



## **PUBLIC DISCLOSURE**

May 28, 2019

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

Commercial Banking Company  
Charter Number 713248

3462 North Valdosta Road  
Valdosta, GA 31602

Office of the Comptroller of the Currency

4042 Park Oaks Blvd  
Suite 240  
Tampa, FL 33610

**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

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

- Considering the thrift's size, financial condition, and credit needs of the assessment area, Commercial Banking Company's (CBC) loan-to-deposit ratio is more than reasonable.
- A substantial majority of the thrift's loans are inside its assessment area.
- Based on the data in the tables and performance context factors described in appendix B, lending to borrowers of different income levels and businesses of different sizes reflects reasonable distribution.
- Based on the data in the tables and performance context factors described in appendix B, lending in geographies of different income levels reflects reasonable distribution.

## Definitions and Common Abbreviations

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

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

Commercial Banking Company (CBC) is a \$234.1 million intrastate thrift located in Valdosta, Georgia. CBC was chartered in 1929 as a state bank and converted to a federal thrift charter in 1995. CBC is wholly owned by Lowndes Bancshares, Inc., a one-bank holding company also headquartered in Valdosta, Georgia. CBC has five offices; three in Lowndes County; one in Colquitt County and one in Tift County. CBC did not open or close any branches since the last CRA exam.

As of December 31, 2018, CBC reported net loans of \$171.5 million and tier 1 capital of \$34.4 million. CBC's lending strategy focused on the business and residential real estate needs in both the Valdosta assessment area and the Colquitt and Tift counties nonMSA assessment area, representing 49.9 and 42.9 percent, respectively, of the total loan portfolio. Consumer lending makes up the remaining 7.2 percent.

CBC offers full service banking, including automated teller machines (ATMs) access at each office location with the exception of the Tifton office, and drive-thru facilities. In addition, there is an offsite ATM located in Valdosta. Banking services include alternative banking such as online banking with bill-pay and mobile banking. Deposit services include a variety of personal and business checking and savings accounts. Other services offered include investment advisory services and products offered through a third party financial services company. Details on banking products and services CBC offers to its customers are described in the Community Development Services section below.

CBC offers a variety of consumer loans, including personal lines of credit, Home Equity Lines of Credit and short-term, fixed-rate balloon home mortgage loans. In addition, the thrift offers other home mortgage products, including 30-year, fixed rate loans, through participation in the secondary real estate market, which is attractive to low-and moderate-income borrowers.

CBC offers an array of business loan products and is a qualified U.S. Small Business Administration (SBA) lender, which allows the thrift to address the lending needs of small businesses throughout the thrift's assessment area. During the evaluation period, CBC originated seven SBA loans totaling \$2.6 million in the assessment areas, which is reflected in the lending test below.

CBC has two assessment areas: 1. Valdosta MSA (#46660) and. 2. Colquitt and Tift Counties NonMSA. CBC has delineated the entire Valdosta MSA (34 census tracts) which includes the counties of Brooks, Echols, Lanier and Lowndes. Similarly, CBC delineated all census tracts (19 in total) for Colquitt and Tift Counties NonMSA, which are contiguous to the Valdosta MSA.

Banking is competitive in the Valdosta MSA. FDIC market share data as of June 30, 2018, shows CBC with a 6.44 percent market share and ranks 5<sup>th</sup> out of 17 financial institutions. Similarly, home mortgage market share data for the Valdosta MSA as of



2017 (2018 data was not available), shows 254 home mortgage lenders with CBC ranking 19<sup>th</sup> with a 1.17 percent market share in the assessment area.

Banking is also competitive in the Colquitt and Tift Counties NonMSA assessment area. FDIC market share data as of June 30, 2018, shows CBC with a 3.06 percent market share and ranks 7<sup>th</sup> out of nine financial institutions operating in the assessment area. Similarly, home mortgage market share reports for the NonMSA as of 2017 (2018 data was not available), shows 186 home mortgage lenders with CBC ranking 7<sup>th</sup> with a 4.09 percent market share in the assessment area.

Refer to appendix B for further details on the demographic data for the assessment areas.

There are no financial or legal obstacles affecting CBC's ability to meet its community credit needs. The last Community Reinvestment Act (CRA) evaluation for CBC was completed in February 2015. CBC received a "Satisfactory" rating.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

CBC was evaluated using the Community Reinvestment Act (CRA) small bank examination procedures. Procedures include a lending test to evaluate the thrift's record of meeting the credit needs within its assessment area through its lending activities.

The evaluation period was January 1, 2016, through December 31, 2018, for the lending test. Due to the census changes effective in 2017, lending performance for 2017 and 2018 were evaluated on a combined basis and separately for 2016. As such, due to the volume, lending test conclusions were based primarily on the combined 2017-2018 lending performance. Although the Valdosta assessment area represents approximately 60.0 percent of CBC's branches, deposits and loans, lending in the NonMSA assessment area (Colquitt and Tift Counties) was weighted equally when determining the overall lending performance due to the similar demographics and performance context factors. Refer to the community profile in appendix B for detailed demographics and other performance context information.

As previously noted, CBC's primary loan products during the evaluation period were business and home mortgage lending with an emphasis on business lending, which reflects CBC's lending strategy during the same period. During the evaluation period CBC originated 823 business loans (60.4 percent in dollar volume and 40.8 percent in number) and 475 home mortgage loans (25.6 percent in dollar volume and 23.5 percent in number of total loan originations). Due to the volume of business loan originations, the review of the thrift's lending performance weighted business lending more than home mortgage lending.

During a CRA evaluation, it is customary for examiners to contact various persons and organizations within the institution's assessment area to gain insight regarding local economic conditions and credit needs. Earlier this year, we completed a follow-up interview with a local nonprofit community based organization that serves small businesses and low- and moderate-income persons in the Valdosta MSA assessment area. We learned that opportunities for financial institutions remain challenged by the low wages of workers. The community contact stated that decent affordable housing continues to be a community credit need in Valdosta. However, from the contact's perspective, the greatest credit need in the assessment area continues to focus on financial literacy training and small dollar loans for both low-and moderate-income individuals and small business. Refer to appendix B for additional information on the community credit needs in the thrift's assessment area.

## **Data Integrity**

We performed a CRA Data Verification examination that began on March 18, 2019. Our objective was to determine the accuracy and reliability of data reported on the HMDA Loan Application Register (LAR) for 2016, 2017, and 2018 for use in the upcoming CRA evaluation.

We concluded the HMDA LAR data for 2016, 2017, and 2018 is reliable.

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

The Valdosta MSA and Colquitt and Tifton Counties NonMSA received full-scope reviews. Refer to appendix A for more information on these two assessment areas.

## **Ratings**

The bank's overall rating is based primarily on those areas that received full-scope reviews.

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

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

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

Based on the data in the Tables below and consideration of CBC's size, capacity to lend, and performance context considerations, CBC's lending performance for the Valdosta MSA and Colquitt and Tift Counties NonMSA is excellent. CBC's lending distribution to borrowers of different income levels and businesses of different sizes and lending in geographies of different income levels was reasonable.

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

Considering CBC's size, financial condition, and credit needs of the assessment area, the loan-to-deposit ratio is more than reasonable.

- CBC's quarterly average net loan-to-deposit (LTD) ratio since the preceding CRA evaluation (16 quarters starting March 2015 and ending December 2018) was 86.01 percent. For the same period, CBC's ratio was higher than the 79.47 percent ratio of six similarly situated banks operating within the thrift's assessment areas and nearby counties. The quarterly average high net LTD ratio for CBC was 91.08 percent and the low was 81.95 percent in comparison to the six peer banks of 121.10 percent and 54.75 percent, respectively. Peer banks used in the analysis offer similar loan and deposit products and reported total assets of less than \$535 million.

#### **Lending in Assessment Area**

A substantial majority of CBC's loans were inside its assessment area.

- This conclusion is based on an analysis of HMDA loans and a sample of business loans originated during the period of January 1, 2016, through December 31, 2018. As detailed in Table D below, 89.8 percent by number, and 92.6 percent by dollar amount, of originated loans were within CBC's assessment areas.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
<b>Home Mortgage</b>	419	88.2	56	11.8	475	54,809	90.2	5,938	9.8	60,747
<b>Business Loans</b>	153	94.4	9	5.6	162	27,416	97.7	650	2.3	28,066
<b>Total</b>	<b>572</b>	<b>89.8</b>	<b>65</b>	<b>10.2</b>	<b>637</b>	<b>82,225</b>	<b>92.6</b>	<b>6,588</b>	<b>7.4</b>	<b>88,813</b>

Source: Evaluation Period: 1/1/2016 - 12/31/2018; HMDA Data and sample from bank prepared loan origination report.

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

Refer to Table P and R in appendix C for the facts and data used to evaluate the borrower distribution of CBC's loan originations.

Based on the data in Tables P and R, and performance context considerations discussed in appendix B, CBC's lending to borrowers of different income levels and businesses of different sizes reflects reasonable distribution in the Valdosta MSA and Colquitt and Tift Counties NonMSA. As part of our analysis, we used a sample of 153 business loans originated in the MSA (77) and NonMSA (76), all 2016 - 2018 home mortgage loans (419) originated in both assessment areas.

### Home Mortgage Loans

Based on Table P and performance context considerations described in appendix B, we concluded the distribution of lending to low-and moderate-income borrowers in the assessment areas reflects poor distribution.

#### Valdosta MSA Assessment Area:

- For 2016, CBC's distribution of home mortgage loans to low and moderate-income borrowers was lower than the proportion of low-and moderate-income families residing in these geographies in the assessment area. CBC's distribution of loans to low-income borrowers was significantly higher than the aggregate distribution of lending to those borrowers in the assessment area. CC's distribution of loans to moderate-income borrowers was lower than the aggregate distribution of lending to moderate-income families residing in the assessment area.

- For 2017-2018 combined, the distribution of home mortgage loans to low-income borrowers was significantly lower than the proportion of low-income families residing in the assessment area and near to the aggregate distribution of loans made to low-income borrowers residing in the assessment area. The distribution of loans to moderate-income borrowers was lower than the proportion of moderate-income families residing in the assessment area and lower than the aggregate distribution of loans made to those borrowers residing in those geographies.
- As noted in appendix B, high and increasing poverty levels coupled with continued low paying jobs in the Valdosta MSA limits homeownership and affordability, especially to low and moderate-income borrowers. The MSA's median housing value was \$116,564. The maximum income level for low-income borrowers was under \$24,750 making the median housing value near five times over the maximum low-income level. The maximum income level for moderate-income borrowers was less than \$39,600, making the median housing value three times over the maximum moderate-income level. Further, home mortgage lending is very competitive with 254 home mortgage lenders in the assessment area all competing for the same home mortgage loans.

#### **Colquitt and Tift Counties NonMSA Assessment Area:**

- For 2016, CBC's distribution of home mortgage loans to low and moderate-income borrowers was lower than the proportion of low and moderate-income families residing in these geographies in the assessment area. CBC's distribution of loans to low-income borrowers was significantly higher than the aggregate distribution of loans made to those borrowers in the assessment area. The thrift's distribution of loans to moderate-income borrowers was somewhat lower than the aggregate distribution of loans made to moderate-income borrowers residing in the assessment area.
- For 2017-2018 combined, CBC's distribution of home mortgage loans to low-income borrowers was significantly lower than the proportion of low-income families residing in the assessment area and lower than aggregate distribution of loans made to low-income borrowers residing in the assessment area. CBC's distribution of loans to moderate-income borrowers was lower than the proportion of moderate-income families residing in the assessment area and somewhat lower than the aggregate distribution of loans made to moderate-income borrowers residing in the assessment area.
- Similar to the Valdosta MSA and noted in appendix B, high and increasing poverty levels coupled with continued low paying jobs in the NonMSA assessment area negatively impacts homeownership and affordability, especially to low and moderate-income borrowers. The MSA's median housing value was 95,701. The maximum income level for low-income borrowers was under \$24,450 making the median housing value four times over the maximum low-

income level. The maximum income level for moderate-income borrowers was less than \$39,120, making the median housing value over two times over the maximum moderate-income level. Further, home mortgage lending is very competitive with 186 home mortgage lenders in the assessment area all competing for the same home mortgage loans.

### **Small Business Loans**

Based on the data in Table R, and performance context considerations described in appendix B, we concluded CBC's lending to businesses of different sizes reflects excellent distribution in both assessment areas.

#### **Valdosta MSA:**

- For 2016, CBC's distribution of loans to small businesses is somewhat lower than the proportion of small businesses (gross annual revenues of \$1 million or less) operating in the assessment area and exceeds the aggregate distribution of small business loans made in the assessment area.
- For 2017-2018 combined, CBC's distribution of loans to small businesses is near the proportion of small businesses (gross annual revenues of \$1 million or less) operating in the assessment area and significantly exceeds the aggregate distribution of small business loans made in the assessment area.

#### **Colquitt and Tift Counties NonMSA Assessment Area:**

- For 2016, the distribution of thrift's loans to small businesses is somewhat lower than the proportion of small businesses (gross annual revenues of \$1 million or less) operating in the assessment area and exceeds the aggregate distribution of small business loans made in the assessment area.
- For 2017-2018 combined, the distribution of thrift loans to small businesses is near to the proportion of small businesses (gross annual revenues of \$1 million or less) operating in the assessment area and significantly exceeds the aggregate distribution of small business loans made in the assessment area.

### **Geographic Distribution of Loans**

Refer to Table O and Q, in appendix C for the facts and data used to evaluate the geographic distribution of the thrift's loan originations.

Based on the data in Tables O and Q, and performance context considerations discussed in appendix B, we concluded CBC's distribution of lending in geographies of different income levels reflects reasonable distribution in the Valdosta MSA and NonMSA Colquitt and Tift Counties. We used the same sample for our analysis of the



geographic distribution of loans as we did for our analysis of lending to borrowers of different income levels and borrowers of different sizes.

## **Home Mortgage Loans**

Based on Table O and performance context considerations described in appendix B, we concluded the distribution of lending in low-and moderate-income geographies reflects excellent distribution in both assessment areas.

### **Valdosta MSA Assessment Area**

- For 2016, CBC's distribution of home mortgage loans made in low- and moderate-income geographies was somewhat lower than the proportion of owner-occupied housing units in low-and moderate-income geographies in the assessment area. CBC's distribution of loans in low-income geographies significantly exceeds the aggregate distribution of loans made in low-income geographies and near the aggregate distribution of loans made in moderate-income geographies. Lending in low-income geographies in the assessment area was reasonable with only 2.8 percent owner-occupied units located in these geographies.
- For 2017-2018 combined, CBC's distribution of home mortgage loans made in low-income geographies was near the proportion of owner-occupied housing units in those geographies in the assessment area and significantly exceeds the aggregate distribution of loans made in low-income geographies. The distribution of home mortgage loans made in moderate-income geographies in the assessment area significantly exceeds the proportion of owner-occupied units in moderate-income geographies and the aggregate distribution of loans made in those geographies.

### **Colquitt and Tift Counties NonMSA Assessment Area**

- For 2016, there were no low-income geographies in the assessment area. CBC's distribution of home mortgage loans made in moderate-income geographies significantly exceeds the proportion of owner-occupied housing units in moderate-income geographies in the assessment area and significantly exceeds the aggregate distribution of loans made in those geographies.
- For 2017-2018 combined, the distribution of home mortgage loans made in low-income geographies exceeds the proportion of owner-occupied housing units in low-income geographies in the assessment area and significantly exceeds the aggregate distribution of loans made in low-income geographies. The distribution of home mortgage loans made in moderate-income geographies exceeds the proportion of owner-occupied housing units in moderate-income geographies in the assessment area and aggregate distribution of loans made in those geographies.

## **Small Business Loans**

Based on Table Q and performance context considerations described in appendix B, we concluded the distribution of lending to small businesses operating in low and moderate-income geographies is reasonable. It is noted the aggregate distribution of lending to small businesses operating in low- and moderate-income geographies are reported by small business lenders in the assessment area that report these types of loans.

### **Valdosta MSA Assessment Area**

- For 2016, CBC did not make loans to small businesses (gross annual revenues of \$1 million or less) operating in the two low-income geographies located in the assessment area, which is considered reasonable as only 4.8 percent of businesses operate in those geographies. CBC's distribution of loans made to small businesses operating in moderate-income geographies was lower than the proportion of small businesses operating in those geographies and lower than the aggregate distribution of small business loans made in moderate-income geographies in the assessment area.
- For 2017-2018 combined, CBC's distribution of loans made to small businesses operating in low-income geographies was lower than the proportion of small businesses operating in those geographies and lower than the aggregate distribution of small business loans made in low-income geographies. CBC's distribution of loans made to small businesses operating in moderate-income geographies is somewhat lower than the proportion of small businesses operating in these geographies and somewhat lower than the aggregate distribution of loans made to small businesses operating in moderate-income geographies.

CBC made nine loans totaling \$1.9 million in the assessment area to start-up and small businesses operating in low- and moderate-income geographies that have been designated Opportunity Zones in Downtown Valdosta. These designations reflect high levels of poverty within distressed geographies of the assessment area. Loan proceeds benefitted the assessment area by supporting economic growth and revitalization and stabilization efforts with new jobs that pay a decent wage in order to address the high levels of poverty.

### **Colquitt and Tift Counties NonMSA**

- For 2016, there were no low-income geographies in the assessment area. The distribution of lending to small businesses (gross annual revenues of \$1 million or less) located in moderate-income geographies was near the proportion of small businesses operating in moderate-income geographies and near the aggregate distribution of lending to small businesses operating in those geographies.

- For 2017-2018 combined, CBC's distribution of loans made to small businesses operating in low-income geographies was lower than the distribution of lending to small businesses operating in those geographies and lower than the aggregate distribution of lending to small businesses in low-income geographies. CBC's distribution of loans made to small businesses operating in moderate-income geographies was near to the proportion of lending to small businesses operating in those geographies and near to the aggregate distribution of lending to small businesses in moderate-income geographies.

CBC made five loans totaling \$1.6 million in the NonMSA, and all loans with the exception of one, were made to start-up and small businesses operating and benefitting low- and moderate-income geographies, distressed nonmetropolitan middle-income geographies and designated Opportunity Zones. These designations reflect high levels of poverty within distressed geographies of the assessment area. Loan proceeds to these businesses were used to promote economic development and revitalization and stabilization in areas experiencing high poverty levels by creating jobs that pay a decent wage, which was an identified community credit need. Loan proceeds also provided funds to small businesses to support the affordable housing needs in the area, also an identified community credit need.

### **Responses to Complaints**

There were no complaints related to CBC's CRA performance during the evaluation period.

## Appendix A: Scope of Examination

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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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2016 – 12/31/2018	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Commercial Banking Company (CBC) Valdosta, Georgia		Home Mortgage and Business loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Georgia:  Valdosta MSA #46660  Colquitt and Tift Counties NonMSA	Full-Scope  Full-Scope	

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: CBC 2016 AA Valdosta MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	34	5.9	35.3	29.4	29.4	0.0
Population by Geography	139,588	4.2	36.2	28.4	31.2	0.0
Housing Units by Geography	55,651	4.7	34.9	30.0	30.3	0.0
Owner-Occupied Units by Geography	30,333	2.8	24.2	35.8	37.2	0.0
Occupied Rental Units by Geography	18,933	7.7	49.4	20.1	22.8	0.0
Vacant Units by Geography	6,385	5.1	43.2	32.4	19.3	0.0
Businesses by Geography	7,868	4.8	38.6	20.0	36.7	0.0
Farms by Geography	409	0.5	30.8	36.2	32.5	0.0
Family Distribution by Income Level	33,916	22.5	18.6	18.4	40.5	0.0
Household Distribution by Income Level	49,266	24.3	16.4	16.9	42.4	0.0
Median Family Income MSA - 46660 Valdosta, GA MSA		\$47,027	Median Housing Value			\$116,097
			Median Gross Rent			\$678
			Families Below Poverty Level			15.6%

*Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0*

Table A – Demographic Information of the Assessment Area						
Assessment Area: CBC 2018 AA Valdosta MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	34	8.8	23.5	41.2	26.5	0.0
Population by Geography	143,291	7.6	24.7	39.9	27.8	0.0
Housing Units by Geography	59,022	8.0	26.0	39.9	26.1	0.0
Owner-Occupied Units by Geography	28,036	4.5	14.8	46.9	33.7	0.0
Occupied Rental Units by Geography	22,997	11.8	38.7	30.9	18.7	0.0
Vacant Units by Geography	7,989	9.4	28.9	41.2	20.5	0.0
Businesses by Geography	7,891	9.3	29.2	28.3	33.1	0.0
Farms by Geography	407	3.2	13.0	57.5	26.3	0.0
Family Distribution by Income Level	32,277	24.1	16.6	17.1	42.2	0.0
Household Distribution by Income Level	51,033	25.9	15.7	16.1	42.3	0.0
Median Family Income MSA - 46660 Valdosta, GA MSA		\$47,592	Median Housing Value			\$116,564
			Median Gross Rent			\$735
			Families Below Poverty Level			19.5%

*Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0*

## **Valdosta MSA Assessment Area:**

CBC delineated the entire Valdosta MSA (34 census tracts) which includes the counties of Brooks, Echols, Lanier and Lowndes. The Valdosta MSA assessment area meets the requirements of CRA and does not arbitrarily exclude low and moderate-income geographies. CBC operates three offices in the Valdosta MSA, all located in Lowndes County. Two are located in upper-income geographies and one in a moderate-income Opportunity Zone geography.

In 2018, based on the 2015 ACS Census, the 34 census tracts consisted of: three, (8.8 percent) census tracts designated as low-income, eight, (23.5 percent) as moderate-income, 14 (41.2 percent) as middle-income and nine (26.5 percent) as upper-income. The population of the assessment area was 143,291, of which 51,033 were households and 32,277 families. Of the total family population, 24.1 percent are low-income, 16.6 percent, moderate-income, 17.1 percent, middle-income and 42.2 percent upper-income. Families below the poverty level were reported at 22.8 percent and households at 24.9 percent. The 2018 FFIEC median family income for the assessment area was \$49,500.

Based on 2018 Dunn & Bradstreet Data and 2015 Census, there were a total of 7,891 non-farm businesses in the assessment area, of which 6,385 (80.9 percent) are small businesses (total revenues \$1 million or less), 432 (5.5 percent) reporting total revenues greater than \$1 million and 1,074 (13.6 percent) did not report gross annual revenues. Of the total business population, 9.3 percent are located in low-income census tracts, 29.2 percent in moderate-income, 28.3 percent in middle-income and 33.2 percent upper-income. There are currently six designated Federal Government Qualified Opportunity Zone located in downtown area of Valdosta. An Opportunity Zone are areas that are considered distressed with poverty levels reported greater than 20 percent. Opportunity Zones are structured to attract investors to those distressed areas with tax initiatives for investments in economic development and revitalization projects.

As mentioned in the Description of the Institution section above, banking is competitive in the Valdosta MSA. FDIC market share data as of June 30, 2018, shows CBC with a 6.44 percent market share and ranks 5<sup>th</sup> out of 17 financial institutions operating 38 offices in the assessment area. Top competitors include Synovus Bank, Guardian Bank and Bank of America, N.A. with a combined market share of 45.53 percent. Similarly, home mortgage market share data for the Valdosta MSA as of 2017 (2018 data was not available), report 254 home mortgage lenders with CBC ranking 19<sup>th</sup> with a 1.17 percent market share in the assessment area.

Based on the Bureau of Labor Statistics, as of December 31, 2018, the unemployment rate for the Valdosta MSA was 4.5 percent, which is higher than the State of Georgia and national rates of 3.7 percent and 3.9 percent, respectively. Unemployment rates continue to decline since the Great Recession; however, at a modest pace. The economy has been slow to recover. However, in 2018, economic indicators show some improvement.

The Valdosta MSA assessment area has an economy driven by a diverse base of industries to include manufacturing, warehousing and distribution, agribusiness and food processing, retail/wholesale trade, healthcare, educational service. Valdosta-Lowndes County is

conveniently situated between four interstates, and proximity to the Savannah, Jacksonville, and Brunswick ports allows for importing/exporting of goods to/from anywhere in the world. The largest employers include Moody's Air Force Base, South Georgia Medical Center, Fresh Beginnings, Lowe's Distribution Center and Wild Adventures and other public entities to include universities and the local school system.

During a CRA evaluation, it is customary for examiners to contact with various persons and organizations within the institution's assessment area to gain insight regarding local economic conditions and credit needs. Earlier this year, we completed a follow-up interview with a local nonprofit community based organization that serves small businesses and low and moderate-income persons in the Valdosta MSA assessment area. We learned that opportunities for financial institutions remain challenged by the low wages of workers. The community contact stated that decent affordable housing continues to be a community credit need in Valdosta. However, from the contact's perspective, the greatest credit need in the assessment area continues to focus on financial literacy training and small dollar loans for both low and moderate-income individuals and small business. Opportunities for local financial institutions include partnering with local nonprofit organizations and government entities to provide homeownership counseling and financial literacy training to low and moderate-income persons, and small businesses, in particular start-up businesses.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: CBC 2016 AA Colquitt Tift</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA % of #</b>
Geographies (Census Tracts)	19	0.0	31.6	47.4	21.1	0.0
Population by Geography	85,616	0.0	28.4	47.2	24.4	0.0
Housing Units by Geography	34,576	0.0	29.3	47.0	23.6	0.0
Owner-Occupied Units by Geography	19,064	0.0	23.3	48.8	27.9	0.0
Occupied Rental Units by Geography	11,073	0.0	39.7	42.2	18.2	0.0
Vacant Units by Geography	4,439	0.0	29.6	51.2	19.1	0.0
Businesses by Geography	5,116	0.0	33.6	42.2	24.1	0.0
Farms by Geography	465	0.0	15.5	59.4	25.2	0.0
Family Distribution by Income Level	21,938	24.9	18.5	17.0	39.5	0.0
Household Distribution by Income Level	30,137	24.9	17.1	16.5	41.5	0.0
Median Family Income Non-MSAs - GA		\$44,940	Median Housing Value			\$98,842
			Median Gross Rent			\$551
			Families Below Poverty Level			17.9%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data. Due to rounding, totals may not equal 100.0</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: CBC 2018 AA Colquitt Tift</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA % of #</b>
Geographies (Census Tracts)	19	5.3	31.6	42.1	21.1	0.0
Population by Geography	86,811	6.7	24.9	53.0	15.4	0.0
Housing Units by Geography	34,730	6.3	25.2	52.5	16.0	0.0
Owner-Occupied Units by Geography	18,398	3.1	20.0	54.2	22.7	0.0
Occupied Rental Units by Geography	11,466	11.5	30.1	51.4	7.0	0.0
Vacant Units by Geography	4,866	6.0	33.0	49.0	12.0	0.0
Businesses by Geography	5,223	6.4	33.4	47.1	13.1	0.0
Farms by Geography	487	3.7	15.2	55.4	25.7	0.0
Family Distribution by Income Level	20,915	27.8	17.2	15.8	39.2	0.0
Household Distribution by Income Level	29,864	27.0	15.2	17.6	40.3	0.0
Median Family Income Non-MSAs – GA		\$45,816	Median Housing Value			\$95,701
			Median Gross Rent			\$588
			Families Below Poverty Level			22.8%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data .Due to rounding, totals may not equal 100.0</i>						



## **NonMSA Assessment Area-Colquitt and Tift Counties**

CBC's NonMSA assessment area consists of Colquitt and Tift Counties. CBC delineated all 19 census tracts as its assessment area. Both counties are contiguous to the Valdosta MSA assessment area. The assessment area meets the requirements of CRA and does not arbitrarily exclude low and moderate-income geographies. CBC operates two offices in the NonMSA assessment area, one in each county. In Colquitt County, the office is located in a moderate-income and Opportunity Zone geography. In Tift County, the office is located in a distressed middle-income geography. Both offices have drive-thru facilities and the Moultrie Branch has an onsite ATM.

In 2018, based on the 2015 ACS Census, the combined 19 census tracts (10 located in Colquitt County and 9 in Tift County), consists of: one, (5.2 percent) census tract designated as low-income, six (31.6 percent) as moderate-income, eight (42.1 percent) as middle-income and four (21.1 percent) as upper-income. All eight middle-income tracts (five in Colquitt and three in Tift) were designated as distressed nonmetropolitan geographies by the banking agencies due to the economic conditions and specifically high levels of poverty within those geographies in the assessment area. The combined population of the assessment area was 86,811 of which 29,864 were households and 20,915, families. Of the total family population, 27.8 percent are low-income, 17.2 percent, moderate-income, 15.8 percent, middle-income and 39.2 percent, upper-income. Families below the poverty level were reported at 22.8 percent and households, 24.9 percent. The 2018 FFIEC median family income for the assessment area was \$48,900.

Based on 2018 Dunn & Bradstreet Data and 2015 Census, there were a total of 5,223 non-farm businesses in the assessment area, of which 4,171 (79.9 percent) are small businesses (total revenues \$1 million or less), 286 (5.5 percent) reporting total revenue greater than \$1 million and 766 (14.6 percent) did not report gross annual revenue. Of the total business population, 6.4 percent are located in low-income census tracts, 33.4 percent in moderate-income, 47.1 percent in distressed middle-income and 13.1 percent upper-income. There are currently four designated Federal Government Qualified Opportunity Zones located in Colquitt County and three in Tift County. Qualified Opportunity Zones are considered distressed areas with poverty levels in excess of 20 percent. Opportunity Zones are structured to attract investors to these distressed areas with tax initiatives for investments in economic development and revitalization projects.

As mentioned in the Description of the Institution, banking is competitive in the NonMSA assessment area. FDIC market share data as of June 30, 2018, shows CBC with a 3.06 percent market share and ranks 7<sup>th</sup> out of nine financial institutions operating 22 offices in the assessment area. Top competitors include Ameris Bank, Synovus Bank, Southwest Georgia Bank with a combined market share of 75.67 percent. Similarly, home mortgage market share data for the NonMSA as of 2017 (2018 data was not available), report 186 home mortgage lenders with CBC ranking 7<sup>th</sup> with a 4.09 percent market share in the assessment area.

Based on the Bureau of Labor Statistics, as of December 31, 2018, unemployment rates in Colquitt County was 4.0 percent, which is higher than the State of Georgia and the national rates of 3.7 percent and 3.9 percent, respectively. For Tift County, the unemployment rate was 4.7 percent, also higher than the state and federal rates. Similar to the Valdosta MSA,

unemployment rates continue to decline since the Great Depression; however, at a modest pace. The economy has been slow to recover. However, in 2018, economic indicators shows improvement.

Similar to the Valdosta MSA assessment area and based on local government economic development websites, Colquitt and Tift Counties has an economy driven by the same diverse industries along with the addition of Tift County's agricultural-bioscience technology industry. Similar to the Valdosta MSA, both counties are conveniently situated between interstates and shipping ports which allows for importing/exporting of goods to/from anywhere in the world. Large employers include Colquitt Regional Medical Center and Tift Regional Health System and other public entities that include universities and the local school system. Large private employers for Colquitt County include National Beef, Sanderson Farms, Affinity Apparel, and Premium Pork. For Tift County, Target Distribution, Heat Craft, American Textile and Orgill. Tift County is also the location of the Technology Development Center, an incubator to house and assist new agriculture-technology related companies. The Center is a joint venture with the University of Georgia to benefit Southwest Georgia Counties.

Although we did not conduct an interview with local nonprofit organizations in the assessment area, based on the demographics and performance context factors, we identified community credit needs are similar to the Valdosta MSA.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colquitt & Tift Counties	70	4,784	43.8	1,456	0.0	0.0	0.0	23.3	34.3	17.9	48.8	47.1	49.6	27.9	18.6	32.5	0.0	0.0	0.0
Valdosta MSA	90	12,120	56.3	3,774	2.8	2.2	1.1	24.2	18.9	21.0	35.8	23.3	27.8	37.2	55.6	50.1	0.0	0.0	0.0

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colquitt and Tift Counties	124	14,460	47.9	1,363	3.1	3.2	1.9	20.0	21.8	18.5	54.2	57.3	60.2	22.7	17.7	19.4	0.0	0.0	0.0
Valdosta MSA	135	23,445	52.1	3,779	4.5	4.4	2.8	14.8	28.1	13.5	46.9	27.4	39.1	33.7	40.0	44.5	0.0	0.0	0.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Colquitt & Tift Counties	70	4,784	43.8	1,456	24.9	7.1	4.3	18.5	7.1	11.7	17.0	11.4	15.1	39.5	50.0	44.6	0.0	24.3	24.2		
Valdosta MSA	90	12,120	56.3	3,774	22.5	5.6	4.0	18.6	4.4	11.0	18.4	12.2	19.4	40.5	44.4	35.9	0.0	33.3	29.7		

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Colquitt & Tift Counties	124	14,460	47.9	1,363	27.8	1.6	3.8	17.2	6.5	10.7	15.9	8.9	15.6	39.2	62.9	46.0	0.0	20.2	23.8		
Valdosta MSA	135	23,445	52.1	3,779	24.1	2.2	2.7	16.6	4.4	9.4	17.1	8.1	17.4	42.2	44.4	44.0	0.0	40.7	26.4		

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			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	
Colquitt & Tift Counties	33	7,559	100	1,469	0.0	0.0	0.0	33.6	27.3	28.9	42.2	48.5	43.1	24.1	24.2	28.0	0.0	0	0.0	
Valdosta MSA	30	4,661	100	2,196	4.8	0.0	3.6	38.6	16.7	37.8	20.0	30.0	19.3	36.7	53.3	39.3	0.0	0.0	0.0	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 sample of business loans from bank prepared loan origination report; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18	
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	
Colquitt & Tift Counties	43	7,092	47.8	1,348	6.4	2.3	5.9	33.4	27.9	32.0	47.1	44.2	45.1	13.1	25.6	16.9	0.0	0.0	0.0	
Valdosta MSA	47	8,104	52.2	2,291	9.3	2.1	7.5	29.2	19.2	27.0	28.3	36.2	32.0	33.1	42.5	33.6	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 sample of business loans from bank prepared loan origination report; 2017 CRA Aggregate Data, (2018 data not available.) Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											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
Colquitt and Tift Counties	33	7,559	52.4	1,469	81.2	60.6	48.6	5.1	30.3	13.7	9.1
Valdosta MSA	30	4,661	47.6	2,196	82.2	53.3	46.2	5.1	43.3	12.7	3.4
<i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016; sample of business loans from bank prepared loan origination report; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0</i>											

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
Colquitt & Tift Counties	43	7,092	47.8	1,348	79.9	74.4	44.5	5.5	20.9	14.7	4.7
Valdosta MSA	47	8,104	52.2	2,291	80.9	72.3	44.4	5.5	23.4	13.6	4.3
<i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018; sample of businesses loans from bank prepared loan origination report; 2017 CRA Aggregate Data, (2018 data not available). Due to rounding, totals may not equal 100.0</i>											