	3.0	23.4	26.1	16.2	39.1	18.3	17.4	42.1	10.9	0.0	6.5
Davenport-Moline-Rock Island	83	158	5.4	24.4	54.2	17.0	26.5	19.3	15.7	39.2	3.6	0.0	0.0
Decatur	18	30	1.2	25.4	44.4	15.2	27.8	17.1	16.7	42.2	5.6	0.0	5.6
Kankakee	153	253	10.0	23.8	56.9	15.6	24.2	18.6	13.7	41.9	3.3	0.0	2.0
Peoria	127	232	8.3	23.2	56.7	16.4	24.4	18.4	12.6	42.0	3.9	0.0	2.4
Rockford	53	89	3.5	26.0	43.4	16.1	20.8	17.8	28.3	40.1	7.5	0.0	0.0
Springfield	116	195	7.6	25.2	65.5	15.6	17.2	17.2	10.3	41.9	6.0	0.0	0.9
St Louis	177	324	11.6	25.8	53.7	16.5	24.9	17.3	13.6	40.4	4.5	0.0	3.4
Total	1,532	2,672	100.0	25.1	50.8	15.9	26.8	17.6	14.9	41.4	4.8	0.0	2.7

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

Illinois - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
IL-Non MSA	201	340	32.7	23.8	41.8	16.2	28.9	18.1	13.9	41.9	10.9	0.0	4.5
Bloomington	21	27	3.4	23.7	71.4	15.8	19.0	17.7	9.5	42.9	0.0	0.0	0.0
Carbondale-Marion	34	56	5.5	27.6	41.2	13.6	32.4	16.6	11.8	42.2	8.8	0.0	5.9
Champaign-Urbana	41	65	6.7	26.2	53.7	15.2	26.8	16.0	14.6	42.6	2.4	0.0	2.4
Danville	22	35	3.6	24.1	45.5	16.1	40.9	18.2	13.6	41.7	0.0	0.0	0.0
Davenport-Moline-Rock Island	42	78	6.8	23.8	40.5	17.4	38.1	18.6	14.3	40.2	4.8	0.0	2.4
Decatur	7	12	1.1	23.2	42.9	17.2	28.6	17.7	28.6	41.9	0.0	0.0	0.0
Kankakee	46	78	7.5	24.3	45.7	16.7	28.3	17.6	15.2	41.3	8.7	0.0	2.2
Peoria	65	108	10.6	23.3	53.8	16.4	20.0	18.7	13.8	41.6	9.2	0.0	3.1
Rockford	30	56	4.9	25.6	23.3	16.4	26.7	17.6	30.0	40.3	20.0	0.0	0.0
Springfield	45	76	7.3	23.9	57.8	16.4	17.8	18.1	15.6	41.7	4.4	0.0	4.4
St Louis	60	110	9.8	25.9	50.0	16.2	23.3	18.5	13.3	39.4	5.0	0.0	8.3
Total	614	1,041	100.0	24.6	46.3	16.2	27.2	18.0	14.8	41.2	8.0	0.0	3.7

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Indiana - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Indianapolis	35	79	30.7	31,748	8.6	17.1	8.2	18.9	14.3	16.5	34.0	51.4	33.3	38.4	17.1	41.7	0.1	0.0	0.2
Bloomington	3	8	2.6	1,927	5.8	0.0	6.8	21.1	0.0	21.4	35.4	100.0	36.0	35.7	0.0	35.4	2.0	0.0	0.4
Columbus	3	15	2.6	1,100	0.0	0.0	0.0	35.7	0.0	33.3	40.1	66.7	38.8	24.2	33.3	27.9	0.0	0.0	0.0
Elkhart-Goshen	6	10	5.3	2,746	1.2	0.0	1.1	15.6	50.0	12.8	63.8	33.3	66.9	19.4	16.7	19.3	0.0	0.0	0.0
Evansville	9	23	7.9	3,592	8.2	0.0	8.3	19.3	33.3	20.7	37.5	66.7	33.5	30.3	0.0	32.9	4.8	0.0	4.6
Fort Wayne	9	17	7.9	6,635	6.5	11.1	6.2	18.7	11.1	18.8	43.0	33.3	42.3	27.4	44.4	28.5	4.5	0.0	4.2
Lafayette-West Lafayette	4	8	3.5	1,839	4.8	0.0	5.1	31.6	25.0	33.6	26.6	0.0	25.0	32.8	75.0	34.1	4.3	0.0	2.2
Michigan City-La Porte	5	9	4.4	1,367	8.8	0.0	10.5	30.2	60.0	26.6	27.7	20.0	26.0	33.3	20.0	36.9	0.0	0.0	0.0
Muncie	1	2	0.9	1,201	5.4	0.0	4.0	29.3	100.0	30.8	28.5	0.0	27.5	32.2	0.0	35.5	4.5	0.0	2.2
South Bend-Mishawaka	7	12	6.1	3,593	12.0	14.3	9.4	16.2	14.3	14.2	42.7	57.1	46.7	29.2	14.3	29.7	0.0	0.0	0.0
Terre Haute	6	34	5.3	1,555	6.4	16.7	10.0	22.2	33.3	18.8	37.0	33.3	33.6	34.5	16.7	37.6	0.0	0.0	0.0
IN-Non MSA	26	46	22.8	7,957	0.0	0.0	0.0	12.8	11.5	10.7	68.4	69.2	68.0	18.9	19.2	21.2	0.0	0.0	0.0
Total	114	263	100.0	65,260	6.6	7.9	6.5	19.1	20.2	17.4	41.1	51.8	40.3	32.1	20.2	34.8	1.0	0.0	0.9

Source: 2017 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

Indiana - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Indianapolis	15	35	17.6	33,714	5.3	13.3	4.9	19.6	26.7	16.4	40.6	40.0	38.5	34.5	20.0	40.2	0.0	0.0	0.0
Bloomington	1	1	1.2	1,776	7.6	0.0	6.8	13.1	0.0	12.1	50.4	0.0	48.5	28.9	100.0	32.6	0.0	0.0	0.0
Columbus	2	7	2.4	1,130	0.0	0.0	0.0	26.3	0.0	23.9	56.2	100.0	59.1	17.5	0.0	17.0	0.0	0.0	0.0
Elkhart-Goshen	10	36	11.8	2,862	0.0	0.0	0.0	17.2	0.0	13.8	55.1	70.0	55.6	27.7	30.0	30.6	0.0	0.0	0.0
Evansville	9	19	10.6	3,244	5.0	0.0	5.1	24.3	22.2	24.4	37.6	44.4	34.4	33.1	33.3	36.1	0.0	0.0	0.0
Fort Wayne	10	113	11.8	6,914	9.1	10.0	8.3	24.1	30.0	21.0	37.9	30.0	37.8	28.5	20.0	32.6	0.3	10.0	0.3
Lafayette-West Lafayette	0	0	0.0	1,864	6.4	0.0	6.1	40.1	0.0	35.6	34.2	0.0	40.6	18.7	0.0	17.7	0.6	0.0	0.0
Michigan City-La Porte	6	8	7.1	1,395	0.0	0.0	0.0	29.3	50.0	26.7	55.6	16.7	56.6	15.1	33.3	16.6	0.0	0.0	0.0
Muncie	2	3	2.4	1,337	2.7	0.0	2.8	32.1	100.0	34.5	39.3	0.0	35.7	23.7	0.0	26.6	2.2	0.0	0.5
South Bend-Mishawaka	6	97	7.1	4,137	8.0	16.7	5.9	24.8	50.0	21.6	34.7	16.7	34.7	32.5	16.7	37.7	0.0	0.0	0.0
Terre Haute	3	4	3.5	1,565	16.5	0.0	18.9	9.4	0.0	9.6	52.1	66.7	47.5	22.0	33.3	24.0	0.0	0.0	0.0
IN-Non MSA	21	69	24.7	7,770	0.0	0.0	0.0	12.5	14.3	10.1	65.1	76.2	65.9	22.4	9.5	24.0	0.0	0.0	0.0
Total	85	392	100.0	67,708	5.0	4.7	4.7	20.3	23.5	17.7	44.8	49.4	43.0	29.8	21.2	34.5	0.1	1.2	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Indiana - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Indianapolis	35	79	30.7	31,748	82.0	100.0	46.0	6.3	0.0	11.7	0.0
Bloomington	3	8	2.6	1,927	81.8	66.7	41.0	5.6	33.3	12.6	0.0
Columbus	3	15	2.6	1,100	75.6	100.0	42.6	7.9	0.0	16.5	0.0
Elkhart-Goshen	6	10	5.3	2,746	77.5	100.0	38.2	9.7	0.0	12.8	0.0
Evansville	9	23	7.9	3,592	77.3	100.0	44.4	8.0	0.0	14.8	0.0
Fort Wayne	9	17	7.9	6,635	79.6	100.0	48.3	7.4	0.0	13.0	0.0
Lafayette-West Lafayette	4	8	3.5	1,839	79.8	100.0	44.8	5.6	0.0	14.7	0.0
Michigan City-La Porte	5	9	4.4	1,367	79.2	100.0	48.1	6.1	0.0	14.7	0.0
Muncie	1	2	0.9	1,201	77.8	100.0	47.1	6.9	0.0	15.4	0.0
South Bend-Mishawaka	7	12	6.1	3,593	79.0	100.0	46.0	6.8	0.0	14.2	0.0
Terre Haute	6	34	5.3	1,555	75.6	100.0	44.8	6.9	0.0	17.5	0.0
IN-Non MSA	26	46	22.8	7,957	78.7	100.0	49.2	6.1	0.0	15.3	0.0
Total	114	263	100.0	65,260	80.2	99.1	46.0	6.7	0.9	13.1	0.0

Source: 2017 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

Indiana - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Indianapolis	15	35	17.6	33,714	81.7	100.0	39.5	6.5	0.0	11.7	0.0
Bloomington	1	1	1.2	1,776	81.6	100.0	34.9	5.7	0.0	12.7	0.0
Columbus	2	7	2.4	1,130	76.7	100.0	37.7	7.4	0.0	15.9	0.0
Elkhart-Goshen	10	36	11.8	2,862	78.3	100.0	33.9	9.6	0.0	12.1	0.0
Evansville	9	19	10.6	3,244	77.5	88.9	40.7	8.0	0.0	14.5	11.1
Fort Wayne	10	113	11.8	6,914	80.0	90.0	41.1	7.3	10.0	12.7	0.0
Lafayette-West Lafayette	0	0	0.0	1,864	80.0	0.0	40.9	5.5	0.0	14.5	0.0
Michigan City-La Porte	6	8	7.1	1,395	79.8	100.0	42.2	6.0	0.0	14.2	0.0
Muncie	2	3	2.4	1,337	79.1	100.0	39.9	6.3	0.0	14.6	0.0
South Bend-Mishawaka	6	97	7.1	4,137	79.1	83.3	40.9	7.0	0.0	13.9	16.7
Terre Haute	3	4	3.5	1,565	76.6	100.0	40.1	6.7	0.0	16.7	0.0
IN-Non MSA	21	69	24.7	7,770	79.5	100.0	47.1	5.7	0.0	14.8	0.0
Total	85	392	100.0	67,708	80.3	96.5	40.4	6.7	1.2	13.0	2.4

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Indiana - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indianapolis	310	522	0.0	10.9	12.9	23.3	34.5	34.0	38.7	31.7	13.9	0.1	0.0
Bloomington	19	33	0.0	6.3	21.1	21.3	15.8	37.2	57.9	35.1	5.3	0.1	0.0
Columbus	54	103	0.0	0.0	0.0	26.7	42.6	48.4	44.4	24.9	13.0	0.0	0.0
Elkhart-Goshen	80	149	0.0	1.2	0.0	17.9	22.5	61.5	65.0	19.4	12.5	0.0	0.0
Evansville	122	235	0.0	9.4	17.2	18.8	30.3	41.8	34.4	29.7	18.0	0.3	0.0
Fort Wayne	121	212	0.0	8.7	11.6	18.2	27.3	47.7	46.3	25.0	14.1	0.4	0.8
Lafayette-West Lafayette	22	42	0.0	6.6	0.0	22.1	18.2	33.1	40.9	35.2	40.9	3.0	0.0
Michigan City-La Porte	61	128	0.0	4.4	4.9	27.3	42.6	30.3	23.0	38.0	29.5	0.0	0.0
Muncie	35	60	0.0	6.4	22.9	26.8	40.0	29.0	28.6	34.5	8.6	3.2	0.0
South Bend-Mishawaka	113	205	0.0	9.6	10.6	17.4	31.0	45.6	42.5	27.5	15.9	0.0	0.0
Terre Haute	60	123	0.0	5.4	11.7	20.7	11.7	39.8	45.0	34.2	31.7	0.0	0.0
IN-Non MSA	471	840	0.0	0.0	0.0	10.0	19.5	70.9	69.6	19.1	10.8	0.0	0.0
Total	1,468	2,652	0.0	7.6	7.4	20.1	27.2	43.2	50.5	28.8	14.9	0.3	0.1

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

Indiana - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indianapolis	118	196	0.0	8.1	6.8	25.0	34.7	39.2	44.9	27.7	13.6	0.0	0.0
Bloomington	3	5	0.0	8.4	0.0	17.4	33.3	45.1	66.7	29.1	0.0	0.0	0.0
Columbus	20	32	0.0	0.0	0.0	16.3	30.0	66.5	50.0	17.2	20.0	0.0	0.0
Elkhart-Goshen	31	55	0.0	0.0	0.0	17.3	16.1	56.2	51.6	26.5	32.3	0.0	0.0
Evansville	37	63	0.0	5.3	2.7	24.5	27.0	35.4	27.0	34.8	43.2	0.0	0.0
Fort Wayne	65	109	0.0	7.5	7.7	26.7	41.5	40.3	33.8	25.5	16.9	0.0	0.0
Lafayette-West Lafayette	8	17	0.0	7.2	12.5	31.6	0.0	40.7	50.0	20.2	37.5	0.3	0.0
Michigan City-La Porte	36	62	0.0	0.0	0.0	24.9	38.9	57.3	55.6	17.7	5.6	0.0	0.0
Muncie	14	22	0.0	3.9	0.0	29.2	50.0	40.1	42.9	26.7	7.1	0.2	0.0
South Bend-Mishawaka	45	78	0.0	4.2	11.1	29.3	35.6	36.3	28.9	30.3	24.4	0.0	0.0
Terre Haute	32	50	0.0	10.4	6.3	11.4	21.9	54.0	43.8	24.3	28.1	0.0	0.0
IN-Non MSA	204	355	0.0	0.0	0.0	10.4	18.1	68.8	64.7	20.8	17.2	0.0	0.0
Total	613	1,044	0.0	5.7	3.6	22.4	27.9	45.7	49.3	26.2	19.3	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Indiana - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower
2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indianapolis	310	522	21.1	23.7	46.8	16.4	30.0	17.8	15.8	42.2	6.1	0.0	1.3
Bloomington	19	33	1.3	28.1	26.3	14.1	52.6	15.2	10.5	42.7	5.3	0.0	5.3
Columbus	54	103	3.7	22.5	35.2	17.0	27.8	19.1	27.8	41.4	5.6	0.0	3.7
Elkhart-Goshen	80	149	5.5	21.6	33.8	17.2	25.0	20.6	27.5	40.6	10.0	0.0	3.8
Evansville	122	235	8.3	22.5	35.2	17.1	36.1	17.5	17.2	42.9	8.2	0.0	3.3
Fort Wayne	121	212	8.2	22.2	40.5	17.5	38.8	19.7	11.6	40.6	6.6	0.0	2.5
Lafayette-West Lafayette	22	42	1.5	26.5	9.1	14.8	36.4	17.6	36.4	41.1	18.2	0.0	0.0
Michigan City-La Porte	61	128	4.2	23.6	29.5	16.8	29.5	17.1	18.0	42.5	21.3	0.0	1.6
Muncie	35	60	2.4	25.5	34.3	14.4	45.7	18.4	14.3	41.8	5.7	0.0	0.0
South Bend-Mishawaka	113	205	7.7	23.8	35.4	16.8	43.4	17.7	14.2	41.7	4.4	0.0	2.7
Terre Haute	60	123	4.1	25.1	26.7	16.2	38.3	16.8	15.0	42.0	10.0	0.0	10.0
IN-Non MSA	471	840	32.1	21.3	35.0	16.6	31.8	19.2	22.9	42.8	8.3	0.0	1.9
Total	1,468	2,652	100.0	23.4	36.9	16.4	33.6	18.2	19.1	42.0	8.0	0.0	2.5

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

Indiana - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower
2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Indianapolis	118	196	19.3	22.9	40.7	17.0	37.3	18.4	14.4	41.7	5.1	0.0	2.5
Bloomington	3	5	0.5	28.8	66.7	13.8	0.0	14.8	33.3	42.6	0.0	0.0	0.0
Columbus	20	32	3.3	22.0	55.0	17.4	25.0	20.0	10.0	40.6	5.0	0.0	5.0
Elkhart-Goshen	31	55	5.1	21.4	12.9	17.6	25.8	20.4	41.9	40.7	16.1	0.0	3.2
Evansville	37	63	6.0	23.4	48.6	16.2	21.6	17.3	16.2	43.1	5.4	0.0	8.1
Fort Wayne	65	109	10.6	21.5	41.5	17.9	43.1	20.1	6.2	40.5	4.6	0.0	4.6
Lafayette-West Lafayette	8	17	1.3	26.6	50.0	15.6	37.5	16.0	12.5	41.8	0.0	0.0	0.0
Michigan City-La Porte	36	62	5.9	22.4	41.7	17.4	36.1	18.3	13.9	41.9	8.3	0.0	0.0
Muncie	14	22	2.3	24.4	35.7	15.5	50.0	18.3	7.1	41.8	7.1	0.0	0.0
South Bend-Mishawaka	45	78	7.3	23.1	26.7	17.0	35.6	18.3	20.0	41.6	8.9	0.0	8.9
Terre Haute	32	50	5.2	23.9	37.5	16.7	25.0	17.5	12.5	41.9	12.5	0.0	12.5
IN-Non MSA	204	355	33.3	21.5	36.8	16.6	31.4	19.6	17.2	42.4	7.8	0.0	6.9
Total	613	1,044	100.0	22.9	38.0	16.8	33.3	18.5	16.0	41.7	7.3	0.0	5.4

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
 Due to rounding, totals may not equal 100.0

Kentucky - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KY–Non MSA	25	44	71.4	7,756	0.3	0.0	0.6	12.3	12.0	11.6	50.4	64.0	47.4	37.0	24.0	40.4	0.0	0.0	0.0
Bowling Green	2	5	5.7	2,193	7.0	0.0	6.3	21.3	50.0	19.2	33.2	50.0	30.2	33.3	0.0	40.7	5.3	0.0	3.6
Elizabethtown-Fort Knox	2	5	5.7	1,094	0.0	0.0	0.0	21.2	50.0	17.3	51.3	50.0	58.5	27.1	0.0	24.0	0.3	0.0	0.2
Lexington-Fayette	6	14	17.1	8,008	6.9	33.3	5.9	20.9	50.0	21.1	41.1	16.7	40.1	31.1	0.0	32.9	0.0	0.0	0.0
Owensboro	0	0	0.0	1,501	3.3	0.0	2.4	31.1	0.0	28.4	40.2	0.0	42.1	25.5	0.0	27.0	0.0	0.0	0.0
Total	35	68	100.0	20,552	3.2	5.7	3.4	17.7	22.9	17.6	45.2	54.3	42.9	33.3	17.1	35.7	0.5	0.0	0.4

Source: 2017 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

Kentucky - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KY-Non MSA	20	35	76.9	8,123	1.8	0.0	1.7	11.1	15.0	10.8	46.2	70.0	44.2	40.9	15.0	43.4	0.0	0.0	0.0
Bowling Green	1	1	3.8	2,220	12.2	0.0	9.5	5.1	0.0	3.7	46.4	0.0	41.4	36.2	100.0	45.4	0.1	0.0	0.0
Elizabethtown-Fort Knox	1	1	3.8	978	0.0	0.0	0.0	13.1	0.0	11.0	59.5	0.0	62.6	27.1	100.0	26.4	0.3	0.0	0.0
Lexington-Fayette	2	4	7.7	8,082	8.1	0.0	8.7	23.1	0.0	19.3	36.1	0.0	36.0	32.6	100.0	35.9	0.0	0.0	0.0
Owensboro	2	4	7.7	1,654	11.4	0.0	9.9	10.8	0.0	11.7	54.3	0.0	55.6	23.5	100.0	22.9	0.0	0.0	0.0
Total	26	45	100.0	21,057	5.2	0.0	5.8	14.5	11.5	13.4	44.5	53.8	42.5	35.8	34.6	38.3	0.0	0.0	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kentucky - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018

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
KY–Non MSA	25	44	71.4	7,756	79.5	100.0	49.1	5.2	0.0	15.3	0.0
Bowling Green	2	5	5.7	2,193	80.7	100.0	50.0	5.8	0.0	13.5	0.0
Elizabethtown-Fort Knox	2	5	5.7	1,094	80.6	100.0	50.1	4.8	0.0	14.6	0.0
Lexington-Fayette	6	14	17.1	8,008	82.3	100.0	49.7	6.1	0.0	11.6	0.0
Owensboro	0	0	0.0	1,501	79.2	0.0	49.3	6.5	0.0	14.3	0.0
Total	35	68	100.0	20,552	80.6	100.0	49.5	5.6	0.0	13.8	0.0

Source: 2017 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

Kentucky - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-2016

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
KY–Non MSA	20	35	76.9	8,123	80.7	100.0	46.7	5.0	0.0	14.4	0.0
Bowling Green	1	1	3.8	2,220	80.7	100.0	49.8	5.8	0.0	13.5	0.0
Elizabethtown-Fort Knox	1	1	3.8	978	81.1	100.0	45.1	4.7	0.0	14.2	0.0
Lexington-Fayette	2	4	7.7	8,082	82.0	100.0	45.5	6.2	0.0	11.7	0.0
Owensboro	2	4	7.7	1,654	78.9	100.0	45.9	6.6	0.0	14.5	0.0
Total	26	45	100.0	21,057	81.0	100.0	46.4	5.5	0.0	13.4	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kentucky - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
KY–Non MSA	382	625	0.0	0.2	0.5	13.1	9.9	50.6	63.4	36.0	26.2	0.0	0.0
Bowling Green	36	68	0.0	6.0	8.3	22.4	25.0	33.6	44.4	35.9	22.2	2.0	0.0
Elizabethtown-Fort Knox	25	45	0.0	0.0	0.0	18.0	28.0	58.1	56.0	23.9	16.0	0.0	0.0
Lexington-Fayette	92	153	0.0	9.7	8.7	28.2	50.0	35.7	38.0	26.4	3.3	0.0	0.0
Owensboro	16	28	0.0	3.7	6.3	24.5	25.0	48.7	56.3	23.1	12.5	0.0	0.0
Total	551	919	0.0	3.5	2.5	19.2	18.9	45.5	57.4	31.6	21.2	0.2	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Kentucky - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography
2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
KY–Non MSA	151	256	0.0	0.9	0.0	13.7	18.5	44.0	46.4	41.4	35.1	0.0	0.0
Bowling Green	11	19	0.0	8.8	9.1	8.3	0.0	49.6	45.5	33.3	45.5	0.0	0.0
Elizabethtown-Fort Knox	10	17	0.0	0.0	0.0	9.9	10.0	67.3	50.0	22.7	40.0	0.0	0.0
Lexington-Fayette	20	28	0.0	9.4	10.0	27.8	45.0	34.2	40.0	28.6	5.0	0.0	0.0
Owensboro	5	8	0.0	5.5	0.0	10.5	0.0	64.0	100.0	20.0	0.0	0.0	0.0
Total	197	328	0.0	4.1	1.5	16.6	19.3	44.9	47.2	34.4	32.0	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Kentucky - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower
2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
KY–Non MSA	382	625	69.3	22.9	34.8	14.3	30.9	16.5	20.4	46.3	11.3	0.0	2.6
Bowling Green	36	68	6.5	24.1	47.2	14.0	22.2	17.9	19.4	44.0	8.3	0.0	2.8
Elizabethtown-Fort Knox	25	45	4.5	23.1	40.0	17.1	44.0	18.5	12.0	41.4	4.0	0.0	0.0
Lexington-Fayette	92	153	16.7	26.7	46.7	15.6	40.2	15.9	6.5	41.8	6.5	0.0	0.0
Owensboro	16	28	2.9	24.1	37.5	16.6	6.3	16.5	37.5	42.8	6.3	0.0	12.5
Total	551	919	100.0	24.2	37.9	15.0	31.8	16.6	18.1	44.2	9.8	0.0	2.4

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

Kentucky - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
KY–Non MSA	151	256	76.7	23.3	34.4	14.1	21.9	15.8	26.5	46.8	15.2	0.0	2.0
Bowling Green	11	19	5.6	23.8	36.4	15.6	0.0	16.8	36.4	43.9	27.3	0.0	0.0
Elizabethtown-Fort Knox	10	17	5.1	22.6	40.0	16.3	40.0	19.0	20.0	42.1	0.0	0.0	0.0
Lexington-Fayette	20	28	10.2	26.1	60.0	15.8	35.0	17.0	5.0	41.1	0.0	0.0	0.0
Owensboro	5	8	2.5	24.7	40.0	15.6	20.0	18.6	20.0	41.1	20.0	0.0	0.0
Total	197	328	100.0	24.2	37.6	14.9	22.8	16.6	24.4	44.3	13.7	0.0	1.5

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Louisiana - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
LA-Non MSA	5	22	10.2	3,500	8.5	60.0	5.7	26.3	20.0	20.7	32.8	0.0	31.9	32.5	20.0	41.8	0.0	0.0	0.0
New Orleans-Metairie	15	25	30.6	31,087	8.1	13.3	7.7	19.9	33.3	17.9	30.5	13.3	28.1	40.3	40.0	44.9	1.2	0.0	1.4
Alexandria	1	15	2.0	2,795	9.9	0.0	10.8	10.6	0.0	8.7	50.2	100.0	49.2	29.0	0.0	31.0	0.3	0.0	0.3
Baton Rouge	10	50	20.4	10,748	10.5	10.0	7.9	24.9	60.0	21.3	21.9	30.0	22.0	42.7	0.0	48.7	0.1	0.0	0.1
Hammond	5	22	10.2	2,186	0.0	0.0	0.0	21.7	60.0	24.9	52.6	20.0	51.1	25.7	20.0	24.0	0.0	0.0	0.0
Houma-Thibodaux	2	6	4.1	3,976	0.0	0.0	0.0	19.8	50.0	22.5	57.6	50.0	52.4	22.6	0.0	25.2	0.0	0.0	0.0
Lafayette	3	3	6.1	9,835	6.2	0.0	6.1	22.5	66.7	19.5	40.4	33.3	39.8	30.9	0.0	34.6	0.1	0.0	0.0
Lake Charles	2	2	4.1	4,671	5.4	0.0	7.2	27.7	50.0	25.8	32.7	0.0	30.0	34.0	50.0	37.0	0.2	0.0	0.1
Monroe	3	5	6.1	4,053	19.7	33.3	19.9	11.4	33.3	11.2	29.0	33.3	24.6	39.6	0.0	43.9	0.2	0.0	0.5
Shreveport-Bossier City	3	8	6.1	6,992	16.3	100.0	16.3	21.4	0.0	19.9	24.2	0.0	23.2	37.9	0.0	40.6	0.1	0.0	0.0
Total	49	158	100.0	79,843	8.9	20.4	8.3	21.2	40.8	19.1	32.8	20.4	30.9	36.7	18.4	41.1	0.5	0.0	0.6

Source: 2017 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

Louisiana - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
LA-Non MSA	2	2	8.0	3,500	6.3	0.0	4.1	23.8	0.0	18.9	32.8	50.0	32.6	37.1	50.0	44.3	0.0	0.0	0.0
New Orleans-Metairie	10	20	40.0	32,170	6.8	0.0	6.8	20.0	40.0	19.1	33.0	40.0	29.8	40.0	20.0	44.3	0.1	0.0	0.0
Alexandria	0	0	0.0	2,926	10.1	0.0	8.8	12.9	0.0	11.4	34.3	0.0	30.0	42.4	0.0	49.4	0.3	0.0	0.4
Baton Rouge	5	8	20.0	11,371	11.5	40.0	8.9	18.6	60.0	15.6	19.1	0.0	18.4	50.7	0.0	56.9	0.1	0.0	0.1
Hammond	1	1	4.0	2,106	0.0	0.0	0.0	28.2	100.0	32.1	56.0	0.0	52.0	15.8	0.0	15.9	0.0	0.0	0.0
Houma-Thibodaux	1	110	4.0	3,396	0.0	0.0	0.0	25.0	0.0	23.5	53.4	100.0	51.7	21.6	0.0	24.9	0.0	0.0	0.0
Lafayette	2	2	8.0	9,644	1.9	0.0	1.1	19.9	0.0	15.7	44.1	100.0	44.5	34.0	0.0	38.6	0.1	0.0	0.1
Lake Charles	3	203	12.0	4,839	6.5	33.3	6.1	26.6	33.3	24.2	42.2	0.0	41.8	24.6	33.3	27.7	0.2	0.0	0.2
Monroe	1	3	4.0	4,169	11.2	0.0	11.2	22.1	100.0	19.9	35.7	0.0	36.6	30.9	0.0	32.0	0.2	0.0	0.4
Shreveport-Bossier City	0	0	0.0	7,095	11.2	0.0	12.2	22.2	0.0	19.2	34.1	0.0	32.0	32.4	0.0	36.5	0.1	0.0	0.0
Total	25	349	100.0	81,216	7.1	12.0	6.6	21.0	40.0	18.8	35.0	32.0	32.8	36.8	16.0	41.7	0.1	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Louisiana - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
LA-Non MSA	5	22	10.2	3,500	86.9	100.0	33.3	3.5	0.0	9.6	0.0
New Orleans-Metairie	15	25	30.6	31,087	88.5	100.0	41.4	4.1	0.0	7.3	0.0
Alexandria	1	15	2.0	2,795	83.9	100.0	43.7	4.3	0.0	11.8	0.0
Baton Rouge	10	50	20.4	10,748	85.7	100.0	38.5	4.7	0.0	9.6	0.0
Hammond	5	22	10.2	2,186	88.5	100.0	38.3	3.1	0.0	8.4	0.0
Houma-Thibodaux	2	6	4.1	3,976	86.3	100.0	26.7	4.8	0.0	8.9	0.0
Lafayette	3	3	6.1	9,835	86.5	100.0	36.5	4.9	0.0	8.6	0.0
Lake Charles	2	2	4.1	4,671	86.5	100.0	29.7	3.7	0.0	9.8	0.0
Monroe	3	5	6.1	4,053	86.3	100.0	37.8	4.6	0.0	9.1	0.0
Shreveport-Bossier City	3	8	6.1	6,992	87.6	100.0	35.3	3.8	0.0	8.6	0.0
Total	49	158	100.0	79,843	87.2	100.0	37.9	4.2	0.0	8.5	0.0

Source: 2017 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

Louisiana - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-2016

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
LA-Non MSA	2	2	8.0	3,500	88.3	50.0	31.2	3.2	50.0	8.5	0.0
New Orleans-Metairie	10	20	40.0	32,170	89.1	100.0	39.7	3.9	0.0	7.0	0.0
Alexandria	0	0	0.0	2,926	85.4	0.0	41.7	4.0	0.0	10.7	0.0
Baton Rouge	5	8	20.0	11,371	86.7	100.0	36.3	4.4	0.0	8.9	0.0
Hammond	1	1	4.0	2,106	89.7	100.0	39.5	2.7	0.0	7.6	0.0
Houma-Thibodaux	1	110	4.0	3,396	87.5	0.0	26.6	4.3	0.0	8.2	100.0
Lafayette	2	2	8.0	9,644	87.5	100.0	33.5	4.6	0.0	7.9	0.0
Lake Charles	3	203	12.0	4,839	87.8	33.3	29.3	3.3	0.0	8.9	66.7
Monroe	1	3	4.0	4,169	87.8	100.0	31.2	4.1	0.0	8.1	0.0
Shreveport-Bossier City	0	0	0.0	7,095	88.3	0.0	34.8	3.6	0.0	8.1	0.0
Total	25	349	100.0	81,216	88.1	84.0	36.2	4.0	4.0	7.9	12.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Louisiana - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
LA–Non MSA	99	142	0.0	8.7	3.0	26.4	40.4	35.2	40.4	29.7	16.2	0.0	0.0
New Orleans-Metairie	139	226	0.0	10.7	20.9	24.1	36.7	33.7	28.8	30.6	12.2	0.9	1.4
Alexandria	19	28	0.0	7.4	21.1	10.3	36.8	50.9	26.3	31.3	15.8	0.0	0.0
Baton Rouge	41	69	0.0	12.9	26.8	26.7	48.8	23.0	17.1	37.4	7.3	0.0	0.0
Hammond	50	80	0.0	0.0	0.0	19.0	62.0	50.4	26.0	30.7	12.0	0.0	0.0
Houma-Thibodaux	22	43	0.0	0.0	0.0	16.0	50.0	64.3	36.4	19.7	13.6	0.0	0.0
Lafayette	44	82	0.0	4.4	6.8	24.9	18.2	41.9	61.4	28.8	13.6	0.0	0.0
Lake Charles	19	32	0.0	5.2	21.1	24.0	36.8	35.1	21.1	35.7	21.1	0.0	0.0
Monroe	43	57	0.0	16.2	39.5	11.1	20.9	34.3	23.3	38.5	16.3	0.0	0.0
Shreveport-Bossier City	26	43	0.0	11.6	15.4	19.1	30.8	28.0	19.2	41.3	34.6	0.0	0.0
Total	502	802	0.0	9.1	14.9	22.3	38.2	35.9	31.7	32.5	14.7	0.3	0.4

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

Louisiana - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
LA-Non MSA	36	59	0.0	6.8	2.8	24.2	25.0	34.6	30.6	34.4	41.7	0.0	0.0
New Orleans-Metairie	79	126	0.0	8.1	20.3	22.5	39.2	38.3	34.2	31.1	6.3	0.0	0.0
Alexandria	10	12	0.0	7.8	50.0	15.2	10.0	39.2	40.0	37.7	0.0	0.0	0.0
Baton Rouge	17	29	0.0	15.1	5.9	19.4	41.2	20.1	11.8	45.4	41.2	0.0	0.0
Hammond	7	10	0.0	0.0	0.0	25.2	57.1	56.7	42.9	18.1	0.0	0.0	0.0
Houma-Thibodaux	12	27	0.0	0.0	0.0	27.3	8.3	55.3	75.0	17.4	16.7	0.0	0.0
Lafayette	18	33	0.0	2.9	0.0	23.3	16.7	45.2	55.6	28.6	27.8	0.0	0.0
Lake Charles	11	18	0.0	7.6	54.5	22.2	18.2	44.7	27.3	25.6	0.0	0.0	0.0
Monroe	13	19	0.0	8.0	23.1	22.2	23.1	39.9	46.2	29.9	7.7	0.0	0.0
Shreveport-Bossier City	8	12	0.0	6.2	12.5	22.2	25.0	38.6	37.5	33.0	25.0	0.0	0.0
Total	211	345	0.0	7.3	15.6	22.3	29.9	38.6	37.0	31.8	17.5	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Louisiana - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
LA–Non MSA	99	142	19.7	29.4	48.5	15.5	14.1	13.5	25.3	41.7	12.1	0.0	0.0
New Orleans-Metairie	139	226	27.7	26.5	46.0	15.1	26.6	15.4	20.9	43.1	5.8	0.0	0.7
Alexandria	19	28	3.8	25.9	47.4	14.9	31.6	16.8	15.8	42.3	5.3	0.0	0.0
Baton Rouge	41	69	8.2	27.9	39.0	15.5	31.7	16.2	17.1	40.4	4.9	0.0	7.3
Hammond	50	80	10.0	27.1	40.0	14.1	28.0	15.4	26.0	43.4	4.0	0.0	2.0
Houma-Thibodaux	22	43	4.4	25.7	13.6	15.3	36.4	17.1	36.4	42.0	4.5	0.0	9.1
Lafayette	44	82	8.8	26.5	34.1	14.8	31.8	15.4	25.0	43.3	6.8	0.0	2.3
Lake Charles	19	32	3.8	25.3	26.3	15.5	36.8	16.2	10.5	43.0	26.3	0.0	0.0
Monroe	43	57	8.6	26.6	53.5	14.4	27.9	15.3	18.6	43.7	0.0	0.0	0.0
Shreveport-Bossier City	26	43	5.2	24.4	34.6	15.6	30.8	15.6	11.5	44.3	23.1	0.0	0.0
Total	502	802	100.0	26.5	42.2	15.1	26.5	15.6	21.7	42.8	8.0	0.0	1.6

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

Louisiana - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
LA–Non MSA	36	59	17.1	29.7	36.1	13.6	16.7	14.2	25.0	42.5	19.4	0.0	2.8
New Orleans-Metairie	79	126	37.4	25.1	54.4	15.5	20.3	17.0	19.0	42.4	6.3	0.0	0.0
Alexandria	10	12	4.7	25.5	40.0	14.8	30.0	17.3	30.0	42.5	0.0	0.0	0.0
Baton Rouge	17	29	8.1	27.3	41.2	15.3	17.6	17.0	17.6	40.3	17.6	0.0	5.9
Hammond	7	10	3.3	27.1	28.6	14.0	14.3	15.7	57.1	43.2	0.0	0.0	0.0
Houma-Thibodaux	12	27	5.7	26.5	16.7	15.0	16.7	16.3	33.3	42.2	8.3	0.0	25.0
Lafayette	18	33	8.5	26.0	22.2	15.3	22.2	16.1	27.8	42.5	16.7	0.0	11.1
Lake Charles	11	18	5.2	25.2	45.5	16.3	18.2	15.5	27.3	43.0	9.1	0.0	0.0
Monroe	13	19	6.2	27.0	53.8	14.4	15.4	16.3	7.7	42.3	23.1	0.0	0.0
Shreveport-Bossier City	8	12	3.8	25.1	62.5	15.6	12.5	16.2	12.5	43.2	12.5	0.0	0.0
Total	211	345	100.0	26.1	43.6	15.2	19.0	16.4	22.7	42.3	11.4	0.0	3.3

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Maryland - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Baltimore	13	35	68.4	55,217	5.2	15.4	4.1	15.4	30.8	13.7	38.2	30.8	37.9	40.5	23.1	43.8	0.8	0.0	0.5
Salisbury	5	21	26.3	3,659	1.2	0.0	1.7	15.9	20.0	15.3	50.9	40.0	49.4	31.9	40.0	33.5	0.1	0.0	0.1
California-Lexington Park	1	1	5.3	1,384	6.1	0.0	4.9	9.7	0.0	9.2	63.3	100.0	65.9	20.9	0.0	20.0	0.0	0.0	0.0
Total	19	57	100.0	60,260	5.0	10.5	4.0	15.2	26.3	13.7	39.6	36.8	39.2	39.5	26.3	42.7	0.7	0.0	0.4

Source: 2017 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

Maryland - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Baltimore	5	9	55.6	58,798	6.9	20.0	5.3	14.0	0.0	11.8	37.6	80.0	36.9	41.3	0.0	45.7	0.2	0.0	0.2
Salisbury	2	2	22.2	3,647	0.6	0.0	0.5	16.4	50.0	16.4	63.0	50.0	62.1	19.8	0.0	20.9	0.2	0.0	0.0
California-Lexington Park	2	2	22.2	1,361	5.9	0.0	5.4	7.1	50.0	4.7	72.2	50.0	73.9	14.7	0.0	16.0	0.0	0.0	0.0
Total	9	13	100.0	63,806	6.5	11.1	5.0	14.0	22.2	11.9	40.1	66.7	39.2	39.3	0.0	43.7	0.2	0.0	0.2

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Maryland - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018
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
Baltimore	13	35	68.4	55,217	83.8	100.0	50.9	6.1	0.0	10.1	0.0
Salisbury	5	21	26.3	3,659	81.3	80.0	48.2	5.6	20.0	13.1	0.0
California-Lexington Park	1	1	5.3	1,384	81.8	100.0	50.5	4.9	0.0	13.3	0.0
Total	19	57	100.0	60,260	83.6	94.7	50.8	6.0	5.3	10.4	0.0
Source: 2017 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											

Maryland - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-2016
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
Baltimore	5	9	55.6	58,798	83.6	100.0	47.8	6.3	0.0	10.1	0.0
Salisbury	2	2	22.2	3,647	81.9	100.0	49.6	5.4	0.0	12.6	0.0
California-Lexington Park	2	2	22.2	1,361	81.2	100.0	49.9	5.1	0.0	13.7	0.0
Total	9	13	100.0	63,806	83.4	100.0	48.0	6.2	0.0	10.4	0.0
Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Maryland - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Baltimore	175	321	0.0	8.9	20.6	22.5	29.1	36.4	38.3	32.0	11.4	0.2	0.6
Salisbury	76	125	0.0	2.0	1.3	23.1	43.4	44.5	38.2	30.4	15.8	0.0	1.3
California-Lexington Park	22	33	0.0	5.1	13.6	12.6	36.4	63.6	45.5	18.7	4.5	0.0	0.0
Total	273	479	0.0	8.3	14.7	22.2	33.7	37.8	38.8	31.5	12.1	0.2	0.7
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Maryland - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Baltimore	70	124	0.0	10.4	8.6	21.3	25.7	36.3	45.7	32.0	20.0	0.0	0.0
Salisbury	27	45	0.0	0.8	0.0	18.4	29.6	63.1	66.7	17.7	3.7	0.1	0.0
California-Lexington Park	14	25	0.0	5.6	14.3	7.7	7.1	72.3	71.4	14.5	7.1	0.0	0.0
Total	111	194	0.0	9.7	7.2	20.7	24.3	39.0	54.1	30.6	14.4	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Maryland - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Baltimore	175	321	64.1	25.1	55.4	15.4	28.6	17.4	8.6	42.2	5.1	0.0	2.3
Salisbury	76	125	27.8	25.5	46.1	16.6	28.9	16.8	18.4	41.1	5.3	0.0	1.3
California-Lexington Park	22	33	8.1	23.4	72.7	15.0	9.1	22.0	13.6	39.5	4.5	0.0	0.0
Total	273	479	100.0	25.0	54.2	15.4	27.1	17.5	11.7	42.0	5.1	0.0	1.8

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

Maryland - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Baltimore	70	124	63.1	24.0	51.4	15.9	24.3	18.3	17.1	41.8	4.3	0.0	2.9
Salisbury	27	45	24.3	23.1	48.1	16.7	29.6	18.7	11.1	41.5	7.4	0.0	3.7
California-Lexington Park	14	25	12.6	21.5	78.6	17.0	7.1	22.2	7.1	39.2	7.1	0.0	0.0
Total	111	194	100.0	23.9	54.1	15.9	23.4	18.4	14.4	41.7	5.4	0.0	2.7

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Mississippi - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Gulfport-Biloxi	12	28	15.8	5,926	8.5	8.3	8.7	13.9	33.3	11.7	55.1	50.0	56.5	22.2	8.3	22.8	0.3	0.0	0.2
Jackson	8	11	10.5	4,120	13.2	25.0	11.4	36.2	37.5	31.4	28.5	37.5	28.6	22.0	0.0	28.6	0.0	0.0	0.0
Memphis	2	6	2.6	254	0.0	0.0	0.0	53.4	0.0	48.4	46.6	100.0	51.6	0.0	0.0	0.0	0.0	0.0	0.0
MS-Non MSA	54	127	71.1	10,548	4.5	3.7	2.9	24.4	22.2	21.5	40.7	51.9	42.8	30.0	22.2	32.5	0.4	0.0	0.2
Total	76	172	100.0	20,848	7.2	6.6	6.2	24.8	25.0	21.0	41.6	51.3	44.0	26.1	17.1	28.6	0.3	0.0	0.2

Source: 2017 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

Mississippi - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Gulfport-Biloxi	11	23	22.9	5,955	3.5	0.0	2.8	19.9	36.4	19.2	54.7	45.5	53.2	21.8	18.2	24.8	0.1	0.0	0.0
Jackson	1	1	2.1	3,935	20.1	0.0	18.1	18.8	0.0	15.9	39.7	100.0	37.9	21.4	0.0	28.1	0.0	0.0	0.0
Memphis	2	2	4.2	240	0.0	0.0	0.0	65.9	50.0	63.8	34.1	50.0	36.3	0.0	0.0	0.0	0.0	0.0	0.0
MS-Non MSA	34	64	70.8	10,618	4.8	8.8	3.1	22.8	26.5	18.8	38.1	32.4	39.6	34.3	32.4	38.4	0.1	0.0	0.1
Total	48	90	100.0	20,748	7.7	6.3	5.8	21.9	29.2	18.9	42.2	37.5	43.2	28.2	27.1	32.1	0.1	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Mississippi - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Gulfport-Biloxi	12	28	15.8	5,926	81.7	100.0	41.9	4.5	0.0	13.9	0.0
Jackson	8	11	10.5	4,120	81.8	100.0	48.1	5.5	0.0	12.7	0.0
Memphis	2	6	2.6	254	80.3	100.0	35.8	4.0	0.0	15.7	0.0
MS-Non MSA	54	127	71.1	10,548	78.3	96.3	49.7	5.4	1.9	16.3	1.9
Total	76	172	100.0	20,848	79.8	97.4	47.0	5.2	1.3	15.0	1.3

Source: 2017 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

Mississippi - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Gulfport-Biloxi	11	23	22.9	5,955	81.0	100.0	39.6	4.5	0.0	14.5	0.0
Jackson	1	1	2.1	3,935	81.5	100.0	47.9	5.4	0.0	13.1	0.0
Memphis	2	2	4.2	240	79.6	100.0	41.3	3.6	0.0	16.8	0.0
MS-Non MSA	34	64	70.8	10,618	78.2	100.0	49.8	5.1	0.0	16.6	0.0
Total	48	90	100.0	20,748	79.6	100.0	46.4	5.0	0.0	15.4	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Mississippi - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Gulfport-Biloxi	203	340	0.0	6.1	3.0	13.9	22.7	56.8	52.2	23.1	22.2	0.1	0.0
Jackson	82	128	0.0	13.4	6.1	36.4	56.1	33.1	30.5	17.1	7.3	0.0	0.0
Memphis	20	35	0.0	0.0	0.0	34.1	50.0	65.9	50.0	0.0	0.0	0.0	0.0
MS-Non MSA	594	975	0.0	4.2	2.5	21.1	25.1	44.2	50.0	30.4	22.2	0.2	0.2
Total	899	1,478	0.0	6.2	2.9	22.1	27.9	45.8	48.7	25.7	20.4	0.1	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Mississippi - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2015-2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Gulfport-Biloxi	106	168	0.0	2.6	2.8	15.2	18.9	60.8	63.2	21.5	15.1	0.0	0.0
Jackson	27	38	0.0	16.0	3.7	22.7	48.1	43.5	37.0	17.8	11.1	0.0	0.0
Memphis	10	18	0.0	0.0	0.0	53.3	40.0	46.7	60.0	0.0	0.0	0.0	0.0
MS-Non MSA	238	399	0.0	5.4	4.2	22.2	22.3	38.3	44.5	34.1	29.0	0.0	0.0
Total	381	623	0.0	6.5	3.7	21.2	23.6	44.7	49.6	27.6	23.1	0.0	0.0
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Mississippi - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Gulfport-Biloxi	203	340	22.6	24.5	36.0	15.8	30.0	17.8	14.8	41.9	17.7	0.0	1.5
Jackson	82	128	9.1	31.3	43.9	17.6	31.7	16.4	15.9	34.7	8.5	0.0	0.0
Memphis	20	35	2.2	25.4	30.0	17.9	25.0	17.7	25.0	39.1	15.0	0.0	5.0
MS-Non MSA	594	975	66.1	26.7	33.5	14.7	30.3	15.3	21.5	43.3	13.8	0.0	0.8
Total	899	1,478	100.0	26.9	34.9	15.5	30.3	16.1	19.6	41.4	14.2	0.0	1.0

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

Mississippi - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Gulfport-Biloxi	106	168	27.8	23.8	38.7	16.5	33.0	18.1	16.0	41.6	9.4	0.0	2.8
Jackson	27	38	7.1	29.9	48.1	16.6	25.9	17.6	18.5	35.9	3.7	0.0	3.7
Memphis	10	18	2.6	27.7	40.0	16.7	40.0	19.6	20.0	36.0	0.0	0.0	0.0
MS-Non MSA	238	399	62.5	27.0	28.6	15.2	28.2	15.0	22.7	42.9	19.3	0.0	1.3
Total	381	623	100.0	26.8	33.1	15.8	29.7	16.2	20.5	41.2	15.0	0.0	1.8

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

New York - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Rochester	10	22	20.0	16,410	9.3	10.0	8.0	13.8	30.0	11.6	44.8	30.0	45.1	31.9	30.0	35.2	0.3	0.0	0.1
Albany-Schenectady-Troy	5	9	10.0	7,196	16.4	40.0	12.0	13.7	20.0	14.1	42.5	40.0	43.5	26.6	0.0	29.9	0.8	0.0	0.6
Buffalo-Cheektowaga-Niagara Falls	13	27	26.0	15,301	9.1	15.4	8.8	12.3	15.4	11.4	38.0	46.2	36.3	37.1	23.1	41.1	3.6	0.0	2.4
Elmira	1	10	2.0	800	20.6	0.0	16.1	11.3	0.0	13.0	42.1	100.0	40.4	25.9	0.0	30.4	0.1	0.0	0.1
Syracuse	2	2	4.0	8,846	8.5	0.0	6.3	14.2	50.0	12.9	42.8	50.0	43.0	32.0	0.0	36.0	2.5	0.0	1.8
Utica-Rome	2	2	4.0	3,645	12.5	50.0	12.9	14.4	0.0	11.7	45.4	50.0	42.4	26.2	0.0	31.8	1.6	0.0	1.3
Watertown-Fort Drum	0	0	0.0	1,544	0.0	0.0	0.0	18.2	0.0	15.0	75.8	0.0	78.4	5.9	0.0	6.5	0.1	0.0	0.1
NY-Non MSA	17	68	34.0	4,551	4.2	5.9	2.9	9.0	17.6	7.3	83.8	76.5	87.2	3.0	0.0	2.7	0.0	0.0	0.0
Total	50	140	100.0	58,293	9.8	14.0	8.2	13.1	20.0	11.8	46.1	54.0	46.4	29.4	12.0	32.5	1.7	0.0	1.1

Source: 2017 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

New York - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Rochester	8	62	29.6	16,171	9.5	37.5	7.8	11.3	12.5	9.1	49.6	25.0	50.0	29.5	25.0	32.9	0.2	0.0	0.1
Albany-Schenectady-Troy	1	1	3.7	7,000	11.5	100.0	10.7	17.0	0.0	13.4	38.1	0.0	39.8	33.3	0.0	36.1	0.0	0.0	0.0
Buffalo-Cheektowaga-Niagara Falls	5	10	18.5	14,981	8.0	60.0	7.0	14.5	0.0	13.8	40.9	20.0	38.6	36.1	20.0	40.5	0.4	0.0	0.1
Elmira	1	3	3.7	830	15.5	0.0	12.9	24.1	100.0	23.9	31.4	0.0	30.5	29.0	0.0	32.8	0.0	0.0	0.0
Syracuse	1	1	3.7	9,109	14.1	0.0	12.1	14.4	100.0	12.9	40.7	0.0	43.1	30.8	0.0	31.9	0.0	0.0	0.0
Utica-Rome	5	5	18.5	3,584	4.9	20.0	4.8	14.3	40.0	14.8	53.5	40.0	49.0	25.6	0.0	30.2	1.7	0.0	1.2
Watertown-Fort Drum	2	2	7.4	1,519	0.0	0.0	0.0	17.0	0.0	15.1	60.3	50.0	62.3	22.3	50.0	22.5	0.4	0.0	0.0
NY-Non MSA	4	11	14.8	4,749	2.7	0.0	1.7	13.9	0.0	11.1	74.7	100.0	77.2	8.6	0.0	10.1	0.0	0.0	0.0
Total	27	95	100.0	58,497	9.0	29.6	7.7	14.1	18.5	12.3	46.8	37.0	47.4	29.7	14.8	32.5	0.3	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

New York - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018
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
Rochester	10	22	20.0	16,410	80.6	90.0	49.2	7.2	10.0	12.2	0.0
Albany-Schenectady-Troy	5	9	10.0	7,196	77.2	100.0	48.6	7.4	0.0	15.4	0.0
Buffalo-Cheektowaga-Niagara Falls	13	27	26.0	15,301	80.1	100.0	49.5	7.4	0.0	12.5	0.0
Elmira	1	10	2.0	800	72.4	100.0	40.8	7.6	0.0	20.0	0.0
Syracuse	2	2	4.0	8,846	78.7	100.0	46.5	7.2	0.0	14.1	0.0
Utica-Rome	2	2	4.0	3,645	78.4	100.0	47.8	6.8	0.0	14.8	0.0
Watertown-Fort Drum	0	0	0.0	1,544	74.6	0.0	47.1	7.0	0.0	18.4	0.0
NY-Non MSA	17	68	34.0	4,551	76.4	100.0	52.7	6.9	0.0	16.7	0.0
Total	50	140	100.0	58,508	79.0	98.0	48.8	7.2	2.0	13.8	0.0
Source: 2017 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											

New York - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Rochester	8	62	29.6	16,171	80.6	87.5	44.9	7.2	0.0	12.2	12.5
Albany-Schenectady-Troy	1	1	3.7	7,000	76.6	100.0	44.0	7.6	0.0	15.8	0.0
Buffalo-Cheektowaga-Niagara Falls	5	10	18.5	14,981	80.2	100.0	46.4	7.4	0.0	12.4	0.0
Elmira	1	3	3.7	830	73.2	100.0	41.6	7.5	0.0	19.4	0.0
Syracuse	1	1	3.7	9,109	79.1	100.0	43.9	7.2	0.0	13.7	0.0
Utica-Rome	5	5	18.5	3,584	78.9	100.0	50.8	6.6	0.0	14.6	0.0
Watertown-Fort Drum	2	2	7.4	1,519	74.2	100.0	41.9	7.1	0.0	18.6	0.0
NY-Non MSA	4	11	14.8	4,749	77.8	100.0	53.6	6.5	0.0	15.7	0.0
Total	27	95	100.0	58,497	79.1	96.3	45.9	7.2	0.0	13.7	3.7

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

New York - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Rochester	246	412	0.0	8.9	18.3	15.1	37.0	47.7	39.8	28.3	4.9	0.1	0.0
Albany-Schenectady-Troy	63	116	0.0	11.0	34.9	20.2	20.6	41.8	30.2	26.7	12.7	0.2	1.6
Buffalo-Cheektowaga-Niagara Falls	205	368	0.0	12.6	13.7	14.2	16.6	41.5	44.9	31.5	24.9	0.1	0.0
Elmira	38	62	0.0	12.2	21.1	10.6	7.9	53.2	50.0	24.0	21.1	0.0	0.0
Syracuse	40	69	0.0	8.5	2.5	18.0	42.5	44.5	52.5	27.9	2.5	1.0	0.0
Utica-Rome	127	225	0.0	11.5	4.7	12.2	22.0	51.9	67.7	24.4	5.5	0.0	0.0
Watertown-Fort Drum	34	61	0.0	0.0	0.0	18.6	35.3	74.4	64.7	6.9	0.0	0.0	0.0
NY-Non MSA	158	276	0.0	1.9	0.6	8.9	15.2	86.3	80.4	2.8	3.8	0.0	0.0
Total	913	1,594	0.0	9.5	12.2	15.0	24.3	49.5	53.2	25.7	10.2	0.2	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

New York - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Rochester	104	162	0.0	8.1	19.2	13.7	29.8	52.9	45.2	25.2	5.8	0.0	0.0
Albany-Schenectady-Troy	30	48	0.0	13.0	33.3	13.9	36.7	40.3	16.7	32.8	13.3	0.0	0.0
Buffalo-Cheektowaga-Niagara Falls	62	108	0.0	10.0	16.1	18.3	9.7	40.4	56.5	31.3	17.7	0.0	0.0
Elmira	7	11	0.0	6.0	0.0	29.0	28.6	37.8	28.6	27.2	42.9	0.0	0.0
Syracuse	13	25	0.0	10.1	0.0	18.4	23.1	41.0	61.5	30.5	15.4	0.0	0.0
Utica-Rome	45	83	0.0	7.1	0.0	15.3	24.4	53.7	66.7	23.9	8.9	0.1	0.0
Watertown-Fort Drum	14	24	0.0	0.0	0.0	23.3	35.7	60.8	57.1	15.9	7.1	0.0	0.0
NY-Non MSA	61	108	0.0	1.2	0.0	13.5	18.0	76.2	75.4	9.1	6.6	0.0	0.0
Total	337	570	0.0	8.4	11.9	16.3	23.7	48.7	54.0	26.6	10.4	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

New York - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Rochester	246	412	26.9	24.4	53.7	16.0	32.5	17.4	10.6	42.1	2.0	0.0	1.2
Albany-Schenectady- Troy	63	116	6.9	26.3	65.1	15.7	28.6	18.6	6.3	39.3	0.0	0.0	0.0
Buffalo-Cheektowaga-Niagara Falls	205	368	22.5	25.9	51.7	15.3	25.9	16.5	17.1	42.3	4.9	0.0	0.5
Elmira	38	62	4.2	26.4	57.9	15.3	21.1	17.4	10.5	41.0	5.3	0.0	5.3
Syracuse	40	69	4.4	25.0	57.5	15.6	22.5	17.1	12.5	42.3	5.0	0.0	2.5
Utica-Rome	127	225	13.9	25.1	42.5	16.3	33.9	17.0	17.3	41.6	5.5	0.0	0.8
Watertown-Fort Drum	34	61	3.7	22.6	58.8	16.2	23.5	20.8	5.9	40.5	8.8	0.0	2.9
NY-Non MSA	158	276	17.3	25.4	55.7	16.8	19.0	18.7	17.1	39.1	5.7	0.0	2.5
Total	913	1,594	100.0	25.2	53.2	15.8	27.4	17.4	13.8	41.5	4.2	0.0	1.4

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

New York - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Rochester	104	162	30.9	24.1	56.7	16.2	24.0	18.1	14.4	41.6	2.9	0.0	1.9
Albany-Schenectady- Troy	30	48	8.9	25.5	66.7	16.5	26.7	17.7	6.7	40.4	0.0	0.0	0.0
Buffalo-Cheektowaga-Niagara Falls	62	108	18.4	25.2	56.5	15.6	27.4	17.0	12.9	42.2	3.2	0.0	0.0
Elmira	7	11	2.1	24.6	71.4	17.0	28.6	16.9	0.0	41.5	0.0	0.0	0.0
Syracuse	13	25	3.9	24.8	38.5	16.3	30.8	17.3	7.7	41.6	15.4	0.0	7.7
Utica-Rome	45	83	13.4	25.0	26.7	16.1	37.8	17.9	24.4	41.0	8.9	0.0	2.2
Watertown-Fort Drum	14	24	4.2	22.5	42.9	16.4	28.6	19.8	21.4	41.3	7.1	0.0	0.0
NY-Non MSA	61	108	18.1	24.9	39.3	16.7	34.4	19.1	18.0	39.3	4.9	0.0	3.3
Total	337	570	100.0	24.7	49.6	16.1	29.1	17.7	15.1	41.4	4.5	0.0	1.8

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

North Carolina - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Greensboro-High Point	45	107	12.3	12,648	4.2	6.7	4.0	21.8	24.4	21.7	36.5	60.0	36.2	37.3	8.9	38.1	0.2	0.0	0.1
Asheville	11	22	3.0	9,620	2.9	0.0	2.9	15.8	0.0	16.3	53.9	72.7	52.9	27.5	27.3	27.9	0.0	0.0	0.0
Burlington	12	16	3.3	2,259	0.0	0.0	0.0	25.8	41.7	22.8	46.6	33.3	48.8	27.6	25.0	28.4	0.0	0.0	0.0
Durham-Chapel Hill	29	69	7.9	10,364	7.5	13.8	6.1	17.1	17.2	15.6	34.5	41.4	34.9	39.1	27.6	42.7	1.8	0.0	0.6
Fayetteville	4	6	1.1	3,792	1.8	0.0	2.1	19.1	50.0	17.2	58.5	50.0	56.1	20.3	0.0	24.6	0.3	0.0	0.0
Goldsboro	16	46	4.4	1,354	0.0	0.0	0.0	36.4	37.5	33.8	52.4	50.0	52.6	11.2	12.5	13.6	0.0	0.0	0.0
Greenville	5	8	1.4	2,508	17.4	0.0	13.9	17.0	20.0	15.1	36.7	40.0	39.0	28.9	40.0	31.9	0.0	0.0	0.0
Hickory-Lenoir-Morganton	17	49	4.6	3,750	0.0	0.0	0.0	18.3	17.6	19.8	53.1	47.1	48.8	28.6	35.3	31.4	0.0	0.0	0.0
Jacksonville	11	14	3.0	1,881	0.0	0.0	0.0	12.6	18.2	11.4	66.9	81.8	68.0	19.6	0.0	20.5	0.9	0.0	0.1
New Bern	7	13	1.9	1,493	9.6	28.6	7.8	8.4	0.0	10.2	55.1	14.3	52.6	26.9	57.1	29.5	0.0	0.0	0.0
Raleigh	52	161	14.2	28,245	4.4	13.5	4.3	23.7	42.3	22.0	32.9	30.8	33.5	38.9	13.5	40.1	0.2	0.0	0.1
Rocky Mount	21	91	5.7	1,567	0.0	0.0	0.0	14.2	9.5	11.9	66.3	66.7	65.3	19.5	23.8	22.8	0.0	0.0	0.0
Winston-Salem	51	216	13.9	10,150	6.0	9.8	5.0	17.3	25.5	15.5	39.0	43.1	39.3	37.2	21.6	39.5	0.6	0.0	0.7
NC-Non MSAs	85	179	23.2	14,686	1.5	4.7	1.0	22.5	24.7	19.4	52.2	62.4	52.1	23.8	8.2	27.4	0.0	0.0	0.0
Total	366	997	100.0	104,317	4.0	6.8	3.7	20.4	25.4	19.0	42.9	50.8	42.4	32.4	16.9	34.7	0.3	0.0	0.2

Source: 2017 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

North Carolina - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Greensboro-High Point	27	86	15.6	14,663	6.3	14.8	6.2	20.0	22.2	18.8	43.0	55.6	39.6	30.5	7.4	35.3	0.2	0.0	0.1
Asheville	6	7	3.5	9,721	4.5	0.0	4.4	16.8	0.0	18.1	54.7	83.3	51.5	24.0	16.7	26.0	0.0	0.0	0.0
Burlington	3	3	1.7	2,488	0.0	0.0	0.0	18.4	33.3	17.4	51.0	66.7	50.2	30.6	0.0	32.5	0.0	0.0	0.0
Durham-Chapel Hill	13	18	7.5	11,365	6.0	7.7	4.4	20.4	30.8	18.6	36.1	53.8	35.8	36.7	7.7	41.2	0.7	0.0	0.1
Fayetteville	1	1	0.6	3,973	8.9	0.0	9.2	9.4	100.0	7.5	46.4	0.0	43.9	35.1	0.0	39.4	0.3	0.0	0.0
Goldsboro	4	13	2.3	1,396	4.1	0.0	3.2	15.5	0.0	13.7	61.2	75.0	61.2	19.2	25.0	21.9	0.0	0.0	0.0
Greenville	3	5	1.7	2,648	2.7	0.0	1.2	23.3	33.3	22.8	37.1	33.3	37.8	37.0	33.3	38.2	0.0	0.0	0.0
Hickory-Lenoir-Morganton	10	34	5.8	3,736	0.0	0.0	0.0	22.3	10.0	22.2	52.0	80.0	49.2	25.7	10.0	28.6	0.0	0.0	0.0
Jacksonville	5	10	2.9	2,012	0.0	0.0	0.0	9.7	0.0	7.4	65.3	100.0	67.5	23.8	0.0	25.1	1.2	0.0	0.1
New Bern	4	20	2.3	1,558	8.8	0.0	6.1	15.2	25.0	15.8	41.3	25.0	40.5	34.7	50.0	37.6	0.0	0.0	0.0
Raleigh	29	180	16.8	29,701	4.6	17.2	3.7	23.1	44.8	20.7	33.6	27.6	34.7	38.5	10.3	40.8	0.2	0.0	0.1
Rocky Mount	7	16	4.0	1,534	0.0	0.0	0.0	17.2	0.0	16.7	56.7	42.9	56.0	26.0	57.1	27.3	0.0	0.0	0.0
Winston-Salem	27	66	15.6	12,215	4.6	7.4	3.6	17.2	44.4	14.3	44.9	33.3	43.3	33.4	14.8	38.9	0.0	0.0	0.0
NC-Non MSAs	34	71	19.7	15,324	2.8	5.9	1.8	15.9	8.8	13.6	55.1	67.6	53.4	26.2	17.6	31.1	0.0	0.0	0.0
Total	173	530	100.0	112,334	4.4	8.1	3.7	18.8	24.9	17.5	44.8	52.0	42.9	31.8	15.0	35.9	0.2	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

North Carolina - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018

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
Greensboro-High Point	45	107	12.3	12,648	83.2	97.8	53.0	5.6	2.2	11.2	0.0
Asheville	11	22	3.0	9,620	86.9	100.0	54.3	4.3	0.0	8.8	0.0
Burlington	12	16	3.3	2,259	80.7	100.0	49.5	6.3	0.0	13.0	0.0
Durham-Chapel Hill	29	69	7.9	10,364	85.1	100.0	56.2	4.8	0.0	10.1	0.0
Fayetteville	4	6	1.1	3,792	84.1	75.0	52.7	4.2	25.0	11.7	0.0
Goldsboro	16	46	4.4	1,354	79.8	100.0	46.4	5.7	0.0	14.5	0.0
Greenville	5	8	1.4	2,508	80.8	100.0	44.8	5.4	0.0	13.8	0.0
Hickory-Lenoir-Morganton	17	49	4.6	3,750	79.4	94.1	49.1	7.2	5.9	13.4	0.0
Jacksonville	11	14	3.0	1,881	84.0	100.0	50.0	3.9	0.0	12.1	0.0
New Bern	7	13	1.9	1,493	81.2	100.0	53.7	5.1	0.0	13.7	0.0
Raleigh	52	161	14.2	28,245	85.3	98.1	54.0	4.6	1.9	10.1	0.0
Rocky Mount	21	91	5.7	1,567	78.5	100.0	44.0	6.1	0.0	15.3	0.0
Winston-Salem	51	216	13.9	10,150	83.4	96.1	53.8	5.8	3.9	10.8	0.0
NC-Non MSAs	85	179	23.2	14,686	81.5	98.8	50.6	5.2	0.0	13.2	1.2
Total	366	997	100.0	104,317	83.7	98.1	52.7	5.1	1.6	11.2	0.3

Source: 2017 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

North Carolina - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**2015-2016**

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
Greensboro-High Point	27	86	15.6	14,663	83.5	92.6	49.4	5.7	7.4	10.7	0.0
Asheville	6	7	3.5	9,721	86.5	100.0	52.4	4.4	0.0	9.0	0.0
Burlington	3	3	1.7	2,488	81.7	100.0	47.9	6.1	0.0	12.2	0.0
Durham-Chapel Hill	13	18	7.5	11,365	84.6	92.3	52.7	5.0	7.7	10.4	0.0
Fayetteville	1	1	0.6	3,973	84.2	100.0	54.2	4.3	0.0	11.6	0.0
Goldsboro	4	13	2.3	1,396	80.3	100.0	45.1	5.9	0.0	13.7	0.0
Greenville	3	5	1.7	2,648	80.9	100.0	46.3	5.4	0.0	13.7	0.0
Hickory-Lenoir-Morganton	10	34	5.8	3,736	80.3	100.0	47.5	6.9	0.0	12.9	0.0
Jacksonville	5	10	2.9	2,012	83.6	100.0	50.8	4.1	0.0	12.3	0.0
New Bern	4	20	2.3	1,558	81.6	100.0	50.4	5.0	0.0	13.3	0.0
Raleigh	29	180	16.8	29,701	84.8	93.1	50.0	5.0	6.9	10.2	0.0
Rocky Mount	7	16	4.0	1,534	79.8	100.0	44.7	5.9	0.0	14.3	0.0
Winston-Salem	27	66	15.6	12,215	84.1	96.3	49.2	5.8	0.0	10.1	3.7
NC – Non MSAs	34	71	19.7	15,324	82.4	97.1	50.0	5.0	0.0	12.6	2.9
Total	173	530	100.0	112,334	83.7	96.0	50.1	5.2	2.9	11.1	1.2

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

North Carolina - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography

2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greensboro-High Point	438	768	0.0	5.4	6.4	22.9	23.1	43.0	58.4	28.6	12.1	0.0	0.0
Asheville	114	197	0.0	1.9	4.4	14.2	27.2	62.6	57.0	21.3	11.4	0.0	0.0
Burlington	93	155	0.0	0.0	0.0	28.5	48.4	45.8	35.5	25.7	16.1	0.0	0.0
Durham-Chapel Hill	131	240	0.0	9.8	11.5	20.6	22.1	36.3	48.1	33.3	18.3	0.0	0.0
Fayetteville	54	98	0.0	0.8	1.9	16.5	11.1	65.8	68.5	16.9	18.5	0.0	0.0
Goldsboro	85	148	0.0	0.0	0.0	33.1	44.7	54.5	49.4	12.4	5.9	0.0	0.0
Greenville	52	81	0.0	11.9	15.4	22.7	19.2	38.6	38.5	26.7	26.9	0.0	0.0
Hickory-Lenoir-Morganton	192	337	0.0	0.0	0.0	15.8	20.8	62.1	64.1	22.0	15.1	0.0	0.0
Jacksonville	41	74	0.0	0.0	0.0	11.5	4.9	72.3	92.7	16.2	0.0	0.0	2.4
New Bern	68	117	0.0	5.0	4.4	13.7	16.2	54.5	47.1	26.7	32.4	0.0	0.0
Raleigh	353	636	0.0	5.9	10.5	29.2	52.1	33.5	30.0	31.4	7.4	0.0	0.0
Rocky Mount	118	195	0.0	0.0	0.0	19.9	23.7	59.7	61.9	20.4	14.4	0.0	0.0
Winston-Salem	375	649	0.0	7.4	10.4	20.1	25.1	41.5	46.1	30.7	18.4	0.3	0.0
NC – Non MSAs	735	1,269	0.0	1.5	1.2	22.8	24.2	56.2	61.4	19.6	13.2	0.0	0.0
Total	2,849	4,964	0.0	4.3	5.1	22.1	28.0	47.9	53.1	25.6	13.8	0.0	0.0

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

North Carolina - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography

2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greensboro-High Point	214	375	0.0	5.4	6.5	23.3	33.6	44.0	50.5	27.2	9.3	0.0	0.0
Asheville	50	88	0.0	1.8	0.0	15.8	26.0	62.9	58.0	19.6	16.0	0.0	0.0
Burlington	24	44	0.0	0.0	0.0	21.8	16.7	47.9	50.0	30.3	33.3	0.0	0.0
Durham-Chapel Hill	61	104	0.0	8.5	11.5	21.8	21.3	36.2	45.9	33.3	21.3	0.2	0.0
Fayetteville	19	26	0.0	3.2	5.3	14.5	21.1	50.9	47.4	31.4	26.3	0.0	0.0
Goldsboro	32	56	0.0	2.5	0.0	13.8	12.5	62.7	75.0	21.0	12.5	0.0	0.0
Greenville	18	26	0.0	6.5	0.0	19.4	38.9	41.1	33.3	33.0	27.8	0.0	0.0
Hickory-Lenoir-Morganton	71	132	0.0	0.0	0.0	17.3	18.3	61.9	64.8	20.8	16.9	0.0	0.0
Jacksonville	17	27	0.0	0.0	0.0	8.9	5.9	66.2	82.4	24.8	11.8	0.1	0.0
New Bern	21	34	0.0	5.9	9.5	21.2	19.0	42.3	33.3	30.6	38.1	0.0	0.0
Raleigh	121	230	0.0	5.7	5.0	28.1	46.3	36.1	38.0	30.1	10.7	0.0	0.0
Rocky Mount	46	75	0.0	0.0	0.0	17.7	19.6	56.7	58.7	25.6	21.7	0.0	0.0
Winston-Salem	167	286	0.0	5.7	9.6	19.9	26.9	45.6	50.3	28.8	13.2	0.0	0.0
NC – Non MSAs	297	494	0.0	2.4	2.4	17.9	21.9	57.2	60.6	22.4	15.2	0.0	0.0
Total	1,158	1,997	0.0	4.1	4.6	20.4	26.8	48.5	53.5	26.9	15.1	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

North Carolina - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greensboro-High Point	438	768	15.4	23.4	37.4	16.6	34.5	17.4	15.5	42.6	9.4	0.0	3.2
Asheville	114	197	4.0	23.5	50.9	16.5	28.9	18.2	11.4	41.9	7.9	0.0	0.9
Burlington	93	155	3.3	23.8	33.3	17.2	35.5	17.3	21.5	41.8	8.6	0.0	1.1
Durham-Chapel Hill	131	240	4.6	24.9	40.5	15.3	35.9	17.2	14.5	42.7	6.9	0.0	2.3
Fayetteville	54	98	1.9	22.4	40.7	17.2	24.1	18.6	16.7	41.9	16.7	0.0	1.9
Goldsboro	85	148	3.0	23.8	20.0	16.9	32.9	16.3	34.1	43.0	10.6	0.0	2.4
Greenville	52	81	1.8	26.5	53.8	15.4	25.0	15.8	9.6	42.3	7.7	0.0	3.8
Hickory-Lenoir-Morganton	192	337	6.7	22.5	35.9	16.6	30.7	18.2	19.8	42.7	9.9	0.0	3.6
Jacksonville	41	74	1.4	21.1	46.3	17.6	26.8	21.6	9.8	39.7	14.6	0.0	2.4
New Bern	68	117	2.4	22.8	35.3	15.9	29.4	19.5	17.6	41.7	16.2	0.0	1.5
Raleigh	353	636	12.4	23.1	54.7	17.2	29.5	17.8	10.2	41.9	3.1	0.0	2.6
Rocky Mount	118	195	4.1	24.9	39.0	16.3	22.9	16.8	19.5	42.0	15.3	0.0	3.4
Winston-Salem	375	649	13.2	23.6	40.5	16.7	30.4	17.1	19.2	42.6	8.0	0.0	1.9
NC – Non MSAs	735	1,269	25.8	25.4	33.7	15.5	32.7	16.9	19.7	42.3	11.2	0.0	2.7
Total	2,849	4,964	100.0	23.9	39.5	16.4	31.3	17.6	17.3	42.2	9.3	0.0	2.6

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

North Carolina - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greensboro-High Point	214	375	18.5	23.3	38.8	16.9	30.8	17.7	15.9	42.1	11.2	0.0	3.3
Asheville	50	88	4.3	23.1	36.0	17.0	26.0	18.3	26.0	41.5	12.0	0.0	0.0
Burlington	24	44	2.1	24.4	33.3	16.9	41.7	17.7	8.3	40.9	12.5	0.0	4.2
Durham-Chapel Hill	61	104	5.3	24.7	42.6	16.1	39.3	17.0	9.8	42.2	6.6	0.0	1.6
Fayetteville	19	26	1.6	22.4	15.8	17.1	52.6	18.8	21.1	41.7	10.5	0.0	0.0
Goldsboro	32	56	2.8	24.1	25.0	16.0	50.0	18.8	15.6	41.2	6.3	0.0	3.1
Greenville	18	26	1.6	28.7	55.6	12.9	22.2	16.2	16.7	42.2	5.6	0.0	0.0
Hickory-Lenoir-Morganton	71	132	6.1	22.0	33.8	17.2	26.8	17.8	23.9	43.0	14.1	0.0	1.4
Jacksonville	17	27	1.5	20.0	41.2	18.2	23.5	21.1	23.5	40.6	5.9	0.0	5.9
New Bern	21	34	1.8	23.0	38.1	17.2	33.3	17.9	19.0	41.9	9.5	0.0	0.0
Raleigh	121	230	10.4	22.8	37.2	17.4	29.8	18.1	17.4	41.7	13.2	0.0	2.5
Rocky Mount	46	75	4.0	25.9	37.0	14.3	23.9	18.3	13.0	41.5	19.6	0.0	6.5
Winston-Salem	167	286	14.4	23.6	40.1	16.8	24.0	17.8	21.0	41.8	11.4	0.0	3.6
NC – Non MSAs	297	494	25.6	25.4	32.3	15.2	29.6	17.1	18.9	42.3	13.5	0.0	5.7
Total	1,158	1,997	100.0	23.8	36.3	16.5	30.1	17.8	18.1	41.9	12.0	0.0	3.5

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Ohio - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
OH-Non MSA	80	156	48.5	19,425	0.7	0.0	0.7	18.0	22.5	15.1	61.0	70.0	63.0	20.3	7.5	21.2	0.0	0.0	0.0
Akron	10	20	6.1	11,467	10.4	10.0	8.7	14.9	50.0	13.8	37.2	30.0	36.8	37.5	10.0	40.7	0.0	0.0	0.0
Canton-Massillon	2	3	1.2	5,551	5.4	0.0	4.2	6.9	0.0	6.1	66.6	100.0	66.7	18.8	0.0	21.5	2.4	0.0	1.5
Cleveland-Elyria	15	673	9.1	36,228	8.1	6.7	7.2	16.1	20.0	14.8	33.0	46.7	32.3	42.0	26.7	44.9	0.8	0.0	0.7
Columbus	18	422	10.9	32,035	9.1	22.2	14.1	17.4	33.3	14.2	31.1	22.2	27.5	41.9	22.2	43.9	0.5	0.0	0.3
Dayton	10	20	6.1	10,966	7.1	50.0	7.2	17.7	10.0	17.5	43.3	40.0	42.0	31.8	0.0	33.3	0.0	0.0	0.0
Lima	2	5	1.2	1,026	4.8	50.0	3.1	19.7	0.0	18.2	44.3	50.0	45.5	31.2	0.0	33.1	0.0	0.0	0.0
Mansfield	5	11	3.0	1,459	9.4	0.0	8.4	15.0	0.0	14.7	48.4	100.0	50.2	27.2	0.0	26.7	0.0	0.0	0.0
Springfield	0	0	0.0	1,511	5.4	0.0	4.4	27.4	0.0	27.5	38.0	0.0	36.6	29.2	0.0	31.4	0.0	0.0	0.0
Toledo	15	35	9.1	7,280	12.4	6.7	10.4	10.3	40.0	9.7	38.9	33.3	36.8	38.3	20.0	43.1	0.1	0.0	0.0
Wheeling	3	5	1.8	745	0.0	0.0	0.0	16.1	33.3	23.8	65.4	33.3	57.9	18.6	33.3	18.4	0.0	0.0	0.0
Youngstown-Warren-Boardman	5	11	3.0	6,224	8.7	0.0	7.7	13.2	0.0	12.4	40.1	80.0	38.2	38.0	20.0	41.7	0.0	0.0	0.0
Total	165	1,361	100.0	133,917	7.3	7.9	8.0	16.0	24.2	14.3	41.0	55.8	39.2	35.2	12.1	38.1	0.4	0.0	0.3

Source: 2017 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

Ohio - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
OH-Non MSA	63	153	46.7	19,580	1.1	0.0	0.8	15.3	20.6	13.0	63.4	68.3	64.9	20.2	11.1	21.3	0.0	0.0	0.0
Akron	10	14	7.4	11,198	7.5	10.0	5.9	16.1	10.0	14.1	35.9	20.0	35.8	40.4	60.0	44.2	0.0	0.0	0.0
Canton-Massillon	5	7	3.7	5,360	6.6	40.0	5.2	9.5	0.0	7.0	52.4	60.0	51.3	31.5	0.0	36.5	0.0	0.0	0.0
Cleveland-Elyria	13	299	9.6	38,020	7.6	7.7	6.1	13.0	30.8	11.3	38.5	30.8	36.2	40.6	30.8	46.2	0.4	0.0	0.2
Columbus	16	27	11.9	32,783	8.2	18.8	6.9	18.7	0.0	20.9	32.5	56.3	28.6	40.2	25.0	43.3	0.4	0.0	0.3
Dayton	7	9	5.2	11,632	6.7	0.0	6.0	18.3	28.6	16.7	42.0	57.1	39.9	33.0	14.3	37.5	0.0	0.0	0.0
Lima	3	5	2.2	1,085	15.0	33.3	12.4	11.2	33.3	8.2	48.0	33.3	49.4	25.7	0.0	30.0	0.0	0.0	0.0
Mansfield	0	0	0.0	1,644	0.0	0.0	0.0	27.8	0.0	29.6	45.1	0.0	43.2	27.1	0.0	27.2	0.0	0.0	0.0
Springfield	1	3	0.7	1,527	8.5	100.0	7.3	18.0	0.0	16.2	34.1	0.0	32.3	39.4	0.0	44.2	0.0	0.0	0.0
Toledo	9	22	6.7	8,640	6.5	0.0	4.5	13.9	11.1	10.7	45.0	66.7	43.2	34.4	22.2	41.6	0.3	0.0	0.0
Wheeling	3	8	2.2	743	6.4	0.0	6.2	12.3	0.0	13.2	51.3	33.3	46.2	29.9	66.7	34.5	0.0	0.0	0.0
Youngstown-Warren-Boardman	5	13	3.7	5,936	8.1	0.0	7.1	12.0	40.0	10.4	47.6	60.0	45.0	32.3	0.0	37.4	0.0	0.0	0.0
Total	135	560	100.0	138,148	6.4	6.7	5.4	15.5	17.8	14.5	43.1	56.3	40.4	34.8	19.3	39.6	0.2	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Ohio - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018

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
OH-Non MSA	80	156	48.5	19,425	78.3	98.8	49.6	6.5	1.3	15.2	0.0
Akron	10	20	6.1	11,467	80.9	100.0	47.7	7.2	0.0	11.9	0.0
Canton-Massillon	2	3	1.2	5,551	80.6	100.0	48.2	6.7	0.0	12.7	0.0
Cleveland-Elyria	15	673	9.1	36,228	81.6	73.3	50.9	7.4	26.7	10.9	0.0
Columbus	18	422	10.9	32,035	82.4	100.0	46.8	5.8	0.0	11.7	0.0
Dayton	10	20	6.1	10,966	79.6	100.0	48.1	7.0	0.0	13.5	0.0
Lima	2	5	1.2	1,026	75.6	100.0	37.8	7.3	0.0	17.2	0.0
Mansfield	5	11	3.0	1,459	77.1	100.0	48.3	6.5	0.0	16.3	0.0
Springfield	0	0	0.0	1,511	76.9	0.0	53.6	7.0	0.0	16.1	0.0
Toledo	15	35	9.1	7,280	78.1	100.0	47.9	7.8	0.0	14.1	0.0
Wheeling	3	5	1.8	745	77.6	100.0	40.7	5.7	0.0	16.7	0.0
Youngstown-Warren-Boardman	5	11	3.0	6,224	79.5	100.0	47.2	7.0	0.0	13.6	0.0
Total	165	1,361	100.0	133,917	80.5	97.0	48.6	6.8	3.0	12.7	0.0

Source: 2017 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

Ohio - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-2016

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
OH-Non MSA	63	153	46.7	19,580	79.2	100.0	46.1	6.2	0.0	14.6	0.0
Akron	10	14	7.4	11,198	81.0	100.0	42.2	7.4	0.0	11.7	0.0
Canton-Massillon	5	7	3.7	5,360	80.9	100.0	46.0	6.7	0.0	12.3	0.0
Cleveland-Elyria	13	299	9.6	38,020	81.7	69.2	45.1	7.5	23.1	10.8	7.7
Columbus	16	27	11.9	32,783	82.3	100.0	38.7	6.0	0.0	11.7	0.0
Dayton	7	9	5.2	11,632	79.9	100.0	42.7	7.0	0.0	13.1	0.0
Lima	3	5	2.2	1,085	76.4	100.0	33.3	7.2	0.0	16.5	0.0
Mansfield	0	0	0.0	1,644	77.8	0.0	41.1	6.4	0.0	15.9	0.0
Springfield	1	3	0.7	1,527	78.2	100.0	51.2	6.5	0.0	15.3	0.0
Toledo	9	22	6.7	8,640	78.5	100.0	44.5	7.6	0.0	13.8	0.0
Wheeling	3	8	2.2	743	78.5	100.0	37.7	5.3	0.0	16.2	0.0
Youngstown-Warren-Boardman	5	13	3.7	5,936	80.1	100.0	43.7	6.9	0.0	13.0	0.0
Total	135	560	100.0	138,148	80.7	97.0	43.1	6.8	2.2	12.5	0.7

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Ohio - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
OH-Non MSA	1,159	2,032	0.0	0.3	0.7	16.7	22.4	63.1	63.8	19.9	13.1	0.0	0.0
Akron	143	250	0.0	10.6	6.3	20.5	32.2	42.5	51.0	26.4	10.5	0.0	0.0
Canton-Massillon	82	141	0.0	6.1	12.2	11.0	19.5	66.1	63.4	16.4	3.7	0.4	1.2
Cleveland-Elyria	240	400	0.0	12.1	29.2	21.4	36.7	34.9	26.3	31.2	7.5	0.5	0.4
Columbus	219	383	0.0	10.1	15.5	22.0	37.0	35.5	37.9	32.2	9.6	0.2	0.0
Dayton	172	289	0.0	9.5	13.4	20.2	36.0	43.6	41.9	26.7	8.7	0.0	0.0
Lima	31	45	0.0	6.3	19.4	18.4	38.7	47.9	32.3	27.4	9.7	0.0	0.0
Mansfield	28	49	0.0	4.2	10.7	17.5	50.0	55.5	25.0	22.8	14.3	0.0	0.0
Springfield	73	126	0.0	6.9	9.6	26.1	39.7	41.5	37.0	25.5	13.7	0.0	0.0
Toledo	293	516	0.0	12.9	17.7	15.0	17.7	42.6	48.5	29.5	15.7	0.0	0.3
Wheeling	37	69	0.0	0.0	0.0	19.6	27.0	69.2	62.2	11.2	10.8	0.0	0.0
Youngstown-Warren-Boardman	106	188	0.0	8.7	11.3	16.8	19.8	47.3	46.2	27.2	22.6	0.0	0.0
Total	2,583	4,488	0.0	8.4	9.1	19.3	26.8	45.0	51.9	27.1	12.2	0.2	0.1
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due rounding, totals may not equal 100.0</i>													

Ohio - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2015-2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
OH-Non MSA	484	818	0.0	0.9	0.4	14.3	18.4	65.3	64.1	19.5	17.1	0.0	0.0
Akron	64	113	0.0	8.5	7.8	21.8	29.7	40.4	50.0	29.4	12.5	0.0	0.0
Canton-Massillon	41	65	0.0	5.2	4.9	12.3	24.4	57.8	61.0	24.7	9.8	0.0	0.0
Cleveland-Elyria	117	184	0.0	10.6	21.4	18.5	34.2	39.7	36.8	31.2	7.7	0.0	0.0
Columbus	105	180	0.0	10.5	17.1	20.7	36.2	36.9	38.1	31.9	8.6	0.0	0.0
Dayton	80	146	0.0	7.0	8.8	23.0	42.5	42.5	37.5	27.4	11.3	0.0	0.0
Lima	7	12	0.0	9.3	14.3	13.9	28.6	49.5	57.1	27.3	0.0	0.0	0.0
Mansfield	14	28	0.0	0.0	0.0	26.0	35.7	47.9	57.1	26.1	7.1	0.0	0.0
Springfield	24	44	0.0	9.6	37.5	16.1	4.2	42.4	45.8	31.9	12.5	0.0	0.0
Toledo	118	210	0.0	9.6	20.3	17.5	18.6	46.3	50.8	26.6	10.2	0.0	0.0
Wheeling	12	20	0.0	5.1	0.0	14.6	8.3	63.8	75.0	16.5	16.7	0.0	0.0
Youngstown-Warren-Boardman	56	98	0.0	7.9	1.8	16.1	33.9	53.4	55.4	22.6	8.9	0.0	0.0
Total	1,122	1,918	0.0	7.6	8.4	18.3	25.0	46.7	53.7	27.4	12.9	0.0	0.0
<i>Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>													

Ohio - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
OH-Non MSA	1,159	2,032	44.9	22.5	38.7	16.3	30.5	18.5	18.6	42.8	9.0	0.0	3.2
Akron	143	250	5.5	24.8	46.2	15.7	23.8	17.7	19.6	41.8	5.6	0.0	4.9
Canton-Massillon	82	141	3.2	23.7	48.8	16.5	29.3	18.4	11.0	41.5	9.8	0.0	1.2
Cleveland-Elyria	240	400	9.3	25.9	43.8	15.3	33.8	16.6	12.9	42.2	7.1	0.0	2.5
Columbus	219	383	8.5	23.9	52.5	16.3	29.7	17.2	9.6	42.6	5.0	0.0	3.2
Dayton	172	289	6.7	24.9	45.3	15.8	33.1	17.2	12.8	42.2	7.6	0.0	1.2
Lima	31	45	1.2	24.7	48.4	15.9	29.0	16.9	16.1	42.5	6.5	0.0	0.0
Mansfield	28	49	1.1	22.1	42.9	17.4	32.1	18.6	14.3	41.8	7.1	0.0	3.6
Springfield	73	126	2.8	23.9	35.6	16.3	37.0	17.9	17.8	41.9	9.6	0.0	0.0
Toledo	293	516	11.3	25.9	41.6	15.4	33.1	16.1	14.7	42.7	9.6	0.0	1.0
Wheeling	37	69	1.4	23.6	51.4	17.0	13.5	17.5	5.4	42.0	21.6	0.0	8.1
Youngstown-Warren-Boardman	106	188	4.1	24.6	31.1	16.0	32.1	17.9	24.5	41.6	8.5	0.0	3.8
Total	2,583	4,488	100.0	24.4	41.8	15.9	30.8	17.4	16.3	42.3	8.4	0.0	2.7
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Ohio - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2015-2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
OH-Non MSA	484	818	43.1	22.3	38.0	16.2	30.4	18.9	18.4	42.6	8.5	0.0	4.8
Akron	64	113	5.7	24.2	32.8	15.8	37.5	18.2	18.8	41.8	10.9	0.0	0.0
Canton-Massillon	41	65	3.7	22.9	39.0	17.2	39.0	18.5	7.3	41.4	9.8	0.0	4.9
Cleveland-Elyria	117	184	10.4	24.9	53.8	15.5	23.9	17.6	14.5	41.9	4.3	0.0	3.4
Columbus	105	180	9.4	23.5	53.3	16.1	25.7	18.0	12.4	42.4	5.7	0.0	2.9
Dayton	80	146	7.1	23.8	41.3	16.5	23.8	17.8	21.3	41.9	12.5	0.0	1.3
Lima	7	12	0.6	24.6	14.3	16.1	57.1	17.4	28.6	41.9	0.0	0.0	0.0
Mansfield	14	28	1.2	20.6	21.4	18.0	14.3	19.2	42.9	42.2	21.4	0.0	0.0
Springfield	24	44	2.1	23.5	45.8	16.3	29.2	18.9	16.7	41.3	8.3	0.0	0.0
Toledo	118	210	10.5	25.1	33.1	15.9	34.7	16.8	21.2	42.2	10.2	0.0	0.8
Wheeling	12	20	1.1	23.5	33.3	15.9	33.3	18.5	16.7	42.2	16.7	0.0	0.0
Youngstown-Warren-Boardman	56	98	5.0	24.6	37.5	16.2	28.6	18.1	17.9	41.1	12.5	0.0	3.6
Total	1,122	1,918	100.0	23.8	40.3	16.1	29.9	18.1	17.8	42.1	8.8	0.0	3.2
Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Pennsylvania - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Pittsburgh	23	54	21.5	44,392	4.8	8.7	3.9	16.3	17.4	16.3	42.7	65.2	43.5	35.4	8.7	35.9	0.8	0.0	0.4
Altoona	3	6	2.8	1,608	8.5	0.0	6.0	8.3	33.3	7.8	76.4	66.7	75.1	6.8	0.0	11.1	0.0	0.0	0.0
Chambersburg-Waynesboro	2	3	1.9	1,881	4.7	0.0	3.9	8.4	0.0	6.5	79.6	100.0	81.7	7.4	0.0	7.9	0.0	0.0	0.0
East Stroudsburg	11	116	10.3	2,889	0.0	0.0	0.0	20.8	9.1	17.2	74.1	90.9	76.1	5.0	0.0	6.8	0.0	0.0	0.0
Erie	12	28	11.2	4,094	12.9	0.0	11.1	12.0	0.0	11.4	45.3	58.3	45.4	29.8	41.7	32.1	0.0	0.0	0.0
Harrisburg-Carlisle	5	7	4.7	3,528	4.8	0.0	3.6	8.9	20.0	8.5	58.2	60.0	57.7	28.2	20.0	30.2	0.0	0.0	0.0
Johnstown	2	5	1.9	1,727	1.8	0.0	1.7	19.0	0.0	13.8	48.1	50.0	50.8	31.0	50.0	33.8	0.0	0.0	0.0
Lancaster	1	1	0.9	10,120	4.2	100.0	3.4	11.5	0.0	9.4	72.3	0.0	76.1	12.0	0.0	11.1	0.0	0.0	0.0
Lebanon	0	0	0.0	1,670	1.3	0.0	1.0	20.2	0.0	15.3	60.0	0.0	66.0	18.5	0.0	17.7	0.0	0.0	0.0
Montgomery Co- Bucks Co- Chester Co	11	32	10.3	52,257	2.5	0.0	2.1	15.0	45.5	14.9	48.3	36.4	48.5	34.2	18.2	34.4	0.1	0.0	0.0
Newark	2	4	1.9	944	0.0	0.0	0.0	67.4	100.0	67.5	32.6	0.0	32.5	0.0	0.0	0.0	0.0	0.0	0.0
Reading	9	30	8.4	6,234	10.3	0.0	7.6	5.1	0.0	4.1	58.4	100.0	60.4	26.1	0.0	27.9	0.0	0.0	0.0
Scranton-Wilkes-Barre-Hazleton	4	9	3.7	9,060	2.8	25.0	2.4	20.0	25.0	18.4	50.8	50.0	50.6	24.2	0.0	26.7	2.2	0.0	1.9
York-Hanover	7	36	6.5	6,088	8.8	14.3	7.8	6.6	0.0	6.0	67.0	71.4	66.6	17.6	14.3	19.5	0.0	0.0	0.0
PA-Non MSA	15	50	14.0	5,565	0.0	0.0	0.0	14.4	26.7	11.5	71.0	53.3	71.3	14.5	20.0	17.1	0.1	0.0	0.0
Total	107	381	100.0	152,057	4.2	4.7	3.4	14.7	17.8	14.2	52.1	63.6	52.5	28.6	14.0	29.7	0.4	0.0	0.2

Source: 2017 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

Pennsylvania - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Pittsburgh	11	22	17.7	45,350	4.2	0.0	3.4	16.6	36.4	15.6	47.2	63.6	46.1	31.5	0.0	34.6	0.6	0.0	0.3
Altoona	0	0	0.0	1,575	3.6	0.0	1.8	12.5	0.0	9.9	70.6	0.0	72.9	13.3	0.0	15.4	0.0	0.0	0.0
Chambersburg-Waynesboro	2	2	3.2	1,909	0.0	0.0	0.0	10.7	0.0	9.0	82.3	100.0	82.7	6.9	0.0	8.3	0.0	0.0	0.0
East Stroudsburg	6	10	9.7	2,843	0.0	0.0	0.0	3.0	0.0	2.8	85.7	100.0	82.5	11.3	0.0	14.6	0.0	0.0	0.0
Erie	5	14	8.1	3,726	11.6	0.0	10.4	14.1	0.0	13.1	43.0	20.0	43.8	31.2	80.0	32.7	0.0	0.0	0.0
Harrisburg-Carlisle	3	3	4.8	3,909	0.0	0.0	0.0	18.1	0.0	14.9	44.3	100.0	39.9	37.6	0.0	45.2	0.0	0.0	0.0
Johnstown	2	3	3.2	1,706	0.0	0.0	0.0	12.4	0.0	10.7	68.4	100.0	68.7	19.1	0.0	20.6	0.0	0.0	0.0
Lancaster	1	1	1.6	11,595	5.5	0.0	4.2	5.9	100.0	4.5	75.3	0.0	77.5	13.3	0.0	13.8	0.0	0.0	0.0
Lebanon	1	1	1.6	1,939	0.0	0.0	0.0	6.2	100.0	4.5	68.8	0.0	66.9	25.0	0.0	28.6	0.0	0.0	0.0
Montgomery Co- Bucks Co- Chester Co	13	44	21.0	56,400	1.4	23.1	1.1	17.4	15.4	16.7	46.9	53.8	46.7	34.2	7.7	35.6	0.1	0.0	0.0
Newark	0	0	0.0	988	0.0	0.0	0.0	67.5	0.0	67.0	32.5	0.0	33.0	0.0	0.0	0.0	0.0	0.0	0.0
Reading	5	14	8.1	6,583	10.2	0.0	6.8	7.8	0.0	6.4	54.7	100.0	56.3	27.4	0.0	30.5	0.0	0.0	0.0
Scranton-Wilkes-Barre-Hazleton	3	8	4.8	8,813	5.7	0.0	4.6	15.6	33.3	13.3	56.8	33.3	57.5	21.7	33.3	24.5	0.1	0.0	0.1
York-Hanover	0	0	0.0	5,758	6.8	0.0	4.8	7.8	0.0	7.3	65.7	0.0	66.8	19.7	0.0	21.1	0.0	0.0	0.0
PA-Non MSA	10	26	16.1	5,522	0.0	0.0	0.0	9.9	10.0	7.8	71.0	80.0	70.6	19.0	10.0	21.6	0.1	0.0	0.0
Total	62	148	100.0	158,616	3.5	4.8	2.6	14.8	16.1	13.8	53.4	67.7	52.8	28.2	11.3	30.7	0.2	0.0	0.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Pennsylvania - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-2018**

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
Pittsburgh	23	54	21.5	44,392	81.4	100.0	51.0	6.7	0.0	11.9	0.0
Altoona	3	6	2.8	1,608	77.8	100.0	46.5	7.5	0.0	14.6	0.0
Chambersburg-Waynesboro	2	3	1.9	1,881	83.7	100.0	48.0	5.1	0.0	11.2	0.0
East Stroudsburg	11	116	10.3	2,889	86.1	90.9	50.5	4.3	9.1	9.6	0.0
Erie	12	28	11.2	4,094	78.4	100.0	43.7	7.9	0.0	13.7	0.0
Harrisburg-Carlisle	5	7	4.7	3,528	81.8	100.0	50.0	6.0	0.0	12.2	0.0
Johnstown	2	5	1.9	1,727	76.9	100.0	48.6	6.9	0.0	16.2	0.0
Lancaster	1	1	0.9	10,120	83.6	100.0	50.9	6.8	0.0	9.5	0.0
Lebanon	0	0	0.0	1,670	82.8	0.0	51.4	5.9	0.0	11.2	0.0
Montgomery Co- Bucks Co- Chester Co	11	32	10.3	52,257	85.6	100.0	49.5	6.4	0.0	8.0	0.0
Newark	2	4	1.9	944	88.5	100.0	52.6	3.2	0.0	8.3	0.0
Reading	9	30	8.4	6,234	83.0	100.0	49.4	6.5	0.0	10.4	0.0
Scranton-Wilkes-Barre-Hazleton	4	9	3.7	9,060	81.8	100.0	45.8	6.1	0.0	12.1	0.0
York-Hanover	7	36	6.5	6,088	83.2	100.0	51.9	6.0	0.0	10.8	0.0
PA-Non MSA	15	50	14.0	5,565	80.3	100.0	48.3	5.8	0.0	13.9	0.0
Total	107	381	100.0	152,057	83.0	99.1	49.7	6.4	0.9	10.6	0.0

Source: 2017 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

Pennsylvania - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2015-2016**

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
Pittsburgh	11	22	17.7	45,350	81.7	100.0	46.7	6.5	0.0	11.9	0.0
Altoona	0	0	0.0	1,575	78.4	0.0	39.4	7.2	0.0	14.5	0.0
Chambersburg-Waynesboro	2	2	3.2	1,909	84.5	100.0	47.8	5.0	0.0	10.5	0.0
East Stroudsburg	6	10	9.7	2,843	86.0	83.3	52.5	4.1	16.7	9.9	0.0
Erie	5	14	8.1	3,726	79.1	100.0	41.4	7.5	0.0	13.4	0.0
Harrisburg-Carlisle	3	3	4.8	3,909	81.9	100.0	44.9	6.0	0.0	12.1	0.0
Johnstown	2	3	3.2	1,706	78.2	100.0	43.9	6.4	0.0	15.3	0.0
Lancaster	1	1	1.6	11,595	83.7	100.0	45.4	6.7	0.0	9.5	0.0
Lebanon	1	1	1.6	1,939	83.1	100.0	49.7	5.8	0.0	11.2	0.0
Montgomery Co- Bucks Co- Chester Co	13	44	21.0	56,400	85.5	100.0	45.2	6.4	0.0	8.1	0.0
Newark	0	0	0.0	988	88.5	0.0	51.9	3.3	0.0	8.2	0.0
Reading	5	14	8.1	6,583	83.1	100.0	46.6	6.4	0.0	10.5	0.0
Scranton-Wilkes-Barre-Hazleton	3	8	4.8	8,813	82.1	100.0	45.9	5.9	0.0	12.0	0.0
York-Hanover	0	0	0.0	5,758	83.3	0.0	48.7	6.0	0.0	10.7	0.0
PA-Non MSA	10	26	16.1	5,522	81.1	90.0	44.7	5.5	10.0	13.5	0.0
Total	62	148	100.0	158,616	83.2	96.8	46.0	6.3	3.2	10.5	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Pennsylvania - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Pittsburgh	401	705	0.0	5.1	10.5	21.5	36.4	48.3	45.4	25.0	7.7	0.1	0.0
Altoona	57	108	0.0	6.5	1.8	10.7	7.0	74.6	87.7	8.2	3.5	0.0	0.0
Chambersburg-Waynesboro	45	73	0.0	3.3	4.4	9.8	0.0	78.4	95.6	8.5	0.0	0.0	0.0
East Stroudsburg	69	140	0.0	0.0	0.0	12.1	7.2	82.7	91.3	5.2	1.4	0.0	0.0
Erie	80	132	0.0	10.2	3.8	13.1	7.5	46.8	51.3	29.9	37.5	0.0	0.0
Harrisburg-Carlisle	71	121	0.0	3.9	21.1	10.7	19.7	56.6	52.1	28.8	7.0	0.0	0.0
Johnstown	44	83	0.0	2.0	0.0	18.5	0.0	54.4	70.5	25.1	29.5	0.0	0.0
Lancaster	48	77	0.0	3.8	22.9	11.1	25.0	72.9	52.1	12.3	0.0	0.0	0.0
Lebanon	10	14	0.0	2.9	10.0	19.2	20.0	61.0	60.0	17.0	10.0	0.0	0.0
Montgomery Co-Bucks Co- Chester Co	71	113	0.0	3.7	21.1	19.8	28.2	48.5	43.7	28.0	7.0	0.0	0.0
Newark	22	43	0.0	0.0	0.0	76.4	72.7	23.6	27.3	0.0	0.0	0.0	0.0
Reading	118	216	0.0	14.4	39.8	5.1	10.2	57.0	43.2	23.4	6.8	0.0	0.0
Scranton-Wilkes-Barre-Hazleton	76	131	0.0	3.2	6.6	20.7	34.2	52.5	50.0	23.2	9.2	0.4	0.0
York-Hanover	67	116	0.0	7.6	23.9	7.0	3.0	69.1	62.7	16.3	10.4	0.0	0.0
PA-Non MSA	276	489	0.0	0.0	0.0	12.8	13.0	74.8	79.7	12.4	7.2	0.0	0.0
Total	1,455	2,561	0.0	4.8	10.9	17.4	20.7	55.2	59.5	22.6	8.9	0.1	0.0

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

Pennsylvania - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Pittsburgh	177	305	0.0	4.0	4.5	22.5	36.7	48.9	46.3	24.6	12.4	0.0	0.0
Altoona	19	33	0.0	2.1	0.0	11.5	5.3	76.2	94.7	10.3	0.0	0.0	0.0
Chambersburg-Waynesboro	18	33	0.0	0.0	0.0	10.5	22.2	81.9	77.8	7.6	0.0	0.0	0.0
East Stroudsburg	36	60	0.0	0.0	0.0	3.7	11.1	80.7	80.6	15.6	8.3	0.0	0.0
Erie	40	64	0.0	8.7	0.0	16.8	15.0	43.1	42.5	31.4	42.5	0.0	0.0
Harrisburg-Carlisle	21	36	0.0	0.0	0.0	15.5	23.8	52.7	66.7	31.9	9.5	0.0	0.0
Johnstown	29	53	0.0	0.0	0.0	18.1	3.4	63.7	86.2	18.2	10.3	0.0	0.0
Lancaster	22	31	0.0	4.5	13.6	8.6	13.6	75.0	72.7	12.0	0.0	0.0	0.0
Lebanon	8	13	0.0	0.0	0.0	11.9	37.5	65.0	50.0	23.1	12.5	0.0	0.0
Montgomery Co-Bucks Co- Chester Co	26	41	0.0	2.4	11.5	21.2	38.5	48.5	50.0	27.9	0.0	0.0	0.0
Newark	18	40	0.0	0.0	0.0	79.7	72.2	20.3	27.8	0.0	0.0	0.0	0.0
Reading	56	92	0.0	14.1	42.9	6.4	14.3	55.7	37.5	23.9	5.4	0.0	0.0
Scranton-Wilkes-Barre-Hazleton	26	39	0.0	2.2	0.0	19.4	23.1	57.3	69.2	21.1	7.7	0.0	0.0
York-Hanover	26	48	0.0	6.2	15.4	8.5	15.4	66.9	65.4	18.4	3.8	0.0	0.0
PA-Non MSA	120	194	0.0	0.0	0.0	10.6	12.5	72.5	84.2	16.9	3.3	0.0	0.0
Total	642	1,082	0.0	3.6	6.5	17.9	23.1	55.6	61.4	22.9	9.0	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

Pennsylvania - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Pittsburgh	401	705	27.6	25.2	54.6	15.5	26.2	17.0	12.0	42.3	4.7	0.0	2.5
Altoona	57	108	3.9	24.0	54.4	16.3	28.1	17.4	10.5	42.4	5.3	0.0	1.8
Chambersburg-Waynesboro	45	73	3.1	21.3	42.2	17.6	35.6	19.7	11.1	41.4	4.4	0.0	6.7
East Stroudsburg	69	140	4.7	23.1	37.7	16.4	17.4	19.4	26.1	41.1	11.6	0.0	7.2
Erie	80	132	5.5	24.3	50.0	15.9	21.3	17.7	15.0	42.1	10.0	0.0	3.8
Harrisburg-Carlisle	71	121	4.9	19.7	57.7	16.1	19.7	19.2	11.3	45.0	4.2	0.0	7.0
Johnstown	44	83	3.0	24.8	43.2	16.1	29.5	17.0	15.9	42.1	4.5	0.0	6.8
Lancaster	48	77	3.3	22.1	66.7	17.4	18.8	19.6	10.4	40.8	4.2	0.0	0.0
Lebanon	10	14	0.7	22.0	70.0	17.1	20.0	20.7	10.0	40.3	0.0	0.0	0.0
Montgomery Co-Bucks Co- Chester Co	71	113	4.9	23.6	81.7	16.5	9.9	18.2	5.6	41.6	2.8	0.0	0.0
Newark	22	43	1.5	30.1	54.5	20.7	27.3	20.4	13.6	28.8	0.0	0.0	4.5
Reading	118	216	8.1	24.3	53.4	15.8	36.4	18.3	6.8	41.6	2.5	0.0	0.8
Scranton-Wilkes-Barre-Hazleton	76	131	5.2	25.3	38.2	15.9	30.3	16.8	15.8	42.0	9.2	0.0	6.6
York-Hanover	67	116	4.6	22.6	44.8	16.9	40.3	19.6	4.5	40.9	6.0	0.0	4.5
PA-Non MSA	276	489	19.0	22.7	42.4	17.3	33.7	17.9	14.1	42.2	8.0	0.0	1.8
Total	1,455	2,561	100.0	24.0	51.1	16.3	27.7	18.0	12.3	41.8	5.8	0.0	3.1

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

Pennsylvania - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Pittsburgh	177	305	27.6	24.9	49.2	15.9	28.8	17.2	9.6	42.0	7.9	0.0	4.5
Altoona	19	33	3.0	24.4	21.1	17.0	26.3	17.0	15.8	41.5	15.8	0.0	21.1
Chambersburg-Waynesboro	18	33	2.8	21.1	55.6	17.3	16.7	21.4	22.2	40.2	0.0	0.0	5.6
East Stroudsburg	36	60	5.6	22.8	41.7	16.6	16.7	19.6	22.2	41.1	11.1	0.0	8.3
Erie	40	64	6.2	24.3	47.5	16.1	30.0	17.4	5.0	42.1	7.5	0.0	10.0
Harrisburg-Carlisle	21	36	3.3	19.5	66.7	17.1	9.5	18.4	9.5	45.0	4.8	0.0	9.5
Johnstown	29	53	4.5	23.3	51.7	17.2	34.5	17.5	3.4	41.9	3.4	0.0	6.9
Lancaster	22	31	3.4	21.6	72.7	17.2	13.6	21.0	9.1	40.2	0.0	0.0	4.5
Lebanon	8	13	1.2	21.8	62.5	17.0	37.5	21.1	0.0	40.1	0.0	0.0	0.0
Montgomery Co-Bucks Co- Chester Co	26	41	4.1	22.7	84.6	16.8	15.4	19.1	0.0	41.4	0.0	0.0	0.0
Newark	18	40	2.8	29.9	38.9	21.9	44.4	23.6	11.1	24.6	5.6	0.0	0.0
Reading	56	92	8.7	23.1	58.9	17.3	25.0	18.7	8.9	40.9	1.8	0.0	5.4
Scranton-Wilkes-Barre-Hazleton	26	39	4.1	24.6	26.9	16.5	30.8	16.9	23.1	42.0	11.5	0.0	7.7
York-Hanover	26	48	4.1	22.2	34.6	17.0	30.8	20.6	23.1	40.2	3.8	0.0	7.7
PA-Non MSA	120	194	18.7	22.6	42.5	16.7	36.7	18.4	11.7	42.4	6.7	0.0	2.5
Total	642	1,082	100.0	23.5	48.9	16.6	28.2	18.5	11.2	41.5	6.2	0.0	5.5

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Greenville	35	78	32.1	14,619	5.9	11.4	5.6	19.0	22.9	16.6	39.7	42.9	38.4	35.3	22.9	39.4	0.0	0.0	0.0
Augusta-Richmond County	4	6	3.7	1,905	0.0	0.0	0.0	29.0	0.0	27.5	45.0	75.0	46.7	25.9	25.0	25.7	0.1	0.0	0.1
Charleston-North Charleston	13	37	11.9	14,747	7.7	38.5	7.0	19.6	0.0	16.6	33.9	46.2	32.1	37.2	15.4	42.6	1.6	0.0	1.7
Columbia	16	33	14.7	12,724	9.4	0.0	6.8	24.0	18.8	22.0	32.6	50.0	33.4	33.3	31.3	37.8	0.7	0.0	0.2
Hilton Head Island-Bluffton-Beaufort	2	3	1.8	4,148	0.0	0.0	0.0	16.9	100.0	14.8	54.5	0.0	53.4	28.6	0.0	31.8	0.0	0.0	0.0
Spartanburg	5	310	4.6	4,591	2.3	20.0	1.6	24.3	0.0	20.5	41.0	40.0	42.7	32.4	40.0	35.2	0.0	0.0	0.0
SC-Non MSA	34	73	31.2	3,433	1.2	0.0	0.8	18.3	11.8	15.5	53.6	55.9	51.1	26.9	32.4	32.6	0.0	0.0	0.0
Total	109	540	100.0	56,167	5.8	9.2	5.0	21.0	15.6	18.3	39.1	48.6	38.1	33.6	26.6	38.1	0.5	0.0	0.5

Source: 2017 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

South Carolina - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2015-2016 Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Greenville	11	26	21.2	15,537	4.6	18.2	3.7	20.2	27.3	16.9	40.4	45.5	37.9	34.8	9.1	41.5	0.0	0.0	0.0
Augusta-Richmond County	1	1	1.9	2,140	5.0	0.0	3.1	23.8	0.0	20.8	40.5	100.0	43.0	30.5	0.0	33.0	0.1	0.0	0.0
Charleston-North Charleston	2	6	3.8	15,803	4.5	0.0	4.4	22.8	50.0	18.2	40.7	50.0	38.2	31.9	0.0	39.2	0.0	0.0	0.0
Columbia	22	87	42.3	13,185	2.6	4.5	1.5	23.9	22.7	21.2	39.3	54.5	37.6	33.4	18.2	39.5	0.8	0.0	0.2
Hilton Head Island-Bluffton-Beaufort	3	5	5.8	4,117	4.2	0.0	4.2	15.4	33.3	12.5	35.9	66.7	32.8	44.5	0.0	50.5	0.0	0.0	0.0
Spartanburg	4	7	7.7	4,925	3.5	25.0	2.1	21.7	0.0	16.7	45.5	75.0	47.1	29.3	0.0	34.1	0.0	0.0	0.0
SC-Non MSA	9	16	17.3	3,507	1.3	0.0	0.8	13.0	44.4	9.8	55.1	22.2	49.9	30.5	33.3	39.6	0.0	0.0	0.0
Total	52	148	100.0	59,214	3.7	7.7	3.1	21.0	26.9	17.6	41.8	50.0	39.2	33.3	15.4	40.0	0.2	0.0	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

South Carolina - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Greenville	35	78	32.1	14,619	80.9	97.1	50.1	6.2	2.9	12.9	0.0
Augusta-Richmond County	4	6	3.7	1,905	82.0	100.0	52.7	4.3	0.0	13.7	0.0
Charleston-North Charleston	13	37	11.9	14,747	83.0	100.0	49.5	5.4	0.0	11.6	0.0
Columbia	16	33	14.7	12,724	80.8	100.0	51.3	5.6	0.0	13.6	0.0
Hilton Head Island- Bluffton- Beaufort	2	3	1.8	4,148	85.3	100.0	51.6	5.2	0.0	9.5	0.0
Spartanburg	5	310	4.6	4,591	79.4	80.0	49.6	6.7	20.0	13.9	0.0
SC-Non MSA	34	73	31.2	3,433	79.2	94.1	49.6	5.1	5.9	15.8	0.0
Total	109	540	100.0	56,167	81.4	96.3	50.3	5.7	3.7	12.9	0.0

Source: 2017 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

South Carolina - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-2016
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
Greenville	11	26	21.2	15,537	80.8	100.0	47.8	6.2	0.0	13.0	0.0
Augusta-Richmond County	1	1	1.9	2,140	81.8	100.0	51.6	4.4	0.0	13.8	0.0
Charleston-North Charleston	2	6	3.8	15,803	81.7	100.0	47.9	5.8	0.0	12.5	0.0
Columbia	22	87	42.3	13,185	80.0	100.0	52.2	5.9	0.0	14.2	0.0
Hilton Head Island- Bluffton- Beaufort	3	5	5.8	4,117	84.2	100.0	47.6	5.6	0.0	10.2	0.0
Spartanburg	4	7	7.7	4,925	79.4	100.0	45.5	6.6	0.0	14.0	0.0
SC-Non MSA	9	16	17.3	3,507	79.9	100.0	50.5	4.7	0.0	15.4	0.0
Total	52	148	100.0	59,214	80.9	100.0	48.9	5.8	0.0	13.3	0.0
Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

South Carolina - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography
2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greenville	328	553	0.0	5.4	9.8	24.0	39.3	42.1	40.5	28.5	10.4	0.0	0.0
Augusta-Richmond County	47	88	0.0	0.0	0.0	33.0	44.7	43.2	44.7	23.8	10.6	0.0	0.0
Charleston-North Charleston	84	141	0.0	6.5	9.5	21.0	28.6	41.7	50.0	30.1	11.9	0.7	0.0
Columbia	187	309	0.0	6.2	8.0	27.9	39.6	34.4	30.5	31.4	21.9	0.0	0.0
Hilton Head Island-Bluffton- Beaufort	23	34	0.0	0.0	0.0	22.2	43.5	50.7	56.5	27.1	0.0	0.0	0.0
Spartanburg	68	107	0.0	4.4	4.4	23.5	35.3	44.8	50.0	27.3	10.3	0.0	0.0
SC-Non MSA	259	430	0.0	1.3	0.0	23.0	29.0	53.8	53.3	21.9	17.8	0.0	0.0
Total	996	1,662	0.0	4.7	5.8	24.5	35.8	42.3	44.0	28.4	14.4	0.1	0.0

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

South Carolina - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greenville	115	190	0.0	4.9	3.5	22.1	24.3	47.1	62.6	25.9	9.6	0.0	0.0
Augusta-Richmond County	25	40	0.0	3.4	0.0	26.7	32.0	41.0	48.0	29.0	20.0	0.0	0.0
Charleston-North Charleston	39	64	0.0	4.3	7.7	22.0	30.8	47.3	53.8	26.5	7.7	0.0	0.0
Columbia	93	153	0.0	3.7	3.2	29.2	39.8	37.3	34.4	29.8	22.6	0.1	0.0
Hilton Head Island-Bluffton- Beaufort	5	9	0.0	1.7	0.0	24.8	40.0	35.4	60.0	38.0	0.0	0.0	0.0
Spartanburg	31	50	0.0	4.8	6.5	21.4	25.8	50.9	61.3	23.0	6.5	0.0	0.0
SC-Non MSA	77	119	0.0	1.4	0.0	16.0	19.5	58.2	64.9	24.3	15.6	0.0	0.0
Total	385	625	0.0	3.8	3.1	23.3	28.6	45.6	54.3	27.2	14.0	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

South Carolina - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower
2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greenville	328	553	32.9	24.9	42.1	15.9	32.9	16.7	15.9	42.4	5.8	0.0	3.4
Augusta-Richmond County	47	88	4.7	24.9	38.3	16.3	29.8	16.9	8.5	41.9	19.1	0.0	4.3
Charleston-North Charleston	84	141	8.4	24.5	56.0	15.7	21.4	17.6	10.7	42.2	9.5	0.0	2.4
Columbia	187	309	18.8	24.3	46.0	16.2	27.3	17.9	15.5	41.6	9.6	0.0	1.6
Hilton Head Island-Bluffton- Beaufort	23	34	2.3	20.6	52.2	16.5	21.7	18.3	21.7	44.5	0.0	0.0	4.3
Spartanburg	68	107	6.8	24.5	33.8	15.8	29.4	17.4	23.5	42.4	10.3	0.0	2.9
SC-Non MSA	259	430	26.0	25.2	27.8	15.8	34.0	16.7	22.4	42.3	12.7	0.0	3.1
Total	996	1,662	100.0	24.5	39.8	16.0	30.5	17.3	17.4	42.2	9.4	0.0	2.9

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

South Carolina - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Greenville	115	190	29.9	24.7	38.3	16.2	29.6	17.2	22.6	41.9	7.0	0.0	2.6
Augusta-Richmond County	25	40	6.5	25.6	56.0	15.8	28.0	15.0	4.0	43.6	8.0	0.0	4.0
Charleston-North Charleston	39	64	10.1	23.9	41.0	15.8	35.9	19.1	17.9	41.3	5.1	0.0	0.0
Columbia	93	153	24.2	23.7	40.9	16.7	33.3	18.0	11.8	41.7	9.7	0.0	4.3
Hilton Head Island-Bluffton- Beaufort	5	9	1.3	19.7	20.0	17.4	20.0	19.4	0.0	43.4	40.0	0.0	20.0
Spartanburg	31	50	8.1	25.0	29.0	15.7	22.6	17.0	41.9	42.3	3.2	0.0	3.2
SC-Non MSA	77	119	20.0	24.9	27.3	15.7	39.0	16.4	19.5	43.0	13.0	0.0	1.3
Total	385	625	100.0	24.1	37.1	16.2	32.2	17.6	19.0	42.0	8.8	0.0	2.9

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Virginia - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Virginia Beach-Norfolk	26	73	18.8	24,172	4.2	11.5	3.5	22.7	34.6	21.6	37.0	34.6	35.3	34.9	19.2	38.1	1.3	0.0	1.4
Blacksburg-Christiansburg-Radford	7	23	5.1	1,671	0.0	0.0	0.0	1.3	0.0	1.0	75.5	57.1	73.5	21.6	42.9	23.6	1.5	0.0	1.8
Harrisonburg	1	1	0.7	1,718	2.0	0.0	2.2	20.4	0.0	20.0	63.1	100.0	61.7	14.6	0.0	16.1	0.0	0.0	0.0
Kingsport-Bristol	0	0	0.0	1,082	0.0	0.0	0.0	10.4	0.0	10.1	64.5	0.0	61.4	25.1	0.0	28.6	0.0	0.0	0.0
Lynchburg	19	64	13.8	3,365	1.2	0.0	0.9	20.1	26.3	17.9	56.9	73.7	55.3	21.8	0.0	25.8	0.0	0.0	0.0
Richmond	41	81	29.7	19,430	5.9	7.3	5.1	20.4	22.0	18.0	33.0	48.8	32.8	40.3	22.0	43.9	0.4	0.0	0.1
Roanoke	10	16	7.2	5,287	2.6	10.0	3.1	15.6	40.0	16.2	50.4	40.0	48.6	31.3	10.0	32.1	0.0	0.0	0.0
Staunton-Waynesboro	4	6	2.9	1,652	4.9	25.0	3.1	6.2	0.0	7.3	80.7	75.0	82.9	8.2	0.0	6.6	0.0	0.0	0.0
VA-Non MSA	30	51	21.7	6,378	0.3	0.0	0.2	16.3	23.3	15.9	62.8	63.3	61.2	20.5	10.0	22.5	0.2	3.3	0.1
Total	138	315	100.0	64,755	3.7	5.8	3.3	19.2	24.6	18.2	44.6	53.6	42.6	31.9	15.2	35.3	0.7	0.7	0.6

Source: 2017 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

Virginia - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography
2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Virginia Beach-Norfolk	32	206	33.7	26,708	4.6	3.1	4.3	18.8	21.9	16.4	37.8	37.5	36.1	38.4	37.5	42.8	0.3	0.0	0.4
Blacksburg-Christiansburg-Radford	1	3	1.1	1,736	0.0	0.0	0.0	16.8	0.0	15.4	58.4	100.0	60.8	23.0	0.0	23.7	1.9	0.0	0.1
Harrisonburg	2	2	2.1	2,531	0.0	0.0	0.0	11.4	0.0	11.3	67.8	0.0	65.5	20.8	100.0	23.2	0.0	0.0	0.0
Kingsport-Bristol	1	3	1.1	1,287	1.5	0.0	1.2	18.9	0.0	18.3	67.9	100.0	64.5	11.7	0.0	16.0	0.0	0.0	0.0
Lynchburg	4	9	4.2	3,575	5.0	25.0	4.8	19.5	0.0	18.4	55.9	75.0	55.7	19.7	0.0	21.2	0.0	0.0	0.0
Richmond	18	167	18.9	22,758	5.1	0.0	5.5	19.1	27.8	14.7	33.0	38.9	30.9	42.7	33.3	48.9	0.1	0.0	0.1
Roanoke	6	12	6.3	5,225	3.2	0.0	4.1	21.1	16.7	21.5	39.6	33.3	39.8	36.1	50.0	34.6	0.0	0.0	0.0
Staunton-Waynesboro	1	1	1.1	2,072	5.4	0.0	3.3	7.0	0.0	7.6	64.0	100.0	63.6	23.6	0.0	25.5	0.0	0.0	0.0
VA-Non MSA	30	96	31.6	7,057	1.2	0.0	1.1	13.5	13.3	12.4	65.0	60.0	62.8	20.2	26.7	23.6	0.1	0.0	0.1
Total	95	499	100.0	72,949	3.9	2.1	4.0	17.9	17.9	15.6	43.5	47.4	41.2	34.4	32.6	39.1	0.2	0.0	0.2

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Virginia - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
Virginia Beach-Norfolk	26	73	18.8	24,172	83.8	100.0	53.0	5.0	0.0	11.2	0.0
Blacksburg-Christiansburg-Radford	7	23	5.1	1,671	80.7	100.0	56.8	5.0	0.0	14.3	0.0
Harrisonburg	1	1	0.7	1,718	82.2	100.0	55.6	5.5	0.0	12.4	0.0
Kingsport-Bristol	0	0	0.0	1,082	79.7	0.0	57.3	5.3	0.0	15.0	0.0
Lynchburg	19	64	13.8	3,365	83.3	94.7	54.6	5.3	5.3	11.4	0.0
Richmond	41	81	29.7	19,430	84.0	92.7	54.2	5.4	4.9	10.6	2.4
Roanoke	10	16	7.2	5,287	81.8	100.0	57.0	5.8	0.0	12.5	0.0
Staunton-Waynesboro	4	6	2.9	1,652	82.0	100.0	54.1	5.6	0.0	12.4	0.0
VA-Non MSA	30	51	21.7	6,378	81.1	100.0	52.7	5.3	0.0	13.6	0.0
Total	138	315	100.0	64,755	83.1	97.1	54.0	5.2	2.2	11.7	0.7

Source: 2017 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

Virginia - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
Virginia Beach-Norfolk	32	206	33.7	26,708	83.5	96.9	49.2	5.1	3.1	11.4	0.0
Blacksburg-Christiansburg-Radford	1	3	1.1	1,736	81.1	100.0	52.7	4.9	0.0	14.0	0.0
Harrisonburg	2	2	2.1	2,531	82.2	100.0	43.4	5.4	0.0	12.4	0.0
Kingsport-Bristol	1	3	1.1	1,287	80.3	100.0	55.6	5.6	0.0	14.0	0.0
Lynchburg	4	9	4.2	3,575	83.9	100.0	51.6	5.1	0.0	11.0	0.0
Richmond	18	167	18.9	22,758	84.0	94.4	47.3	5.4	5.6	10.5	0.0
Roanoke	6	12	6.3	5,225	82.3	100.0	52.1	5.7	0.0	12.0	0.0
Staunton-Waynesboro	1	1	1.1	2,072	82.9	100.0	46.3	5.3	0.0	11.8	0.0
VA-Non MSA	30	96	31.6	7,057	82.3	93.3	51.7	4.9	0.0	12.7	6.7
Total	95	499	100.0	72,949	83.2	95.8	49.1	5.2	2.1	11.5	2.1

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Virginia - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Virginia Beach-Norfolk	384	662	0.0	5.9	10.2	26.3	33.9	36.6	37.2	30.9	18.8	0.3	0.0
Blacksburg-Christiansburg-Radford	59	95	0.0	0.0	0.0	3.5	1.7	74.4	71.2	20.4	23.7	1.8	3.4
Harrisonburg	24	35	0.0	3.0	0.0	15.6	33.3	70.3	62.5	11.1	4.2	0.0	0.0
Kingsport-Bristol	12	18	0.0	0.0	0.0	8.5	8.3	72.5	75.0	19.0	16.7	0.0	0.0
Lynchburg	182	299	0.0	2.0	2.7	18.6	27.5	61.0	65.9	18.4	3.8	0.0	0.0
Richmond	226	394	0.0	9.1	16.4	20.5	32.3	35.7	34.5	34.6	16.8	0.1	0.0
Roanoke	153	267	0.0	3.0	5.2	21.5	18.3	46.9	57.5	28.6	19.0	0.0	0.0
Staunton-Waynesboro	54	92	0.0	1.2	3.7	10.5	25.9	81.5	66.7	6.8	3.7	0.0	0.0
VA-Non MSA	514	842	0.0	0.6	1.2	20.4	23.7	63.3	64.0	15.8	11.1	0.0	0.0
Total	1,608	2,704	0.0	4.8	6.0	21.2	26.6	47.2	53.5	26.6	13.8	0.2	0.1

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

Virginia - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography
2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Virginia Beach-Norfolk	168	275	0.0	4.5	3.6	23.5	31.0	38.5	47.0	33.5	18.5	0.0	0.0
Blacksburg-Christiansburg-Radford	23	41	0.0	0.0	0.0	17.8	13.0	55.7	69.6	26.5	17.4	0.0	0.0
Harrisonburg	5	8	0.0	0.0	0.0	13.1	0.0	68.2	80.0	18.7	20.0	0.0	0.0
Kingsport-Bristol	8	15	0.0	3.3	12.5	16.5	25.0	70.7	62.5	9.5	0.0	0.0	0.0
Lynchburg	56	98	0.0	2.0	5.4	18.0	23.2	63.4	62.5	16.6	8.9	0.0	0.0
Richmond	117	200	0.0	7.7	13.7	20.6	29.9	34.1	33.3	37.6	23.1	0.0	0.0
Roanoke	82	136	0.0	4.2	6.1	23.4	24.4	42.3	41.5	30.1	28.0	0.0	0.0
Staunton-Waynesboro	18	28	0.0	1.1	5.6	11.6	22.2	69.3	55.6	17.9	16.7	0.0	0.0
VA-Non MSA	224	374	0.0	0.5	0.9	15.8	24.1	68.8	62.9	14.9	12.1	0.0	0.0
Total	701	1,175	0.0	4.0	4.9	20.4	26.1	47.1	51.8	28.6	17.3	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Virginia - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Virginia Beach-Norfolk	384	662	23.9	22.8	50.5	16.7	26.0	19.0	14.8	41.4	7.3	0.0	1.3
Blacksburg-Christiansburg-Radford	59	95	3.7	26.8	59.3	13.3	18.6	18.2	16.9	41.7	5.1	0.0	0.0
Harrisonburg	24	35	1.5	22.9	45.8	16.7	33.3	19.0	8.3	41.4	12.5	0.0	0.0
Kingsport-Bristol	12	18	0.7	24.3	66.7	15.9	8.3	17.6	25.0	42.3	0.0	0.0	0.0
Lynchburg	182	299	11.3	24.3	57.7	16.0	25.8	18.0	9.9	41.8	5.5	0.0	1.1
Richmond	226	394	14.1	22.7	47.8	16.4	36.3	18.1	11.5	42.8	3.1	0.0	1.3
Roanoke	153	267	9.5	24.1	45.8	16.1	26.8	19.1	20.3	40.8	3.9	0.0	3.3
Staunton-Waynesboro	54	92	3.4	22.9	53.7	17.4	20.4	18.9	24.1	40.8	0.0	0.0	1.9
VA-Non MSA	514	842	32.0	25.8	46.5	16.7	26.7	17.5	16.1	40.1	8.2	0.0	2.5
Total	1,608	2,704	100.0	23.6	49.7	16.4	27.2	18.5	15.1	41.5	6.2	0.0	1.8

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

Virginia - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Virginia Beach-Norfolk	168	275	24.0	21.7	48.2	17.3	27.4	19.9	13.1	41.1	8.9	0.0	2.4
Blacksburg-Christiansburg-Radford	23	41	3.3	27.0	43.5	14.1	26.1	16.9	17.4	42.0	13.0	0.0	0.0
Harrisonburg	5	8	0.7	23.5	60.0	16.3	40.0	19.3	0.0	40.9	0.0	0.0	0.0
Kingsport-Bristol	8	15	1.1	25.4	25.0	15.8	37.5	18.1	12.5	40.7	25.0	0.0	0.0
Lynchburg	56	98	8.0	24.0	50.0	16.0	25.0	17.9	12.5	42.0	8.9	0.0	3.6
Richmond	117	200	16.7	22.0	40.2	16.6	38.5	18.6	12.0	42.8	6.8	0.0	2.6
Roanoke	82	136	11.7	22.7	43.9	17.0	32.9	19.1	17.1	41.2	4.9	0.0	1.2
Staunton-Waynesboro	18	28	2.6	24.4	61.1	15.8	11.1	19.0	22.2	40.8	0.0	0.0	5.6
VA-Non MSA	224	374	32.0	26.1	44.2	16.3	24.6	18.4	15.6	39.3	10.7	0.0	4.9
Total	701	1,175	100.0	23.1	45.2	16.7	28.5	19.0	14.4	41.3	8.7	0.0	3.1

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

West Virginia - 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			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
WV-Non MSA AA	14	38	50.0	2,565	2.0	0.0	1.6	13.5	14.3	10.2	46.9	28.6	45.1	37.7	57.1	43.2	0.0	0.0	0.0
Huntington AA	3	5	10.7	1,901	15.4	0.0	13.1	8.7	0.0	5.3	39.6	66.7	41.6	35.4	33.3	39.9	0.9	0.0	0.1
Beckley AA	8	23	28.6	1,482	0.0	0.0	0.0	5.0	0.0	4.4	85.6	100.0	82.1	9.4	0.0	13.6	0.0	0.0	0.0
Charleston AA	2	5	7.1	2,903	3.8	0.0	3.4	14.8	0.0	13.3	58.3	100.0	57.6	23.1	0.0	25.7	0.0	0.0	0.0
Hagerstown-Martinsburg AA	1	1	3.6	1,141	0.0	0.0	0.0	23.4	100.0	22.2	67.9	0.0	67.7	8.7	0.0	10.1	0.0	0.0	0.0
Total	28	72	100.0	9,992	4.7	0.0	3.9	12.8	10.7	10.7	56.0	57.1	56.1	26.3	32.1	29.3	0.2	0.0	0.0

Source: 2017 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

West Virginia - Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography
2015-2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
WV-Non MSA AA	10	22	38.5	2,484	1.9	0.0	1.8	12.9	0.0	11.6	61.0	70.0	58.7	24.2	30.0	28.0	0.0	0.0	0.0
Huntington AA	4	7	15.4	1,956	5.2	0.0	3.5	25.5	25.0	19.9	30.8	25.0	31.7	38.4	50.0	44.9	0.0	0.0	0.0
Beckley AA	6	9	23.1	1,441	0.0	0.0	0.0	12.8	0.0	11.0	70.3	83.3	71.2	16.9	16.7	17.8	0.0	0.0	0.0
Charleston AA	6	8	23.1	3,160	0.0	0.0	0.0	32.0	16.7	27.3	44.9	83.3	45.5	23.2	0.0	27.2	0.0	0.0	0.0
Hagerstown-Martinsburg AA	0	0	0.0	1,182	0.0	0.0	0.0	26.3	0.0	20.5	64.7	0.0	67.9	9.0	0.0	11.6	0.0	0.0	0.0
Total	26	46	100.0	10,223	1.6	0.0	1.1	22.5	7.7	19.0	51.7	69.2	52.3	24.2	23.1	27.6	0.0	0.0	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

West Virginia - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2017-2018

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
WV-Non MSA AA	14	38	50.0	2,565	75.2	100.0	38.1	7.0	0.0	17.7	0.0
Huntington AA	3	5	10.7	1,901	76.5	100.0	46.5	7.1	0.0	16.4	0.0
Beckley AA	8	23	28.6	1,482	74.3	100.0	41.0	6.9	0.0	18.9	0.0
Charleston AA	2	5	7.1	2,903	73.2	100.0	42.1	7.5	0.0	19.3	0.0
Hagerstown-Martinsburg AA	1	1	3.6	1,141	84.2	100.0	55.2	4.1	0.0	11.7	0.0
Total	28	72	100.0	9,992	75.8	100.0	43.3	6.8	0.0	17.4	0.0

Source: 2017 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

West Virginia - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues
2015-2016

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
WV Non MSA AA	10	22	38.5	2,484	75.5	100.0	38.4	6.8	0.0	17.7	0.0
Huntington AA	4	7	15.4	1,956	76.9	100.0	45.8	6.9	0.0	16.2	0.0
Beckley AA	6	9	23.1	1,441	74.7	100.0	41.3	6.5	0.0	18.9	0.0
Charleston AA	6	8	23.1	3,160	74.0	100.0	39.6	7.2	0.0	18.8	0.0
Hagerstown-Martinsburg AA	0	0	0.0	1,182	84.7	0.0	47.3	4.0	0.0	11.3	0.0
Total	26	46	100.0	10,223	76.3	100.0	41.6	6.6	0.0	17.1	0.0

Source: 2016 D&B Data; 07/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

West Virginia - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography
2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
WV Non MSA AA	131	213	0.0	0.7	0.8	12.7	11.5	54.8	57.3	31.8	30.5	0.0	0.0
Huntington AA	40	65	0.0	7.7	0.0	11.5	5.0	47.1	70.0	32.9	22.5	0.7	2.5
Beckley AA	68	96	0.0	0.0	0.0	8.2	14.7	80.9	72.1	10.9	13.2	0.0	0.0
Charleston AA	51	89	0.0	1.8	0.0	18.9	25.5	55.3	49.0	23.9	25.5	0.0	0.0
Hagerstown-Martinsburg AA	28	42	0.0	0.0	0.0	13.6	28.6	77.5	60.7	8.8	10.7	0.0	0.0
Total	318	505	0.0	2.2	0.3	13.6	15.1	59.6	61.0	24.4	23.3	0.1	0.3

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

West Virginia - Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
WV Non MSA AA	44	75	0.0	0.5	2.3	6.7	4.5	70.4	79.5	22.4	13.6	0.0	0.0
Huntington AA	12	20	0.0	5.2	0.0	21.0	0.0	40.2	66.7	33.6	33.3	0.0	0.0
Beckley MSA	15	21	0.0	0.0	0.0	10.7	13.3	71.3	73.3	18.0	13.3	0.0	0.0
Charleston MSA	24	45	0.0	0.0	0.0	20.4	8.3	58.9	70.8	20.8	20.8	0.0	0.0
Hagerstown-Martinsburg AA	11	21	0.0	0.0	0.0	20.3	18.2	71.4	63.6	8.3	18.2	0.0	0.0
Total	106	182	0.0	1.2	0.9	15.2	7.5	61.6	73.6	22.0	17.9	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

West Virginia - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
WV Non MSA AA	131	213	41.2	23.3	38.9	15.6	22.9	16.1	18.3	45.1	15.3	0.0	4.6
Huntington AA	40	65	12.6	26.6	40.0	14.5	15.0	15.8	17.5	43.1	25.0	0.0	2.5
Beckley AA	68	96	21.4	24.1	42.6	16.3	27.9	18.0	20.6	41.6	7.4	0.0	1.5
Charleston AA	51	89	16.0	24.5	33.3	15.9	27.5	17.7	21.6	41.9	17.6	0.0	0.0
Hagerstown-Martinsburg AA	28	42	8.8	23.0	46.4	15.7	28.6	20.7	14.3	40.6	7.1	0.0	3.6
Total	318	505	100.0	24.3	39.6	15.6	24.2	17.2	18.9	42.9	14.5	0.0	2.8

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

West Virginia - Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2015-2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
WV Non MSA AA	44	75	41.5	23.1	47.7	15.7	25.0	15.9	13.6	45.3	13.6	0.0	0.0
Huntington AA	12	20	11.3	24.5	41.7	16.0	16.7	15.8	0.0	43.7	41.7	0.0	0.0
Beckley AA	15	21	14.2	24.8	53.3	16.4	20.0	15.3	20.0	43.4	6.7	0.0	0.0
Charleston AA	24	45	22.6	24.3	29.2	15.8	29.2	18.5	33.3	41.4	8.3	0.0	0.0
Hagerstown-Martinsburg AA	11	21	10.4	22.0	54.5	18.0	36.4	18.4	9.1	41.6	0.0	0.0	0.0
Total	106	182	100.0	23.8	44.3	16.1	25.5	16.8	17.0	43.3	13.2	0.0	0.0

Source: 2010 U.S. Census; 07/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0