

PUBLIC DISCLOSURE

November 28, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fifth Third Bank
RSSD #723112

38 Fountain Square Plaza
Cincinnati, Ohio

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, Ohio 44101-1387

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

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INSTITUTION’S CRA RATING: Outstanding

The following table indicates the performance level of Fifth Third Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	FIFTH THIRD BANK PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors supporting the institution’s rating include:

- An excellent responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A leader in making community development loans;
- An extensive use of flexible lending practices in serving the assessment area’s credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership role in providing community development investments and grants;
- Retail delivery systems that are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility (good) of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

DESCRIPTION OF INSTITUTION

Overview

Fifth Third Bank (Fifth Third) is a wholly owned subsidiary of Fifth Third Bancorp, a bank holding company headquartered in Cincinnati, Ohio. As of September 30, 2016, Fifth Third Bancorp reported total assets of \$143.3 billion and Fifth Third reported total assets of \$140.8 billion. As of June 30, 2016, Fifth Third had approximately 1,263 branches across its footprint in 12 states, including Florida, Georgia, Illinois, Indiana, Kentucky, Michigan, Missouri, North Carolina, Ohio, Pennsylvania, Tennessee, and West Virginia. During the evaluation period, Fifth Third exited both the St. Louis, Missouri and Pittsburgh, Pennsylvania markets; the branches were sold in these assessment areas by January 2016 and April 2016, respectively.

Nonbank Subsidiaries

Fifth Third requested to include lending by its nonbank subsidiaries in this performance evaluation. These subsidiaries include Fifth Third Mortgage Company, which processes and funds most purchase money and refinance mortgage lending for the corporation and services all mortgage lending for the corporation, and Fifth Third Mortgage MI LLC, which processes and funds purchase money and refinance mortgage lending primarily in Michigan.

Fifth Third Community Development Corporation (CDC) is a holding company nonbank subsidiary organized primarily for making investments in small business investment companies, other qualifying business ventures, and affordable housing tax credit deals. As of September 30, 2016, the CDC had assets of \$1.7 billion. The CDC is a primary contributor to Fifth Third's investment test under CRA.

Business Lines

Fifth Third operates with three primary business lines. Consumer banking consists of branch banking, consumer lending, and real estate lending. Commercial banking provides loans, deposits, cash management, capital markets, leasing, and financing to small and large companies. The Investment Advisor area is comprised of five businesses:

- Private banking – provides financial services to affluent clients;
- Fifth Third Securities – offers retirement, investment, and brokerage services;
- Fifth Third Insurance – sells insurance products and services;
- ClearArc Capital, Inc. – provides asset management services to institutional clients; and,
- Fifth Third Institutional Services – offers consulting, investment, and recordkeeping services for profit and non-profit institutions.

Assessment Areas

The following summarizes Fifth Third's assessment areas evaluated as part of this CRA performance evaluation:

Multi-state

- Chicago-Naperville IL-IN-WI Combined Statistical Area (CSA) #176, consisting of the following three Metropolitan Statistical Areas (MSAs):
 - Chicago-Naperville-Elgin IL-IN-WI MSA #16980, consisting of the following four Metropolitan Divisions (MDs):
 - Chicago-Naperville-Arlington Heights IL MD #16974, consisting of Cook, DuPage, Kendall, McHenry, and Will counties (excluding Grundy County)
 - Elgin IL MD #20994, consisting of DeKalb and Kane counties
 - Gary IN MD #23844, consisting of Jasper, Lake, and Porter counties (excluding Newton County)
 - Lake County-Kenosha County IL-WI MD #29404, consisting of Lake County in Illinois (excluding Kenosha County in Wisconsin)
 - Kankakee IL MSA #28100, consisting of Kankakee County
 - Michigan City-LaPorte IN MSA #33140, consisting of LaPorte County
- Cincinnati OH-KY-IN MSA #17140, consisting of Brown, Butler, Clermont, Hamilton, and Warren counties in Ohio; Dearborn and Ohio counties in Indiana; and Boone, Campbell, Gallatin, Grant, Kenton, and Pendleton counties in Kentucky (excluding Union County in Indiana and Bracken County in Kentucky)
- Evansville IN-KY MSA #21780, consisting of Posey, Vanderburgh, and Warrick counties in Indiana and Henderson County in Kentucky
- Huntington-Ashland WV-KY-OH MSA #26580, consisting of Boyd and Greenup counties in Kentucky, Lawrence County in Ohio, and Cabell, Lincoln, Putnam, and Wayne counties in West Virginia
- Louisville/Jefferson County KY-IN MSA #31140, consisting of Clark, Floyd, and Harrison counties in Indiana and Bullitt, Jefferson, Oldham, and Shelby counties in Kentucky (excluding Scott and Washington counties in Indiana and Henry, Spencer, and Trimble counties in Kentucky)
- South Bend-Elkhart-Mishawaka IN-MI CSA #515, consisting of the following three MSAs:
 - Elkhart-Goshen IN MSA #21140, consisting of Elkhart County
 - Niles-Benton Harbor MI MSA #35660, consisting of Berrien County
 - South Bend-Mishawaka IN-MI MSA #43780, consisting of St. Joseph County in Indiana and Cass County in Michigan

Florida

- Cape Coral-Fort Myers FL MSA #15980, consisting of Lee County
- Jacksonville FL MSA #27260, consisting of Clay, Duval, and St. Johns counties (excluding Baker and Nassau counties)
- Lakeland-Winter Haven FL MSA #29460, consisting of Polk County
- Miami-Fort Lauderdale-West Palm Beach FL MSA #33100, consisting of the following two MDs (excluding Miami-Dade County¹):
 - Fort Lauderdale-Pompano Beach-Deerfield Beach FL MD #22744, consisting of Broward County
 - West Palm Beach-Boca Raton-Delray Beach FL MD #48424, consisting of Palm Beach County
- Naples-Immokalee-Marco Island FL MSA #34940, consisting of Collier County
- Orlando-Deltona-Daytona Beach FL CSA #422, consisting of the following two MSAs:
 - Deltona-Daytona Beach-Ormond Beach FL MSA #19660, consisting of Volusia County (excluding Flagler County)
 - Orlando-Kissimmee-Sanford FL MSA #36740, consisting of Lake, Orange, Osceola, and Seminole counties
- North Port-Sarasota FL CSA #412, consisting of the following two MSAs:
 - North Port-Bradenton-Sarasota FL MSA #35840, consisting of Manatee and Sarasota counties
 - Punta Gorda FL MSA #39460, consisting of Charlotte County
- Tampa-St. Petersburg-Clearwater FL MSA #45300, consisting of Hillsborough, Pasco, and Pinellas counties (excluding Hernando County)

Georgia

- Atlanta-Sandy Springs-Roswell GA MSA #12060, consisting of Clayton, Cobb, DeKalb, Douglas, Forsyth, Fulton, Gwinnett, Paulding, Rockdale, and Walton counties (excluding Barrow, Bartow, Butts, Cherokee, Coweta, Dawson, Fayette, Haralson, Heard, Henry, Jasper, Lamar, Morgan, Meriwether, Newton, Pickens, Pike, and Spalding counties)
- Augusta-Richmond County GA-SC MSA #12260, consisting of Columbia and Richmond Counties in Georgia (excluding Burke, Lincoln, and McDuffie counties in Georgia and Aiken and Edgefield counties in South Carolina)

Illinois

- Carbondale-Marion IL MSA #16060, consisting of Williamson County (excluding Jackson County)

¹ Miami-Miami Beach-Kendall FL MD #33124

- Non-metropolitan Northern Illinois, consisting of Lee, Stephenson, and Whiteside counties
- Non-metropolitan Southern Illinois, consisting of Effingham and Jefferson counties
- Rockford IL MSA #40420, consisting of Boone and Winnebago counties

Indiana

- Bloomington IN MSA #14020, consisting of Monroe and Owen counties
- Fort Wayne IN MSA #23060, consisting of Allen County (excluding Wells and Whitley counties)
- Indianapolis-Carmel-Muncie IN CSA #294, consisting of following two MSAs:
 - Columbus IN MSA #18020, which encompasses all of Bartholomew County
 - Indianapolis-Carmel-Anderson IN MSA #26900, consisting of Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Putnam, and Shelby counties
- Lafayette-W. Lafayette IN MSA #29200, consisting of Benton and Tippecanoe counties (excluding Carroll County)
- Non-metropolitan Northern Indiana, consisting of Adams and Steuben counties
- Non-metropolitan Southern Indiana, consisting of Decatur, Dubois, Fayette, Franklin, Gibson, Knox, Orange, Parke, Perry, Pike, Ripley, Rush, and Spencer counties
- Terre Haute IN MSA #45460, consisting of Clay, Sullivan, Vermillion, and Vigo counties

Kentucky

- Lexington-Fayette KY MSA #30460, consisting of Bourbon, Clark, Fayette, Jessamine, Scott, and Woodford counties
- Non-metropolitan Eastern Kentucky, consisting of Anderson, Franklin, Harrison, Madison, and Mercer counties
- Non-metropolitan Western Kentucky, consisting of Crittenden, Hopkins, Lyon, and Union counties
- Owensboro KY MSA #36980, consisting of Daviess County (excluding Hancock and McLean Counties)

Michigan

- Battle Creek MI MSA #12980, consisting of Calhoun County
- Detroit-Warren-Ann Arbor MI CSA #220, consisting of the following four MSAs:
 - Ann Arbor MI MSA #11460, consisting of Washtenaw County
 - Detroit-Warren-Dearborn MI MSA #19820, which encompasses the following two MDs:
 - Detroit-Livonia-Dearborn MI MD #19804, consisting of Wayne County

- Warren-Farmington Hills-Troy MI MD #47644, consisting of Livingston, Macomb, Oakland, and St. Clair Counties (excluding Lapeer County)
- Flint MI MSA #22420, consisting of Genesee County
- Monroe MI MSA #33780, consisting of Monroe County
- Grand Rapids-Wyoming-Muskegon MI CSA #266, consisting of the following two MSAs:
 - Grand Rapids-Wyoming MI MSA #24340, which encompasses Barry, Kent, Montcalm, and Ottawa counties
 - Muskegon MI MSA #34740, consisting of Muskegon County
- Jackson MI MSA #27100, consisting of Jackson County
- Kalamazoo-Portage MI MSA #28020, consisting of Kalamazoo and Van Buren counties
- Lansing-East Lansing MI MSA #29620, consisting of Clinton, Eaton, and Ingham counties
- Non-metropolitan Northern Michigan, consisting of Antrim, Benzie, Charlevoix, Clare, Crawford, Emmet, Grand Traverse, Isabella, Kalkaska, Lake, Leelanau, Mason, Mecosta, Missaukee, Oceana, Oscoda, Otsego, Roscommon, and Wexford counties
- Non-metropolitan Southern Michigan, consisting of Allegan, Hillsdale, Ionia, Newaygo, St. Joseph, and Shiawassee counties
- Saginaw-Midland-Bay City MI CSA #474, consisting of the following three MSAs:
 - Bay City MI MSA #13020, consisting of Bay County
 - Midland MI MSA #33220, consisting of Midland County
 - Saginaw MI MSA #40980, consisting of Saginaw County

Missouri

- St. Louis MO-IL MSA #41180, consisting of St. Louis City, St. Louis County, and St. Charles County in Missouri (excluding Bond, Calhoun, Clinton, Jersey, Macoupin, Madison, Monroe, and St. Clair counties in Illinois and Franklin, Jefferson, Lincoln, and Warren Counties in Missouri)

North Carolina

- Asheville NC MSA #11700, consisting of Buncombe County (excluding Haywood, Henderson, and Madison counties)
- Charlotte-Gastonia-Concord NC-SC MSA #16740, consisting of Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, and Union counties in North Carolina (excluding Chester, Lancaster, and York counties in South Carolina)
- Hickory-Lenoir-Morganton NC MSA #25860, consisting of Catawba County (excluding Alexander, Burke, and Caldwell counties)

- Non-metropolitan Western North Carolina, consisting of Alleghany, Ashe, Avery, Cleveland, Lincoln, McDowell, Rutherford, Transylvania, and Watauga counties
- Raleigh-Cary NC MSA #39580, consisting of Wake County (excluding Franklin and Johnston Counties)

Ohio

- Cleveland-Akron-Canton OH CSA #184, consisting of the following three MSAs:
 - Akron OH MSA #10420, consisting of Portage and Summit counties
 - Canton-Massillon OH MSA #15940, consisting of Stark County (excluding Carroll County)
 - Cleveland-Elyria OH MSA #17460, consisting of Cuyahoga, Geauga, Lake, Lorain, and Medina counties
- Columbus OH MSA #18140, consisting of Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, and Union counties (excluding Hocking, Morrow, and Perry counties)
- Dayton-Springfield-Sidney OH CSA #212, consisting of the following two MSAs:
 - Dayton OH MSA #19380, consisting of Greene, Miami, and Montgomery counties
 - Springfield OH MSA #44220, consisting of Clark County
- Lima OH MSA #30620, consisting of Allen County
- Non-metropolitan Northwestern Ohio, consisting of Auglaize, Champaign, Darke, Defiance, Erie, Hancock, Huron, Logan, Marion, Ottawa, Sandusky, Seneca, Shelby, and Williams counties
- Non-metropolitan Southwestern Ohio, consisting of Adams, Athens, Clinton, Fayette, Highland, Pike, Preble, Ross, and Scioto counties
- Toledo OH MSA #45780, consisting of Fulton, Lucas, and Wood counties

Pennsylvania

- Pittsburgh PA MSA #38300, consisting of Allegheny County and portions of Washington and Westmoreland counties (excluding Armstrong, Beaver, Butler, and Fayette counties)

Tennessee

- Knoxville TN MSA #28940, consisting of Knox County (excluding Anderson, Blount, Campbell, Grainger, Loudon, Morgan, Roane, and Union counties)
- Nashville-Davidson-Murfreesboro-Franklin TN MSA #34980, consisting of Davidson, Rutherford, Sumner, Williamson, and Wilson counties (excluding Cannon, Cheatham, Dickson, Hickman, Macon, Maury, Robertson, Smith, and Trousdale counties)

West Virginia

- Charleston WV MSA #16620, consisting of Kanawha County (excluding Boone and Clay counties)

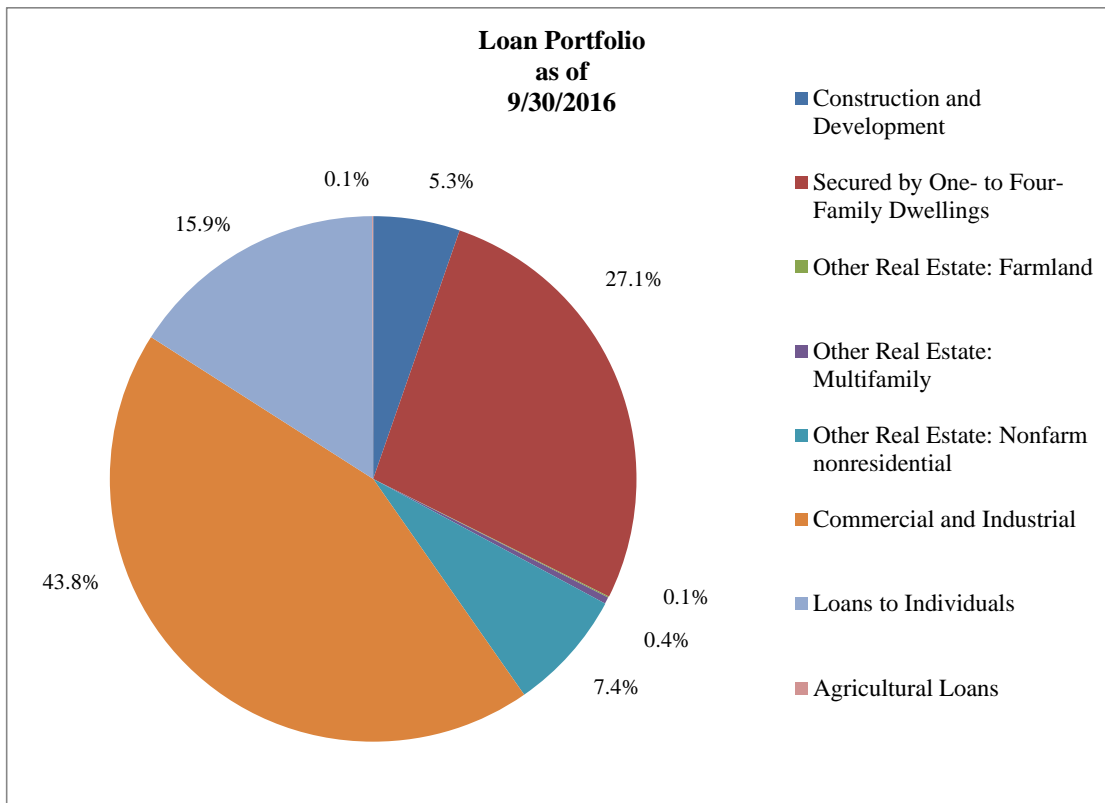
Financial Overview

Fifth Third offers a wide variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in its assessment areas. Consumer loan products include auto loans, personal lines of credit, installment loans, home equity loans, mortgage loans, and credit cards. Fifth Third also offers construction lending and commercial loan products, including loans and lines of credit, business credit cards, and Small Business Administration (SBA) loans.

The following charts display Fifth Third’s loan portfolio composition as of September 30, 2016.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	4,465,600	5.3%	3,666,825	4.4%	2,565,345	3.2%
Secured by One- to Four- Family Dwellin	22,719,047	27.1%	22,027,731	26.5%	21,815,424	26.8%
Other Real Estate: Farmland	60,397	0.1%	57,637	0.1%	64,461	0.1%
Other Real Estate: Multifamily	344,062	0.4%	337,490	0.4%	338,622	0.4%
Other Real Estate: Nonfarm nonresidenti	6,248,301	7.4%	6,352,442	7.6%	6,784,396	8.3%
Commercial and Industrial	36,741,176	43.8%	36,010,773	43.3%	34,424,958	42.4%
Loans to Individuals	13,321,924	15.9%	14,680,522	17.6%	15,150,132	18.6%
Agricultural Loans	51,433	0.1%	84,606	0.1%	109,590	0.1%
Total	\$83,951,940	100.00%	\$83,218,026	100.00%	\$81,252,928	100.00%

* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



Fifth Third’s loan portfolio includes products that provide flexible repayment terms to help meet the credit needs of low- and moderate-income borrowers and small businesses. Fifth Third also originates Federal Housing Administration (FHA) loans for home purchase and refinances and works with many state and local agencies that offer first-time homebuyer mortgages and/or down payment assistance for low- and moderate-income borrowers. Finally, Fifth Third developed a department to better align CRA and the CDC to achieve a comprehensive strategy for CRA lending performance and community connectivity.

For small businesses, Fifth Third made changes to streamline the financial document submission process to reduce duplicate requests to customers and reduce time from application submission to decision. Fifth Third is an active SBA lender. The SBA ranked Fifth Third the 36th highest volume lender nationwide by dollar volume for its 7(a) loan program through the fourth quarter of fiscal year 2016.² The 7(a) program is the SBA’s most common loan program, offering funds to small businesses with flexible repayment terms for multiple purposes. Fifth Third improved the SBAExpress underwriting process in order to reduce the application to funding time by half and updated underwriting guidelines for the business line of credit on deals less than \$100,000 to improve the number approved and remove the inconvenience of closing. Several community contacts expressed the need to streamline the small business application process and increase access to small-dollar loans up to \$100,000.

² <https://www.sba.gov/lenders-top-100>

Fifth Third's investment portfolio as of September 30, 2016, was \$34.2 billion, which represented 24.3% of total assets. Investments in U.S. Treasuries and Agency Securities accounted for 47.0% of investments, while interest-bearing bank balances comprised 8.8% of investments. The remaining 44.2% of total investments consisted of municipal securities, foreign debt securities, trading account assets, and all other securities.

No known legal impediments exist that would restrain Fifth Third from meeting the credit needs of its assessment areas.

Previous Public Evaluation

Fifth Third received a "Needs to Improve" rating as a result of the January 6, 2014 CRA Performance Evaluation completed by the Federal Reserve Bank of Cleveland. The lending test was rated "High Satisfactory," the investment test was rated "Outstanding," and the service test was rated "High Satisfactory." However, the rating was adjusted downward based on evidence of discriminatory and other illegal credit practices noted during the evaluation period and considered in assigning the overall rating.

SCOPE OF EXAMINATION

For the purpose of this evaluation, Fifth Third had a total of 57 CRA assessment areas across 12 states. Fifth Third is an interstate bank; therefore, the scope of this evaluation includes a full-scope review of at least one assessment area in each state where Fifth Third has branches. Each assessment area was reviewed for lending, investment, and service performance utilizing either full- or limited-scope examination procedures. Twenty-two assessment areas were chosen for full-scope review, including six multistate MSAs. Criteria used to select full-scope assessment areas include the volume of HMDA-reportable and CRA small business lending by number of loans and dollar amount as a percentage of statewide lending activity, deposit market share, number of branches, percentage of deposits, amount of community development activity, and other non-financial considerations. Full-scope assessment areas represent the most active markets in each state based on these criteria. Where comparable activity was noted, full-scope assessment areas were considered that were not selected at the previous examination.

The following assessment areas received full-scope reviews:

- **Multi-state(s):** Chicago-Naperville, Cincinnati, Evansville, Huntington-Ashland, Louisville-Jefferson County, and South Bend-Elkhart-Mishawaka
- **Florida:** Orlando-Deltona-Daytona Beach and Tampa-St. Petersburg-Clearwater
- **Georgia:** Atlanta-Sandy Springs-Roswell
- **Illinois:** Non-metropolitan area – Southern IL
- **Indiana:** Indianapolis-Carmel-Muncie and Non-metropolitan Southern IN
- **Kentucky:** Lexington-Fayette
- **Michigan:** Detroit-Warren-Ann Arbor and Grand Rapids-Wyoming-Muskegon
- **Missouri:** St. Louis
- **North Carolina:** Charlotte-Concord-Gastonia
- **Ohio:** Cleveland-Akron-Canton and Columbus
- **Pennsylvania:** Pittsburgh
- **Tennessee:** Nashville-Davidson-Murfreesboro-Franklin
- **West Virginia:** Charleston

Limited-scope reviews were completed for the remaining assessment areas.

Michigan, Ohio, and the Cincinnati and Chicago-Naperville multi-state assessment areas had the highest number of branches and largest concentration of lending and deposit activity. Together, these four areas represent more than half of Fifth Third banking centers, ATMs, lending activity, and market share of deposits in this evaluation period. Further, Fifth Third was among the ten largest institutions in each of these markets. As a result, performance in these areas received the greatest weight in determining the overall rating for each test and the institution overall.

Examination Evaluation Period and Products Reviewed

This evaluation included an analysis of HMDA-reportable loans and CRA-reportable small business loans originated between January 1, 2014 and June 30, 2016. HMDA-reportable home purchase, home refinance, and home improvement loans and CRA-reportable small business loans were the major lending products reviewed in this evaluation. HMDA-reportable multi-family loans and CRA-reportable small farm loans were not considered in the overall evaluation due to low activity levels. Fifth Third elected to include loan activity originated through affiliated mortgage companies and in its overall lending analysis, but only loans originated by these affiliates within its assessment areas were included. Other types of consumer loans that can be reported optionally were not included in the analysis.

Community development loans and investments funded between January 1, 2014 and June 30, 2016 were reviewed as part of the lending and investment tests, respectively. Investments funded by its affiliate CDC, the Foundation, and regional banking centers were included in the analysis. Also, investments with community development as a primary purpose that were funded during a prior evaluation period, but still outstanding as of June 30, 2016, were also considered. Finally, community development services that occurred during the evaluation period were included in the service test evaluation.

A summary of the scope of the examination is listed in Appendix A.

Examination Analysis

This evaluation of Fifth Third's lending record in individual assessment areas includes the utilization of and comparison to demographic characteristics. The primary sources for demographic data are the 2010 U.S. Census and 2015 Dun & Bradstreet data. Demographic characteristics of a particular assessment area are useful in analyzing a financial institution's lending record, since they provide a means of estimating loan demand and identifying lending opportunities. To understand small business demand, self-reported data on revenue size and geographic location from business entities are collected and published by Dun & Bradstreet. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with information about housing and economic conditions, is used to establish performance context and evaluate Fifth Third accordingly.

Loans are evaluated to determine the lending activity inside and outside Fifth Third's assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA loans is assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses within each geographic income category.

The distribution of HMDA loans by borrower income is assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) to the percentage of families in each income category. The distribution of small business loans by borrower income is assessed by comparing the percentage of loans made to businesses in each revenue category (less than or equal to \$1 million and greater than \$1 million) to the percentage of total businesses in each revenue category.

Fifth Third's lending performance was also compared to the performance of aggregate lenders in 2014 and 2015; due to the timing of this evaluation, only 2014 and 2015 aggregate lending data was available. Aggregate lenders include all lenders required to report HMDA-reportable and CRA small business lending data within the respective assessment areas. Lending market share is also discussed to give a better understanding of where Fifth Third ranks within the respective areas. For retail services, Fifth Third's branch distribution analysis was conducted using data as of June 30, 2016.

Changes in the median family income level of branch locations that resulted from changes in census data were considered as part of this analysis. Community development activities were reviewed to determine whether they have community development as a primary purpose and meet the geographic requirements of CRA. The eligibility of a loan, investment, or service is based on demographic information available to Fifth Third at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

In order to better understand assessment area community development and credit needs, several sources were utilized, including publicly accessible data, information submitted by Fifth Third, and plans that describe the community development environment in local markets. Community contact interviews were conducted with representatives from affordable housing, economic development, social service, community revitalization, and governmental organizations operating inside Fifth Third's assessment areas. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which Fifth Third operates and gather information on its performance.

In most of Fifth Third's markets, community contacts noted that affordable housing was the most significant concern. In urban communities, homeownership is unattainable for many low-wage workers due to significant housing price increases and many more low- and moderate-income renters are paying a significantly higher share of their income for rent. In rural communities, substandard housing is a significant concern. Community contacts also identified the need for more technical assistance and capital, particularly in the form of small-dollar loans up to \$100,000 for small businesses.

Finally, a number of the community contacts stated that low- and moderate-income families and communities are still struggling financially and there is an ongoing need for programs to address financial stability and financial education. Contacts in each market identified opportunities in these key areas for bank participation. More detailed information obtained from individual community contacts is included in the “Description of the Institution’s Operations” sections for each full-scope assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Fifth Third's lending test performance is rated "Outstanding." Lending performance is excellent in the Chicago-Naperville and Cincinnati multi-state assessment areas and in Florida, Indiana, Michigan, and Ohio. Lending performance is good in the Evansville, Louisville-Jefferson County, and South Bend-Elkhart-Mishawaka multi-state assessment areas and in Georgia, Kentucky, Missouri, North Carolina, Pennsylvania, Tennessee, and West Virginia. Lending performance is adequate in the Huntington-Ashland multi-state assessment area and in Illinois. The geographic distribution of loans throughout the assessment areas is excellent. The penetration of loans among borrowers of different income levels is excellent, and the distribution of loans to businesses of different sizes is good. Additionally, Fifth Third made an excellent level of community development loans. Community development lending was excellent in the Chicago-Naperville and Cincinnati multi-state assessment areas and in Florida, Indiana, and Michigan; good in the Louisville-Jefferson County and South Bend-Elkhart-Mishawaka multi-state assessment areas and in Georgia, Missouri, North Carolina, Ohio, Pennsylvania, and Tennessee; adequate in the Evansville multi-state assessment area and in Illinois, Kentucky, and West Virginia; and poor in the Huntington-Ashland multi-state assessment area. As discussed earlier, Fifth Third's performance in Michigan, Ohio, and the Cincinnati and Chicago-Naperville multi-state assessment areas had the greatest impact on its overall lending performance.

While Fifth Third's lending distribution by geography and borrower income is referenced throughout this report, detailed information about HMDA-reportable and CRA small business loans can be found in Appendices E and F for full- and limited-scope assessment areas, respectively. In some assessment areas and product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance and the reader should refer to the appendices for specific data.

Lending Activity

Fifth Third's lending activity reflects an excellent responsiveness to the credit needs of its assessment areas, taking into consideration Fifth Third's strategic objectives, economic conditions, and competitive factors.

While no substantial concentration of loans was identified in excluded counties within Fifth Third's delineated footprint, there were some small concentrations of lending noted in a few assessment areas. In addition to lending, Fifth Third modified existing loans to borrowers under the Home Affordable Modification Program (HAMP) and other real-estate secured modification programs. For example, the 53 Select product offers current Fifth Third borrowers the opportunity to refinance a maturing balloon into an amortizing refinance product. This product may benefit borrowers who do not qualify for another mortgage product due to insufficient equity. Fifth Third provided data about the number and dollar amount of loan modifications made to low- and moderate-income individuals and in low- and moderate-income geographies.

When there was sufficient volume to conduct a meaningful analysis, modified loans were evaluated in order to determine Fifth Third’s ability to assist low- and moderate-income homeowners and homeowners in low- and moderate-income geographies avoid foreclosure.

The following table summarizes Fifth Third’s lending activity for 2014, 2015, and the first half of 2016. As the data shows, Fifth Third originated more HMDA-related loans than small business loans by number and dollar amount. Due to the higher percentage of loans by number and dollar amount, HMDA-related lending typically had a greater impact on lending ratings. Lending was considered responsive to credit needs in all states and commensurate with deposits in each state and no conspicuous gaps in lending activity by income category were identified. Detailed information about lending activity can be found in each of the multi-state and state sections of this report.

Summary of Lending Activity				
Loan Type	#	%	\$(000)	%
Home Improvement	4,658		336,995	
Home Purchase	52,874		9,252,623	
Multi-Family	69		150,645	
Refinancing	46,694		7,344,471	
Total HMDA related	104,295	72.4	17,084,734	76.6
Small Business	39,184		5,168,689	
Total Small Business related	39,184	27.2	5,168,689	23.2
Small Farm	509		48,796	
Total Small Farm related	509	0.4	48,796	0.2
TOTAL LOANS	143,988	100	22,302,219	100

Note: Affiliate loans include only loans originated or purchased within Fifth Third’s assessment areas.

Assessment Area Concentration

The following table shows the number and percentage of loans located inside and outside of Fifth Third’s assessment areas by loan type. As indicated below, Fifth Third originated a substantial majority of the total loans to borrowers and businesses located within its assessment areas. Originated affiliate loans are not included in the table below, but are considered as part of the lending test evaluation.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	3,629	95.6	\$194,798	95.8	169	4.4	\$8,557	4.2
Home Purchase - Conventional	133	93.7	\$17,924	80.2	9	6.3	\$4,433	19.8
Multi-Family Housing	22	84.6	\$143,816	73.2	4	15.4	\$52,610	26.8
Refinancing	10,505	96.3	\$920,267	96.0	403	3.7	\$37,888	4.0
Total HMDA related	14,289	96.1	\$1,276,805	92.5	585	3.9	\$103,488	7.5
Small Business	39,184	97.0	\$5,168,689	94.9	1,204	3.0	\$278,559	5.1
Total Small Bus. related	39,184	97.0	\$5,168,689	94.9	1,204	3.0	\$278,559	5.1
Small Farm	509	90.9	\$48,841	90.0	51	9.1	\$5,435	10.0
Total Small Farm related	509	90.9	\$48,841	90.0	51	9.1	\$5,435	10.0
TOTAL LOANS	53,982	96.7	\$6,494,335	94.4	1,840	3.3	\$387,482	5.6

Note: Affiliate loans not included

Fifth Third originated 96.1% of HMDA-related loans by volume and 92.5% by dollar amount and 97.0% of small business loans by volume and 94.9% by dollar amount to borrowers and businesses located inside its assessment areas. This indicates Fifth Third's willingness to originate loans that meet the credit needs of its delineated assessment areas.

Distribution of Lending by Geography, Borrower Income, and Business Revenue Size

The overall geographic distribution of HMDA and small business lending reflects an excellent penetration in low- and moderate-income geographies. Of the six multi-state and 16 full-scope assessment areas, 11 are considered excellent, ten are considered good, and one is considered adequate.

The overall distribution of loans among borrowers of different income levels is excellent and good to businesses of different sizes. HMDA-reportable lending to borrowers of different income levels is excellent. Of the six multi-state and 16 full-scope assessment areas, 14 are considered excellent, six are considered good, and two are considered adequate. Small business lending to businesses of different revenue sizes is good. Of the six multi-state and 16 full-scope assessment areas, four are considered excellent, 12 are considered good, and six are considered adequate.

HMDA-reportable and small business lending analyses within each assessment area are discussed in detail later in this report.

Community Development Loans

Fifth Third made an excellent level of community development loans during the evaluation period. Since the previous examination, Fifth Third originated or renewed 949 loans totaling approximately \$6.0 billion. This volume of community development lending is considered excellent given the size and presence of the institution in its assessment areas and community development lending opportunities.

As noted earlier, performance in Michigan and Ohio and in the Cincinnati and Chicago-Naperville multi-state assessment areas had the greatest impact on the assessment. Responsiveness to community development needs at the assessment area level is also excellent. The community development loans originated or renewed during the evaluation period were for a variety of purposes, including affordable housing for low- and moderate-income individuals, community services targeted to low- and moderate-income individuals, the promotion of economic development by financing small businesses that resulted in permanent job creation and/or retention, and the revitalization/stabilization of targeted low- and moderate-income census tracts or other qualified geographies. The following table reflects the total number community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	\$
Revitalization & Stabilization	473	\$3,669,590,982
Economic Development	258	\$1,365,281,492
Community Services	161	\$309,539,500
Affordable Housing	57	\$648,980,512
Total	949	\$5,993,392,486

Nearly 26.0% of Fifth Third’s community development lending in the evaluation period took place in the Cincinnati and Chicago-Naperville multi-state assessment areas (representing \$996.4 million and \$586.3 million, respectively). Fifth Third’s performance was considered excellent in these multi-states considering its size and presence in these areas, performance in the full-scope assessment areas, competition, and community development lending opportunities. The largest concentration of community development loans by state was in Michigan with \$1.2 billion, accounting for 19.9% of bank-wide community development lending. Performance in Michigan was considered excellent. The second-largest concentration of community development loans by state was in Ohio with \$823.9 million, accounting for 13.8% of bank-wide community development lending. Performance in Ohio was considered good. The remaining ten states and four multi-state assessment areas accounted for \$2.4 billion (40.3%) in community development loans.

Finally, consideration was given to community development loans without a purpose, mandate, or function of serving any of Fifth Third’s delineated assessment areas. Fifth Third made three qualified community development loans totaling \$8.5 million. These loans supported economic development and revitalization projects that benefited counties within the state, but outside of Fifth Third’s delineated assessment areas within Pennsylvania and Tennessee.

More information on individual community development loans can be found in the full-scope assessment area sections of this report.

Flexible Lending Programs

Fifth Third offers and participates in several flexible lending programs to provide borrowers with various options to obtain mortgage loans. These programs include government-guaranteed loans through the FHA, Veterans Administration (VA), and United States Department of Agriculture (USDA).

Other flexible lending programs include state loan programs, Fifth Third-specific products, and down payment assistance. Product offerings to promote low- and moderate-income lending include, but are not limited to, the following: no minimum FICO³ scores for FHA streamline refinances, 97.0% financing and flexible down payment sources for underserved markets, and down payment and closing cost assistance. Fifth Third provided data on the number and dollar amount of loans made through these programs to low- and moderate-income individuals and in low- and moderate-income geographies. In 2015, Fifth Third launched the Community Reinvestment Mortgage Special, whereby all lender fees are waived for borrowers purchasing properties located in a low-income tract. Fifth Third's use of these programs was evaluated when there was sufficient volume necessary to conduct a meaningful analysis. Overall, Fifth Third made extensive use of flexible lending practices in serving low- and moderate-income needs within its assessment areas.

More information on individual flexible lending programs can be found in the full-scope assessment area sections of this report.

Investment Test

Fifth Third made an "Outstanding" level of qualified community development investments during the evaluation period. Fifth Third's performance was excellent in all six multi-state assessment areas and in Florida, Georgia, Indiana, Michigan, North Carolina, Ohio, Pennsylvania, and Tennessee. Investment performance was good in Illinois, Kentucky, and West Virginia; and adequate in Missouri.

Fifth Third had the highest volume of qualified community development investments in the Cincinnati and Chicago-Naperville multi-state assessment areas, followed by Michigan, Florida, Ohio, Indiana, North Carolina, Georgia, Evansville multi-state assessment area, Louisville-Jefferson County multi-state assessment area, Tennessee, South Bend-Elkhart-Mishawaka multi-state assessment area, Pennsylvania, Kentucky, Missouri, Huntington-Ashland multi-state assessment area, Illinois, and West Virginia.

Community development investments, grants, and charitable contributions are made from three sources: the CDC, Fifth Third Foundation (Foundation), and the Bank. The CDC is a nonbank subsidiary of Fifth Third Bancorp organized primarily for making venture capital investments in small business investment corporations (SBICs), other qualifying business ventures, and affordable housing tax credit deals. The CDC is the primary contributor of investments for Fifth Third and responsible for 53.0% of total qualified investments made during the evaluation period. The Foundation is a charitable trust funded by Fifth Third Bancorp and managed by Fifth Third Investment Advisors to provide funding for community development and other charitable purposes throughout Fifth Third's assessment areas.

³ FICO: Fair, Isaac and Company (data analytics company that provided credit scoring services or a measure of consumer credit risk)

Qualified investments obtained during the current evaluation period totaled approximately \$980.6 million (as shown in the table below). The majority of Fifth Third’s qualified investments by dollar and number supported affordable housing through Low-Income Housing Tax Credits (LIHTCs), Historic Tax Credits (HTCs), New Markets Tax Credits (NMTCs), and Small Business Investment Companies (SBICs). Completed tax credit housing projects provide valuable affordable housing units and wraparound services and/or amenities for veterans, the elderly, and low- to moderate-income families and individuals. SBIC investments provide needed capital for business growth. Many of Fifth Third’s tax credit projects, including HTC and NMTC, have sustained or been the catalyst for neighborhood revitalization projects. To a lesser extent, Fifth Third also makes investments in mortgage-backed securities through its Treasury department.

Qualified investments also took the form of contributions, grants, and donations (approximately 2.1% of total investments). Fifth Third partners with a wide array of organizations and non-profits to fund outreach activities, educational programs, and initiatives aimed at responding to community needs, improving the financial stability of individuals and families, and revitalizing underserved communities. These contributions help to support a multitude of priority needs such as youth education, homelessness, affordable housing, small business development, neighborhood development, financial services and education, and community services targeting low- and moderate-income individuals and communities.

Purpose of CD Investment	#	\$
Affordable Housing	2,721	\$931,983,601
Community Services	2,237	\$12,860,857
Economic Development	660	\$4,857,782
Revitalization & Stabilization	97	\$30,843,482
Total	5,715	\$980,545,721

From prior periods, Fifth Third holds outstanding LIHTC equity investments that have a current book value of approximately \$643.1 million. Finally, consideration was given to investments without a purpose, mandate, or function of serving any of Fifth Third’s delineated assessment areas. Fifth Third made \$31.7 million in qualified investments, typically in the form of LIHTCs that benefited counties within the state, but outside Fifth Third’s delineated assessment areas within Florida, Illinois, Indiana, Kentucky, North Carolina, and Ohio.

More information detailing specific investments and contributions can be found in the full-scope assessment area sections of this report.

Service Test

Fifth Third’s performance under the service test is rated “High Satisfactory.” Fifth Third had excellent performance the Huntington-Ashland multi-state assessment area and in Indiana, Michigan, North Carolina, Tennessee, and West Virginia. Service test performance is good in the Chicago-Naperville, Cincinnati, Evansville, Louisville-Jefferson County, and South Bend-Elkhart-Mishawaka multi-state assessment areas and in Florida, Georgia, Kentucky, and Ohio. Performance is adequate in Illinois, Missouri, and Pennsylvania.

Retail Services

Retail delivery systems are accessible to geographies and individuals of different income levels. Retail services are excellent in the South Bend-Elkhart-Mishawaka multi-state assessment area and West Virginia. Retail services are good in the Cincinnati, Evansville, Huntington-Ashland, and Louisville-Jefferson County multi-state assessment areas and in Florida, Georgia, Indiana, Kentucky, Michigan, North Carolina, Pennsylvania, and Tennessee. Finally, retail services are adequate in the Chicago-Naperville multi-state assessment area and in Illinois, Missouri, and Ohio.

Fifth Third has a total of 1,263 branches and 1,788 full-service ATMs. During the evaluation period, Fifth Third opened 15 new branches and closed 112 branches, including opening six branches in moderate-income tracts and closing five branches in low-income and 20 branches in moderate-income tracts. A specific listing of branches opened or closed during the evaluation period may be obtained by accessing Fifth Third’s CRA public file. Overall, Fifth Third’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or for low- and moderate-income individuals. The geographic distribution of Fifth Third’s branches as of June 30, 2016 is shown in the table below and is based on 2010 U.S. Census tracts.

Geographic Distribution of Branches & ATMS

Institution

Tract Category	Branches				ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	62	4.9%	0	5	Total	158	6.4%	101	5.6%	57	8.6%	1,433	9.5%	6.4%	4.6%
DTO	2		0	0	SA	158		101		57					
Moderate	261	20.7%	6	20	Total	557	22.7%	378	21.1%	179	27.0%	3,407	22.5%	21.5%	18.1%
DTO	8		0	0	SA	557		378		179					
Middle	515	40.8%	2	35	Total	973	39.7%	728	40.7%	245	37.0%	5,868	38.8%	41.7%	38.0%
DTO	7		0	0	SA	973		728		245					
Upper	421	33.3%	5	51	Total	734	29.9%	573	32.0%	161	24.3%	4,247	28.1%	30.4%	39.0%
DTO	3		0	0	SA	734		573		161					
Unknown	4	0.3%	2	1	Total	29	1.2%	8	0.4%	21	3.2%	180	1.2%	0.0%	0.3%
DTO	0		0	0	SA	29		8		21					
Total	1,263	100.0%	15	112	Total	2451	100.0%	1,788	100.0%	663	100.0%	15,135	100.0%	100.0%	100.0%
DTO	20		0	0	SA	2451		1,788		663					

2015 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total

Banking services do not vary in a way that inconveniences any portions of Fifth Third's assessment areas. Fifth Third banking centers are generally open six days a week, while Fifth Third Bank Marts, located inside certain grocery stores, are open seven days a week. Banking centers generally provide lobby and/or drive-thru services full days Monday through Friday and half days on Saturday. Bank Mart locations provide extended evening and weekend hours. Lastly, Fifth Third has three loan production offices within its delineated footprint located in the Chicago-Naperville-Elgin, Detroit-Warren-Ann Arbor, and Asheville assessment areas. None of these offices is located in low- or moderate-income tracts. Physical banking centers and ATMs represent 15.0% of customer interactions.

Alternative delivery systems primarily consist of digital online and mobile banking (53.com, mobile app, text alerts/notifications). Digital banking represents 75-80% of customer interactions. Call center or voice banking represents 5-10% of customer interactions. Fifth Third provided data showing non-branch sales (internet and call center) have become more meaningful over the evaluation period and that low- and moderate-income customers purchase through non-branch channels more frequently than middle- and upper-income customers.

In an effort to expand access to retail banking services, Fifth Third offers several no- or low-cost deposit products, including regular checking accounts, student checking accounts, goal setter savings accounts, military checking, and Express Banking. Express Banking is designed to meet the financial needs of the underbanked/low- and moderate-income customers by offering immediate access to deposits for purchases and bills; real-time deposits can be made at the branch or via the mobile app. Previous checking closures are accepted and there are no service charges for check writing or check deposits at ATMs, no credit score requirements, no overdraft capabilities, and no minimum balance requirements. Benefits include check cashing, direct deposit, and a Fifth Third debit card.

Community Development Services

Fifth Third is a leader in providing community development services throughout its assessment area with 118,861 hours of community development services supporting various service activities during the evaluation period. Community development services are excellent in the Chicago-Naperville, Cincinnati, and Huntington-Ashland multi-state assessment areas and in Florida, Georgia, Indiana, Michigan, North Carolina, Ohio, Tennessee, and West Virginia. Community development services are good in the Evansville, Louisville-Jefferson County, and South Bend-Elkhart-Mishawaka multi-state assessment areas and in Kentucky. Community development services are adequate in Illinois, Missouri, and Pennsylvania.

The following table provides a breakdown of qualified community development services by hours. Fifth Third employees had extensive involvement with organizations and activities that promote or facilitate community services targeted to low- and moderate-income individuals, economic development by financing small businesses, promote or facilitate affordable housing to low- and moderate-income individuals, and revitalization/stabilization of low- and moderate-income areas.

Purpose of CD Service	# Hours
Community Services	90,943
Economic Development	15,557
Affordable Housing	9,365
Revitalization & Stabilization	2,996
Total	118,861

Fifth Third’s directors, officers, and staff members provided their financial expertise to the community by engaging in activities that promoted or facilitated affordable housing, services for low- and moderate-income individuals, economic development, and revitalization of low- and moderate-income areas.

The variety of community development services, the use of innovative techniques in delivering these services (e.g., E-bus), the impact and responsiveness to community development needs in various individual assessment areas, and the number of organizations and individuals that benefitted were the primary reasons for the overall assessment.

Community development services included, but were not limited to, the following:

E-bus

The institution continued its unique partnership with Freddie Mac and The Community College Foundation to sponsor the Homeownership Mobile, also known as the E-Bus. This bus is equipped with a satellite dish and computers to provide homeownership counseling, financial literacy, credit reports, volunteer income tax assistance (VITA), and lending services primarily to low- and moderate-income geographies and occasionally is used for marketing events, such as a new banking center location or community events. The E-Bus operated in 48 (84.2%) of Fifth Third’s 57 assessment areas during the evaluation period. Communities served were primarily those identified as underserved and/or designated as one of Fifth Third’s partner community organizations. Details regarding the bus’s performance in individual assessment areas can be found in the individual assessment area sections.

Financial Education

Fifth Third continued its involvement in providing financial education programs through partnerships with schools, local organizations, government agencies, businesses, and local churches, including the following programs:

- The “Young Banker’s Club,” targeted to elementary schools located in low- and moderate-income tracts, is a proprietary program that educated students on the importance of financial responsibility over a five- to ten-week curriculum in money management and economics. The program meets local and state educational standards for both mathematics and social studies.
- Homebuyer training was provided either through onsite facilities of Fifth Third or the offices of community organizations conveniently located in or near low- and moderate-income communities.

- General financial education was provided to low- and moderate-income individuals covering topics such as saving money, credit repair, banking basics, banking products, and budgeting.

Board and Committee Memberships

Fifth Third officers and managers provided financial expertise through their involvement with community development organizations throughout the assessment areas by serving as board directors, loan committee members, or treasurers.

Technical Assistance

Fifth Third's employees provided technical assistance to community development and non-profit organizations. Technical assistance included fund raising, accounting and bookkeeping, applying for government grants, volunteer income tax assistance, and reviewing loan application requests.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Pursuant to the Dodd-Frank Act, the Consumer Financial Protection Bureau (CFPB) has examination and enforcement authority over insured depository institutions with total assets of more than \$10 billion, including Fifth Third, when assessing compliance with the requirements of many federal consumer protection laws. The Federal Reserve, however, retains responsibility for certain consumer protection laws and regulations and for CRA. Pursuant to 12 CFR §228.28(c), a state member bank's CRA performance is adversely affected by evidence of discriminatory or other illegal credit practices in any geography by Fifth Third, or in any assessment area by any affiliate whose loans have been considered as part of Fifth Third's lending performance in connection with any type of lending activity described in §228.22(a). As part of the CRA evaluation process for state member banks with assets of more than \$10 billion, the Federal Reserve considers information from the CFPB. The Federal Reserve also may consider information from other federal agencies that have enforcement responsibilities, such as the U.S. Department of Justice and the U.S. Department of Housing and Urban Development. The CRA evaluation and ratings process includes information that is public, as well as information that is made available to the Federal Reserve on a confidential basis.

The Federal Reserve Bank of Cleveland does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to Fifth Third. In determining this institution's overall CRA rating, the Federal Reserve has considered information that was made available on a confidential basis during its consultations and has considered this information in conjunction with the factors in 12 CFR §228.28(c)(2) and thereby determined that an adjustment to the CRA Performance Evaluation rating is not warranted.

MULTI-STATE METROPOLITAN AREA
(Full-scope Review)

CRA RATING for Chicago-Naperville IL-IN-WI CSA #176: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- An excellent responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A leader in making community development loans;
- Use of flexible lending practices in serving assessment area credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that generally has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Chicago-Naperville multistate assessment area. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the “Institution” section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHICAGO-NAPERVILLE IL-IN-WI CSA

The Chicago-Naperville IL-IN-WI CSA consists of the following three MSAs:

- Chicago-Naperville-Elgin IL-IN-WI MSA #16980, consisting of the following four metropolitan divisions (MDs):
 - Chicago-Naperville-Arlington Heights IL MD #16974, consisting of Cook, DuPage, Kendall, McHenry, and Will counties, but excluding Grundy County
 - Elgin IL MD #20994, consisting of DeKalb and Kane counties
 - Gary IN MD #23844, consisting of Jasper, Lake, and Porter counties, but excluding Newton County
 - Lake County-Kenosha County IL-WI MD #29404, consisting of Lake County in Illinois, but excluding Kenosha County in Wisconsin
- Kankakee-Bradley IL MSA #28100, consisting of Kankakee County
- Michigan City-La Porte IN MSA #33140, consisting of LaPorte County

The assessment area is comprised of 280 low-, 515 moderate-, 742 middle-, and 672 upper-income tracts. There are also 14 tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked eighth out of 193 institutions with 3.2% of the deposit market share. JPMorgan Chase Bank had the majority of the market share with 21.8% of deposits. The next three largest institutions, BMO Harris Bank N.A., Bank of America, and the Northern Trust Company, had 13.6%, 10.9%, and 7.7% of the market share, respectively. Deposits in this assessment area accounted for 11.3% of Fifth Third's total deposits. This was the second-highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 12,135 HMDA loans and 5,001 CRA loans, which represented 11.6% and 12.8% of the total loans originated during the evaluation period, respectively. This was the largest HMDA market and second-largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked tenth among 977 HMDA reporters in the assessment area, while Fifth Third ranked 98th. JPMorgan Chase Bank, Wells Fargo Bank, Guaranteed Rate, and U.S. Bank were the top four HMDA lenders in the assessment area. Fifth Third ranked 16th of 225 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express Bank, Chase Bank USA, Citibank, and U.S. Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Fifteen community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an affordable housing organization, indicated there has been an increased need for rental counseling services in the past two years, as foreclosed homeowners are forced to seek rental housing. The time to foreclose on a property has been significantly reduced over the past several years and this organization has seen a decline in the number of foreclosure counseling requests since 2012. This organization works with local community banks involved with first-time homebuyer programs and the contact indicated there continues to be a need for more affordable housing, since most residents are employed in minimum-wage jobs and housing and rental costs are dramatically increasing. The contact stated that banking consolidation has not hindered products and services being offered to low- and moderate-income individuals by the local financial institutions.

The second contact, representing an affordable housing organization, stated the cost of living remains high and there continues to be a need for more affordable housing, as evidenced by the organization's waiting list of individuals wanting to participate in the program. The contact also indicated that HUD is unable to provide the necessary level of funding required by the organization to adequately serve its clientele, but that financial institutions could assist by providing grant money.

The third contact, representing an organization that provides services to lower-income individuals, indicated there is a growing number of homeless individuals and families in need of immediate assistance. The contact mentioned that funding is very limited and there are only a few organizations to help all the individuals and families in need. The contact also stated there is a need for basic financial literacy, specifically understanding credit and developing long-term savings habits. The contact indicated that a few of the small banks have responded by volunteering time for financial literacy programs in the area, specifically West Suburban and Lisle Community Bank. The contact implied the larger banks have been uninterested in helping low- and moderate-income individuals in the community.

The fourth contact, representing a community development agency, stated that foreclosures in the area have slowed significantly since lower-value market housing (homes <\$300K) has started to stabilize and increase in value. The contact indicated while the rate of new housing construction is sluggish, it has improved in the past year and continues to improve slowly. The contact also stated that while poverty levels have stabilized, the community is concerned about possible increased poverty levels due to the upcoming layoffs of many manufacturers. Manufacturers are affected by the increased value of the U.S. dollar, which slows its exports. The contact mentioned that small businesses continue to be conservative and decide to not assume additional debt, as many are still feeling cautious about the local and world market economic conditions. The contact specifically mentioned that small businesses are not interested in seeking loans because they are not confident about the value of their commercial collateral remaining stable or increasing in value, as it was prior to the economic downturn. The contact believed that local bankers are looking to lend to businesses of all sizes, but these challenges would need to be overcome before area businesses would be willing to assume more debt. The contact specifically mentioned American Community Bank, WinTrust Bank, and Home State Bank as being active in the community.

The fifth contact, representing an affordable housing organization, stated that financial institutions need to better understand the needs of low- and moderate-income individuals within the county. For example, additional funding that supports housing development for seniors and disabled individuals would be helpful, as there is an increasing senior population in the area. The contact also stated that many financial institutions are not open to assist developers in constructing and/or rehabilitating housing for seniors and the disabled. The contact indicated that banks could help the community by developing a homeownership program to assist low- and moderate-income individuals buy homes. The contact believes financial institutions are unwilling to take a chance on these individuals because of low salaries, but financial institutions need to realize that many of these individuals could manage a mortgage payment with some assistance. Lastly, credit counseling programs would benefit lower-income individuals in the area.

The sixth contact, representing a community development agency, stated that banks are active in the community and have partnered with the organization to provide financial awareness and education. The contact mentioned HSBC, Citibank, Charter One, BMO Harris, ABC Bank, Republic Bank, TCF Bank, and Hinsdale Bank and Trust as being active in the community. The contact noted that some financial institutions are willing to tailor products for young adults and the unbanked. The contact believes large banks are more focused on national programs, rather than local communities.

The seventh contact, representing a community development agency, stated that a major economic factor affecting the community is the lack of jobs. The unemployment rates in some areas within the county are higher than the state's average and, according to the contact, there are various opportunities within the area for financial institutions to become involved. The contact stated that the organization partners with several local banks to provide services, including homebuyer education programs and financial literacy courses. Through these programs, consumers are educated on the importance of credit and basic money management. The contact believes banks are currently very active within the community and support the organization's mission. The contact specifically mentioned Marquette Bank, BMO Harris Bank, First Personal Bank, Citibank, and U.S. Bank as being active in the community.

The eighth contact, representing a community development and affordable housing agency, stated that although housing values have remained stable in the surrounding areas, they have not grown at the same rate as other regions around the country. The contact mentioned that many of the residents are over-mortgaged on the value of their property and believed that some home values may not return to pre-recession levels. While low property values continue to plague the community, foreclosure rates continue to improve and have stabilized to pre-recession levels. Additionally, the contact mentioned the significant need for affordable housing, both for sale and rental. However, these projects require some degree of self-financing and government financing and although the city and state are under serious financial constraints, the contact has seen development in the area. The contact also explained that unemployment rates, particularly for lower-income individuals in the area, are higher than Chicago and national averages.

The contact mentioned that opportunity exists for financial institutions to offer entry-level banking products and credit building products for the unbanked, in addition to access to small business capital (which remains a challenge for small and emerging business owners) and opportunities for commercial real estate projects. For neighborhood banks, providing service work, such as joining boards of community groups/organizations and providing financial expertise, would be helpful. The contact stated that the organization works closely with larger institutions, such as Bank of America, Wells Fargo, and Chase Bank USA. Overall, the contact believes that banks in the area are actively engaged, but additional opportunities exist for local banks to become more involved with community partners.

The ninth contact, representing a community development agency, stated that current economic trends in the area are improving and there is tremendous opportunity for Fifth Thirds to reach out and be more helpful to the small business community. The contact explained that growth in the area was limited because small business owners were unaware of how banks could help them. The south side of town is underserved and does not have a significant community bank presence. The contact specifically mentioned Village Bank, MB Financial, and Mount Prospect State Bank as being involved in the community and noted that national and larger regional banks like Fifth Third could increase its involvement in the community.

The tenth contact, representing an affordable housing organization, stated that current economic conditions are improving slightly, although several communities are improving at a slower rate than others. The contact also noted that foreclosures impacted rental rates, which, in turn, disproportionately impacted low-income communities. The contact also stated there is always the opportunity for more community involvement from local financial institutions, specifically regarding lending for first-time homeowners. The contact believed that not enough information was provided to these borrowers about condominium options, especially since the area has experienced significant growth in condominium development. Additionally, the contact felt that the aging population, especially minority seniors, required more assistance from local financial institutions and specifically mentioned that Fifth Third was a very helpful institution.

The eleventh contact, representing an organization that provides services to low-income individuals, stated that the economy has been on a slow, uphill climb, with an increase in jobs and construction projects. The contact stated that local financial institutions could assist the community by providing more construction loans and offering lines of credit to community organizations. Otherwise, the contact believes that local financial institutions are providing needed services to the community, such as outreach activities in low- and moderate-income areas, and specifically mentioned Heartland and First Midwest Bank as institutions that have helped the community.

The twelfth contact, representing a community development organization, indicated that economic conditions are improving. Historically, there have been a lack of employment opportunities in the community that resulted from many people commuting to jobs in the Chicago suburbs. However, over the last several years, the area has attracted new businesses and retained businesses that are beginning to capitalize on some expansion opportunities. The contact explained there are a large number of employment opportunities in the area, but the local talent pool does not always have the appropriate skill set to fill available job openings.

In addition, this area has been impacted by a high amount of drug abuse, which contributes to the higher unemployment rates in the area. The contact explained that local banks have conducted several educational breakfasts to provide financial assistance and training and believes Fifth Thirds in the area are very active and provide assistance as much as possible. There are a number of entrepreneurs in the area who have not been able to secure bank loans due to a lack of credit. In these cases, Fifth Thirds often refer them to local organizations with which they have partnerships to assist these entrepreneurs in securing loans.

The thirteenth contact, representing a community development organization, felt that banks were making an effort to meet the credit needs of the community. The contact explained this organization serves a very low-income population; a large percentage of these residents have poor credit ratings and as a result, banks cannot always assist these individuals. According to the contact, there is insufficient affordable housing in the area and the housing that is affordable is often in disrepair. Generally, not many developers are interested in building low-income housing, but recently, more developers have been showing increased interest in developing mixed-income, mixed-use housing developments. The contact believes there are opportunities available to banks to begin to finance large blocks of land that can be sold for this type of mixed-use development. While this organization primarily works with community banks, the contact indicated that Fifth Third is also helpful and specifically mentioned the closing of several JP Morgan Chase branches in the area.

The fourteenth contact, representing a community development organization in Indiana, stated that housing and small business startups are experiencing difficulty in obtaining credit. For workforce housing, defined as poor working class, there is a gap where people looking for housing do not meet low-income qualifications. The contact indicated that not much first-time homeowner training is provided in the area. The contact also stated that small businesses have a difficult time meeting lending requirements because banks do not want to assume the risk and are much more cautious due to regulatory requirements. The contact noted that while there is affordable housing in the area, most of it is in disrepair. There is no money for rehabilitating the structures primarily because banks are more focused on funding loans for newer, move-in ready housing. Further, the contact explained that banks claim that construction loans pose too many challenges and tend to avoid these types of loans. The contact believes there are opportunities for banks to fund projects related to single- and multi-family housing, specifically condominium developments and home mortgages with down payment assistance. The contact stated Fifth Third is somewhat active, but Horizon and First Source are very active within the community.

The final contact, representing an organization that provides services to low-income individuals, stated there are numerous banks and credit unions in the area and many make an effort to attend outreach and community events. The contact indicated while more banks in the area have bilingual employees, there is a growing need for multilingual financial literacy and debt counseling programs to better assist the area's diverse population.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 9.5 million. Slightly less than a third (31.4%) of the population lived in low- and moderate-income tracts. In addition, 74.9% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Chicago MSA remains the third largest in terms of population in the nation, while the Michigan City MSA is the 338th and the Kankakee MSA is the 339th largest. Cook County is by far the largest county in the assessment area and is the second-most populous county in the U.S.; however, Cook County experienced its first population decline since 2007 (a decline of 10,488 between 2014 and 2015) to 5.2 million residents. More than 40.0% of all residents in Illinois live in Cook County.⁴

Chicago is the largest city in Illinois and is the third-most populous city in the U.S., behind New York and Los Angeles. Although Chicago has 2.7 million residents, its population growth declined by 6.0% between 2000 and 2015. According to the Illinois Policy Center, the Chicago metropolitan area is failing to attract and maintain population. Compared to other major cities in the U.S., Chicago is the only city losing more people to other parts of the country than it gains from other parts of the world. In the Midwest from July 2014-July 2015, only Chicago and Cleveland decreased in population, with other Midwest cities in Fifth Third's delineated CRA footprint growing in population (e.g., Detroit, Fort Wayne, St. Louis, Louisville, Indianapolis, and Columbus).⁵ According to Moody's Analytics in 2015, the Chicago metropolitan area lost 67,203 people in net domestic migration and gained only 27,840 people from international immigration. In contrast, the cities of Naperville, Illinois; Gary, Indiana; and Michigan City, Indiana only have 147,100, 77,909, and 31,487 residents, respectively.⁶ According to 2015 U.S. Census data,⁷ Naperville is the fifth largest city in Illinois. Lake County is the second-largest county in Indiana and the most populous county in Indiana in this assessment area. Gary is the eighth-largest city in Indiana is located in Lake County.⁸

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease.⁹ For the most part, the population within the CSA remained relatively stable between 2010 and 2015, with Kendall County experiencing the greatest growth and Kankakee County experiencing the greatest decline in population.

⁴ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract: <https://factfinder.census.gov>

⁵ Illinois Policy Center: <https://www.illinoispolicy.org/chicago-area-sees-greatest-population-loss-of-any-major-u-s-city-in-2015/>

⁶ City-Data.com: <http://www.city-data.com/> (main page – must enter city, county or zip code)

⁷ US Census Bureau: <http://www.census.gov/quickfacts/table/PST045216/00> (main page – must enter state, county, city, town or zip code)

⁸ City-Data.com: <http://www.city-data.com/> (main page – must enter city, county or zip code)

⁹ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Cook, IL	5,194,675	5,238,216	0.8%
DuPage, IL	916,924	933,736	1.8%
Kendall, IL	114,736	123,355	7.5%
McHenry, IL	308,760	307,343	-0.5%
Will, IL	677,560	687,263	1.4%
DeKalb, IL	105,160	104,352	-0.8%
Kane, IL	515,269	530,847	3.0%
Jasper, IN	33,478	33,470	0.0%
Lake, IN	496,005	487,865	-1.6%
Porter, IN	164,343	167,688	2.0%
Lake, IL	703,462	703,910	0.1%
Kankakee, IL	113,449	110,879	-2.3%
LaPorte, IN	111,467	110,884	-0.5%
Total	9,455,288	9,539,808	0.8%

Income Characteristics

The 2010 assessment area median family income was significantly higher (\$72,527) than Illinois and Indiana at \$68,236 and \$58,944, respectively. As shown in the table below, since 2010, the median family income increased across all MDs and MSAs within the CSA, with the exception of the Lake County-Kenosha County MD. Between 2014 and 2015, the median family income increased in all areas except for the Elgin MD and Michigan City MSA. However, between 2015 and 2016, the median family income increased in the Elgin MD and Michigan City MSA and decreased in all other areas within the CSA.

FFIEC Estimated Median Family Income	2010	2014	2015	2016
Chicago-Naperville-Arlington Heights IL MD	\$72,196	\$76,300	\$77,700	\$74,700
Elgin IL MD	\$76,576	\$76,300	\$75,400	\$82,500
Gary IN MD	\$62,512	\$63,700	\$66,400	\$63,900
Lake County-Kenosha County IL-WI MD	\$86,241	\$84,200	\$87,500	\$85,000
Kankakee IL MSA	\$59,998	\$53,800	\$68,100	\$60,500
Michigan City-La Porte IL MSA	\$56,679	\$68,200	\$55,100	\$59,400

Poverty rates increased in each county in the assessment area from 1999 to 2015.¹⁰ In 2015, Lake (IN), Cook, DeKalb, LaPorte, and Kankakee counties had the highest poverty rates compared to the same counties in 1999. In 2015, Cook, DeKalb, and Kankakee counties had poverty rates higher than Illinois and Lake and LaPorte counties had poverty rates higher than Indiana. However, McHenry, DuPage, and Porter counties experienced the largest increase in poverty rates during this period. Indiana experienced the biggest increase in its poverty rate compared to Illinois and the nation between 1999 and 2015. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.¹¹ Nonetheless, poverty rates remain elevated in some of the most populous counties in the region. The following table shows the poverty rates for 1999¹² and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Cook	13.5%	16.2%	20.0%
DeKalb	11.4%	16.2%	42.1%
DuPage	3.6%	7.1%	97.2%
Kane	6.7%	10.8%	61.2%
Kankakee	11.4%	15.2%	33.3%
Kendall	3.0%	4.8%	60.0%
Lake	5.7%	9.0%	57.9%
McHenry	3.7%	8.1%	118.9%
Will	4.9%	8.0%	63.3%
Illinois	10.7%	13.6%	27.1%
Jasper	6.7%	9.3%	38.8%
Lake	12.2%	16.6%	36.1%
LaPorte	8.7%	15.7%	80.5%
Porter	5.9%	11.6%	96.6%
Indiana	9.5%	14.4%	51.6%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 3.8 million housing units and 2.3 million families in the assessment area. From an income perspective, 31.3% of housing units, 21.2% of owner-occupied units, and 28.9% of families are located in low- or moderate-income tracts.

¹⁰ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹¹ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

¹² 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Nearly three-quarters of the housing units in the low-income census tracts are either rental or vacant (74.8%) and 25.2% are owner-occupied. In the moderate-income census tracts, over half (51.5%) of the housing units are either rental or vacant and nearly half (48.5%) are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 46 years old, with 29.5% of the stock built before 1950. The oldest housing stock was in Cook County with a median age of 53 years, while the newest was 12 years in Kendall County. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 57 years in moderate-income tracts, which indicates that there is ample opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$249,828, with an affordability ratio of 24.15. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The median housing value decreased between 2010 and 2011-2015 and, as a result, housing became more affordable across the assessment area. According to Moody’s Analytics, single-family housing price growth is on the upswing. During the evaluation period, the most affordable housing was in Kendall County, with the least affordable in Cook County. Median gross rents increased at a substantial rate across the assessment area, with renters in Will County experiencing the largest increase in rental rates and renters in LaPorte County experiencing the smallest increase. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area, Illinois, and Indiana.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Cook	\$265,800	20.29	\$218,700	25.26	\$900	\$980	8.9%
DeKalb	\$192,300	28.08	\$165,200	32.75	\$797	\$860	7.9%
DuPage	\$316,900	24.17	\$278,500	28.60	\$1,008	\$1,143	13.4%
Kane	\$245,000	27.66	\$213,200	33.16	\$929	\$1,011	8.8%
Kankakee	\$148,400	34.02	\$138,700	37.57	\$721	\$820	13.7%
Kendall	\$248,300	32.18	\$200,200	42.15	\$1,099	\$1,305	18.7%
Lake	\$287,300	27.48	\$245,300	31.81	\$963	\$1,069	11.0%
McHenry	\$249,700	30.63	\$208,200	37.09	\$998	\$1,074	7.6%
Will	\$240,500	31.56	\$209,800	36.27	\$890	\$1,039	16.7%
Illinois	\$202,500	27.52	\$173,800	31.01	\$834	\$907	8.8%
Jasper	\$142,200	38.74	\$148,300	37.34	\$657	\$733	11.6%
Lake	\$135,400	35.98	\$136,100	36.84	\$748	\$819	9.5%
LaPorte	\$119,800	38.41	\$123,300	38.01	\$664	\$701	5.6%
Porter	\$164,500	37.01	\$156,000	40.98	\$791	\$862	9.0%
Indiana	\$123,000	38.78	\$178,600	30.17	\$683	\$753	10.2%

According to Bankrate.com,¹³ Illinois ranked seventh and Indiana ranked 15th for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹⁴

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Cook	1:857
DeKalb	1:993
DuPage	1:1,314
Kane	1:1,033
Kankakee	1:1,517
Kendall	1:742
Lake	1:705
McHenry	1:734
Will	1:619
Illinois	1:1,036
Jasper	1:1,153
Lake	1:778
LaPorte	1:2,702
Porter	1:6,367
Indiana	1:1,590
U.S.	1:1,533

In November 2016, Will County had the highest rate of foreclosure and Porter County had the lowest foreclosure rate within the assessment area.

Building permits in the three MSAs, Illinois, Indiana, and the nation are included in the following table for 2014, 2015, and 2016.¹⁵

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Chicago-Naperville-Elgin IL-IN-WI MSA	15,679	15,813	0.9%	19,469	23.1%
Kankakee IL MSA	127	89	-29.9%	17	-80.9%
Michigan City-La Porte IN MSA	125	159	27.2%	96	-39.6%
Illinois	20,602	19,571	-5.0%	22,580	15.4%
Indiana	17,813	18,483	3.8%	18,317	-0.9%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

¹³ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹⁴ Realtytrac: <http://www.realtytrac.com/statsandrends/foreclosurestrends/>

¹⁵ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

The Chicago MSA experienced its greatest increase of housing permits between 2015 and 2016, while the Michigan City MSA experienced its greatest increase of housing permits between 2014 and 2015. Conversely, the Kankakee MSA experienced substantial decreases in the number of housing permits issued between 2014-2015 and 2015-2016. The rise in the number of permits could indicate the demand for home purchase loans increased in the Chicago MSA, but decreased dramatically in the Kankakee and Michigan City MSAs during the evaluation period.

Labor, Employment, and Economic Characteristics

According to Moody's Analytics, the Chicago area economy is making some progress (business cycle in recovery); however, manufacturing weaknesses, population losses, and Chicago's budget troubles are sapping momentum. Service industries are responsible for the majority of new jobs, with some from construction created the last half of 2016.

According to *World Business Chicago*,¹⁶ the Chicago metropolitan area is home to 36 Fortune 500 headquarters, including 12 in Chicago. Seven of the 12 companies headquartered in Chicago held steady or improved over the last year. The only company to drop off the list since 2015 was Integrys Energy Group, Inc. which was acquired by Milwaukee-based WEC Energy Group.

¹⁶ World Business Chicago: <http://www.worldbusinesschicago.com/2016-fortune-500/>

Chicago Fortune 500 Companies (2016)¹⁷		
Rank	Company	Location
19	Walgreens Boots Alliance	Deerfield, IL
24	Boeing	Chicago, IL
41	Archer Daniels Midland	Chicago, IL
80	United Continental Holdings	Chicago, IL
81	Allstate	Northbrook, IL
94	Mondelez International	Deerfield, IL
95	Excelon	Chicago, IL
109	McDonald's	Oak Brook, IL
111	Sears Holdings	Hoffman Estates, IL
122	US Foods Holding	Rosemont, IL
123	AbbVie	Chicago, IL
138	Abbott Laboratories	Abbott Park, IL
153	Kraft Heinz	Northfield, IL
176	ConAgra Foods	Chicago, IL
211	Illinois Tool Works	Glenview, IL
220	CDW	Lincolnshire, IL
255	R.R. Donnelley & Sons	Chicago, IL
281	Navistar International	Lisle, IL
283	Discover Financial Services	Riverwoods, IL
285	W.W. Grainger	Lake Forest, IL
286	Baxter International	Deerfield, IL
315	Univar	Downers Grove, IL
334	Tenneco	Lake Forest, IL
369	LKQ	Chicago, IL
377	Dover	Downers Grove, IL
391	Anixter International	Glenview, IL
420	Baxalta	Bannockburn, IL
436	Jones Lang LaSalle	Chicago, IL
442	Old Republic International	Chicago, IL
446	Packaging Corp of America	Lake Forest, IL
451	Motorola Solutions	Chicago, IL
456	Ingredion	Westchester, IL
471	Arthur J. Gallagher	Itasca, IL
477	Essendant	Deerfield, IL
483	NiSource	Merrillville, IN
496	Telephone & Data Systems	Chicago, IL

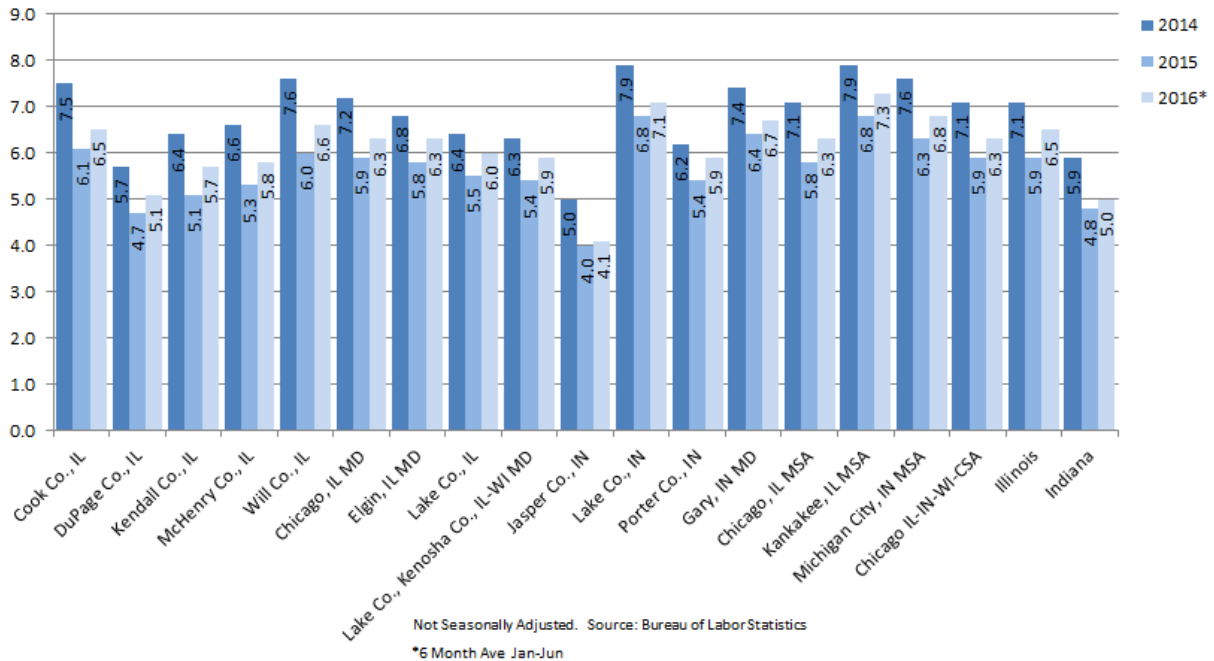
¹⁷ Bold type indicates company new to the list in 2016

According to Moody’s Analytics, the top ten employers in the Chicago MSA in 2015 were:

Company	Number of Employees
Advocate Health Care System	18,556
University of Chicago	16,025
JP Morgan Chase & Co	15,015
Northwestern Memorial Healthcare	14,550
Walgreen Co.	14,528
United Continental Holdings, Inc.	14,000
AT&T	13,000
Arcelor Mittal	5,000+
Riverside HealthCare	2,600
Blue Chip Hotel & Casino	1,800
Porter Valparaiso Hospital	1,600
La Porte Regional Health Systems	1,500

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the CSA, Illinois, and Indiana.

Unemployment Rates - Multi-State Chicago



Overall, the unemployment rates declined from 2014 to 2015 and increased between 2015 and June 2016. Kankakee County (IL) and Lake County (IN) had the highest unemployment rates and Jasper County (IN) had the lowest unemployment rates all three years.

According to an article in *Crain's Chicago Business*,¹⁸ more than 677 workers in Cook, Lake, and DuPage counties will lose their jobs in 2016. The article went on to highlight the following layoffs:

- Elk Grove Village-based Glazer Stoller Wholesale (sells alcoholic beverages) is closing and laying off more than 170 workers.
- Grocery chain Meijer is shutting down one of its stores in Niles, affecting 118 workers.
- Grace Davison Discovery Sciences (asphalt manufacturer and paver) is closing its Deerfield location, affecting more than 100 workers.
- Packers Sanitation Services (janitorial services) is laying off more than 50 workers at its Chicago location.
- Assembled Products (metal stamping) is shutting down its Buffalo Grove location, affecting 81 workers.
- WestRock (box manufacturer) is laying off 45 people at its Chicago location.
- JPMorgan Chase is closing a branch in Elgin, affecting 44 workers.
- Artco (transportation subsidiary of Archer Daniels Midland) is laying off 40 workers at its Lemont location.
- Siemens Medical Solutions USA (sells refurbished medical imaging equipment) is closing its Wood Dale location and laying off 29 workers.

¹⁸ Davis, Katherine. "Chicago-area Employers Plan Hundreds of Layoffs." *Crain's Chicago Business*. April 8, 2016. - <http://www.chicagobusiness.com/article/20160408/EMPLOYMENT/160409830/chicago-area-employers-plan-hundreds-of-layoffs>

Combined Demographics Report

Assessment Area: Multi Chicago

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	280	12.6	172,989	7.6	58,177	33.6	503,776	22.1
Moderate-income	515	23.2	486,204	21.3	76,810	15.8	385,857	16.9
Middle-income	742	33.4	842,762	36.9	53,504	6.3	452,575	19.8
Upper-income	672	30.2	781,173	34.2	21,141	2.7	940,934	41.2
Unknown-income	14	0.6	14	0	0	0	0	0
Total Assessment Area	2,223	100.0	2,283,142	100.0	209,632	9.2	2,283,14	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	348,549	87,814	3.8	25.2	189,408	54.3	71,327	20.5
Moderate-income	833,389	404,064	17.4	48.5	330,672	39.7	98,653	11.8
Middle-income	1,364,044	917,285	39.5	67.2	347,888	25.5	98,871	7.2
Upper-income	1,226,412	914,605	39.4	74.6	229,748	18.7	82,059	6.7
Unknown-income	14	3	0	21.4	11	78.6	0	0
Total Assessment Area	3,772,408	2,323,771	100.0	61.6	1,097,727	29.1	350,910	9.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	17,215	4.3	15,567	4.3	1,581	4.1	67	4.6
Moderate-income	60,337	15.1	53,753	14.9	6,357	16.5	227	15.6
Middle-income	140,205	35	126,649	35.1	12,953	33.6	603	41.6
Upper-income	182,373	45.5	164,255	45.6	17,564	45.6	554	38.2
Unknown-income	307	0.1	233	0.1	74	0.2	0	0
Total Assessment Area	400,437	100.0	360,457	100.0	38,529	100.0	1,451	100.0
	Percentage of Total Businesses:			90.0		9.6		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	48	1.3	47	1.3	1	1.1	0	0
Moderate-income	203	5.5	196	5.4	7	7.8	0	0
Middle-income	2,207	59.7	2,156	59.8	51	56.7	0	0
Upper-income	1,237	33.5	1,205	33.4	31	34.4	1	100
Unknown-income	1	0	1	0	0	0	0	0
Total Assessment Area	3,696	100.0	3,605	100.0	90	100.0	1	100.0
	Percentage of Total Farms:			97.5		2.4		.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHICAGO-NAPERVILLE IL-IN-WI CSA

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “Outstanding.” Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 77 community development loans totaling \$586.3 million in the area. Fifth Third has an excellent geographic distribution of loans in the area and there is a low level of lending gaps. Fifth Third has an excellent distribution among borrowers of different income levels and to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of refinance lending based on the overall volume of lending, followed by home purchase, small business, and home improvement. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 5,919 refinance, 5,835 home purchase, 356 home improvement, 5,001 small business, and 77 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 11.9% is greater than the percentage of total deposits at 11.3% in this area.

Fifth Third made 99.0% of the HMDA and 99.6% of the CRA lending within this designated assessment area. There was no concentration of loans in any of the excluded counties within the assessment area; however, 69 loans were made in Kenosha County, Wisconsin during the evaluation period. Fifth Third does not have a physical presence in Wisconsin.

In addition to lending, Fifth Third modified existing loans to borrowers. The table below shows the distribution of Home Affordable Modification Program (HAMP) and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
HAMP Modifications	8	9.6%	19	22.9%	33	39.8%	23	27.7%
Other Real Estate Secured Modifications	31	3.8%	180	22.0%	398	48.5%	211	25.7%
Percentage of Owner Occupied Units		3.8%		17.4%		39.5%		39.4%

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	134	16.3%	267	32.6%	252	30.7%	160	19.5%
Percentage of Families by Family Income		22.1%		16.9%		19.8%		41.2%

*Unknown tract data is not included in the above table.

The percentage of HAMP and other modifications in low- and moderate-income tracts exceeded or were comparable to the percentage of owner-occupied units in these geographies; therefore, modifications helped to expand lending activities in these areas.

Most of the borrower incomes for HAMP modifications were unknown; therefore, it would not be meaningful to review the income distribution for these modifications. The percentage of other real estate-secured modifications made to low-income borrowers was below the percentage of low-income families in the assessment area. However, the percentage of other modifications to moderate-income borrowers was substantially higher than the percentage of moderate-income families; therefore, modifications enhanced Fifth Third’s ability to reach moderate-income borrowers and low-income borrowers to a lesser extent. Further, several community contacts mentioned the need to help homeowners avoid foreclosure.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Refinance lending; the largest loan category is good, while performance for home purchase and home improvement lending is excellent. Small business lending is also excellent. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
Low	280	101	63.9%
Moderate	515	50	90.3%
Middle	742	21	97.2%
Upper	672	7	99.0%
Unknown	14	13	7.1%
Total	2,223	192	91.4%

Lending gaps are considered minimal, because there is a 90+ percent penetration rate in moderate-, middle-, and upper-income tracts. The lower penetration rate in low-income tracts is primarily due to the relatively low owner-occupancy rate and high percentage of rentals and vacancies in these areas.

Refinance Loans

Fifth Third made 181 refinance loans totaling \$32.9 million in low-income tracts. This represents 3.1% of refinance loans by volume and 2.3% by dollar amount, which is below the percentage of owner-occupied units at 3.8%. The percentage of loans by volume was below the 2014 aggregate at 2.5% and exceeded the 2015 aggregate at 2.0%.

Given that Fifth Third's performance exceeded the aggregate of all lenders and that the majority of housing units are either rental or vacant, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 917 refinance loans totaling \$125.1 million in moderate-income tracts. This represents 15.5% of refinance loans by volume, which is comparable to the percentage of owner-occupied units at 17.4%, and 8.6% by dollar amount, is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 12.3% and exceeded the 2015 aggregate at 10.4%. Given that Fifth Third's performance exceeded the aggregate of all lenders and 48.5% of the housing units in these geographies are owner-occupied, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 2,031 refinance loans totaling \$335.3 million in middle-income tracts. This represents 34.3% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 39.5%, and 23.1% by dollar amount, is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 36.4% and was comparable to the 2015 aggregate at 34.9%.

Fifth Third made 2,790 refinance loans totaling \$957.8 million in upper-income tracts. This represents 47.1% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 39.4%, but the dollar amount at 66.0% is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 48.8% and was below the 2015 aggregate at 52.7%.

Overall, the geographic distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made 210 home purchase loans totaling \$44.9 million in low-income tracts. This represents 3.6% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 3.8%, and 3.2% by dollar amount, which is comparable to the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate at 2.2% and exceeded the 2015 aggregate at 2.3%. Given that Fifth Third's performance exceeded the aggregate of all lenders and was comparable to the percentage of owner-occupied units in these geographies, the geographic distribution of home purchase loans in low-income tracts is excellent.

Fifth Third made 1,046 home purchase loans totaling \$161.2 million in moderate-income tracts. This represents 17.9% of its home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 17.4%, and 11.4% by dollar amount, which was below the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate at 13.3% and exceeded the 2015 aggregate at 13.2%. Since Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

Fifth Third made 2,086 home purchase loans totaling \$374.4 million in middle-income tracts. This represents 35.7% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 39.5%, and 26.4% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 38.7% and was below the 2015 aggregate of 39.3% in 2015.

Fifth Third made 2,493 home purchase loans totaling \$839.3 million in upper-income tracts. This represents 42.7% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 39.4%, and 59.1% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 45.8% and was below the 2015 aggregate of 45.2%.

One of the community contacts stated the need for affordable housing in low- and moderate-income areas. Since Fifth Third was able to effectively penetrate these tracts, this supports the excellent geographic distribution of home purchase loans.

Home Improvement Loans

Fifth Third made 18 home improvement loans totaling \$1.8 million in low-income tracts. This represents 5.1% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 3.8%, and 5.5% by dollar amount, which also exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 3.6% and exceeded the 2015 aggregate of 3.3%. Given Fifth Third's performance and the median age of housing in low-income tracts of 61 years, which would likely indicate the need for home improvement loans, the geographic distribution of home improvement loans in low-income tracts is excellent.

Fifth Third made 62 home improvement loans totaling \$5.2 million in moderate-income tracts. This represents 17.4% of home improvement loans by volume, which equals the percentage of owner-occupied units in these tracts at 17.4%, and 15.9% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 15.7% and exceeded the 2015 aggregate of 14.4%. The geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 166 home improvement loans totaling \$11.9 million in middle-income tracts. This represents 46.6% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 39.5%, and 36.1% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 41.4% and exceeded the 2015 aggregate of 38.7% in 2015.

Fifth Third made 110 home improvement loans totaling \$14.0 million in upper-income tracts. This represents 30.9% of home improvements loans by volume, which is less than the percentage of owner-occupied units in these tracts at 39.4%, and 42.5% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies.

The percentage of loans by volume was below the 2014 aggregate of 39.4% and was below the 2015 aggregate of 43.6%.

Overall, the geographic distribution of home improvement loans is excellent.

Small Business Loans

Fifth Third made 150 small business loans totaling \$23.7 million in low-income tracts. This represents 3.0% of small business loans by volume, which is comparable to the percentage of small businesses in these tracts at 4.3%, and 4.2% by dollar amount, which is also comparable to the percentage of businesses in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 3.3% and was comparable to the 2015 aggregate of 3.5%. Given that Fifth Third's performance was comparable to the proxy and aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is good.

Fifth Third made 767 small business loans totaling \$87.4 million in moderate-income tracts. This represents 15.3% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 14.9%, and is comparable to proxy by dollar amount at 15.4%. The percentage of loans by volume exceeded the 2014 aggregate of 14.2% and was comparable to the 2015 aggregate of 15.0%. Given that Fifth Third's performance exceeded the aggregate of all lenders and exceeds proxy, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 1,891 small business loans totaling \$197.2 million in middle-income tracts. This represents 37.8% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 35.1%, and 34.8% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 34.9% and exceeded the 2015 aggregate of 35.0%.

Fifth Third made 2,189 small business loans totaling \$257.9 million in upper-income tracts. This represents 43.8% of small business loans by volume, which is less than the percentage of businesses in these tracts at 45.6%, and 45.5% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 46.5% and was below the 2015 aggregate of 45.6%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is excellent based on borrower income and for businesses of different revenue sizes. The borrower distribution is excellent for refinance, home purchase, and home improvement loans.

Refinance Loans

Fifth Third made 790 loans totaling \$80.4 million to low-income borrowers. This represents 13.3% of refinance loans by volume, which is significantly below the percentage of low-income families at 22.1%. The percentage of loans by dollar amount in these geographies at 5.5% is also significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.1% and exceeded the 2015 aggregate of 4.6%. Given that Fifth Third's performance was significantly greater than the aggregate of all lenders and comparable to proxy, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 965 loans totaling \$120.8 million to moderate-income borrowers. This represents 16.3% of refinance loans by volume, which is comparable to the percentage of moderate-income families at 16.9%, and 8.3% by dollar volume, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 13.1% and exceeded the 2015 aggregate of 11.3%. Given that Fifth Third's performance exceeded the aggregate of lenders and was comparable to proxy, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 1,169 loans totaling \$182.7 million to middle-income borrowers. This represents 19.7% of refinance loans by volume, which is comparable to the percentage of middle-income families at 19.8%, and 12.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.8% and exceeded the 2015 aggregate of 17.9%.

Fifth Third made 2,682 loans totaling \$994.7 million to upper-income borrowers. This represents 45.3% of refinance loans by volume, which exceeds the percentage of upper-income families at 41.2%, while the percentage of loans by dollar amount at 68.5% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 43.5% and was comparable to the 2015 aggregate of 44.5%.

Overall, the borrower distribution of refinance loans is excellent.

Home Purchase Loans

Fifth Third made 1,150 loans totaling \$121.6 million to low-income borrowers. This represents 19.7% of home purchase loans by volume, which is slightly below the percentage of low-income families at 22.1%, and 8.6% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.8% and exceeded the 2015 aggregate of 7.6%.

Given that Fifth Third's performance is significantly greater than the aggregate of all lenders and comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 1,133 loans totaling \$163.1 million to moderate-income borrowers. This represents 19.4% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 16.9%, and 11.5% of loans by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.0% and exceeded the 2015 aggregate of 18.9%. The borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 972 loans totaling \$180.2 million to middle-income borrowers. This represents 16.7% of home purchase loans by volume, which is less than the percentage of middle-income families at 19.8%, and 12.7% by dollar amount, which is also below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 19.4% and was below the 2015 aggregate of 19.7%.

Fifth Third made 2,331 loans totaling \$895.9 million to upper-income borrowers. This represents 39.9% of home purchase loans by volume, which is slightly below the percentage of upper-income families at 41.2%, and 63.1% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 35.2% and was comparable to the 2015 aggregate of 34.6%.

A community contact stated that a lack of jobs, particularly for low- and moderate-income individuals, affected the ability of these individuals to buy homes. An excellent borrower distribution of home purchase loans demonstrates that Fifth Third was able to effectively reach these borrowers.

Home Improvement Loans

Fifth Third made 64 loans totaling \$4.2 million to low-income borrowers. This represents 18.0% of home improvement loans by volume, which is below the percentage of low-income families at 22.1%, and 12.8% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.7% and exceeded the 2015 aggregate of 7.6%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and the volume of loans was comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 95 loans totaling \$6.4 million to moderate-income borrowers. This represents 26.7% of its home improvement loans by volume, which substantially exceeds the percentage of moderate-income families at 16.9%, and 19.5% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.1% and exceeded the 2015 aggregate of 15.6%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 78 loans totaling \$6.1 million to middle-income borrowers. This represents 21.9% of home improvement loans by volume, which is more than the percentage of middle-income families at 19.8%, and 18.6% by dollar amount, which is slightly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.9% and was slightly less than the 2015 aggregate of 22.9%.

Fifth Third made 117 loans totaling \$15.8 million to upper-income borrowers. This represents 32.9% of home improvement loans by volume, which was below the percentage of upper-income families at 41.2%, and 47.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 38.8% and was below the 2015 aggregate of 46.4%.

The overall borrower distribution of home improvement loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 56.7% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 39.8% and exceeded the 2015 aggregate of 45.0%, but was significantly below the percentage of small businesses in the assessment area at 90.0%. Also, during the evaluation period, Fifth Third was able to make a relatively high percentage of small-dollar loans (76.2%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated 77 community development loans totaling \$586.3 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
4	25,383,000	30	211,048,525	28	309,040,501	15	40,814,150

Community development lending in this assessment area represents 9.8% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s second-highest percentage of community development lending during the evaluation period. Fifth Third’s performance is especially strong, considering the high competition for community development loans and a number of large national banks in the area. Fifth Third only has 3.2% of the deposit market share. As such, Fifth Third is considered a leader in community development lending in this assessment area.

Examples of community development lending include, but are not limited to:

- A renewal of a revolving line of credit to a Community Development Financial Institution (CDFI) that provides loans to LIHTC projects and commercial real estate developments in target communities

- A bridge loan to a development corporation that supports affordable housing and built 1,300 units of new affordable housing for families earning less than 80.0% of the area median income
- A construction loan to a development corporation to construct and renovate a HUD Rental Assistance Demonstration project – 150 units of new affordable housing for seniors. This construction project is in response to the City of Elgin 2015-2019 Consolidated Plan that states the need for affordable housing for seniors.
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies
- Loan to support a FEMA-declared disaster area
- Loans that support eligible activities in designated Empowerment Zones
- Working capital loans that support a school that serves low- and moderate-income students
- Working capital loans that support a nonprofit that provides services to developmentally disabled low- and moderate-income individuals
- Working capital loans to a nonprofit that provides job training to low- and moderate-income individuals
- Loan to purchase a building to nonprofit that provides job training and community services to low- and moderate-income Latino immigrants

The affordable housing loans and loans that provide services to low- and moderate-income areas were deemed to be responsive, as community contacts specifically mentioned the need for these types of loans.

Flexible Lending Programs

Fifth Third had 1,895 flexible lending loans in this assessment area: 972 government loans, 126 down payment assistance loans, and 800 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third's flexible lending programs within the assessment area by census tract income and borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	3.3%	2.9%	3.8%	23.0%	19.0%	17.4%	50.0%	48.6%	39.5%	23.8%	29.5%	39.4%
Down Payment Assistance Programs	36.7%	42.2%	3.8%	31.3%	25.5%	17.4%	21.9%	13.2%	39.5%	10.2%	19.0%	39.4%
Other Flexible Lending Programs	1.9%	1.8%	3.8%	17.7%	12.3%	17.4%	45.5%	42.2%	39.5%	35.0%	43.7%	39.4%
Totals	4.9%	5.6%	3.8%	21.3%	16.6%	17.4%	46.2%	43.1%	39.5%	27.5%	34.6%	39.4%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	14.9%	9.6%	22.1%	30.6%	26.0%	16.9%	29.0%	31.0%	19.8%	22.7%	30.4%	41.2%
Down Payment Assistance Programs	47.6%	25.9%	22.1%	17.5%	11.1%	16.9%	11.9%	12.6%	19.8%	22.2%	50.1%	41.2%
Other Flexible Lending Programs	16.6%	11.7%	22.1%	20.1%	17.0%	16.9%	23.6%	21.4%	19.8%	36.5%	46.3%	41.2%
Totals	17.8%	11.8%	22.1%	25.3%	21.1%	16.9%	25.6%	25.6%	19.8%	28.5%	38.6%	41.2%

*Unknown tract data is not included in the above table.

Overall, Fifth Third’s lending in low-income tracts, by number and dollar amount, exceeded the percentage of owner-occupied units, particularly for down payment assistance programs. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units in these geographies, particularly for down payment assistance programs. Overall, the percentage of lending by dollar amount was below proxy.

Fifth Third’s lending by volume to low-income borrowers was below the percentage of low-income families, but significantly exceeded proxy for down payment assistance programs. The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, particularly for government loan programs.

Despite high foreclosure rates in this assessment area, Fifth Third was able to assist low- and moderate-income borrowers or borrowers purchasing properties in a low- or moderate-income area to purchase homes through the use of several down payment assistance programs. Therefore, Fifth Third made use of flexible lending practices in serving assessment area credit needs since lending through flexible loan programs in low-income tracts and to low-income borrowers was good and lending in moderate-income tracts and to moderate-income borrowers was excellent.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “Outstanding.”

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 481 qualified investments totaling \$212.5 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
158	161,654,485	39	202,959	10	76,250	227	1,711,212

Also included in the total number of qualified investments are 47 prior period investments totaling \$48.9 million. Fifth Third made 13.0% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 11.3% and equivalent to the percentage of branch offices at 12.8%. Included in the total investments are 303 donations totaling \$9.8 million that supported local schools, small businesses, churches, food banks, health care, and affordable housing.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area, which was an important need expressed by several community contacts.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “High Satisfactory.” Retail services are reasonably accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third’s record of opening and closing offices has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. One banking center was opened and twelve were closed since the previous evaluation period, which resulted in the closure of two banking centers in low- and moderate-income tracts. Delivery services are reasonably accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 166 banking centers within this assessment area, including eight in low-, 26 in moderate-, 63 in middle-, and 69 in upper-income census tracts. Fifth Third banking centers in this assessment area represent 12.8% of all its banking centers. Fifth Third has a total of 250 full-service ATMs within this assessment area, including one in low-, 41 in moderate-, 88 in middle-, and 110 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: Multi Chicago

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	8	4.8%	0	1	Total	13	4.3%	11	4.4%	2	4.0%	280	12.6%	8.1%	4.2%
Moderate	26	15.7%	1	1	Total	47	15.7%	41	16.4%	6	12.0%	515	23.2%	21.5%	14.9%
Middle	63	38.0%	0	5	Total	102	34.0%	88	35.2%	14	28.0%	742	33.4%	37.0%	34.9%
Upper	69	41.6%	0	5	Total	138	46.0%	110	44.0%	28	56.0%	672	30.2%	33.4%	45.8%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	14	0.6%	0.0%	0.1%
Total	166	100.0%	1	12	Total	300	100.0%	250	100.0%	50	100.0%	2223	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered poor, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered adequate.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 12,006 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 10.1% of all community development services provided and equates to 5.77 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
800	1,239	1	9,966

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization.

Community development services include 5,092 hours of providing financial literacy through local nonprofits and school programs, 4,671 hours serving on boards and committees, 1,811 hours providing technical assistance to non-profits and local business, and 432 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy and foreclosure outreach prevention activities. Several community contacts mentioned the need for financial literacy training to provide debt counseling and assist first-time homebuyers. Also, the rate of foreclosures remains significantly higher in multiple counties throughout this assessment area compared to the foreclosure rates in Illinois, Indiana, and the nation.

MULTI-STATE METROPOLITAN AREA
(Full-scope Review)

CRA RATING for Cincinnati OH-KY-IN MSA #17140: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- An excellent responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and good to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A leader in making community development loans;
- An extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Cincinnati multistate assessment area. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CINCINNATI OH-KY-IN MSA

The Cincinnati OH-KY-IN MSA includes Brown, Butler, Clermont, Hamilton and Warren counties in Ohio; Dearborn and Ohio counties in Indiana; and Boone, Campbell, Gallatin, Grant, Kenton, and Pendleton counties in Kentucky. Fifth Third's assessment area excludes Union County in Indiana and Bracken County in Kentucky. The assessment area is comprised of 56 low-, 120 moderate-, 196 middle-, and 117 upper-income tracts. There are also four tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked second out of 64 institutions with 27.8% of the deposit market share. U.S. Bank had 49.0% of the market share. Deposits in this assessment area accounted for 28.0% of Fifth Third's total deposits. This was the highest percentage of deposits within Fifth Third's CRA footprint.¹⁹

From January 1, 2014 through June 30, 2016, Fifth Third originated 10,527 HMDA loans and 5,120 CRA loans, which represented 10.1% and 13.1% of the total loans originated during the evaluation period, respectively. This was the second-largest HMDA market and largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked fourth among 522 HMDA reporters in the assessment area and Fifth Third ranked 20th. Union Savings Bank, Guardian Savings Bank, and Wells Fargo Bank were the top three HMDA lenders in the assessment area. Fifth Third ranked sixth of 116 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were U.S. Bank, American Express Bank, PNC Bank, Capital One, and Citibank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Seven community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a community development fund that underwrites and services community development real estate loans supporting the creation or preservation of affordable housing and the revitalization of urban communities, stated the area has experienced growth and repopulation of the city, which has resulted in available funds to help subsidize lower-income housing. The contact indicated involvement from banks in the fund is very strong, although regulatory burdens may impact a bank's ability to conduct outreach.

The second contact, representing a community development organization in Hamilton County, stated that there are limited banking services available in low-income areas. There are only two regional bank branches and two local bank branches that service this community. The contact mentioned that through a tax credit project, PNC Bank provided funding for a new theater and parking garage. The contact also mentioned Fifth Third periodically participates in a funding pool and tax credit projects that help support local real estate development projects.

¹⁹ The high percentage of total deposits (27.8%) is primarily due to deposits that cannot be allocated to specific areas are allocated to Fifth Third's corporate headquarters located in this MSA.

The third contact, representing a community development organization that provides funding to small businesses in Clermont County, stated that the area is experiencing low unemployment rates. Employers are providing technical training to high school students and are offering them jobs after graduation. Several local banks have assisted with funding to construct a new school which will serve 6,000 students. In addition, there are two hospital construction projects underway in the community. The contact believed there is a need for banks to fund new construction projects and extend more working capital loans to small businesses. The contact specifically mentioned Fifth Third as being active in the community.

The fourth contact, representing an affordable housing and community development organization in Butler County, stated there is a substantial need for quality affordable housing in the area. While there is an abundance of affordable housing in the county, what is available is mostly dilapidated and in need of rehabilitation. As a result, the contact believed there is a substantial need for home improvement-type lending in the area. The contact stated several area banks partner with this organization to offer first-time homebuyer assistance to its clients; however, the contact believed it would be nice to see more banks in the area get involved. Overall, the contact believed area banks are doing a good job of being involved in the community.

The fifth contact, representing a community development organization in the Northern Kentucky and Cincinnati region, stated there are available jobs in the area, but employers state they cannot find workers with the right skills to take the jobs. The contact also stated small businesses want to invest and expand, but require working capital. The contact believed that loans are being originated at a steady pace; that many banks are still apprehensive to make loans to start-up businesses.

The sixth contact, representing an organization that provides services to low-income individuals, stated there still individuals struggling to fully recover from the foreclosure crisis and in certain portions of Hamilton County, there are a significant number of vacant properties. However, there are a number of redevelopment projects in progress in several low- and moderate-income communities. The contact stated this organization serves a large number of low-income renters and rental rates are increasing considerably in the area; therefore, affordable rents for lower income individuals are a significant concern. Also, the contact believed that banks offered first-time homebuyer assistance more generously prior to the financial crises and that larger banks have cut back on grant money. The contact explained before the financial crisis, the organization used to receive \$30,000-\$40,000 a year in grants and now it receives about \$5,000-\$10,000 a year. Most of the assistance received from banks is in the form of financial literacy and first-time homebuyer classes. The contact noted that banks are beginning to inquire about community development needs again and specifically noted that Fifth Third recently contacted this organization.

The seventh contact, representing an affordable housing organization in Hamilton County, stated there is a need for lower-income housing in the area and reliable public transportation to provide access to jobs. The contact believed there are opportunities for banks to finance building rehabilitation projects within the city, invest in funds that provide tax credits to organizations such as this one, and fund more construction loans.

The contact specifically mentioned PNC Bank, First Financial, BB&T, Fifth Third, and River Hills Bank as being active with this organization.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 2.1 million. About 27.2% of the population lived in low- and moderate-income tracts. In addition, 75.1% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Cincinnati MSA is the 28th largest in terms of population in the nation and the largest metropolitan area in Ohio.²⁰ Hamilton County is by far the largest county in the assessment area, which includes Cincinnati and is the third-most populous county in Ohio.²¹ Cincinnati is the third-largest city in Ohio and is the 66th most populous city in the U.S. Cincinnati has 298,550 residents and its population decreased by 9.8% between 2000 and 2015; however, the worst of the decline seems to be over, since the population increased by 0.5% between 2010 and 2015.²² According to Moody's Analytics, Cincinnati has below-average population growth and in 2015, the migration flow into and out of Cincinnati resulted in a loss of 2,545 area residents. In contrast, the next largest cities in the MSA are Hamilton and Middletown, which have 62,407 and 48,760, respectively.²³

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease.²⁴ For the most part, the population within the MSA experienced positive growth between 2010 and 2015, with Boone County experiencing the greatest growth and Pendleton County experiencing the greatest decline in population.

²⁰ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²¹ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

²² Cincinnati population: <http://worldpopulationreview.com/us-cities/cincinnati-population>

²³ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

²⁴ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):

<http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Dearborn, IN	50,047	49,455	-1.2%
Ohio, IN	6,128	5,938	-3.1%
Boone, KY	118,811	127,712	7.5%
Campbell, KY	90,336	92,066	1.9%
Gallatin, KY	8,589	8,636	0.5%
Grant, KY	24,662	24,757	0.4%
Kenton, KY	159,720	165,012	3.3%
Pendleton, KY	14,877	14,408	-3.2%
Brown, OH	44,846	43,839	-2.2%
Butler, OH	368,130	376,353	2.2%
Clermont, OH	197,363	201,973	2.3%
Hamilton, OH	802,374	807,598	-0.7%
Warren, OH	212,693	224,469	5.5%
Total	2,098,576	2,142,216	2.1%

Income Characteristics

In 2010 the MSA median family income was significantly higher (\$67,016) than Ohio, Kentucky, and Indiana at \$59,680, \$52,046, and \$58,944, respectively. Between 2014 and 2015, the median family income increased; however, between 2015 and 2016, the median family income decreased by 5.0% in this MSA.

Borrower Income Levels Cincinnati, OH-KY-IN MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$71,100	0 - \$35,549	\$35,550 - \$56,879	\$56,880 - \$85,319	\$85,320 - & above
2015	\$72,400	0 - \$36,199	\$36,200 - \$57,919	\$57,920 - \$86,879	\$86,880 - & above
2016	\$68,800	0 - \$34,399	\$34,400 - \$55,039	\$55,040 - \$82,559	\$82,560 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.²⁵ In 2015, Hamilton, Grant, and Pendleton counties had the highest poverty rates compared to Gallatin, Hamilton, and Pendleton counties in 1999. In 2015, only Hamilton and Brown counties had poverty rates higher than the state-level poverty rate (Ohio). However, Butler and Campbell counties experienced the largest increase in poverty rates during this period.

²⁵ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015):
<https://data.ers.usda.gov/reports.aspx?ID=17826>

In 2015, Kentucky’s, Ohio’s, and Indiana’s poverty rates exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²⁶ The following table shows the poverty rates for 1999²⁷ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Dearborn	6.6%	8.9%	34.8%
Ohio	7.1%	10.2%	43.7%
Indiana	9.5%	14.4%	51.6%
Boone	5.6%	8.2%	46.4%
Campbell	9.3%	14.4%	54.8%
Gallatin	13.4%	15.0%	11.9%
Grant	11.1%	16.4%	47.7%
Kenton	9.0%	12.8%	42.2%
Pendleton	11.4%	16.4%	43.9%
Kentucky	15.8%	18.3%	15.8%
Brown	11.6%	14.9%	28.4%
Butler	8.7%	14.4%	65.5%
Clermont	7.1%	9.5%	33.8%
Hamilton	11.8%	16.6%	40.7%
Warren	4.2%	5.2%	23.8%
Ohio	10.6%	14.8%	39.6%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 899,127 housing units and 533,195 million families in the assessment area. From an income perspective, 31.3% of housing units, 20.2% of owner-occupied units, and 24.7% of families are located in low- or moderate-income tracts. Over three quarters of the housing units in the low-income census tracts are either rental or vacant (78.8%) and 21.2% are owner-occupied. In the moderate-income census tracts, over half of the housing units are either rental or vacant (54.1%) and 45.9% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

²⁶ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²⁷ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 40 years old, with 25.3% of the stock built before 1950. The oldest housing stock was in Campbell and Kenton counties with a median age of 46 and 41 years, respectively, while the newest was 17 years in Boone County. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 53 years in moderate-income tracts, which indicates that there is ample opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$156,715, with an affordability ratio of 34.22. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. While median housing values fluctuated between 2010 and 2011-2015, housing largely became more affordable across the assessment area. According to Moody’s Analytics, Cincinnati has low living costs and affordable housing. During the evaluation period, the most affordable housing was in Pendleton and Gallatin counties, with the least affordable in Hamilton and Ohio counties. Median gross rents increased at a fairly substantial rate across the assessment area, with renters in Dearborn and Gallatin counties experiencing the largest increase in rental rates, renters in Ohio County experiencing the smallest increase, and renters in Pendleton experiencing a decrease in gross rental rates. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area, Indiana, Kentucky, and Ohio.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Dearborn	\$160,300	35.43	\$159,100	36.88	\$631	\$747	18.4%
Ohio	\$134,200	37.98	\$141,000	34.60	\$657	\$671	2.1%
Indiana	\$123,000	38.78	\$124,200	39.66	\$683	\$747	9.4%
Boone	\$175,900	37.83	\$175,100	38.11	\$797	\$905	13.6%
Campbell	\$146,300	35.19	\$150,400	36.32	\$672	\$748	11.3%
Gallatin	\$105,500	39.16	\$107,500	45.00	\$576	\$669	16.1%
Grant	\$117,900	36.03	\$124,900	35.89	\$665	\$715	7.5%
Kenton	\$145,200	36.65	\$145,200	37.39	\$667	\$747	12.0%
Pendleton	\$101,200	44.14	\$104,800	46.14	\$611	\$583	-4.6%
Kentucky	\$116,800	35.60	\$123,200	35.50	\$601	\$675	12.3%
Brown	\$124,100	36.98	\$113,800	40.04	\$624	\$649	4.0%
Butler	\$160,600	34.11	\$157,200	36.60	\$752	\$817	8.6%
Clermont	\$162,000	36.09	\$155,500	39.10	\$698	\$764	9.5%
Hamilton	\$148,200	32.55	\$142,000	34.52	\$652	\$709	8.7%
Warren	\$194,700	36.61	\$190,900	38.96	\$890	\$923	3.7%
Ohio	\$136,400	34.72	\$129,900	38.05	\$678	\$730	7.7%

According to Bankrate.com,²⁸ Ohio ranked eighth, Indiana ranked 15th, and Kentucky ranked 43rd for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac.²⁹

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Dearborn	1:745
Ohio	NA
Indiana	1:1,590
Boone	1:2,082
Campbell	1:2,826
Gallatin	NA
Grant	NA
Kenton	1:1,381
Pendleton	NA
Kentucky	1:4,270
Brown	1:1,056
Butler	1:861
Clermont	1:1,543
Hamilton	1:788
Warren	1:1,491
Ohio	1:1,053
U.S.	1:1,533

In November 2016, Dearborn, Hamilton, and Butler counties had the highest rates of foreclosure and Campbell and Boone counties had the lowest rates of foreclosure in the assessment area.

Building permits for this MSA, Indiana, Kentucky, Ohio, and the nation are included in the following table for 2014, 2015, and 2016.³⁰

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
MSA	5,206	4,661	-10.5%	5,859	25.7%
Indiana	17,813	18,483	3.8%	18,317	-0.9%
Kentucky	9,421	10,566	12.2%	12,798	21.1%
Ohio	19,965	20,047	0.4%	22,269	11.1%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

²⁸ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²⁹ Realtytrac: <http://www.realtytrac.com/statsandrends/foreclosurestrends/>

³⁰ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

While the MSA experienced a decrease in the number of housing permits issued between 2014 and 2015, the MSA also experienced a substantial increase of housing permits between 2015 and 2016. The rise in the number of permits could indicate the demand for home purchase loans increased in the MSA during the evaluation period.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, Cincinnati’s economy is outpacing the rest of Ohio and the nation. Factory output is contracting more quickly than in other parts of the state, whereas goods industries have been cutting jobs. Cincinnati is expected to add slightly more jobs in 2017 than in 2016 due to robust growth in white-collar services and healthcare.

According to Cincinnati Business Courier,³¹ Greater Cincinnati is home to ten of the nation’s largest companies in 2016. A new Fortune 500 firm was added to the list, but the following two firms fell off the list:

- Omnicare (acquired by CVS Health Corp. last year), which was No. 414 on the list in 2015
- General Cable Corp. (fell to No. 544 this year), which was No. 443 on the list in 2015

Cincinnati Fortune 500 Companies (2016)³²		
Rank	Company	Annual Revenue
17	Kroger Co.	\$109.8 billion
21	Cardinal Health	\$102.5 billion
34	Procter & Gamble Co.	\$78.8 billion
103	Macy’s Inc.	\$27 billion
376	Fifth Third Bancorp	\$7 billion
383	AK Steel Holding Corp.	\$6.7 billion
421	American Financial Group	\$6.1 billion
472	Ashland Inc.	\$5.4 billion
479	Western & Southern Financial Group	\$5.4 billion
499	Cincinnati Financial	\$5.1 billion

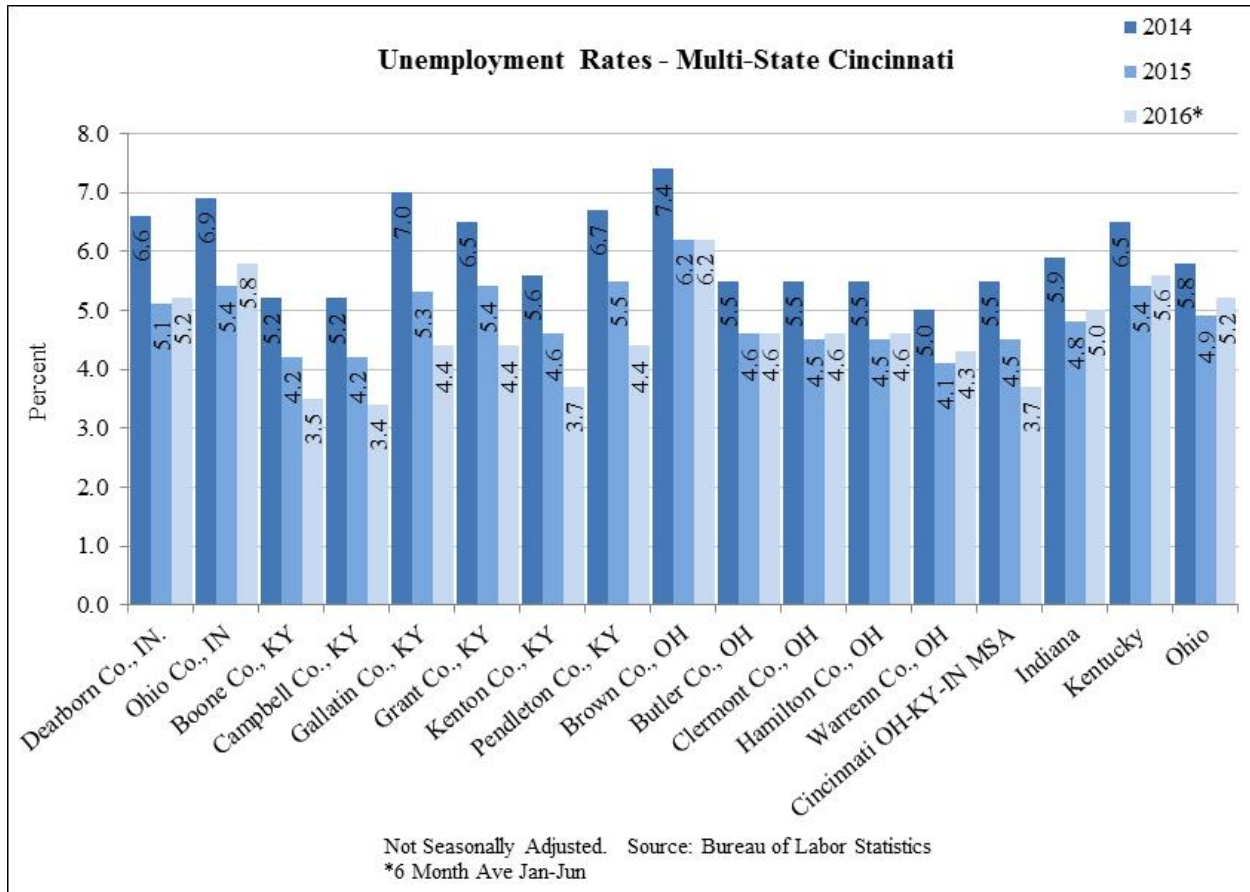
According to Moody’s Analytics, the top ten employers in the MSA in 2015/2016 were:

Company	Number of Employees
Local Government	83,810
State Government	30,688
Kroger Co.	21,646
University of Cincinnati	16,016
Federal Government	15,366
Cincinnati Children’s Hospital Medical Center	14,944
TriHealth Inc.	11,800
Procter & Gamble Co.	11,000
UC Health	10,000
GE Aviation	7,800

³¹ Cincinnati Business Courier: <http://www.bizjournals.com/cincinnati/news/2016/06/06/these-cincinnati-firms-made-this-year-s-fortune.html>

³² Bold type indicates company new to the list in 2016 (returned to the list this year – it was No. 525 in 2015)

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the MSA, Ohio, Kentucky, and Indiana.



Overall, the unemployment rates declined from 2014 to 2015 and varied between 2015 and June 2016. Brown County (OH) had the highest unemployment rates all three years. Warren County (OH) had the lowest unemployment rates in 2014 and 2015, while Campbell County (KY) had the lowest unemployment rate in 2016.

According to *The Enquirer*, GE Aviation cut 307 engineering jobs (238 of which are located in the Cincinnati area) or 7.0% of its workforce at the end of January 2017. The company said the cuts are due to engine development programs that have been completed.³³ According to an article in the *Cincinnati Business Courier*, Omnicare Inc. laid off more of its employees following its acquisition in 2015 by CVS Pharmacy Inc. The Cincinnati-based health care firm initially laid off 232 employees, including numerous high-level executives (who worked in its downtown headquarters), and by May 2016, 13 more employees will receive layoff notices.³⁴

³³The Enquirer. "Omnicare continues layoffs." *Cincinnati.com*. January 28, 2017.

http://www.bizjournals.com/cincinnati/morning_call/2016/02/omnicare-continues-layoffs.html

³⁴ Caproni, Erin. "GE Aviation laying off 238 engineers locally." *Cincinnati Business Courier*. February 10, 2016. -

<http://www.cincinnati.com/story/money/2016/01/28/ge-aviation-laying-off-234-engineers-locally/79459654/>

According to an article in *Cincinnati!com*, Procter & Gamble (P&G) will cut another 3,000-6,000 office jobs worldwide in the next two years (an unknown number of cuts could occur in Cincinnati, where the company is headquartered and employs roughly 11,000 in the region). In 2012, P&G first announced it would slash 5,700 jobs or 10.0% of its nonmanufacturing jobs. From 2012-2015, P&G has eliminated a total of nearly 11,000 office positions and an additional 10,000 manufacturing jobs worldwide. In April 2015, P&G announced it would be eliminating 25.0-30.0% of office positions by mid-2017 and has already eliminated 19.0% of those positions. The company has achieved a net reduction in jobs despite a worldwide factory building boom. The company plans at least another 18 projects for new or expanded plants in overseas markets.³⁵

³⁵ Coolidge, Alexander. "P&G to cut thousands of jobs in next 2 years." *Cincinnati!com*. April 23, 2015. - <http://www.cincinnati.com/story/money/2015/04/23/pg-reports-profit/26228245/>

Combined Demographics Report

Assessment Area: Multi Cincinnati

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	56	11.4	27,494	5.2	10,982	39.9	110,650	20.8
Moderate-income	120	24.3	104,050	19.5	16,685	16	91,799	17.2
Middle-income	196	39.8	236,437	44.3	14,952	6.3	112,467	21.1
Upper-income	117	23.7	165,196	31	4,158	2.5	218,279	40.9
Unknown-income	4	0.8	18	0	8	44.4	0	0
Total Assessment Area	493	100.0	533,195	100.0	46,785	8.8	533,195	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	72,129	15,288	2.8	21.2	36,892	51.1	19,949	27.7
Moderate-income	209,570	96,151	17.4	45.9	83,782	40	29,637	14.1
Middle-income	381,165	255,870	46.3	67.1	92,728	24.3	32,567	8.5
Upper-income	236,160	185,514	33.6	78.6	35,768	15.1	14,878	6.3
Unknown-income	103	9	0	8.7	50	48.5	44	42.7
Total Assessment Area	899,127	552,832	100.0	61.5	249,220	27.7	97,075	10.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	4,797	5.2	4,040	4.9	733	9.4	24	5.3
Moderate-income	19,463	21.3	17,089	20.5	2,264	29.1	110	24.5
Middle-income	36,867	40.3	33,919	40.7	2,728	35.1	220	49
Upper-income	30,308	33.1	28,168	33.8	2,045	26.3	95	21.2
Unknown-income	35	0	24	0	11	0.1	0	0
Total Assessment Area	91,470	100.0	83,240	100.0	7,781	100.0	449	100.0
	Percentage of Total Businesses:			91.0		8.5		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	13	0.8	11	0.7	2	20	0	0
Moderate-income	250	15.3	249	15.3	1	10	0	0
Middle-income	1,064	65	1,061	65.3	3	30	0	0
Upper-income	309	18.9	305	18.8	4	40	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,636	100.0	1,626	100.0	10	100.0	0	.0
	Percentage of Total Farms:			99.4		.6		.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CINCINNATI OH-KY-IN MSA

Lending Test

Fifth Third's performance under the lending test in this assessment area is rated "Outstanding." Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 93 community development loans totaling \$996.4 million in the area. Fifth Third has an excellent geographic distribution of loans and a low level of lending gaps and an excellent distribution among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and extensive use of flexible lending practices augmented Fifth Third's performance in this assessment area.

Greatest consideration was given to the evaluation of refinance lending based on the overall volume of lending, followed by small business, home purchase, and home improvement lending. Details of Fifth Third's residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Lending activity reflects an excellent responsiveness to the credit needs within the assessment area. The percentage of Fifth Third's lending in Cincinnati is 10.9%, while the percentage of total deposits is much higher at 28.0%. As previously mentioned, the large disparity between the percentage of deposits and loans in this AA is primarily because deposits that cannot be assigned to one specific area are assigned to Fifth Third's headquarters in Cincinnati. Fifth Third originated 5,129 refinance, 4,974 home purchase, 410 home improvement, 5,120 small business, and 93 community development loans during the evaluation period.

Fifth Third made 99.7% of the HMDA and 99.9% of the CRA lending within this designated assessment area. There was no concentration of loans identified in any of the excluded counties within the assessment area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
HAMP Modifications	0	0.0%	19	29.2%	38	58.5%	8	12.3%
Other Real Estate Secured Modifications	26	5.6%	124	26.7%	200	43.0%	115	24.7%
<i>Percentage of Owner Occupied Units</i>		<i>2.8%</i>		<i>17.4%</i>		<i>46.3%</i>		<i>33.6%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	137	29.5%	145	31.2%	91	19.6%	89	19.1%
<i>Percentage of Families by Family Income</i>		<i>20.8%</i>		<i>17.2%</i>		<i>21.1%</i>		<i>40.9%</i>

*Unknown tract data is not included in the above table.

The percentage of HAMP modifications in moderate-income tracts and the percentage of other modifications in low- and moderate-income tracts exceeded the percentage of owner-occupied units in these geographies; therefore, modifications helped to expand lending activities in these areas.

Most of the borrower incomes for HAMP modifications were unknown; therefore, it would not be meaningful to review the income distribution for these modifications. The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area. Thus, modifications enhanced Fifth Third's ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third's overall distribution of lending among geographies is excellent. Refinance lending is excellent. Home purchase and home improvement lending is good. Small business lending is excellent. There is also a low overall level of gaps in lending. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	56	2	96.4%
Moderate	120	0	100.0%
Middle	196	1	99.5%
Upper	117	0	100.0%
Unknown	4	3	25.0%
Total	493	6	98.8%

*Unknown tract data is not included in the above table

Lending gaps are considered minimal, as there are no lending gaps in moderate- and upper-income geographies and minimal lending gaps in low-and middle-income geographies.

Refinance Loans

Fifth Third made 135 refinance loans totaling \$10.8 million in low-income tracts. This represents 2.6% of refinance loans by volume and 1.5% by dollar amount, which is below the percentage of owner-occupied units at 2.8%. The percentage of loans by volume exceeded the 2014 aggregate at 1.9% and exceeded the 2015 aggregate at 1.5% in 2015. Given that Fifth Third's performance exceeded the aggregate of all lenders and the owner-occupancy rate in low-income rates is only 21.2%, the geographic distribution of refinance loans in low-income tracts is excellent.

Fifth Third made 849 refinance loans totaling \$74.2 million in moderate-income tracts. This represents 16.6% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 17.4%. The percentage of loans by dollar amount at 10.2% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 14.5% and exceeded the 2015 aggregate at 13.0%. Given that Fifth Third's performance exceeded the aggregate of all lenders and that less than half the housing units are owner-occupied (45.9%), the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 2,189 refinance loans totaling \$250.5 million in middle-income tracts. This represents 42.7% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 46.3%. However, refinance loans by dollar amount (34.6%) was below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 45.1% and was below the 2015 aggregate at 43.8%.

Fifth Third made 1,956 refinance loans totaling \$389.5 million in upper-income tracts. This represents 38.1% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 33.6%, and 53.7% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 38.4% and was comparable to the 2015 aggregate at 41.7%.

Overall, the geographic distribution of refinance loans is excellent.

Home Purchase Loans

Fifth Third made 131 home purchase loans totaling \$14.1 million in low-income tracts. This represents 2.6% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 2.8%, and 1.7% by dollar amount, which is comparable to the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate at 1.8% and exceeded the 2015 aggregate at 1.8%. Given that Fifth Third's performance exceeded the aggregate of all lenders and was comparable to the percentage of owner-occupied units in these geographies, the geographic distribution in low-income tracts is excellent.

Fifth Third made 890 home purchase loans totaling \$92.1 million in moderate-income tracts. This represents 17.9% of its home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 17.4%, and 11.1% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate at 13.6% and exceeded the 2015 aggregate at 14.9%. Since Fifth Third performance exceeded the aggregate of all lenders and proxy, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 2,078 home purchase loans totaling \$277.1 million in middle-income tracts. This represents 41.8% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 46.3%, and 33.5% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 45.8% and was below the 2015 aggregate of 45.8% in 2015.

Fifth Third made 1,875 home purchase loans totaling \$443.5 million in upper-income tracts. This represents 37.7% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 33.6%, and 53.6% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 38.8% and was below the 2015 aggregate of 37.6%.

Several of the community contacts stated the need for affordable housing in low-and moderate-income areas. Since Fifth Third was able to penetrate these areas at an excellent level, the geographic distribution of home purchase loans is excellent.

Home Improvement Loans

Fifth Third made ten home improvement loans totaling \$373,000 in low-income tracts. This represents 2.4% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 2.8%, and 1.4% by dollar amount, which is below the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 2.2% and exceeded the 2015 aggregate of 1.8%. Given Fifth Third's performance and the median age of housing in low-income tracts at 61 years, which would likely indicate the need for home improvement loans, the geographic distribution of home improvement loans in low-income tracts is excellent.

Fifth Third made 72 home improvement loans totaling \$3.2 million in moderate-income tracts. This represents 17.6% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 17.4%, and 11.8% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 13.5% and exceeded the 2015 aggregate of 15.3%. A community contact mentioned the need for home improvement-type lending in this area. Also, as Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 209 home improvement loans totaling \$12.8 million in middle-income tracts. This represents 51.0% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 46.3%, and 47.2% by dollar amount, which is comparable to the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 47.7% and was comparable to the 2015 aggregate of 44.7%.

Fifth Third made 119 home improvement loans totaling \$10.7 million in upper-income tracts. This represents 29.0% of home improvements loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 33.6%, and 39.6% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 36.6% and was below the 2015 aggregate of 38.3%.

Overall, the geographic distribution of home improvement loans is excellent.

Small Business Loans

Fifth Third made 333 small business loans totaling \$65.3 million in low-income tracts. This represents 6.5% of small business loans by volume, which exceeds the percentage of small businesses in these tracts at 4.9%, and at 9.1% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume exceeded 2014 aggregate of 5.0% and exceeded the 2015 aggregate of 5.1%. Given that Fifth Third's performance exceeded the aggregate of lenders and proxy, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 889 small business loans totaling \$164.7 million in moderate-income tracts. This represents 17.4% of small business loans by volume, which is below the percentage of businesses in these tracts at 20.5%, and 23.0% by dollar amount, which is comparable to the percentage of small businesses in these geographies. The percentage of loans by volume was below the 2014 aggregate of 19.6% and was below the 2015 aggregate of 19.7%. Given that Fifth Third's performance was slightly below proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 1,924 small business loans totaling \$254.3 million in middle-income tracts. This represents 37.6% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 40.7%, and 35.6% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume equaled the 2014 aggregate of 37.6% and slightly exceeded the 2015 aggregate of 37.4%.

Fifth Third made 1,973 small business loans totaling \$230.6 million in upper-income tracts. This represents 38.5% of small business loans by volume, which exceeds the percentage of small businesses in these tracts at 33.8%, and 32.3% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 36.8% and was comparable to the 2015 aggregate of 37.0%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is considered excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for refinance, home purchase and home improvement loans.

Refinance Loans

Fifth Third made 809 loans totaling \$61.0 million to low-income borrowers. This represents 15.8% of refinance loans by volume, which is below the percentage of low-income families at 20.8%. The percentage of loans by dollar amount in these geographies at 8.4% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 8.3% and exceeded the 2015 aggregate of 7.2%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 1,071 loans totaling \$98.3 million to moderate-income borrowers. This represents 20.9% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.2%, and 13.6% by dollar volume, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 16.4% and exceeded the 2015 aggregate of 14.6%. Given that Fifth Third's performance exceeded the aggregate of lenders and proxy, the borrower distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 1,159 loans totaling \$136.4 million to middle-income borrowers. This represents 22.6% of refinance loans by volume, which exceeds the percentage of middle-income families at 21.1%, and 18.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 20.8% and exceeded the 2015 aggregate of 19.6%.

Fifth Third made 1,697 loans totaling \$360.4 million to upper-income borrowers. This represents 33.1% of refinance loans by volume, which is less than the percentage of upper-income families at 40.9%, while the percentage of loans by dollar amount at 49.7% is above proxy. The percentage of loans by volume was below the 2014 aggregate of 35.6% and was below the 2015 aggregate of 37.6%.

Overall, the borrower distribution of refinance loans is excellent.

Home Purchase Loans

Fifth Third made 927 loans totaling \$76.8 million to low-income borrowers. This represents 18.6% of home purchase loans by volume, which is comparable to the percentage of low-income families at 20.8%, and 9.3% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 10.3% and exceeded the 2015 aggregate of 11.2%. Given that Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 1,113 loans totaling \$125.4 million to moderate-income borrowers. This represents 22.4% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.2%, and 15.2% of loans by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 21.1% and exceeded the 2015 aggregate of 21.3%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 904 loans totaling \$131.3 million to middle-income borrowers. This represents 18.2% of home purchase loans by volume, which is comparable to the percentage of middle-income families at 21.1%, and 15.9% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 20.3% and was below the 2015 aggregate of 19.4%.

Fifth Third made 1,450 loans totaling \$376.6 million to upper-income borrowers. This represents 29.2% of home purchase loans by volume, which is less than the percentage of upper-income families at 40.9%, and 45.5% of loans by dollar amount, which is comparable to proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 32.0% and was below the 2015 aggregate of 31.4%.

The borrower distribution of home purchase loans is excellent.

Home Improvement Loans

Fifth Third made 87 loans totaling \$3.7 million to low-income borrowers. This represents 21.2% of home improvement loans by volume, which exceeds the percentage of low-income families at 20.8%, and 13.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 9.8% and exceeded the 2015 aggregate of 10.0%. Given that Fifth Third's performance significantly exceeds the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 119 loans totaling \$6.0 million to moderate-income borrowers. This represents 29.0% of its home improvement loans by volume, which substantially exceeded the percentage of moderate-income families at 17.2%, and 22.1% by dollar amount, which is above proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.3% and exceeded the 2015 aggregate of 19.0%.

A community contact specifically mentioned the need for home improvement-type lending in this area. Given that Fifth Third’s performance exceeded the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 81 loans totaling \$5.4 million to middle-income borrowers. This represents 19.8% of home improvement loans by volume, which is comparable to the percentage of middle-income families at 21.1%, and 20.1% by dollar amount, which is also comparable to proxy. The percentage of loans by volume was below the 2014 aggregate of 23.4% and was below the 2015 aggregate of 24.0%.

Fifth Third made 112 loans totaling \$10.9 million to upper-income borrowers. This represents 27.3% of home improvement loans by volume, which is significantly below the percentage of upper-income families at 40.9%, and 40.1% by dollar amount, which is comparable to proxy. The percentage of loans by volume was below the 2014 aggregate of 41.8% and was below the 2015 aggregate of 42.0%.

The overall borrower distribution of home improvement loans is excellent.

Small Business Loans

Considering Fifth Third’s headquarters is in this market, the need to extend working capital loans to small businesses, as expressed by several community contacts, and Fifth Third’s performance relative to the aggregate of all lenders, the distribution of small business loans to businesses of different sizes is good. Fifth Third was able to make 52.8% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 45.9% and was comparable to the 2015 aggregate of 49.2% in 2015, but was significantly below the percentage of small businesses in the assessment area at 91.0%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (71.2%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated 93 community development loans totaling \$996.4 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
6	71,343,200	11	76,132,899	70	842,767,350	6	6,150,000

Community development lending in this assessment area represents 16.6% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third's highest percentage of community development lending during the evaluation period. Fifth Third ranks second in this market with 27.8% of the deposit market share.³⁶ As such, Fifth Third is considered a leader in community development lending in this assessment area.

Examples of community development lending include but are not limited to:

- A renewal of a revolving line of credit to nonprofit financial intermediary that raises private capital for investment in affordable housing developments that utilize LIHTC projects in target communities
- Construction loan to a development corporation that supports affordable housing for U.S. military veterans earning less than 80% of the area median family income – 34 units
- New loan to improve 100 multi-family rental units for families earning less than 80% of area median family income
- Renewal of a revolving line of credit to provide bridge financing for investments by a Small Business Investment Company that funds loans to small businesses in the Greater Cincinnati area.
- Loans to businesses in an area designated by Cincinnati City Council to focus on retaining and expanding existing businesses.
- Renewal of working capital loans that support eligible activities in designated Empowerment Zone(s)
- Working capital loan to support a nonprofit that provides services to homeless individuals
- New loan to construct a 118-bed facility to serve homeless individuals
- Working capital loan to support a nonprofit that provides a multitude of community services to low- and moderate-income individuals

The affordable housing loans, revitalization and stabilization loans to retain and expand existing businesses, and loans that provide services to low- and moderate-individuals were deemed to be responsive as community contacts specifically mentioned the need for these types of loans.

³⁶ The high percentage of total deposits (27.8%) is primarily due to deposits that cannot be allocated to specific areas are allocated to Fifth Third's corporate headquarters located in this MSA.

Flexible Lending Programs

Overall, Fifth Third had 2,569 flexible lending loans in the geographies: 1,287 government loans, 186 down payment assistance loans, and 1,096 were other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.7%	1.2%	2.8%	20.8%	15.0%	17.4%	52.7%	51.3%	46.3%	24.8%	32.5%	33.6%
Down Payment Assistance Programs	26.9%	25.6%	2.8%	28.0%	23.3%	17.4%	34.4%	37.9%	46.3%	10.8%	13.3%	33.6%
Other Flexible Lending Programs	3.9%	2.6%	2.8%	23.0%	18.2%	17.4%	46.0%	42.8%	46.3%	21.1%	36.4%	33.6%
Total	4.5%	3.0%	2.8%	22.3%	16.7%	17.4%	48.5%	47.3%	46.3%	24.8%	33.0%	33.6%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	17.6%	11.1%	20.8%	33.9%	29.2%	17.2%	26.1%	28.7%	21.1%	18.0%	26.2%	40.9%
Down Payment Assistance Programs	61.3%	54.5%	20.8%	24.2%	27.9%	17.2%	4.3%	5.2%	21.1%	8.6%	10.7%	40.9%
Other Flexible Lending Programs	19.8%	15.5%	20.8%	24.0%	21.0%	17.2%	22.0%	21.4%	21.1%	29.7%	37.7%	40.9%
Total	27.1%	15.1%	20.8%	29.0%	25.8%	17.2%	22.8%	24.6%	21.1%	22.3%	30.0%	40.9%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number and dollar amount exceeded the percentage of owner-occupied units in these tracts; particularly for down payment assistance programs. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units in these geographies, while the percentage of lending by dollar amount was slightly below proxy.

Fifth Third’s lending by volume to low-income borrowers exceeded the percentage of low-income families in the assessment area; however, lending by dollar amount was below proxy. The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, particularly for government loan programs.

Therefore, Fifth Third made extensive use of flexible lending practices in serving the assessment area’s credit needs, as lending through flexible loan programs consistently exceeded proxy.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “Outstanding.”

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 421 qualified investments totaling \$179.0 during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
229	82,352,988	2	12,000	47	8,422,666	78	2,337,384

Also included in the total number of qualified investment are 65 prior period investments totaling \$85.9 million. Fifth Third made 11.0% of its total community development investments in this assessment area, which is less than the percentage of total deposits at 28.0% and slightly less than the percentage of branch offices at 10.0%. The percentage of deposits is higher in this market, as the deposits that cannot be allocated elsewhere are allocated to the Fifth Third’s corporate headquarters located in this assessment area.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area, which was an important need expressed by several community contacts. In particular, Fifth Third had a \$4.2 million LIHTC investment that supported the multi-family affordable housing for U.S. military veterans. Fifth Third made 130 donations at \$10.8 million that supported local schools, small businesses, churches, food banks, health care, and affordable housing. The majority of Fifth Third’s donations (77.8%) went toward economic development; in particular, \$7.3 million supported a small business investment company that provides funds to small business development in the Greater Cincinnati area and an \$85,000 charitable donation that supported the multi-family affordable housing for U.S. military veterans. Providing funding to support small business development was a need expressed by several community contacts.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “High Satisfactory.” Retail services are accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Five banking centers were opened and ten closed since the previous evaluation period, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 130 banking centers within this assessment area, including six in low-, 30 in moderate-, 58 in middle-, and 34 in upper-income census tracts. There are also two branches located in unknown income tracts. Fifth Third's banking centers in this assessment area represent 10.0% of all its banking centers.

Fifth Third has a total of 273 full-service ATMs within this assessment area, including 20 in low-, 85 in moderate-, 162 in middle-, and 76 in upper-income census tracts. There are also six full-service ATMs located in unknown-income tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS
Assessment Area: Multi Cincinnati

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			%
Low	6	4.6%	0	0	Total	31	8.6%	20	7.3%	11	12.6%	56	11.4%	6.5%	5.2%
Moderate	30	23.1%	1	1	Total	85	23.6%	61	22.3%	24	27.6%	120	24.3%	22.4%	21.3%
Middle	58	44.6%	2	4	Total	162	45.0%	123	45.1%	39	44.8%	196	39.8%	43.5%	40.0%
Upper	34	26.2%	1	5	Total	76	21.1%	67	24.5%	9	10.3%	117	23.7%	27.6%	33.4%
Unknown	2	1.5%	1	0	Total	6	1.7%	2	0.7%	4	4.6%	4	0.8%	0.0%	0.0%
Total	130	100.0%	5	10	Total	360	100.0%	273	100.0%	87	100.0%	493	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DT O - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered adequate, as the distribution of branches was slightly below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered good.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 16,574 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 13.9% of all community development services provided and equates to 7.97 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
266	566	214	15,528

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization.

Community development services include 11,658 hours providing financial literacy through local nonprofits and school programs, 3,413 hours serving on boards and committees, 975 hours providing technical assistance to non-profits and local business, and 528 hours participating in foreclosure prevention outreach.

Particularly responsive are hours dedicated to financial literacy, first-time homebuyer assistance, and foreclosure outreach prevention activities. Several community contacts mentioned the need for financial literacy training and first-time homebuyer education. Also, the rate of foreclosures remains significantly higher in multiple counties throughout this assessment area compared to the foreclosure rates in Ohio and the nation.

MULTI-STATE METROPOLITAN AREA
(Full-scope Review)

CRA RATING for Evansville IN-KY MSA #21780: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and good to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- An adequate level of making community development loans;
- An extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- Provides a relatively high level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Evansville multistate assessment area. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EVANSVILLE IN-KY MSA

The Evansville IN-KY MSA consists of Posey, Vanderburgh, and Warrick counties in Indiana and Henderson County in Kentucky. The assessment area is comprised of ten low-, 20 moderate-, 28 middle-, and 19 upper-income tracts. There is also one tract with no income designation that is primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked second out of 23 institutions with 26.6% of the deposit market share in the MSA. Old National Bank had 34.6% of the market share. Deposits in this assessment area accounted for 1.4% of Fifth Third's total deposits. This was the 15th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 1,472 HMDA loans and 419 CRA loans, which represented 1.4% and 1.1% of the total loans originated during the evaluation period, respectively. This was the 19th largest HMDA market and 20th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked third among 245 HMDA reporters in the assessment area and Fifth Third ranked 22nd. Evansville Teachers Federal Credit Union and Heritage Federal Credit Union were the top two HMDA lenders in the assessment area. Fifth Third ranked 11th of 55 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were Old National Bank, American Express, German American Bancorp, and Synchrony Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Three community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an affordable housing agency, stated while the economic conditions of the area remain strong; their clients do not always qualify for traditional bank financing and must rely on high-cost credit alternatives, such as check cashing entities or credit cards. The contact believed financial education can help individuals learn how to strengthen their credit position. The contact stated they have partnered with banks to in order to provide their clients with help in obtaining mortgage loans, completing grant applications, and attending homebuyer education and financial literacy programs. In addition, the contact mentioned First Federal Savings Bank, Old National Bank, and German American Bancorp as being actively involved in project fund raising.

The second contact, representing a community development organization that serves Northwestern Kentucky, stated the organization often works with local banks to help ascertain a business' financial needs and connect them with the right type of creditor and to provide financial literacy training. The contact believed the overall distribution of banking branches and ATMs is accessible throughout the region, including rural areas. The contact stated that Field and Main Bank, Old National Bank, and United Community Bank are actively involved in the community.

The third contact, representing an organization that provides services to low-income individuals within Indiana, stated there is a need for homeownership education programs which the contact believed most area banks are helping to provide.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 311,552. About 27.7% of the population lived in low- and moderate-income tracts. In addition, 76.8% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Evansville MSA is the 158th largest in terms of population in the nation.³⁷ Vanderburgh County is the largest county in the assessment area, which includes Evansville and is the sixth-most populous county in Indiana.³⁸ Evansville is the third-largest city in Indiana and is the 228th most populous city in the U.S. Evansville has 119,943 residents and its population growth decreased by 1.1% between 2000 and 2015; however, the population of Evansville decreased by only 0.1% between 2010 and 2015.³⁹ According to Moody’s Analytics, migration flow in and out of Evansville was stable in 2015. In contrast, the next largest cities in the MSA, Boonville, IN and Henderson, KY, only have populations of 28,890 and 6,180, respectively.⁴⁰

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase or decrease.⁴¹ For the most part, the population within the MSA experienced positive growth between 2010 and 2015, with Warrick County experiencing the greatest growth and Posey County experiencing a decline in population.

County	2010 Population	2015 Population	Population Percent Change
Posey, IN	25,910	25,512	-1.5%
Vanderburgh, IN	179,703	181,877	1.2%
Warrick, IN	59,689	61,897	3.7%
Henderson, KY	46,250	46,407	0.3%
Total	311,552	315,693	1.3%

³⁷ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

³⁸ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

³⁹ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁴⁰ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁴¹ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):

<http://www.census.gov/quickfacts/table/PST045216/00>

Income Characteristics

In 2010 the MSA median family income was significantly higher (\$60,793) than Indiana and Kentucky at \$58,944 and \$52,046, respectively. Between 2014 and 2015, the median family income increased; however, between 2015 and 2016 the median family income decreased by 5.3% in this MSA.

Borrower Income Levels Evansville, IN-KY MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$63,600	0 - \$31,799	\$31,800 - \$50,879	\$50,880 - \$76,319	\$76,320 - & above
2015	\$64,800	0 - \$32,399	\$32,400 - \$51,839	\$51,840 - \$77,759	\$77,760 - & above
2016	\$61,400	0 - \$30,699	\$30,700 - \$49,119	\$49,120 - \$73,679	\$73,680 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.⁴² Vanderburgh and Henderson counties had the highest poverty rates in 2015 and 1999. In 2015, Vanderburgh County's poverty rate exceeded Indiana's poverty rate, but Henderson County's poverty rate did not exceed Kentucky's. Vanderburgh County also experienced the largest increase in poverty rate during this period. In 2015, Kentucky's and Indiana's poverty rates exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.⁴³ The following table shows the poverty rates for 1999⁴⁴ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Posey	7.4%	9.7%	31.1%
Vanderburgh	11.2%	17.2%	53.6%
Warrick	5.3%	7.5%	41.5%
Indiana	9.5%	14.4%	51.6%
Henderson	12.3%	17.0%	38.2%
Kentucky	15.8%	18.3%	15.8%
U.S.	11.8%	13.5%	14.4%

⁴² U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

⁴³ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

⁴⁴ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 137,924 housing units and 82,318 million families in the assessment area. From an income perspective, 31.6% of housing units, 22.3% of owner-occupied units, and 25.8% of families are located in low- or moderate-income tracts. Nearly two-thirds of the housing units in the low-income census tracts are either rental or vacant (64.2%). In the moderate-income census tracts, over half of the housing units are either rental or vacant (52.4%) and 47.6% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 42 years old, with 26.4% of the stock built before 1950. The oldest housing stock was in Vanderburgh County with a median age of 48 years, while the newest was 31 years in Warrick County. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 55 years in moderate-income tracts, which indicates that there is ample opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$117,885, with an affordability ratio of 39.54. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The median housing value increased between 2010 and 2011-2015; as a result, housing became less affordable across the assessment area. During the evaluation period, the most affordable housing was in Posey County and the least affordable was in Vanderburgh County. Median gross rents increased at a fairly substantial rate across the assessment area, with renters in Posey County experiencing the largest increase in rental rates and renters in Warrick County experiencing the smallest increase. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area, Indiana, and Kentucky.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Posey	\$120,500	47.74	\$133,800	43.42	\$535	\$666	24.5%
Vanderburgh	\$111,700	37.96	\$115,500	37.27	\$659	\$716	8.6%
Warrick	\$140,200	44.48	\$148,400	41.90	\$714	\$771	8.0%
Indiana	\$123,000	38.78	\$124,200	39.66	\$683	\$747	9.4%
Henderson	\$101,200	39.96	\$105,500	38.90	\$541	\$612	13.1%
Kentucky	\$116,800	35.60	\$123,200	35.50	\$601	\$675	12.3%

According to Bankrate.com,⁴⁵ Indiana ranked 15th and Kentucky ranked 43rd for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:⁴⁶

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Posey	1:5,780
Vanderburgh	1:1,091
Warrick	1:1,629
Indiana	1:1,590
Henderson	1:8,752
Kentucky	1:4,270
U.S.	1:1,533

In November 2016, Vanderburgh County had the highest rate of foreclosure and Henderson County had the lowest rate of foreclosure in the assessment area.

Building permits for this MSA, Indiana, Kentucky, Ohio, and the nation are included in the following table for 2014, 2015, and 2016.⁴⁷

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
MSA	727	763	5.0%	926	21.4%
Indiana	17,813	18,483	3.8%	18,317	-0.9%
Kentucky	9,421	10,566	12.2%	12,798	21.1%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The MSA experienced a small increase in the number of housing permits issued between 2014 and 2015 and a substantial increase of housing permits between 2015 and 2016. The rise in the number of permits could indicate the demand for home purchase loans increased in the MSA during the evaluation period.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, this MSA has a dearth of high-paying jobs and the economy is at risk due its high reliance on manufacturing, which has weak prospects for job growth. In addition, there is a lack of growth in private service jobs. Expansion in healthcare industry and increased higher education enrollment are anticipated to support any growth in the metropolitan area economy in the medium term.

⁴⁵ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

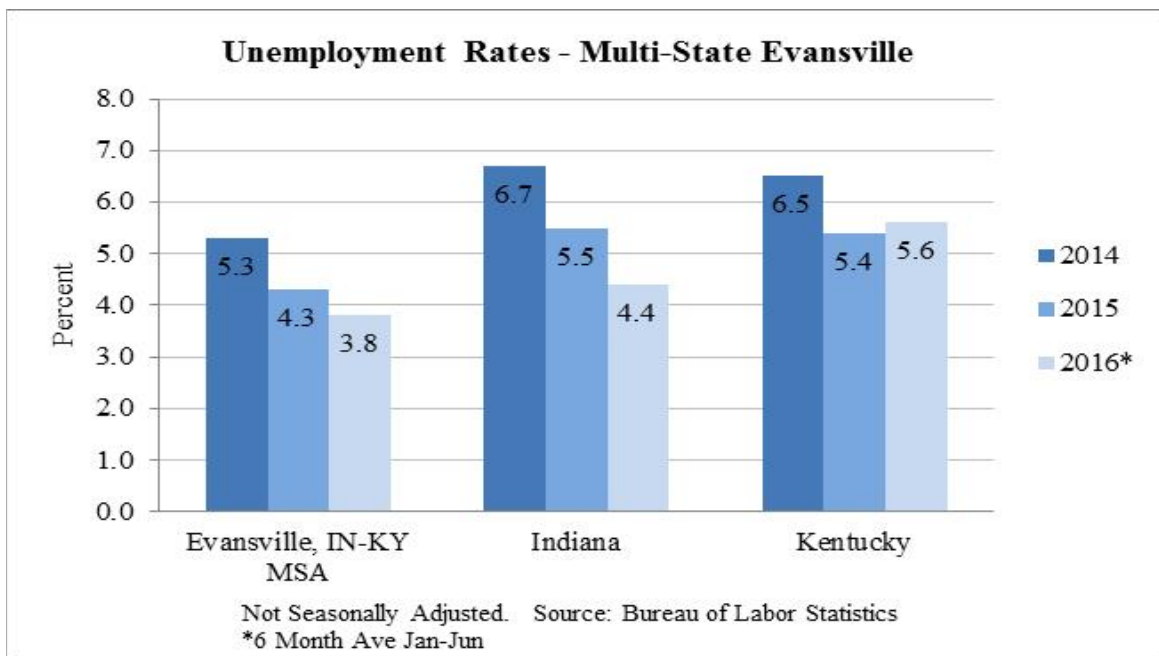
⁴⁶ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosurestrends/>

⁴⁷ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

According to Moody’s Analytics, the top ten employers in the MSA in 2016 were:

Company	Number of Employees
Local Government	11,527
Deaconess Hospital	5,600
Toyota Motor Manufacturing	5,000
State Government	4,140
St. Mary’s Medical Center	3,529
Evansville Vanderburgh School Corp.	3,264
University of Southern Indiana	2,813
Berry Plastics	2,699
SKANSKA	2,460
T.J. Maxx	1,500

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the MSA, Kentucky, and Indiana.



Overall, the unemployment rates declined each year in the MSA and were below either the unemployment rates of Indiana or Kentucky.

According to an article in the *St. Louis Post-Dispatch*, Alcoa announced it will cut 600 jobs as it permanently shuts down its Warrick Operations smelter at the end of March (2016). The company will keep about 1,200 people working at the facility ten miles east of Evansville. The Chamber of Commerce director said the layoffs will be a major economic event in Warrick County, as the smelter has been in operation for 55 years. Alcoa will continue to operate the rolling mill and power plant at the site.⁴⁸

⁴⁸ Associated Press. “Alcoa’s layoff of 600 worries may in southwestern Indiana.” *St. Louis Post-Dispatch*. January 8, 2016. - http://www.stltoday.com/business/local/alcoa-s-layoff-of-worries-many-in-southwestern-indiana/article_e725e6bc-0696-5643-8ffa-e89eb753a797.html

According to an article in the *Evansville Courier & Press*, in June 2015 Peabody Energy Corp., announced it will lay off a quarter of its corporate and regional employees, immediate closing its 70-employee office in Evansville as part of a company-wide cost-cutting measure (40 employees were transferred to mines in Indiana and Illinois or to corporate headquarters in St. Louis, while 30 were laid off).⁴⁹

⁴⁹ Stinnett, Chuck, Evansville Courier & Press. "Peabody Energy leaving Evansville announces layoffs." *Indiana Economic Digest*. June 9, 2015. - <http://www.indianaeconomicdigest.net/main.asp?SectionID=31&SubSectionID=135&ArticleID=79967>

Combined Demographics Report

Assessment Area: Multi Evansville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	12.8	4,583	5.6	1,483	32.4	17,641	21.4
Moderate-income	20	25.6	16,652	20.2	2,675	16.1	14,193	17.2
Middle-income	28	35.9	31,926	38.8	2,307	7.2	17,779	21.6
Upper-income	19	24.4	29,157	35.4	952	3.3	32,705	39.7
Unknown-income	1	1.3	0	0	0	0	0	0
Total Assessment Area	78	100.0	82,318	100.0	7,417	9.0	82,318	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,477	3,751	4.3	35.8	4,587	43.8	2,139	20.4
Moderate-income	33,087	15,763	18	47.6	13,894	42	3,430	10.4
Middle-income	52,446	35,606	40.6	67.9	11,552	22	5,288	10.1
Upper-income	41,914	32,536	37.1	77.6	6,911	16.5	2,467	5.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	137,924	87,656	100.0	63.6	36,944	26.8	13,324	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	927	7.3	778	6.8	141	11.5	8	10.1
Moderate-income	2,889	22.7	2,512	22	374	30.4	3	3.8
Middle-income	4,984	39.1	4,432	38.8	506	41.2	46	58.2
Upper-income	3,944	30.9	3,714	32.5	208	16.9	22	27.8
Unknown-income	1	0	1	0	0	0	0	0
Total Assessment Area	12,745	100.0	11,437	100.0	1,229	100.0	79	100.0
	Percentage of Total Businesses:			89.7		9.6		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2	0.3	2	0.4	0	0	0	0
Moderate-income	25	4.4	25	4.4	0	0	0	0
Middle-income	332	57.8	332	58.1	0	0	0	0
Upper-income	215	37.5	212	37.1	3	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	574	100.0	571	100.0	3	100.0	0	.0
	Percentage of Total Farms:			99.5		.5		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
EVANSVILLE IN-KY MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “High Satisfactory.” Fifth Third has demonstrated good responsiveness to the credit needs of the community. In addition, Fifth Third originated 13 community development loans totaling \$66.5 million in the area. Fifth Third has a good geographic distribution of loans and no lending gaps. Fifth Third has an excellent distribution among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses with gross annual revenues of \$1 million or less. The adequate level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Lending activity reflects a good responsiveness to the credit needs within the assessment area. Fifth Third originated 789 home purchase, 597 refinance, 85 home improvement, 419 small business loans, and 13 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 1.3% is slightly less than the percentage of total deposits at 1.4% in this area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
HAMP Modifications	0	0.0%	4	40.0%	1	10.0%	5	50.0%
Other Real Estate Secured Modifications	3	5.5%	17	30.9%	20	36.4%	15	27.3%
<i>Percentage of Owner Occupied Units</i>		<i>4.3%</i>		<i>18.0%</i>		<i>40.6%</i>		<i>37.1%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	15	27.3%	18	32.7%	15	27.3%	7	12.7%
Percentage of Families by Family Income		21.4%		17.2%		21.6%		39.7%

*Unknown tract data is not included in the above table.

The percentage of other modifications in low- and moderate-income tracts significantly exceeded the percentage of owner-occupied units in these geographies; therefore, modifications helped to expand lending activities in these areas. Most of the borrower incomes for HAMP modifications were unknown; therefore, there it would not be meaningful to review the income distribution for these modifications. The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families; therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. The largest category, home purchase, is poor, while refinance and home improvement lending are good. Small business lending is excellent. There are also no lending gaps.

The following lending gap was noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	10	0	100.0%
Moderate	20	0	100.0%
Middle	28	0	100.0%
Upper	19	0	100.0%
Unknown	1	1	0
Total	79	1	98.7%

There are no gaps in lending in low-, moderate-, middle- and upper-income tracts in this assessment area. There are no owner-occupied units in the unknown tract.

Home Purchase Loans

Fifth Third made six home purchase loans totaling \$531,000 in low-income tracts. This represents 0.8% of home purchase loans by volume, which is significantly below the percentage of owner-occupied units in these tracts at 4.3%, and 0.5% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate at 1.9% and was below the 2015 aggregate at 1.6%. Given that Fifth Third’s performance is significantly below proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is poor.

Fifth Third made 142 home purchase loans totaling \$11.8 million in moderate-income tracts. This represents 18.0% of home purchase loans by volume, which equals the percentage of owner-occupied units in these tracts at 18.0%, and 11.1% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate at 15.2% and exceeded the 2015 aggregate at 15.8%. Since Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

Fifth Third made 257 home purchase loans totaling \$30.3 million in middle-income tracts. This represents 32.6% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 40.6%, and 28.5% by dollar amount, which is also below the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 36.7% and was below the 2015 aggregate of 34.7% in 2015.

Fifth Third made 384 home purchase loans totaling \$63.7 million in upper-income tracts. This represents 48.7% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 37.1%, and 59.9% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 46.2% and was comparable to the 2015 aggregate of 47.9% in 2015.

Fifth Third could have improved its penetration of low-income tracts, as over one-third of the housing units are owner-occupied and a community contact indicated that families need assistance qualifying for home loans. However, Fifth Third's performance in penetrating moderate-income tracts was excellent. Therefore, the geographic distribution of home purchase loans is good.

Refinance Loans

Fifth Third made 15 refinance loans totaling \$587,000 in low-income tracts. This represents 2.5% of refinance loans by volume and 0.9% by dollar amount, which is below the percentage of owner-occupied units at 4.3%. The percentage of loans by volume was comparable to the 2014 aggregate at 2.6% and was comparable to the 2015 aggregate at 2.1% in 2015. Given that Fifth Third's performance was comparable to the aggregate of all lenders and only 35.8% of the units are owner-occupied, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 109 refinance loans totaling \$6.2 million in moderate-income tracts. This represents 18.3% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 18.0%. The percentage of loans by dollar amount at 9.9% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 17.8% and exceeded the 2015 aggregate at 13.5%. Given that Fifth Third's performance exceeded the aggregate of all lenders and that only 46.7% of the housing units are owner-occupied, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 216 refinance loans totaling \$21.5 million in middle-income tracts. This represents 36.2% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 40.6%. The percentage of refinance loans by dollar amount at 34.5% is comparable to proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 37.5% and was comparable to the 2015 aggregate at 36.8%.

Fifth Third made 257 refinance loans totaling \$33.9 million in upper-income tracts. This represents 43.0% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 37.1%, and the dollar amount at 54.6% exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 42.2% and was comparable to the 2015 aggregate at 47.7%.

Overall, the geographic distribution of refinance loans is good.

Home Improvement Loans

Fifth Third made four home improvement loans totaling \$99,000 in low-income tracts. This represents 4.7% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 4.3%, and 1.8% by dollar amount, which is less than percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 3.9% and exceeded the 2015 aggregate of 2.3%. Given Fifth Third's performance, and because the median age of housing in low-income tracts is 61 years (likely indicating the need for home improvement loans), the geographic distribution in low-income tracts is excellent.

Fifth Third made 13 home improvement loans totaling \$500,000 in moderate-income tracts. This represents 15.3% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 18.0%, and 8.9% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 17.6 % and was below the 2015 aggregate of 16.6%. The geographic distribution of home improvement loans in moderate-income tracts is good.

Fifth Third made 31 home improvement loans totaling \$1.2 million in middle-income tracts. This represents 36.5% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 40.6%, and 22.0% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 44.8% and was below the 2015 aggregate of 37.6%.

Fifth Third made 37 home improvement loans totaling \$3.8 million in upper-income tracts. This represents 43.5% of home improvements loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 37.1%, and 67.3% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 33.8% and exceeded the 2015 aggregate of 43.6%.

Overall, the geographic distribution of home improvement loans is good.

Small Business Loans

Fifth Third made 33 small business loans totaling \$4.1 million in low-income tracts. This represents 7.9% of business loans by volume, which exceeded the percentage of businesses in these tracts at 6.8%, and 8.2% by dollar amount, which exceeded the percentage of businesses in these geographies. The percentage of lending was below the 2014 aggregate of 6.8% and exceeded the 2015 aggregate of 7.1%. Therefore, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 106 small business loans totaling \$13.5 million in moderate-income tracts. This represents 25.3% of business loans by volume, which exceeded the percentage of businesses in these tracts at 22.0%, and 26.7% by dollar amount, which exceeded the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 24.2% and was below the 2015 aggregate of 24.2%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 156 small business loans totaling \$18.0 million in middle-income tracts. This represents 37.2% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 38.8%, and 35.6% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 35.8% and exceeded the 2015 aggregate of 39.1%.

Fifth Third made 124 small business loans totaling \$15.0 million in upper-income tracts. This represents 29.6% of small business loans by volume, which is less than the percentage of businesses in these tracts at 32.5%, and 29.6% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 31.3% and was below the 2015 aggregate of 28.5%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for home purchase and refinances. Borrower distribution is good for home improvement loans.

Home Purchase Loans

Fifth Third made 121 loans totaling \$9.1 million to low-income borrowers. This represents 15.3% of home purchase loans by volume, which is below the percentage of low-income families at 21.4%, and 8.5% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 9.1% and exceeded the 2015 aggregate of 10.1%.

Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 216 loans totaling \$21.8 million to moderate-income borrowers. This represents 27.4% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.2%, and 20.5% of loans by dollar amount, which is also above proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.2% and exceeded the 2015 aggregate of 21.7%. The borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 183 loans totaling \$24.1 million to middle-income borrowers. This represents 23.2% of home purchase loans by volume, which is less than the percentage of middle-income families at 21.6%, and 22.6% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.5% and exceeded the 2015 aggregate of 20.4%.

Fifth Third made 247 loans totaling \$48.6 million to upper-income borrowers. This represents 31.3% of home purchase loans by volume, which is below the percentage of upper-income families at 39.7%, and 45.7% of loans by dollar amount, which is above proxy. The percentage of loans by volume exceeded the 2014 aggregate of 25.8% and exceeded the 2015 aggregate of 26.0%.

Overall, the borrower distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 101 loans totaling \$6.5 million to low-income borrowers. This represents 16.9% of refinance loans by volume, which is below the percentage of low-income families at 21.4%. The percentage of loans by dollar amount in these geographies at 10.4% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 9.8% and exceeded the 2015 aggregate of 8.1%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 139 loans totaling \$10.1 million to moderate-income borrowers. This represents 23.3% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.2%, and 16.2% by dollar volume, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.4% and exceeded the 2015 aggregate of 24.3%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 161 loans totaling \$16.2 million to middle-income borrowers. This represents 27.0% of refinance loans by volume, which exceeds the percentage of middle-income families at 21.6%, and 26.0% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.0% and exceeded the 2015 aggregate of 20.4%.

Fifth Third made 170 loans totaling \$26.3 million to upper-income borrowers. This represents 28.5% of refinance loans by volume, which is less than the percentage of upper-income families at 39.7%, while the percentage of loans by dollar amount at 42.2% exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 30.9% and was below the 2015 aggregate of 26.4%.

Overall, the borrower distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made 17 loans totaling \$616,000 to low-income borrowers. This represents 20.0% of home improvement loans by volume, which is comparable to the percentage of low-income families at 21.4%, and 11.0% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 13.4% and in 2015 exceeded the 2015 aggregate of 12.0%. Given that Fifth Third's performance exceeded the aggregate of all lenders and the volume of loans is comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 18 loans totaling \$957,000 to moderate-income borrowers. This represents 21.2% of its home improvement loans by volume, which exceeded the percentage of moderate-income families at 17.2%, and 17.1% by dollar amount, which is comparable to proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 20.8% and was comparable to the 2015 aggregate of 21.4%. Given that Fifth Third's performance was comparable to the aggregate of lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is good.

Fifth Third made 23 loans totaling \$1.4 million to middle-income borrowers. This represents 27.1% of home improvement loans by volume, which exceeds the percentage of middle-income families at 21.6%, and 25.5% by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 25.9% and below the 2015 aggregate of 28.9%.

Fifth Third made 27 loans totaling \$2.6 million to upper-income borrowers. This represents 31.8% of home improvement loans by volume, which was below the percentage of upper-income families at 39.7%, and 46.5% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 34.5% and exceeded the 2015 aggregate of 34.5%.

Overall, the borrower distribution of home improvement loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 50.6% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 37.5% and exceeded the 2015 aggregate of 41.2%, but was significantly below the percentage of small businesses in the assessment area at 89.7%. Also, Fifth Third made a relatively high percentage of small-dollar loans (76.8%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated 13 community development loans totaling \$66.5 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
1	9,930,000	2	3,250,000	8	53,130,337	2	230,000

Community development lending in this assessment area represents 1.1% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s 23rd highest percentage of community development lending during the evaluation period; however, Fifth Third ranks second with 26.6% of the deposit market share. Therefore, Fifth Third has an adequate level of community development lending.

Examples of community development lending include, but are not limited to:

- Loan to construct affordable rental housing for families earning less than 80.0% of the area median income
- Working capital to a non-profit agency that provides housing and services to homeless men, women, and children
- Working capital loan that promotes economic development by financing businesses to support job retention and add new jobs
- Working capital loan that helps to support essential community-wide infrastructure and community services in low- and moderate-income neighborhoods

Flexible Lending Programs

Overall, Fifth Third had 362 flexible lending loans in the geographies: 241 government loans, 24 down payment assistance loans, and 97 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	0.4%	0.2%	4.3%	17.0%	11.0%	18.0%	36.5%	34.4%	40.6%	46.1%	54.3%	37.1%
Down Payment Assistance Programs	25.0%	23.3%	4.3%	12.5%	9.0%	18.0%	50.0%	51.0%	40.6%	12.5%	16.7%	37.1%
Other Flexible Lending Programs	1.0%	0.5%	4.3%	27.8%	19.6%	18.0%	42.3%	37.7%	40.6%	28.9%	42.2%	37.1%
Total	2.2%	1.4%	4.3%	19.6%	12.9%	18.0%	39.0%	36.0%	40.6%	39.2%	49.8%	37.1%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	15.8%	10.6%	21.4%	42.3%	37.5%	17.2%	26.1%	31.2%	21.6%	14.1%	19.0%	39.7%
Down Payment Assistance Programs	81.8%	80.1%	21.4%	13.6%	8.5%	17.2%	0.0%	0.0%	21.6%	4.5%	11.4%	39.7%
Other Flexible Lending Programs	27.3%	21.7%	21.4%	23.2%	17.7%	17.2%	27.3%	30.4%	21.6%	22.2%	30.3%	39.7%
Total	22.9%	16.1%	21.4%	35.4%	31.7%	17.2%	24.9%	29.7%	21.6%	15.7%	21.3%	39.7%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts, by number and dollar amount, are below the percentage of owner-occupied units in these tracts; however, the down payment assistance programs significantly exceeded the percentage of owner-occupied units in low-income tracts. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units in these geographies, while the percentage of lending by dollar amount was below proxy.

Fifth Third’s lending by volume to low-income borrowers exceeded the percentage of low-income families, particularly for down payment assistance programs. Lending by dollar amount was below proxy. The percentage of lending by volume and dollar amount to moderate-income borrowers significantly exceeded the percentage of moderate-income families, particularly for government loan programs. Therefore, Fifth Third made extensive use of flexible lending practices is serving the assessment area’s credit needs, since lending through flexible loan programs exceeded proxy.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “Outstanding.”

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 113 qualified investments totaling \$33.8 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
29	24,806,508	15	48,236	2	880	56	181,206

Also included in the total number of qualified investments are 11 prior period investments totaling \$8.8 million. Overall, Fifth Third made 2.1% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 1.4% and the percentage of branch offices at 1.4%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area. Included in total investments are 74 donations totaling \$235,322 that supported United Way, local schools, small businesses, recreation centers, food banks, churches, and affordable housing. Investments in affordable housing and community services to low- and moderate-income individuals are considered to be responsive based on the assessment area’s at-risk economy, dearth of high-paying jobs, and higher poverty rates.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “High Satisfactory.” Retail services are accessible and Fifth Third provides a relatively high level of providing community development services.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Three banking centers were closed since the previous evaluation period and none were opened. Two banking centers were closed in low- and moderate-income tracts. Delivery services are accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 18 banking centers within this assessment area, including none in low-, six in moderate-, seven in middle-, and five in upper-income census tracts. Fifth Third banking centers in this assessment area represent 1.4% of all its banking centers.

Fifth Third has a total of 22 full-service ATMs within this assessment area, including one in low-, five in moderate-, eight in middle-, and eight in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: Multi Evansville

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	0	0.0%	0	0	Total	1	4.0%	1	4.5%	0	0.0%	10	12.8%	6.7%	7.4%
Moderate	6	33.3%	0	2	Total	6	24.0%	5	22.7%	1	33.3%	20	25.6%	23.8%	23.0%
Middle	7	38.9%	0	1	Total	9	36.0%	8	36.4%	1	33.3%	28	35.9%	37.8%	38.8%
Upper	5	27.8%	0	0	Total	9	36.0%	8	36.4%	1	33.3%	19	24.4%	31.7%	30.8%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	1	1.3%	0.0%	0.0%
Total	18	100.0%	0	3	Total	25	100.0%	22	100.0%	3	100.0%	78	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered poor, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third provides a relatively high level of community development services in this assessment area. During the evaluation period, Fifth Third employees provided 1,772 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 1.5% of all community development services provided and equates to 0.85 annualized persons (ANP).

Affordable Housing	Economic Development	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
44	3	1,725

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development. Community development services include 1,034 hours serving on boards and committees, 589 hours of providing financial literacy through local nonprofits and school programs, 109 hours providing technical assistance to non-profits, and 40 hours participating in foreclosure prevention outreach.

Particularly responsive are hours dedicated to financial literacy, first-time homebuyer assistance, and foreclosure outreach prevention activities. Several community contacts mentioned the need for financial literacy training and first-time homebuyer education.

MULTI-STATE METROPOLITAN AREA
(Full-scope Review)

CRA RATING for Huntington-Ashland WV-KY-OH MSA #26580: Satisfactory

The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Outstanding

The major factors supporting this rating include:

- An adequate responsiveness to credit needs;
- An adequate geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and adequate to businesses of different revenue sizes;
- Exhibits an adequate record of serving the credit needs of low-income individuals and areas and very small businesses;
- Few, if any community development loans;
- Extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Huntington-Ashland multistate assessment area. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HUNTINGTON-ASHLAND WV-KY-OH MSA

The Huntington-Ashland WV-KY-OH MSA consists of Boyd and Greenup counties in Kentucky, Lawrence County in Ohio, and Cabell, Lincoln, Putnam, and Wayne counties in West Virginia. The assessment area is comprised of five low-, 23 moderate-, 48 middle-, and 17 upper-income tracts.

As of June 30, 2016, Fifth Third ranked 11th out of 29 institutions with 4.1% of the deposit market share in assessment area. City National Bank of West Virginia had the majority of the market share with 10.9% of deposits. The next three largest institutions, Putnam County Bank, Huntington Federal Savings Bank, and JPMorgan Chase, had 10.1%, 8.5%, and 8.0% of the market share, respectively. Deposits in this assessment area accounted for 0.2% of the Fifth Third's total deposits. This was the 35th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 649 HMDA loans and 75 CRA loans, which represented 0.6% and 0.2% of the total loans originated during the evaluation period, respectively. This was the 32nd largest HMDA market and 40th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 11th among 222 HMDA reporters in the assessment area and Fifth Third ranked 23rd. City National Bank of West Virginia, Quicken Loans, Town Square Bank, and Wells Fargo Bank were the top four HMDA lenders in the assessment area. Fifth Third ranked 22nd of 50 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Synchrony Bank, U.S. Bank, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Four community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a community development group, stated the economic condition of Boyd County is lagging behind the rest of the country, but beginning to stabilize. The contact noted several large area employers have left or reduced operations in the area primarily due to an increase in foreign steel imports. While the organization works with the county and state to help provide funding, incentives, and grants to businesses entering the area, a local industrial park has remained unsold for over ten years. The contact felt that banks are meeting the credit needs of small businesses in the area, but may remain unwilling to take a risk on newer or start-up businesses. The contact stated several area employers work with local colleges to provide technical job training (e.g., one college offered welding classes during non-standard hours).

The second contact, representing an affordable housing organization, stated the Ashland area economy continues to struggle due to a lack of employment opportunities and shrinking industries. The contact stated that federal regulations (e.g., the Clean Air Act) have impacted the local coal industry and rail industry, but there has been recent recovery in these industries.

Additionally, King's Daughters Medical Center received a landmark fine (\$41 million) in 2014 that may have resulted in layoffs and lack of pay raises over the past three years. The contact also stated that many college graduates are leaving this area to relocate to larger metropolitan areas that tend to have more employment opportunities. The contact stated there is not much new housing construction in the area and homes for sale typically stay on the market for more than 180 days. The contact believed if the job market was better, there would be more demand for home refinance and home improvement lending. For the most part, banks are meeting the credit needs of the community; however, the contact believed banks could offer more home equity loan products. The contact mentioned larger financial institutions such as PNC, Fifth Third, Community Trust, and Town Square are prominent lenders in the area and seem willing to help customers. Local area credit unions are also a good option for individuals seeking smaller loans.

The third contact, representing another affordable housing organization, expressed concern that housing and economic conditions in the Ashland area have been flat for several years and are showing little improvement. The contact stated that home values have remained relatively steady and there was little-to-no new home construction. The contact believed the supply of affordable housing in the area appears to be sufficient and foreclosure levels have stabilized. The contact stated that consumer loan needs are being met by area banks and most individuals seek traditional mortgage financing through FHA, Fannie Mae, or Freddie Mac. However, the contact believed banks could offer more small-dollar lending options to small businesses and credit counseling to individuals, as most consumer lending is credit-score based.

The final contact, representing an affordable housing organization, stated the local economy has been relatively stable over the last ten years and Huntington, West Virginia was not affected by the financial crisis or downturn in the coal industry as much as other West Virginia communities. The largest obstacle Huntington faces is the aged housing stock. The community has a very large aging housing stock and infrastructure. At its peak in the 1920s, the city's housing stock met the needs of nearly 100,000 residents, whereas currently, the population is about 49,000 residents, resulting in a significant number of vacant, dilapidated properties. The contact stated the best way for financial institutions to become involved with affordable housing is to volunteer time and resources. For example, local financial institutions volunteered and supported a home-build project for low- and moderate-income individuals. The build was completely sponsored by local financial institutions that contributed manpower and money toward supplies. The contact also expressed the need for financial literacy programs to help lower-income individuals understand banking and credit. The contact believed local financial institutions are adequately meeting the credit needs of the community and supporting this organization. The contact specifically mentioned Fifth Third's E-Bus that travels to different parts of the community to help educate individuals about banking, saving, and improving their credit scores as beneficial to the community and believed more programs like this are needed in the area.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 364,908. About 20.5% of the population lived in low- and moderate-income tracts. In addition, 78.1% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Huntington-Ashland MSA is the 146th largest in terms of population in the nation.⁵⁰ Cabell County is the largest county in the assessment area, which includes Huntington, the fourth most populous county in West Virginia.⁵¹ Huntington is the largest city in the MSA and is the 782nd most populous city in the U.S. Huntington has 48,638 residents and its population growth decreased by 6.0% between 2000 and 2015, but only decreased by 1.0% between 2010 and 2015.⁵² According to Moody’s Analytics, the migration flow into and out of Huntington resulted in a loss of 800 to 1,500 area residents. A community contact mentioned the impact of the out-flow migration of college graduates on the area’s economy. In contrast, the next largest cities in the MSA are Ashland, KY and Ironton, OH, which have 21,108 and 10,900, respectively.⁵³

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase or decrease.⁵⁴ For the most part, the population within the MSA experienced negative growth between 2010 and 2015, with Putnam County experiencing the greatest growth and Wayne County experiencing the greatest decline in population.

County	2010 Population	2015 Population	Population Percent Change
Boyd, KY	49,542	48,325	-2.5%
Greenup, KY	36,910	36,068	-2.3%
Lawrence, OH	62,450	61,109	-2.1%
Cabell, WV	96,319	96,844	0.5%
Lincoln, WV	21,720	21,415	-1.4%
Putnam, WV	55,486	56,848	2.5%
Wayne, WV	42,481	40,971	-3.6%
Total	364,908	361,580	-0.9%

Income Characteristics

In 2010 the MSA median family income was lower (\$49,771) than Kentucky and Ohio at \$52,046 and \$59,680, respectively and slightly higher than West Virginia at \$48,896. The MSA median family income increased in 2014, 2015, and 2016.

⁵⁰ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

⁵¹ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

⁵² U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁵³ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁵⁴ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):

<http://www.census.gov/quickfacts/table/PST045216/00>

**Borrower Income Levels
Huntington-Ashland, WV-KY-OH MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$52,700	0 - \$26,349	\$26,350 - \$42,159	\$42,160 - \$63,239	\$63,240 - & above
2015	\$55,400	0 - \$27,699	\$27,700 - \$44,319	\$44,320 - \$66,479	\$66,480 - & above
2016	\$56,900	0 - \$28,449	\$28,450 - \$45,519	\$45,520 - \$68,279	\$68,280 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.⁵⁵ Putnam County had the lowest poverty rates and Lincoln County had the highest poverty rates in 1999 and 2015. In 2015, only Greenup and Putnam counties had poverty rates below the state-level poverty rates of Kentucky and West Virginia, respectively. Boyd County experienced the largest increase in poverty rates during this period. In 2015, Kentucky's, Ohio's, and West Virginia's poverty rates exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.⁵⁶ The following table shows the poverty rates for 1999⁵⁷ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Boyd	15.5%	20.5%	32.3%
Greenup	14.1%	16.8%	19.1%
Kentucky	15.8%	18.3%	15.8%
Lawrence	18.9%	21.0%	11.1%
Ohio	10.6%	14.8%	39.6%
Cabell	19.2%	20.2%	5.2%
Lincoln	27.9%	28.3%	1.4%
Putnam	9.3%	10.4%	11.8%
Wayne	19.6%	22.5%	14.8%
West Virginia	17.9%	18.0%	0.6%
U.S.	11.8%	13.5%	14.4%

⁵⁵ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

⁵⁶ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

⁵⁷ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 164,545 housing units and 98,909 million families in the assessment area. From an income perspective, 22.2% of housing units, 16.1% of owner-occupied units, and 18.2% of families are located in low- or moderate-income tracts. Over three quarters of the housing units in the low-income census tracts are either rental or vacant (77.0%) and 23.0% are owner-occupied. In the moderate-income census tracts, nearly half of the housing units are either rental or vacant (48.6%) and 51.5% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 39 years old, with 22.7% of the stock built before 1950. The oldest housing stock was in Cabell and Boyd counties with a median age of 47 and 43 years, respectively, while the newest was 17 years in Boone County. However, within the assessment area, the median age of housing stock was 59 years in low-income tracts and 53 years in moderate-income tracts. In addition, a community contact stated that Cabell County has a large aging housing stock and infrastructure that includes a significant number of vacant, dilapidated properties. Therefore, there appears to be ample opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$95,820, with an affordability ratio of 39.98. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. While median housing values fluctuated between 2010 and 2011-2015, housing generally became less affordable across the assessment area. During the evaluation period, the most affordable housing was in Greenup County and the least affordable was in Cabell County. Median gross rents increased at a fairly substantial rate across the assessment area, with renters in Boyd, Lawrence, and Putnam counties experiencing the largest increase in rental rates and renters in Lincoln County experiencing the smallest increase in gross rental rates. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area Kentucky, Ohio, and West Virginia.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Boyd	\$93,200	41.63	\$99,700	42.45	\$533	\$625	17.3%
Greenup	\$88,400	47.94	\$97,700	46.44	\$550	\$629	14.4%
Kentucky	\$116,800	35.60	\$123,200	35.50	\$601	\$675	12.3%
Lawrence	\$92,300	39.50	\$98,900	43.35	\$556	\$652	17.3%
Ohio	\$136,400	34.72	\$129,900	38.05	\$678	\$730	7.7%
Cabell	\$97,500	35.38	\$112,800	33.99	\$590	\$653	10.7%
Lincoln	\$65,100	47.42	\$81,000	44.20	\$485	\$524	8.0%
Putnam	\$135,200	38.92	\$148,600	38.21	\$626	\$731	16.8%
Wayne	\$85,500	41.03	\$82,800	43.86	\$525	\$589	12.2%
West Virginia	\$94,500	40.61	\$103,800	40.22	\$549	\$643	17.1%

According to Bankrate.com,⁵⁸ Ohio ranked eighth, Indiana ranked 15th, and Kentucky ranked 43rd for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:⁵⁹

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Boyd	1:1,484
Greenup	1:1,182
Kentucky	1:4,270
Lawrence	1:985
Ohio	1:1,053
Cabell	1:7,371
Lincoln	NA
Putnam	1:3,130
Wayne	1:5,210
West Virginia	1:8,311
U.S.	1:1,533

In November 2016, Cabell County had the highest rate of foreclosure and Lawrence County had the lowest rates of foreclosure in the assessment area.

Building permits for this MSA, Indiana, Kentucky, Ohio, and the nation are included in the following table for 2014, 2015, and 2016.⁶⁰

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
MSA	359	291	-18.9%	154	-47.1%
Kentucky	9,421	10,566	12.2%	12,798	21.1%
Ohio	19,965	20,047	0.4%	22,269	11.1%
West Virginia	2,686	2,814	4.8%	2,525	-10.3%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

While the MSA experienced a decrease in the number of housing permits issued between 2014 and 2015 and between 2015 and 2016. The decrease in the number of permits could indicate there is not a strong demand for home purchase loans in the MSA during the evaluation period. Also, two community contacts mentioned a reduced demand for new housing construction and home refinance and home improvement lending in the area.

⁵⁸ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

⁵⁹ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

⁶⁰ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Huntington-Ashland area economy is at risk due to over exposure to coal and steel industries. The recent merger of Cabell Huntington Hospital and St. Mary’s Medical Center may result in healthcare job losses and the area’s declining population may reduce patient volumes at local hospitals. Currently, rebounding coal production should boost the rail industry’s prospects. This area is a hub for rail and water transport.

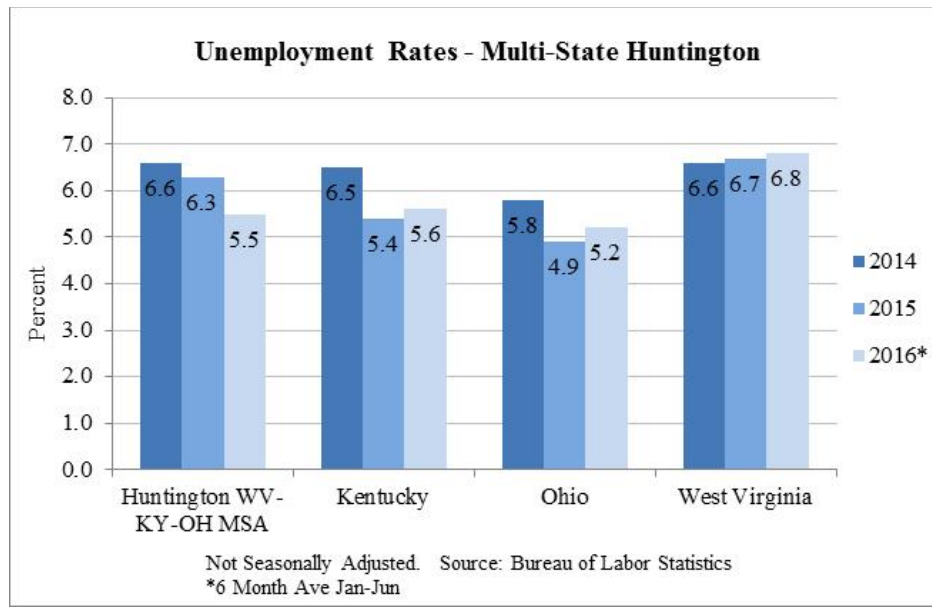
According to Ashland Alliance⁶¹ and The Huntington Area Development Council,⁶² the top 12 employers in the MSA in 2015/2016 were:

Company	Number of Employees
King’s Daughters Medical Center	3,753
St. Mary’s Medical Center	2,600
Cabell Huntington Hospital	2,300
Marshall University	2,000
Marathon Petroleum	1,554
Our Lady of Bellefonte Hospital	1,259
Toyota Motor Manufacturing	1,200
CSX, Huntington Division	1,100
VA Medical Center	1,078
Special Metals	996
AK Steel	937
University Physicians & Surgeons	850
Also:	
Steel of West Virginia	527

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 for the MSA, Kentucky, Ohio, and West Virginia.

⁶¹ <http://ashlandalliance.com/economic-development/top-employers/>

⁶² <http://www.hadco.org/community-profile/business-and-industry/>



Unemployment rates declined each year in the MSA and area unemployment was slightly higher than Kentucky’s and considerably below West Virginia’s during this time period.

According to the *West Virginia Record*, eight months after Cabell Huntington Hospital announced an agreement to acquire St. Mary’s Medical Center (November 2014), the attorney general announced a deal to ensure the acquisition is in compliance with the West Virginia Antitrust Act and all other applicable state and federal laws. This highly contested acquisition represents the combination of two of the largest employers in West Virginia. St. Mary’s Medical Center represents the seventh largest private employer and Cabell Huntington Hospital represents the 11th largest private employer in the state.⁶³ According to WCHS TV, Steel of West Virginia dropped its attempt to block the merger (October 2016). After dismissing its appeal, the president and chief executive officer of Steel of West Virginia expressed his ongoing concern that this merger will create a monopoly and lead to higher cost and lower quality of care. He noted the Federal Trade Commission expressed similar concerns when it dismissed its complaint against the merger. According to the CEO, not enough people stepped forward to stop the monopoly from forming. The merger has been approved by the West Virginia Healthcare Authority, the state, and the attorney general.⁶⁴

According to the *Courier-Journal*, Kings Daughters Medical Center (Ashland, WV), agreed to pay \$40.9 million to the government to settle claims for falsely billing Medicaid and Medicare for unnecessary (heart) surgeries. It is described as the largest ever settlement involving a hospital in the state’s eastern district.⁶⁵

⁶³ Karmasek, Jessica. “Deal Reached.” *West Virginia Record*. July 31, 2015. - <http://wvrecord.com/stories/510631143-morrisey-deal-reached-with-cabell-huntington-hospital-in-st-mary-s-acquisition>

⁶⁴ Aaron, Bob. “Steel of West Virginia drops effort to halt merger.” *WCHS-TV*. October 19, 2016. - <http://wchstv.com/news/local/steel-of-west-virginia-drops-effort-to-halt-cabell-huntington-hospital-st-marys-merger>

⁶⁵ Wolfson, Andrew. “Ashland hospital to pay \$41 million...” *Courier-Journal*. May 29, 2014. - <http://www.courier-journal.com/story/news/local/2014/05/28/ashland-hospital-pays-million-unnecessary-surgeries/9673553/>

Combined Demographics Report

Assessment Area: Multi Huntington

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	5.4	1,856	1.9	710	38.3	21,838	22.1
Moderate-income	23	24.7	16,101	16.3	4,056	25.2	17,447	17.6
Middle-income	48	51.6	58,428	59.1	7,672	13.1	20,182	20.4
Upper-income	17	18.3	22,524	22.8	1,501	6.7	39,442	39.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	93	100.0	98,909	100.0	13,939	14.1	98,909	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,623	1,293	1.2	23	3,112	55.3	1,218	21.7
Moderate-income	30,940	15,918	14.9	51.4	10,599	34.3	4,423	14.3
Middle-income	93,374	63,943	59.9	68.5	19,023	20.4	10,408	11.1
Upper-income	34,608	25,623	24	74	6,037	17.4	2,948	8.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	164,545	106,777	100.0	64.9	38,771	23.6	18,997	11.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	827	6.6	709	6.3	113	11	5	3.1
Moderate-income	2,508	20.1	2,211	19.5	260	25.4	37	22.7
Middle-income	5,822	46.6	5,325	47.1	394	38.5	103	63.2
Upper-income	3,341	26.7	3,066	27.1	257	25.1	18	11
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	12,498	100.0	11,311	100.0	1,024	100.0	163	100.0
Percentage of Total Businesses:			90.5		8.2		1.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	36	10.6	36	10.7	0	0	0	0
Middle-income	241	71.1	239	70.9	2	100	0	0
Upper-income	62	18.3	62	18.4	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	339	100.0	337	100.0	2	100.0	0	.0
Percentage of Total Farms:			99.4		.6		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
HUNTINGTON-ASHLAND WV-KY-OH MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “Low Satisfactory.” Fifth Third has demonstrated an adequate responsiveness to the credit needs of the community. In addition, Fifth Third originated one community development loan totaling \$1.0 million in the area. Fifth Third has an adequate geographic distribution of loans and moderate lending gaps. Fifth Third has a good distribution among borrowers of different income levels and an adequate distribution of loans to businesses of different revenue sizes. Fifth Third exhibits an adequate record of serving the credit needs of highly economically disadvantaged areas, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Lending activity reflects an adequate responsiveness to the credit needs within the assessment area. Fifth Third originated 306 home purchase, 275 refinance, 68 home improvement, 75 small business loans, and one community development loan during the evaluation period. The percentage of Fifth Third’s total lending at 0.5% is greater than the percentage of total deposits at 0.2% in this area.

In addition to lending, Fifth Third modified existing loans to borrowers. Below shows the distribution of other real-estate secured modifications within the assessment area by borrower income.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	7	20.0%	8	22.9%	9	25.7%	10	28.6%
<i>Percentage of Families by Family Income</i>		22.1%		17.6%		20.4%		39.9%

The percentage of HAMP and other modifications by geography was not considered in evaluating Fifth Third’s lending activity due to lack of volume. The percentage of other modifications made to low-income borrowers was comparable to the percentage of low-income families in the assessment area and the percentage of other modifications to moderate-income borrowers exceeded the percentage of moderate-income families. Therefore, other modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is adequate. Refinance lending, which was the largest loan category, is good, while performance for home purchase and home improvement lending is adequate. Small business lending is excellent. Further, there is a moderate level of lending gaps. The following lending gaps were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	5	1	80.0%
Moderate	23	5	78.3%
Middle	48	1	97.9%
Upper	17	0	100.0%
Total	93	7	92.5%

Overall, lending gaps are considered reasonable. Fifth Third had minimal lending gaps in low-income tracts and reasonable lending gaps in moderate-income tracts, as there is a higher owner-occupancy rate in these tracts.

Refinance Loans

Fifth Third made one refinance loan totaling \$58,000 in low-income tracts. This represents 0.4% of refinance loans by volume and 0.2% by dollar amount, which is below the percentage of owner-occupied units at 1.2%. The percentage of loans by volume exceeded the 2014 aggregate at 0.8% and in 2015 was below the 2015 aggregate at 1.1%. Given that only 23.0% of housing units are owner-occupied and 77.0% are either rental or vacant, the geographic distribution of refinance loans in low-income tracts is adequate.

Fifth Third made 23 refinance loans totaling \$2.2 million in moderate-income tracts. This represents 8.4% of refinance loans by volume, which is less than the owner-occupied units in these tracts at 14.9%. The percentage of loans by dollar amount at 6.9% is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate at 10.2% and was below the 2015 aggregate at 8.9%. Given that Fifth Third’s performance was below proxy and slightly below the aggregate of all lenders and nearly half the housing units are either rental or vacant, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 159 refinance loans totaling \$16.9 million in middle-income tracts. This represents 57.8% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 59.9%. The percentage of refinance loans by dollar amount (54.1%) is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate at 59.9% and was comparable to the 2015 aggregate at 58.4%.

Fifth Third made 92 refinance loans totaling \$12.1 million in upper-income tracts. This represents 33.5% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 24.0%, and the dollar amount at 38.8% exceeds proxy. The percentage of loans by volume below the 2014 aggregate at 29.6% and exceeded the 2015 aggregate at 31.6%.

Overall, the geographic distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made three home purchase loans totaling \$228,000 in low-income tracts. This represents 1.0% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 1.2%, and 0.4% by dollar amount, which is below the percentage of owner-occupied units in these geographies. The percentage of loans was comparable to the 2014 aggregate at 0.8% and exceeded the 2015 aggregate at 0.9%. Given that Fifth Third's performance was comparable to the aggregate of all lenders and the percentage of owner-occupied units in these geographies, the geographic distribution of home purchase loans in low-income tracts is good.

Fifth Third made 16 home purchase loans totaling \$1.5 million in moderate-income tracts. This represents 5.2% of its home purchase loans by volume, which is significantly less than the percentage of owner-occupied units in these tracts at 14.9%, and 2.9% by dollar amount, which was also less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate at 9.4% and was below the 2015 aggregate at 9.4%. Since Fifth Third performance was below proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is adequate.

Fifth Third made 134 home purchase loans totaling \$20.9 million in middle-income tracts. This represents 43.8% of home purchase loans by volume, which is less than the percentage of owner-occupied units in these tracts at 59.9%, and 41.1% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 55.4% and was below the 2015 aggregate of 55.5%.

Fifth Third made 153 home purchase loans totaling \$28.3 million in upper-income tracts. This represents 50.0% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 24.0%, but comparable at 55.5% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 34.5% and exceeded the 2015 aggregate of 34.3%.

Overall, the geographic distribution of home purchase loans is adequate.

Home Improvement Loans

Fifth Third made no home improvement loans in low-income tracts. The percentage of owner-occupied properties in these tracts is 1.2%. The aggregate made 0.8% of home improvement loans in these tracts in 2014 and 0.9% in 2015. Therefore, the geographic distribution of home improvement loans in low-income tracts is poor.

Fifth Third made six home improvement loans totaling \$272,000 in moderate-income tracts. This represents 8.8% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 14.9% and 6.0% by dollar amount and is below proxy. The percentage of loans by volume was below the 2014 aggregate of 14.0% and in 2015 was below the 2015 aggregate of 12.1%. Given that Fifth Third's performance was below proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is adequate.

Fifth Third made 46 home improvement loans totaling \$3.3 million in middle-income tracts. This represents 67.6% of home improvement loans by volume, which significantly exceeds the percentage of owner-occupied units in these tracts at 59.9%, and 72.3% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 57.6% and exceeded the 2015 aggregate of 60.1%.

Fifth Third made 16 home improvement loans totaling \$987,000 in upper-income tracts. This represents 23.5% of home improvements loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 24.0%, and 21.7% by dollar amount, which is comparable to the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 27.6% and was below the 2015 aggregate of 26.8%.

Overall, the geographic distribution of home improvement loans is adequate.

Small Business Loans

Fifth Third made five small business loans totaling \$1.6 million in low-income tracts. This represents 6.7% of business loans by volume, which exceeds the percentage of businesses in these tracts at 6.3%, and 12.5% by dollar amount, which exceeds proxy in these geographies. The percentage of loans by volume exceeds the 2014 aggregate of 6.3% and exceeded the 2015 aggregate of 5.9%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 16 small business loans totaling \$3.1 million in moderate-income tracts. This represents 21.3% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 19.5%, and 23.5% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 14.6% and was below the 2015 aggregate of 16.0%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 31 small business loans totaling \$3.0 million in middle-income tracts. This represents 41.3% of small business loans by volume, which is less than the percentage of businesses in these tracts at 47.1%, and 22.7% by dollar amount, which is less than the percentage of businesses in these geographies. The percentage of loans by volume was below the 2014 aggregate of 42.7% and exceeded the 2015 aggregate of 39.9%.

Fifth Third made 23 small business loans totaling \$5.4 million in upper-income tracts. This represents 30.7% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 27.1%, and 41.3% by dollar amount, which is above proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 29.9% and was comparable to the 2015 aggregate of 31.0%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is good based on borrower income and adequate for businesses of different revenue sizes. Borrower distribution is good for refinance, home purchase, and home improvement loans.

Refinance Loans

Fifth Third made ten loans totaling \$800,000 to low-income borrowers. This represents 3.6% of refinance loans by volume, which is significantly below the percentage of low-income families at 22.1%. The percentage of loans by dollar amount in these geographies at 2.6% is also significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 6.8% and below the 2015 aggregate of 6.7%. Given that Fifth Third's performance was significantly below the aggregate of all lenders and proxy, the borrower distribution of refinance loans to low-income borrowers is poor.

Fifth Third made 56 loans totaling \$4.0 million to moderate-income borrowers. This represents 20.4% of refinance loans by volume, which exceeded the percentage of moderate-income families at 17.6%, and 12.8% by dollar volume, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 15.4% and exceeded the 2015 aggregate of 13.4%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 66 loans totaling \$6.1 million to middle-income borrowers. This represents 24.0% of refinance loans by volume, which exceeds the percentage of middle-income families at 20.4%, and 19.4% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 22.3% and exceeded the 2015 aggregate of 20.1%.

Fifth Third made 137 loans totaling \$19.7 million to upper-income borrowers. This represents 49.8% of refinance loans by volume, which exceeds the percentage of upper-income families at 39.9%, and the percentage of loans by dollar amount at 62.8% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 45.2% and exceeded the 2015 aggregate of 43.6%.

Overall, the borrower distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made seven loans totaling \$472,000 to low-income borrowers. This represents 2.3% of home purchase loans by volume, which is significantly below the percentage of low-income families at 22.1%, and 0.9% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 5.6% and in 2015 was below the 2015 aggregate of 6.1%. Given that Fifth Third's performance was significantly below proxy and below the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is poor.

Fifth Third made 58 loans totaling \$6.1 million to moderate-income borrowers. This represents 19.0% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.6%, and 11.9% of loans by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of all lenders at 17.7% and exceeded the 2015 aggregate of 17.7%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 80 loans totaling \$10.7 million to middle-income borrowers. This represents 26.1% of home purchase loans by volume, which exceeds the percentage of middle-income families at 20.4%, and 21.0% by dollar amount, which slightly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 24.0% and was comparable to the 2015 aggregate of 23.2%.

Fifth Third made 158 loans totaling \$33.1 million to upper-income borrowers. This represents 51.6% of home purchase loans by volume, which exceeds the percentage of upper-income families at 39.9%, but below the dollar amount at 65.0%, exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 39.9% and exceeded the 2015 aggregate of 38.2%.

A community contact indicated there would be more demand for mortgage lending with an improved job market. Overall, the borrower distribution of home purchase loans is good.

Home Improvement Loans

Fifth Third made four loans totaling \$70,000 to low-income borrowers. This represents 5.9% of home improvement loans by volume, which is significantly below the percentage of low-income families at 22.1%, and 1.5% by dollar amount, which is also significantly below proxy. The percentage of loans by volume was significantly below the 2014 aggregate of 10.4% and exceeded the 2015 aggregate of 6.7%. Given that Fifth Third's performance was below proxy and the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is adequate.

Fifth Third made 13 loans totaling \$675,000 to moderate-income borrowers. This represents 19.1% of its home improvement loans by volume, which exceeded the percentage of moderate-income families at 17.6%, and 14.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 19.1% and exceeded the 2015 aggregate of 19.4%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is good.

Fifth Third made 18 loans totaling \$1.1 million to middle-income borrowers. This represents 26.5% of home improvement loans by volume, which exceeds the percentage of middle-income families at 20.4%, and 24.8% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.0% and was below the 2015 aggregate of 22.7%.

Fifth Third made 33 loans totaling \$2.7 million to upper-income borrowers. This represents 48.5% of home improvement loans by volume, which exceeded the percentage of upper-income families at 39.9%, and 58.9% by dollar amount, which was below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 43.9% and exceeded the 2015 aggregate of 48.9%.

The overall borrower distribution of home improvement loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 46.7% of small business loans to businesses with revenues of \$1 million or less. Fifth Third's performance was below the 2014 aggregate of 40.9% and the 2015 aggregate of 44.6% and was significantly below the percentage of small businesses in the assessment area at 90.5%. Fifth Third made an acceptable percentage of small-dollar loans (68.0%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. Further, the need for these small-dollar loans for small businesses was expressed by a community contact.

Community Development Loans

Fifth Third originated one community development loan totaling approximately \$1.0 million during the evaluation period. The loan was a working capital loan to promote economic development by financing a small business to support retention of jobs for low- and moderate-income workers.

Community development lending in the assessment area represents 0.02% of the total dollar volume of community development loans originated during the evaluation period. This was Fifth Third’s smallest market of community development lending. As such, Fifth Third made few, if any community development loans in the assessment area.

Flexible Lending Programs

Fifth Third had 155 flexible lending loans in this assessment area: 135 government loans, two down payment assistance loans, and 18 flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.5%	0.8%	1.2%	5.2%	3.1%	14.9%	51.1%	45.7%	59.9%	42.2%	50.4%	24.0%
Down Payment Assistance Programs	0.0%	0.0%	1.2%	0.0%	0.0%	14.9%	50.0%	32.3%	59.9%	50.0%	67.7%	24.0%
Other Flexible Lending Programs	0.0%	0.0%	1.2%	33.3%	34.8%	14.9%	50.0%	44.6%	59.9%	16.7%	20.6%	24.0%
Total	1.3%	0.7%	1.2%	8.4%	5.6%	14.9%	51.0%	45.6%	59.9%	39.4%	48.1%	24.0%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	2.2%	1.2%	21.1%	26.7%	19.0%	17.6%	30.4%	29.2%	20.4%	33.3%	42.8%	39.9%
Down Payment Assistance Programs	100.0%	100.0%	21.1%	0.0%	0.0%	17.6%	0.0%	0.0%	20.4%	0.0%	0.0%	39.9%
Other Flexible Lending Programs	5.6%	2.2%	21.1%	22.2%	16.9%	17.6%	9.8%	20.4%	20.4%	50.0%	68.8%	39.9%
Total	3.9%	1.8%	21.1%	25.8%	18.7%	17.6%	28.4%	27.5%	20.4%	34.8%	44.6%	39.9%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts, by number and dollar amount, was equivalent to the percentage of owner-occupied units in these tracts for government loan programs. The percentage of lending by volume and dollar in moderate-income tracts was below the percentage of owner-occupied units in these geographies.

Fifth Third’s lending by volume and dollar amount to low-income borrowers was significantly below the percentage of low-income families in the assessment area. The percentage of lending by volume to moderate-income borrowers exceeded the percentage of moderate-income families, especially for government loan and other flexible lending programs.

Therefore, Fifth Third made extensive use of flexible lending practices in serving assessment area credit needs, since lending through flexible loan programs in low-income tracts was good and lending in moderate-income tracts and borrowers was adequate and excellent, respectively.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated ‘Outstanding.’

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 92 qualified investments totaling \$12.6 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Community Services	
#	\$	#	\$	#	\$
27	8,224,523	10	10,600	45	60,775

Also included in the total number of qualified investments are ten prior period investments totaling \$4.3 million. Overall, Fifth Third made 0.8% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 0.2% and greater than percentage of branch offices at 0.5%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects and credit counseling throughout the assessment area, which were needs expressed by several community contacts. Included in total investments are 56 donations totaling \$73,375 that supported United Way, local schools, small businesses, recreation centers, food banks, churches, and affordable housing.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “Outstanding.” Retail services are accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. The one banking center closed since the previous evaluation period was in a moderate-income tract. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains seven banking centers within this assessment area, including one in low-, one in moderate-, two in middle-, and three in upper-income census tracts. Fifth Third's banking centers in this assessment area represent 0.5% of all its banking centers.

Fifth Third has a total of nine full-service ATMs within this assessment area, including one in low-, three in moderate-, two in middle-, and three in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: Multi Huntington

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	1	14.3%	0	0	Total	1	7.7%	1	11.1%	0	0.0%	5	5.4%	3.0%	6.7%
Moderate	1	14.3%	0	1	Total	7	53.8%	3	33.3%	4	100.0%	23	24.7%	18.2%	20.2%
Middle	2	28.6%	0	0	Total	2	15.4%	2	22.2%	0	0.0%	48	51.6%	57.0%	46.2%
Upper	3	42.9%	0	0	Total	3	23.1%	3	33.3%	0	0.0%	17	18.3%	21.8%	26.9%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Total	7	100.0%	0	1	Total	13	100.0%	9	100.0%	4	100.0%	93	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered excellent, as the distribution of branches exceeded the percentage of census tracts and households in these tracts. The branch distribution within moderate-income tracts was considered good.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 1,459 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 1.2% of all community development services provided and equates to 0.7 annualized persons (ANP).

Affordable Housing	Economic Development	Community Services
# of Hours	# of Hours	# of Hours
37	10	1,412

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development.

Community development services include 971 hours of providing financial literacy through local nonprofits and school programs, 428 hours serving on boards and committees, 44 hours providing technical assistance to non-profits, and 16 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy activities. Several community contacts mentioned the need for financial literacy training to provide debt counseling and assist first-time homebuyers and affordable housing support.

MULTI-STATE METROPOLITAN AREA
(Full-scope Review)

CRA RATING for Louisville-Jefferson County KY-IN MSA #31140: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and adequate to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of making community development loans;
- An extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A relatively high level of providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Louisville-Jefferson County multistate assessment area. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LOUISVILLE-JEFFERSON COUNTY KY-IN MSA

The Louisville-Jefferson County KY-IN MSA consists of Clark, Floyd, and Harrison counties in Indiana and Bullitt, Jefferson, Oldham, and Shelby counties in Kentucky. Fifth Third's assessment area excludes Scott and Washington counties in Indiana and Henry, Spencer, and Trimble counties in Kentucky. The assessment area is comprised of 35 low-, 57 moderate-, 105 middle-, and 85 upper-income tracts. There are also two tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked third out of 35 institutions with 9.8% of the deposit market share. PNC Bank had the majority of the market share 23.6% of deposits and JPMorgan Chase Bank ranked second with 16.6% of the market share. Deposits in this assessment area accounted for 2.3% of the Fifth Third's total deposits. This was the tenth-highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 3,711 HMDA loans and 982 CRA loans, which represented 3.6% and 2.5% of the total loans originated during the evaluation period, respectively. This was the eighth-largest HMDA market and 12th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked fifth among 424 HMDA reporters in the assessment area and Fifth Third ranked 36th. Wells Fargo Bank, Century Lending Company, PNC Bank, and Commonwealth Bank and Trust Company were the top four HMDA lenders in the assessment area. Fifth Third ranked 11th of 93 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, PNC Bank, Chase Bank USA, and US Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Two community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a small business development in Jefferson County, stated that while the area is experiencing some growth with franchises, there are not many small businesses coming into the area. The contact noted while overall employment is stable, there are a large number of low- and moderate-income individuals within the community, and it is difficult for these individuals to find good jobs that pay a living wage. The contact believed there are opportunities for area banks to work with developers and local organizations that deal with affordable housing needs in the community. Also, banks could make access to credit more obtainable for small business owners, as most banks do not make small-dollar loans up to \$100,000, which small businesses sometimes need. In general, the contact believed banks in the area are fairly responsive to the credit needs of the community.

The second contact, representing a community development organization in the Clark, Floyd and Scott counties, stated there are not many high-tech jobs in the area and many of the (new) jobs do not pay a livable wage, when factoring in rising housing costs.

The contact stated there is a need for more transitional housing to assist homeless individuals and families in stabilizing and eventually securing permanent housing outside the shelter. The contact believed there are opportunities for banks to participate in housing blight eradication/redevelopment projects and to provide financing for local infrastructure projects. Often, local governments have to rely on more expensive financing options because banks seem unwilling to fund these longer-term types of projects.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 1.1 million. About 26.2% of the population lived in low- and moderate-income tracts. In addition, 76.3% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Louisville-Jefferson County MSA is the 43rd largest in terms of population in the nation.⁶⁶ Jefferson County is the largest county in the assessment area and the most populous county in Kentucky.⁶⁷ Louisville is the largest city in the MSA and the 30th most populous city in the U.S. Louisville has 615,366 residents and its population growth increased by 11.0% between 2000 and 2015.⁶⁸ According to Moody's Analytics, in 2015, the migration flow into Louisville was 32,599 residents, with a positive annual net migration from 2012 through 2015. In contrast, the largest cities in the MSA in Kentucky are Jeffersontown and Lyndon, which have 26,946 and 11,372 residents, respectively. The largest cities in Indiana are Jeffersonville, New Albany, and Clarksville, which have 46,960, 36,732, and 21,866 residents, respectively.⁶⁹

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase.⁷⁰ The population within the MSA experienced positive growth between 2010 and 2015, with Shelby County experiencing the greatest growth and Harrison County experiencing the least growth in population during this time period. Moody's Analytics cited favorable population trends as an economic strength for the area.

⁶⁶ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

⁶⁷ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

⁶⁸ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁶⁹ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁷⁰ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):
<http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Clark, IN	110,232	115,371	4.7%
Floyd, IN	74,578	76,778	2.9%
Harrison, IN	39,364	39,578	0.5%
Bullitt, KY	74,319	78,702	5.9%
Jefferson, KY	741,096	763,623	3.0%
Oldham, KY	60,316	64,875	7.6%
Shelby, KY	42,074	45,632	8.5%
Total	1,141,979	1,184,559	3.7%

Income Characteristics

In 2010 the MSA median family income was greater (\$60,164) than Kentucky and Indiana at \$52,046 and \$58,944, respectively. The MSA’s median family income increased in 2014, 2015, and 2016.

Borrower Income Levels Louisville-Jefferson County, KY-IN MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$64,200	0 - \$32,099	\$32,100 - \$51,359	\$51,360 - \$77,039	\$77,040 - & above
2015	\$65,400	0 - \$32,699	\$32,700 - \$52,319	\$52,320 - \$78,479	\$78,480 - & above
2016	\$66,800	0 - \$33,399	\$33,400 - \$53,439	\$53,440 - \$80,159	\$80,160 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.⁷¹ Oldham County had the lowest poverty rates and Jefferson County had the highest poverty rates in 1999 and 2015. In 2015, all of the counties in the assessment area had poverty rates below the state-level poverty rates of Indiana and Kentucky. Harrison County experienced the largest increase in poverty rates during this period. In 2015, Indiana’s and Kentucky’s poverty rates exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.⁷² The following table shows the poverty rates for 1999⁷³ and 2015.

⁷¹ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

⁷² 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

⁷³ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

County	1999 Poverty Rate	2015 Poverty Rate	Change
Clark	8.1%	10.4%	28.4%
Floyd	8.7%	11.3%	29.9%
Harrison	6.4%	11.2%	75.0%
Indiana	9.5%	14.4%	51.6%
Bullitt	7.9%	9.6%	21.5%
Jefferson	12.4%	15.4%	24.2%
Oldham	4.1%	6.2%	51.2%
Shelby	9.9%	11.5%	16.2%
Kentucky	15.8%	18.3%	15.8%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 494,618 housing units and 292,245 families in the assessment area. From an income perspective, 28.7% of housing units, 18.5% of owner-occupied units, and 23.7% of families are located in low- or moderate-income tracts. Nearly three-quarters of the housing units in the low-income census tracts are either rental or vacant (72.5%) and 27.5% are owner-occupied. In the moderate-income census tracts, over half of the housing units are either rental or vacant (52.5%) and 47.5% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 39 years old, with 20.8% of the stock built before 1950. The oldest housing stock was in Jefferson County with a median age of 43 years, while the newest was 20 years in Bullitt County. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 49 years in moderate-income tracts. Therefore, there appears to be ample opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas. In addition, the community contacts said there are opportunities for banks to fund affordable housing needs in the community (e.g., more transitional housing and assistance in eradicating housing blight).

According to 2010 U.S. Census data, the median housing value in the assessment area was \$146,556 with an affordability ratio of 32.79. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. While median housing values fluctuated between 2010 and 2011-2015, housing generally became more affordable across the assessment area due to increased median household incomes. During the evaluation period, the most affordable housing was in Harrison County and the least affordable was in Jefferson County. Median gross rents increased at a fairly substantial rate across the assessment area, with renters in Oldham and Shelby counties experiencing the largest increase in rental rates and renters in Harrison County experiencing the smallest increase in gross rental rates.

The following table presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area, Indiana, and Kentucky. According to Moody’s Analytics, housing has picked up with price appreciation accelerating to match the national pace and starts climbing.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Clark	\$125,800	37.65	\$129,000	40.08	\$692	\$755	9.1%
Floyd	\$147,100	35.64	\$156,300	35.13	\$683	\$723	5.9%
Harrison	\$124,200	41.28	\$129,300	40.32	\$638	\$669	4.9%
Indiana	\$123,000	38.78	\$124,200	39.66	\$683	\$747	9.4%
Bullitt	\$143,000	36.03	\$144,700	38.68	\$701	\$769	9.7%
Jefferson	\$145,900	31.08	\$150,400	32.38	\$667	\$749	12.3%
Oldham	\$234,400	33.88	\$247,500	34.53	\$671	\$833	24.1%
Shelby	\$169,500	32.62	\$175,700	34.33	\$674	\$796	18.1%
Kentucky	\$116,800	35.60	\$123,200	35.50	\$601	\$675	12.3%

According to Bankrate.com,⁷⁴ Indiana ranked 15th and Kentucky ranked 43rd for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:⁷⁵

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Clark	1:863
Floyd	1:1,766
Harrison	1:1,741
Indiana	1:1,590
Bullitt	1:2,590
Jefferson	1:2,723
Oldham	1:7,252
Shelby	1:3,553
Kentucky	1:4,270
U.S.	1:1,533

In November 2016, Clark County had the highest rate of foreclosure and Oldham County had the lowest rates of foreclosure in the assessment area.

⁷⁴ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

⁷⁵ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

Building permits for this MSA, Indiana, Kentucky, and the nation are included in the following table for 2014, 2015, and 2016.⁷⁶

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
MSA	4,035	3,979	-1.4%	5,001	25.7%
Indiana	17,813	18,483	3.8%	18,317	-0.9%
Kentucky	9,421	10,566	12.2%	12,798	21.1%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

While the MSA experienced a slight decrease in the number of housing permits issued between 2014 and 2015, it experienced a significant increase between 2015 and 2016. The increase in the number of permits could indicate there is a growing demand for home purchase loans in the MSA and Kentucky during the evaluation period. According to Moody’s Analytics, the demand for new housing starts has increased.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Louisville-Jefferson County area economy is in expansion due to competitive business costs and favorable population trends. Contributing to the area’s economic strengths is the large insurance industry in a state with Medicaid expansion, a major shipping hub, the presence of a large research university, and low business costs (especially office rents). Economic weaknesses include below-average educational attainment despite the presence of the University of Louisville, few high-tech jobs, and below-average per capita income. Both community contacts commented on jobs not providing a living wage for lower-income workers. However, according to Moody’s Analytics, job creation has been strong enough to absorb a surge in new labor market entrants and put downward pressure on the jobless rate.

According to Insider Louisville,⁷⁷ the Louisville MSA is home to three Fortune 500 companies in 2016. Other Fortune 500 firms with strong ties to Louisville include: General Electric, Ford Motor, Kroger, Comcast, UPS, and Time Warner Cable.

Louisville Fortune 500 Companies (2016) ⁷⁸		
Rank	Company	Annual Revenue
52	Humana	\$54.3 billion
218	Yum! Brands	\$13.3 billion
372	Kindred Healthcare	\$5.3 billion

⁷⁶ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

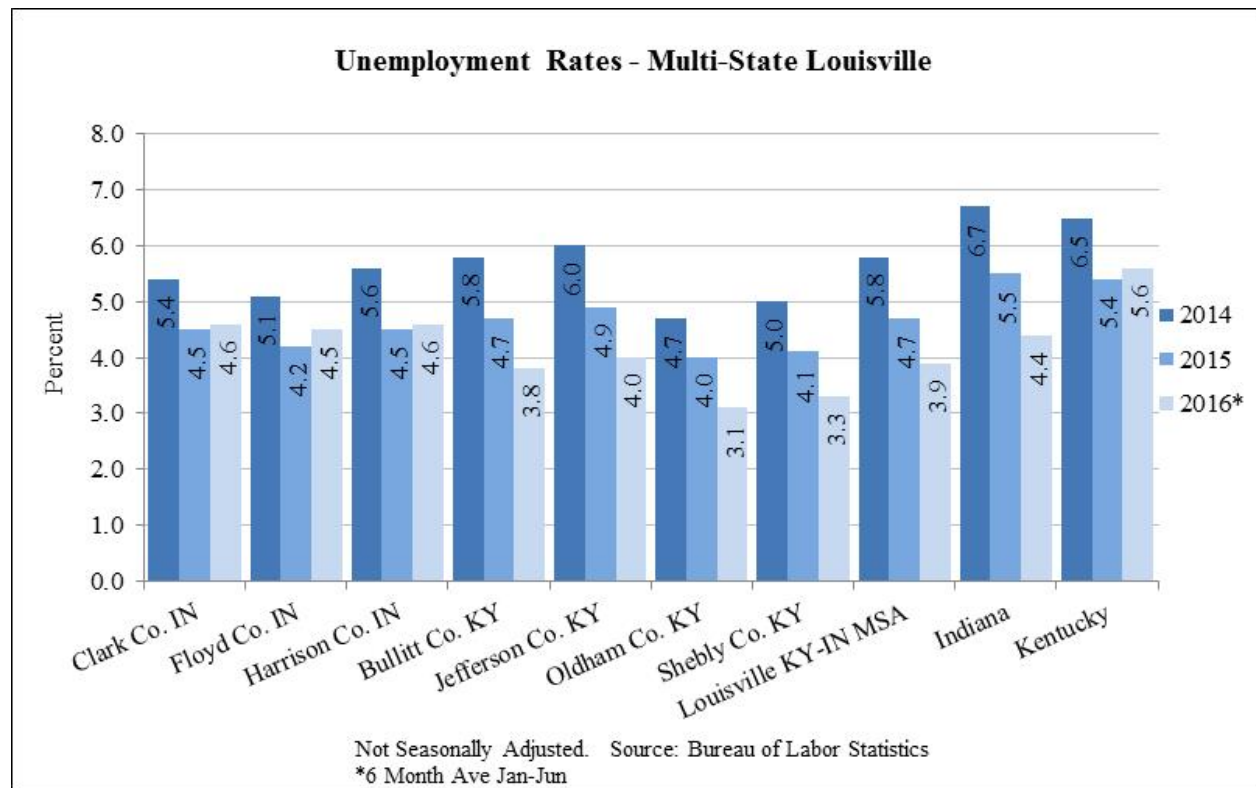
⁷⁷ Insider Louisville: <http://insiderlouisville.com/business/fortune-500-three-louisville-based-firms-make-list-along-many-firms-strong-louisville-ties/>

⁷⁸ All three companies experienced an appreciable improvement from the prior year’s rankings (58th, 228th, 491st)

According to the Greater Louisville Chamber of Commerce,⁷⁹ the top 15 employers in the MSA in 2016 were:

Company	Number of Employees
United Parcel Service (UPS)	22,080
Ford Motor Co. (2 plants)	12,990
Humana Inc.	12,500
Norton Healthcare	11,389
Amazon.com	6,000
GE Appliances	6,000
KentuckyOne Health Inc.	6,000
Baptist Healthcare Systems Inc.	4,995
Kroger Co.	4,626
Manna Inc.	3,120
ResCare Inc.	2,435
Kindred Healthcare Inc.	2,381
LG&E and KU Energy	2,211
PNC Bank	1,500
Yum! Brands	1,343

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 for the MSA, Indiana, and Kentucky.



⁷⁹ GLI: <https://www.greaterlouisville.com/talent/major-employers/>

The unemployment rates declined each year in the MSA and were considerably below Indiana's or Kentucky's during this time period.

According to *Reuters*, on January 23, 2017 a U.S. judge blocked health insurer Aetna Inc.'s proposed \$34 billion acquisition of Humana Inc. The U.S. Justice Department filed a lawsuit in July 2016 to block Aetna's acquisition of Humana and Anthem's acquisition of Cigna, arguing that these two deals would substantially lessen competition and lead to higher prices.⁸⁰ According to Business First of Louisville (as reported to *WDRB News*), Humana is the area's largest corporate headquarters in Kentucky, second-largest private employer, and third-largest employer overall in the 12-county metropolitan area. Humana is the single-largest source of taxes withheld from paychecks, despite having fewer employees than UPS and Jefferson County Public Schools. According to a University of Louisville finance professor, part of the justification for corporate mergers is reducing expenses through eliminating duplicate positions; so, despite what officials say, there will be layoffs.⁸¹

⁸⁰ Bartz, Diane. "U.S. blocks health insurer Aetna's \$34 billion Humana acquisition." *Reuters*. January 23, 2017. - <http://www.reuters.com/article/us-humana-aetna-antitrust-idUSKBN1572BF>

⁸¹ Otts, Chris and Green, Marcus. "Despite loss of biggest headquarters, Louisville officials are optimistic about Humana sale." *WDCB News*. July 3, 2015. - <http://www.wdrb.com/story/29470858/despite-loss-of-biggest-headquarters-louisville-officials-optimistic-about-humana-sale>

Combined Demographics Report

Assessment Area: Multi Louisville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	35	12.3	23,478	8	9,435	40.2	61,453	21
Moderate-income	57	20.1	45,833	15.7	8,073	17.6	50,954	17.4
Middle-income	105	37	125,558	43	9,588	7.6	60,516	20.7
Upper-income	85	29.9	97,376	33.3	3,370	3.5	119,322	40.8
Unknown-income	2	0.7	0	0	0	0	0	0
Total Assessment Area	284	100.0	292,245	100.0	30,466	10.4	292,245	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	52,653	14,472	4.7	27.5	28,283	53.7	9,898	18.8
Moderate-income	89,467	42,469	13.8	47.5	36,393	40.7	10,605	11.9
Middle-income	203,802	138,534	45	68	49,381	24.2	15,887	7.8
Upper-income	148,696	112,700	36.6	75.8	26,464	17.8	9,532	6.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	494,618	308,175	100.0	62.3	140,521	28.4	45,922	9.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	5,767	10.1	4,839	9.3	901	19.4	27	13.2
Moderate-income	8,668	15.2	7,704	14.7	916	19.8	48	23.4
Middle-income	19,539	34.2	18,064	34.6	1,410	30.4	65	31.7
Upper-income	22,989	40.3	21,557	41.3	1,368	29.5	64	31.2
Unknown-income	130	0.2	90	0.2	39	0.8	1	0.5
Total Assessment Area	57,093	100.0	52,254	100.0	4,634	100.0	205	100.0
	Percentage of Total Businesses:			91.5		8.1		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	17	1.7	17	1.7	0	0	0	0
Moderate-income	53	5.2	53	5.3	0	0	0	0
Middle-income	480	47.4	479	47.6	1	16.7	0	0
Upper-income	462	45.7	457	45.4	5	83.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,012	100.0	1,006	100.0	6	100.0	0	.0
	Percentage of Total Farms:			99.4		.6		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
LOUISVILLE-JEFFERSON COUNTY KY-IN MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “High Satisfactory.” Fifth Third has demonstrated a good responsiveness to the credit needs of the community. In addition, Fifth Third originated 33 community development loans totaling \$187.1 million. Fifth Third has a good geographic distribution of loans and minimal lending gaps in the assessment area. Fifth Third has an excellent distribution among borrowers of different income levels and an adequate distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The good level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding aggregate lending, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects good responsiveness to the credit needs within the assessment area. Fifth Third originated 1,836 home purchase, 1,717 refinance, 158 home improvement, 982 small business, and 33 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 3.3% is greater than the percentage of total deposits at 2.3% in this area.

Fifth Third made 95.7% of the HMDA and 98.8% of the CRA lending within this designated assessment area. There was no concentration of loans identified in any of the excluded counties within the assessment area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	8	4.4%	30	16.6%	102	56.4%	41	22.7%
<i>Percentage of Owner Occupied Units</i>		<i>4.7%</i>		<i>13.8%</i>		<i>45.0%</i>		<i>36.6%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	69	38.1%	50	27.6%	36	19.9%	26	14.4%
Percentage of Families by Family Income		21.0%		17.4%		20.7%		40.8%

*Unknown tract data is not included in the above table.

There were not enough HAMP loans for a meaningful analysis. The percentage of other modifications in low-income tracts was slightly below the percentage of owner-occupied units in these geographies, and the other modifications in moderate-income tracts exceeded the percentage of owner-occupied units. Therefore, modifications helped to expand lending activities in these areas.

The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. Home purchase lending, the largest loan category, is good. Performance is also good for refinance and home improvement loans. Small business lending is good. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	35	3	91.4%
Moderate	57	1	98.3%
Middle	105	0	100.0%
Upper	85	0	100.0%
Unknown	2	2	0.0%
Total	284	6	97.9%

Overall, lending gaps are considered minimal, because there is a 90+ percent penetration rate in all tract income levels.

Home Purchase Loans

Fifth Third made 48 home purchase loans totaling \$4.8 million in low-income tracts. This represents 2.6% of home purchase loans by volume, which is less than the percentage of owner-occupied units in these tracts at 4.7%, and 1.5% by dollar amount, which is also less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate at 2.1% and exceeded the 2015 aggregate at 2.0%. As Fifth Third’s performance exceeded the aggregate of all lenders, but was below the percentage of owner-occupied units in these geographies, the geographic distribution is good.

Fifth Third made 254 home purchase loans totaling \$26.2 million in moderate-income tracts. This represents 13.8% of its home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 13.8%, and 8.5% by dollar amount, which was below the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate at 12.2% and exceeded the 2015 aggregate at 11.6%. As Fifth Third's performance exceeded the aggregate of all lenders and comparable to proxy, the geographic distribution is good.

Fifth Third made 702 home purchase loans totaling \$87.4 million in middle-income tracts. This represents 38.2% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 45.0%, and 28.4% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 43.7% and below the 2015 aggregate of 44.4%.

Fifth Third made 832 home purchase loans totaling \$189.2 million in upper-income tracts. This represents 45.3% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 36.6%, and 61.5% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 42.0% and exceeded the 2015 aggregate of 42.0%.

The geographic distribution of home purchase loans is considered good.

Refinance Loans

Fifth Third made 71 refinance loans totaling \$4.1 million in low-income tracts. This represents 4.1% of refinance loans by volume and 1.7% by dollar amount, which is below the percentage of owner-occupied units at 4.7%. The percentage of loans by volume exceeded the 2014 aggregate at 3.7% and was comparable to the 2015 aggregate at 2.4%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders and with only 27.5% of the housing units being owner-occupied, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 235 refinance loans totaling \$20.5 million in moderate-income tracts. This represents 13.7% of refinance loans by volume, which is below the owner-occupied units in these tracts at 17.4%. The percentage of loans by dollar amount at 8.6% is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 13.8% and significantly exceeded the 2015 aggregate at 8.6%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 730 refinance loans totaling \$76.8 million in middle-income tracts. This represents 42.5% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 45.0%. However, refinance loans by dollar amount (32.3%) was below proxy. The percentage of loans by volume at 44.8% was below the 2014 aggregate and was comparable to the 2015 aggregate at 42.9%.

Fifth Third made 681 refinance loans totaling \$136.2 million in upper-income tracts. This represents 39.7% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 36.6%, and also exceeded proxy by dollar amount at 57.3%. The percentage of loans by volume was comparable to the 2014 aggregate at 39.5% and was below the 2015 aggregate at 44.1%.

Overall, the geographic distribution of refinance loans is good.

Home Improvement Loans

Fifth Third made three home improvement loans totaling \$183,000 in low-income tracts. This represents 1.9% of home improvement loans by volume, which is less than the percentage of owner-occupied units in these tracts at 4.7%, and 1.4% by dollar amount, which is significantly less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 3.2% and was below the 2015 aggregate of 4.5%. Given the median age of housing in low-income tracts at 61 years, which may indicate the need for home improvement loans and Fifth Third's lending performance in these tracts, the geographic distribution is considered adequate.

Fifth Third made 29 home improvement loans totaling \$1.6 million in moderate-income tracts. This represents 18.4% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 13.8%, and 12.4% by dollar amount, which is slightly below the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 15.4% and exceeded the 2015 aggregate of 13.1%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 64 home improvement loans totaling \$4.0 million in middle-income tracts. This represents 40.5% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 45.0%, and 30.3% by dollar amount and below the percentage of owner-occupied units in these geographies. Also, the percentage of loans by volume was below the 2014 aggregate of 44.6% and was below the 2015 aggregate of 43.0%.

Fifth Third made 62 home improvement loans totaling \$7.3 million in upper-income tracts. This represents 39.2% of home improvements loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 36.6%, and 55.9% by dollar amount, which also exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 36.8% and was below the 2015 aggregate of 39.4%.

Overall, the geographic distribution of home improvement loans is good.

Small Business Loans

Fifth Third made 123 small business loans totaling \$21.3 million in low-income tracts. This represents 12.5% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 9.3%, and 17.0% by dollar amount, which also exceeds the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 8.7% and exceeded the 2015 aggregate of 10.2%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 140 small business loans totaling \$19.3 million in moderate-income tracts. This represents 14.3% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 14.7%. This also represents 15.4% small business loans by dollar amount, which exceeds the percentage of small businesses in these tracts. The percentage of loans by volume was below the 2014 aggregate of 15.8% and was comparable to the 2015 aggregate of 15.4%. Given that Fifth Third's performance was comparable to proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 273 small business loans totaling \$37.9 million in middle-income tracts. This represents 27.8% of small business loans by volume, which is less than the percentage of businesses in these tracts at 34.6%, and 30.3% by dollar amount, which is comparable to the percentage of businesses in these tracts. The percentage of loans by volume was below the 2014 aggregate of 31.5% and was below the 2015 aggregate of 31.0%.

Fifth Third made 446 small business loans totaling \$46.7 million in upper-income tracts. This represents 45.4% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 41.3%, and 37.3% by dollar amount, which is below the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 42.4% and exceeded the 2015 aggregate of 42.0%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is excellent based on borrower income and adequate for businesses of different revenue sizes. Borrower distribution is excellent for home purchase and refinance, and good for home improvement loans.

Home Purchase Loans

Fifth Third made 338 loans totaling \$30.7 million to low-income borrowers. This represents 18.4% of home purchase loans by volume, which is comparable to the percentage of low-income families at 21.0%. The percentage of loans by dollar amount in these geographies at 10.0% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 10.5% and substantially exceeded the 2015 aggregate of 10.4%.

Given that Fifth Third's performance was substantially above the aggregate of all lenders and comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 450 loans totaling \$51.5 million to moderate-income borrowers. This represents 24.5% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.4%, and 16.7% by dollar volume, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 22.2% and was comparable to the 2015 aggregate of 22.7%. As Fifth Third's performance in home purchase lending to moderate-income borrowers exceeded proxy and the aggregate of all lenders, borrower distribution to moderate-income borrowers is excellent.

Fifth Third made 347 loans totaling \$52.0 million to middle-income borrowers. This represents 18.9% of home purchase loans by volume, which is comparable to the percentage of middle-income families at 20.7%, and 16.9% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 20.6% and was comparable to the 2015 aggregate of 20.1%.

Fifth Third made 639 loans totaling \$160.9 million to upper-income borrowers. This represents 34.8% of home purchase loans by volume, which is below the percentage of upper-income families at 40.8%, while the percentage of loans by dollar amount at 52.3% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 30.7% and exceeded the 2015 aggregate of 30.9%.

Overall, the borrower distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 260 loans totaling \$20.4 million to low-income borrowers. This represents 15.1% of refinance loans by volume, which is below the percentage of low-income families at 21.0%, and 8.6% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 9.4% and significantly exceeded the 2015 aggregate of 7.0%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders, but was below proxy, the borrower distribution of refinance loans to low-income borrowers is good.

Fifth Third made 389 loans totaling \$37.7 million to moderate-income borrowers. This represents 22.7% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.4%, and 15.9% of loans by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 16.6% and exceeded the 2015 aggregate of 15.7%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 436 loans totaling \$48.1 million to middle-income borrowers. This represents 25.4% of refinance loans by volume, which exceeds the percentage of middle-income families at 20.7%, and 20.2% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.3% and exceeded the 2015 aggregate of 18.8%.

Fifth Third made 576 loans totaling \$122.4 million to upper-income borrowers. This represents 33.5% of refinance loans by volume, which is below the percentage of upper-income families at 40.8%, and 51.5% of loans by dollar amount, which exceeded proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 32.0% and was comparable to the 2015 aggregate of 34.0%.

A community contact stated there are a large number of low- and moderate-income individuals within the community; however, it is difficult for these individuals to find good jobs that will support their needs; additionally, the area has a high cost of living. With Fifth Third's excellent performance in refinance lending to low- and moderate-income borrowers that exceeded the aggregate of all lenders, the overall borrower distribution for refinance loans is excellent.

Home Improvement Loans

Fifth Third made 29 loans totaling \$1.6 million to low-income borrowers. This represents 18.4% of home improvement loans by volume, which is comparable to the percentage of low-income families at 21.0%, and 12.2% by dollar, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 11.7% and exceeded the 2015 aggregate of 10.6%. Given that Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is good.

Fifth Third made 43 loans totaling \$2.6 million to moderate-income borrowers. This represents 27.2% of its home improvement loans by volume, which substantially exceeded the percentage of moderate-income families at 17.4%, and 20.0% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.2% and the 2015 aggregate of 21.1%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 36 loans totaling \$2.9 million to middle-income borrowers. This represents 22.8% of home improvement loans by volume, which exceeded the percentage of middle-income families at 20.7%, and 22.0% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.7% and was below the 2015 aggregate of 21.7%.

Fifth Third made 50 loans totaling \$6.0 million to upper-income borrowers. This represents 31.6% of home improvement loans by volume, which was below the percentage of upper-income families at 40.8%, and 45.8% by dollar amount, which exceeds proxy. The percentage of loans by volume was below 2014 aggregate of 37.1% and was below the 2015 aggregate of 40.9%.

The overall borrower distribution of home improvement loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 53.6% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 42.9% and the 2015 aggregate of 47.4%, but was significantly below the percentage of small businesses in the assessment area at 91.5%. Also, Fifth Third made an acceptable percentage of small-dollar loans (73.2%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. A community contact indicated there is a need for small-dollar loans to small businesses.

Community Development Loans

Fifth Third originated 33 community development loans totaling \$187.1 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
1	1,150,000	3	38,250,000	16	143,700,000	13	3,958,290

Community development lending in the assessment area represents 3.1% of the total dollar volume of community development loans originated during the evaluation period. This ranks as Fifth Third’s tenth-highest percentage of community development lending during the evaluation period. Fifth Third’s deposit market share is 9.8% and has high competition for community development loans from a number of large national banks in the area. As such, Fifth Third has a relatively high level of community development lending.

Examples of community development lending include, but are not limited to:

- A new loan to help fund a new markets tax credit that allows a nonprofit community development organization to continue to build and refurbish low-income rental housing and transitional shelter for homeless families and provide home repair assistance and financial empowerment education to low- and moderate-income individuals
- Working capital loans that promote economic development by financing businesses to support job retention, create new jobs, and promote growth to continue operations in low- and moderate-income geographies
- Multiple working capital loans supporting nonprofits that provide a multitude of services to low- and moderate-income individuals and families

Flexible Lending Programs

Fifth Third had 858 flexible lending loans in this assessment area: 547 loans were government loans, 46 were down payment assistance loans, and 265 were other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.5%	0.8%	4.7%	17.7%	13.7%	13.8%	50.5%	47.0%	45.0%	30.3%	38.6%	36.6%
Down Payment Assistance Programs	45.7%	49.5%	4.7%	4.3%	2.2%	13.8%	43.5%	44.6%	45.0%	6.5%	3.8%	36.6%
Other Flexible Lending Programs	13.2%	6.2%	4.7%	17.7%	11.6%	13.8%	44.2%	47.1%	45.0%	24.9%	35.1%	36.6%
Total	7.5%	4.0%	4.7%	17.0%	12.7%	13.8%	48.1%	46.9%	45.0%	27.4%	36.4%	36.6%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	13.0%	8.3%	21.0%	33.3%	28.2%	17.4%	28.5%	30.5%	20.7%	22.1%	29.9%	40.8%
Down Payment Assistance Programs	65.2%	55.7%	21.0%	19.6%	17.9%	17.4%	6.5%	6.4%	20.7%	8.7%	20.1%	40.8%
Other Flexible Lending Programs	17.0%	13.6%	21.0%	23.0%	21.1%	17.4%	27.2%	20.4%	20.7%	30.2%	42.2%	40.8%
Total	17.0%	11.4%	21.0%	29.4%	26.0%	17.4%	26.9%	27.0%	20.7%	23.9%	32.7%	40.8%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number exceeded the percentage of owner-occupied units in these tracts, particularly for the various down payment assistance programs. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units. Flexible lending in low- and moderate-income geographies by dollar amount was slightly below proxy.

Fifth Third’s lending by volume to low-income borrowers was below the percentage of low-income families in the assessment area and lending by dollar amount was significantly below proxy. The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, especially for government loan programs. Therefore, Fifth Third made extensive use of flexible lending practices in serving the assessment area’s credit needs since lending through flexible loan programs to low-income borrowers was good, while the lending to low- and moderate-income tracts and moderate-income borrowers was excellent.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “Outstanding.”

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 168 investments totaling \$36.4 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Community Services	
#	\$	#	\$	#	\$
59	22,803,710	10	52,031	79	474,519

Also included in the total number of qualified investments are 20 prior period investments totaling \$13.1 million. Overall, Fifth Third made 2.2% of its total community development investments in this assessment area, which is comparable to the percentage of total deposits at 2.3% and branch offices at 3.2%, respectively.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable/transitional housing projects and small business funding, which was an important need expressed by community contacts. Included in the total investments are 98 donations totaling \$553,310 that supported United Way, chamber of commerce, local schools, small businesses, churches, food banks, and affordable housing.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “High Satisfactory.” Retail services are accessible and Fifth Third provides a relatively high level of community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. One banking center was opened and two were closed since the previous evaluation period, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 42 banking centers within this assessment area, including six in low-, one in moderate-, 18 in middle-, and 15 in upper-income census tracts. There are also two branches located in unknown income tracts. Fifth Third's banking centers in this assessment area represent 3.2% of all its banking centers.

Fifth Third has a total of 59 full-service ATMs within this assessment area, including nine in low-, four in moderate-, 23 in middle-, and 23 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: Multi Louisville

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	6	14.3%	0	0	Total	14	20.0%	9	15.3%	5	45.5%	35	12.3%	9.5%	10.3%
Moderate	1	2.4%	0	0	Total	4	5.7%	4	6.8%	0	0.0%	57	20.1%	17.6%	15.3%
Middle	18	42.9%	0	0	Total	25	35.7%	23	39.0%	2	18.2%	105	37.0%	41.9%	33.9%
Upper	15	35.7%	0	1	Total	26	37.1%	23	39.0%	3	27.3%	85	29.9%	31.0%	40.3%
Unknown	2	4.8%	1	1	Total	1	1.4%	0	0.0%	1	9.1%	2	0.7%	0.0%	0.2%
Total	42	100.0%	1	2	Total	70	100.0%	59	100.0%	11	100.0%	284	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered excellent, as the distribution of branches exceeded the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered poor.

Community Development Services

Fifth Third provides a relatively high level of community development services in this assessment area. During the evaluation period, Fifth Third employees provided 2,617 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 2.2% of all community development services provided and equates to 0.13 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
459	48	143	1,967

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization. Community development services include 1,779 hours serving on boards and committees, 453 hours of providing financial literacy through local nonprofits and school programs, 313 hours providing technical assistance to non-profits and local business, and 72 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to affordable housing activities, as a community contact noted the need for this type of service.

MULTI-STATE METROPOLITAN AREA
(Full-scope Review)

CRA RATING for South Bend-Elkhart-Mishawaka IN-MI CSA #515: Satisfactory

The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and adequate to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of community development loans;
- Extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are readily accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A relatively high level of providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the South Bend-Elkhart-Mishawaka multistate assessment area. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTH BEND-ELKHART-MISHAWAKA IN-MI CSA

The South Bend-Elkhart-Mishawaka IN-MI CSA consists of the following three MSAs:

- Elkhart-Goshen IN MSA #21140, consisting of Elkhart County in Indiana
- Niles-Benton MI MSA #35660, consisting of Berrien County in Michigan
- South Bend-Mishawaka IN-MI MSA #43780, consisting of St. Joseph County in Indiana and Cass County in Michigan

The assessment area is comprised of 14 low-, 41 moderate-, 72 middle-, and 43 upper-income tracts. There is also one tract with no income designation that does not report income information.

As of June 30, 2016, Fifth Third ranked fourth out of 24 institutions with 9.1% of the deposit market share. 1st Source Bank had the majority of the market share with 27.1% of deposits, followed by JP Morgan Chase and Lake City Bank with 13.3% and 9.7% of the market share, respectively. Deposits in this assessment area accounted for 0.8% of Fifth Third's total deposits, which was the 24th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 777 HMDA loans and 416 CRA loans, which represented 0.7% and 1.1% of the total loans originated during the evaluation period, respectively. This was the 28th largest HMDA market and 20th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 21st among 392 HMDA reporters in the assessment area, Fifth Third Mortgage Company-Michigan ranked 28th, and Fifth Third ranked 50th. Wells Fargo Bank, Ruoff Mortgage Company, Horizon Bank, and 1st Source Bank were the top four HMDA lenders in the assessment area. Fifth Third ranked 16th of 81 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, 1st Source Bank, Capital One, and U.S. Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Three community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an affordable housing organization, stated there is currently a construction project underway that will provide housing to low-income elderly individuals, funding for which primarily comes from Housing and Urban Development (HUD). The contact indicated there is a need for financial institutions to offer low-income individuals and families fee-free banking products and products that encourage a minimum balance be maintained. There is also a need for more programs to help low-income individuals obtain (first-time) mortgages. The contact stated this organization partners with financial institutions to conduct financial literacy workshops for low- and moderate-income individuals and transportation is provided. The contact specifically mentioned Fifth Third as being active in the community.

The second contact, representing a community development organization, stated the economy is improving due to increased manufacturing. The contact believed area banks have an opportunity to develop more deposit products targeted toward the unbanked (i.e., fee-free banking). The contact specifically mentioned 1st Source Bank and Centier Bank as being active in the community.

The final contact, representing a community development organization, stated that Berrien County has sufficient access to banking facilities and businesses generally have good relationships with area banks. The contact believed there is an ongoing need for small business owners and entrepreneurs to increase their financial and business planning expertise. The contact noted that financial institutions are well-represented on the organization's board and that Fifth Third, 1st Source Bank, and United Federal Credit Union are particularly involved and supportive of the organization's mission.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 673,596. About 25.0% of the population lived in low- and moderate-income tracts. In addition, 74.6% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the South Bend-Mishawaka MSA is the 155th largest in terms of population in the nation, while the Elkhart-Goshen MSA is the 217th and the Niles-Benton Harbor MSA is the 264th largest.⁸² St. Joseph is the largest county in the assessment area and the fifth-most populous county in Indiana.⁸³ South Bend (located in St. Joseph County) is the largest city in assessment area and is the 296th most populous city in the U.S. South Bend has 320,098 residents, its population growth decreasing by 6.3% between 2000 and 2015. In contrast, the next largest cities in the assessment area are Elkhart, MI and Mishawaka, IN, which have 52,348 and 48,261 respectively; Niles Township, MI only has 13,895 residents.⁸⁴

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase or decrease.⁸⁵ The population within the assessment area experienced positive growth between 2010 and 2015, with Elkhart County experiencing the greatest growth and Berrien County experiencing the least growth in population during this time period. Moody's Analytics noted positive population growth and net migration trends for Elkhart, IN could indicate an increased demand in prospective homebuyers. Conversely, negative net migration trends in South Bend, IN and Niles, MI could indicate a decreased demand in prospective homebuyers in those metropolitan areas.

⁸² MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

⁸³ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

⁸⁴ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁸⁵ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):
<http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Elkhart, IN	197,559	203,474	3.0%
St. Joseph, IN	266,931	268,441	0.6%
Berrien, MI	156,813	154,636	-1.4%
Cass, MI	52,293	51,657	-1.2%
Total	673,596	678,208	0.7%

Income Characteristics

In 2010, the assessment area median family income was less (\$55,071) than Indiana and Michigan at \$58,944 and \$60,341, respectively. Between 2014 and 2016, the median family income generally decreased in the Elkhart and South Bend MSAs and increased in the Niles MSA. Moody’s Analytics noted exceptionally low household incomes as an economic weakness in the Elkhart MSA; however, Moody’s also noted affordable cost of living and doing business as an economic strength in the Elkhart MSA and Niles MSA.

**Borrower Income Levels
Elkhart-Goshen, IN MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$56,800	0 - \$28,399	\$28,400 - \$45,439	\$45,440 - \$68,159	\$68,160 - & above
2015	\$53,300	0 - \$26,649	\$26,650 - \$42,639	\$42,640 - \$63,959	\$63,960 - & above
2016	\$52,300	0 - \$26,149	\$26,150 - \$41,839	\$41,840 - \$62,759	\$62,760 - & above

**Borrower Income Levels
Niles-Benton Harbor, MI MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$54,900	0 - \$27,449	\$27,450 - \$43,919	\$43,920 - \$65,879	\$65,880 - & above
2015	\$56,300	0 - \$28,149	\$28,150 - \$45,039	\$45,040 - \$67,559	\$67,560 - & above
2016	\$59,100	0 - \$29,549	\$29,550 - \$47,279	\$47,280 - \$70,919	\$70,920 - & above

**Borrower Income Levels
South Bend-Mishawaka, IN-MI MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$55,400	0 - \$27,699	\$27,700 - \$44,319	\$44,320 - \$66,479	\$66,480 - & above
2015	\$57,300	0 - \$28,649	\$28,650 - \$45,839	\$45,840 - \$68,759	\$68,760 - & above
2016	\$52,900	0 - \$26,449	\$26,450 - \$42,319	\$42,320 - \$63,479	\$63,480 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.⁸⁶ Elkhart County had the lowest poverty rates and Berrien County had the highest poverty rates in 1999 and 2015. In 2015, only Elkhart County and Cass County had poverty rates below those of Indiana and Michigan. Elkhart County experienced the largest increase in poverty rates during this period. In 2015, Indiana’s and Michigan’s poverty rates exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.⁸⁷ The following table shows the poverty rates for 1999⁸⁸ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Elkhart	7.8%	14.0%	79.5%
St. Joseph	10.4%	16.7%	60.6%
Indiana	9.5%	14.4%	51.6%
Berrien	12.7%	17.1%	34.6%
Cass	9.9%	14.8%	49.5%
Michigan	10.5%	15.7%	49.5%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 294,119 housing units and 171,632 families in the assessment area. From an income perspective, 26.9% of housing units, 19.0% of owner-occupied units, and 23.0% of families are located in low- or moderate-income tracts. Nearly three quarters of the housing units in the low-income census tracts are either rental or vacant (72.9%) and 27.1% are owner-occupied. In the moderate-income census tracts, over half of the housing units are either rental or vacant (52.1%) and 47.9% are owner-occupied.

⁸⁶ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

⁸⁷ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

⁸⁸ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 44 years old, with 28.1% of the stock built before 1950. The oldest housing stock was in Berrien and St. Joseph counties with a median age of 48 and 47 years, respectively. The newest housing stock was 35 years in Elkhart County. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 57 years in moderate-income tracts. Therefore, there appears to be ample opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$125,451 with an affordability ratio of 35.75. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Median housing values decreased between 2010 and 2011-2015, along with median family incomes. As a result, housing generally became more affordable across the assessment area. During the evaluation period, the most affordable housing was in St. Joseph County and the least affordable was in Berrien County. Median gross rents increased across the assessment area, with renters in Berrien County experiencing the largest increase in rental rates and renters in Elkhart County experiencing the smallest increase in gross rental rates. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area, Indiana, and Michigan. According to Moody's Analytics, overall housing prices are sluggish in this assessment area and below-average job and income gains and rising interest rates may hold back prospective homebuyers in 2017. However, in the Elkhart metropolitan area, Moody's Analytics indicated that gross median rents (as a share of median household income) are below average, so potential homebuyers may be better able to save for a down payment for a home.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Elkhart	\$128,000	36.92	\$124,000	38.64	\$695	\$719	3.5%
St. Joseph	\$116,300	38.39	\$114,800	39.61	\$683	\$719	5.3%
Indiana	\$123,000	38.78	\$124,200	39.66	\$683	\$747	9.4%
Berrien	\$135,600	31.43	\$132,600	33.93	\$592	\$674	13.9%
Cass	\$133,700	33.79	\$122,800	37.92	\$634	\$698	10.1%
Michigan	\$144,200	33.59	\$122,400	40.50	\$723	\$783	8.3%

According to Bankrate.com,⁸⁹ Indiana ranked 15th and Michigan ranked 26th for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:⁹⁰

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Elkhart	1:4,073
St. Joseph	1:1,982
Indiana	1:1,590
Berrien	1:1,637
Cass	1:1,492
Michigan	1:2,036
U.S.	1:1,533

In November 2016, Cass County had the highest rate of foreclosure and Elkhart County had the lowest rate of foreclosure in the assessment area.

Building permits for these MSAs, Indiana, Michigan, and the nation are included in the following table for 2014, 2015, and 2016.⁹¹

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Elkhart-Goshen MSA	270	309	14.4%	287	-7.1%
Niles-Benton Harbor MSA	184	208	13.0%	15	-92.8%
South Bend-Mishawaka MSA	512	524	2.3%	293	-44.1%
Indiana	17,813	18,483	3.8%	18,317	-0.9%
Michigan	15,836	18,226	15.1%	22,426	23.0%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The assessment area experienced increases in the number of housing permits issued between 2014 and 2015 and significant decreases between 2015 and 2016. The decrease in the number of permits could indicate there is a declining demand for home purchase loans within the assessment area during the evaluation period.

⁸⁹ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

⁹⁰ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

⁹¹ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

According to Moody’s Analytics, the demand for new residential construction in the South Bend and Niles MSAs will remain sluggish throughout 2017; however, Moody’s predicted an increase in new residential construction in the Elkhart area primarily based on eventual increases in housing values and below-average gross median rental rates that allow potential homebuyers to save for a down payment.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Niles and South Bend area economies are in recovery, primarily due to the expansion of the Whirlpool research center and stable job base at the University of Notre Dame, respectively. Meanwhile, Elkhart’s economy is at risk, primarily due to an over-reliance on vehicle production and steep cutbacks in manufacturing; however, there are favorable prospects for the recreational vehicle industry and an increased demand in residential construction due to an above-average population growth.

According to *Crain’s Detroit*,⁹² the Niles-Benton Harbor MSA is home to one Fortune 500 company in 2016 (up 14 places from last year). Also, according to the *South Bend Tribune*,⁹³ two Elkhart-based recreational vehicle companies have been named to Fortune magazine’s 2016 list of the country’s 100 fastest-growing companies, Patrick Industries and Drew Industries. Both companies are suppliers of parts for the recreational vehicle and manufactured housing industries. Patrick ranked 41st and Drew ranked 79th on the list.

Niles-Benton Harbor Fortune 500 Companies (2016)		
Rank	Company	Annual Revenue
134	Whirlpool Corporation	\$14.5 billion

According to Moody’s Analytics the top 15 employers in the CSA in 2015/2016 were:

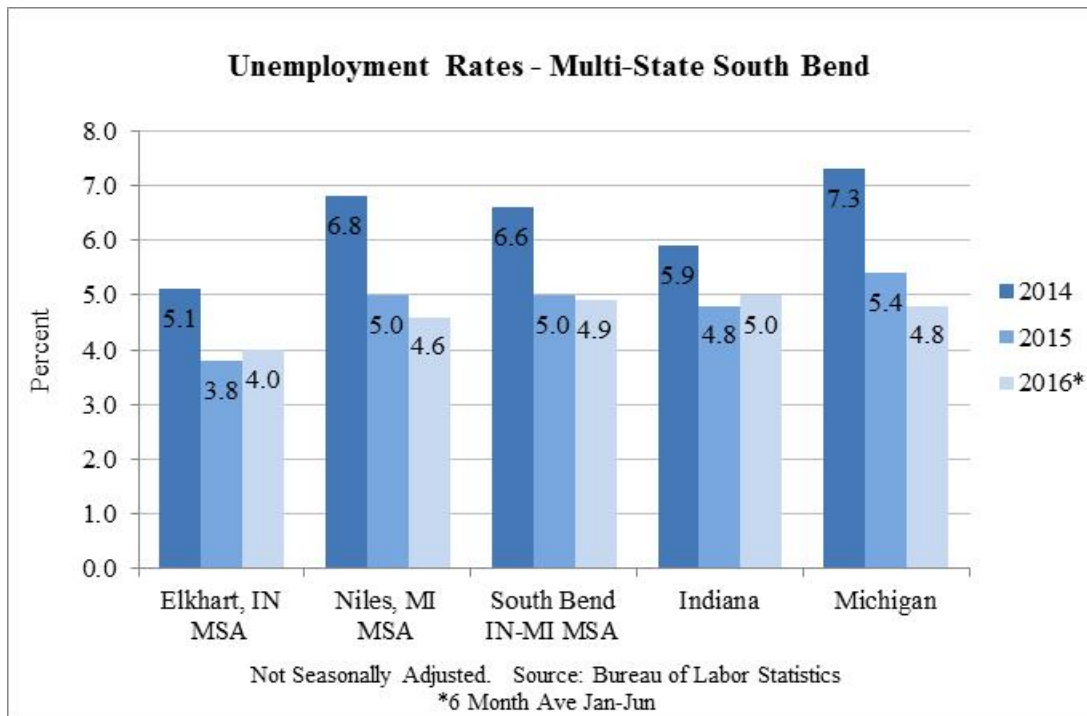
Company ⁹⁴	Number of Employees
Forest River Industries, Inc. (E-G)	10,245
Thor Industries Inc. (E-G)	9,000
University of Notre Dame (SB)	8,466
Drew Industries Inc. (E-G)	4,927
Lakeland Regional Health Systems (N-BH)	3,600
Beacon Health System (SB)	3,400
Whirlpool Corporation (N-BH)	3,362
St. Joseph’s Regional Medical Center (SB)	3,000
Four Winds Casino (N-BH)	1,800
Indiana University Health Goshen (E-G)	1,634
Martin’s Super Markets (SB)	1,555
Patrick Industries (E-G)	1,433
Indiana University (SB)	1,266
Indiana Michigan Power (N-BH)	1,200
1 st Source Bank (SB)	1,160

⁹²Crain’s Detroit: <http://www.craindetroit.com/article/20160606/NEWS/160609759/southeast-michigan-representation-on-fortune-500-shrinks>

⁹³ South Bend Tribune: http://www.southbendtribune.com/news/business/elkhart-rv-companies-make-fortune-s-growth-list/article_868cb02f-3589-5db5-8e88-eb425e47450a.html

⁹⁴ (E-G) Elkhart-Goshen MSA, (N-BH) Niles-Benton Harbor MSA, (SB) South Bend-Mishawaka MSA

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 for the three MSAs, Indiana, and Michigan.



The unemployment rates declined each year in the assessment area, except for a slight increase in 2016 in the Elkhart MSA. Assessment area unemployment rates were considerably below Michigan’s during this time period. The Elkhart MSA had unemployment rates significantly below the other MSAs all three years.

According to the *South Bend Tribune*, CTS Corp. announced that it will phase out production at its Elkhart plant and turn the location into a research and development center. The transition will begin during the first quarter of 2017 and is expected to continue into the second quarter of 2018. The changes will affect about 230 workers, as production in Elkhart is moved to existing CTS locations in China, Mexico, and Taiwan. CTS designs and manufactures electronic components for the aerospace, defense, industrial, information technology, medical, and transportation markets.⁹⁵

⁹⁵ Staff Report. “CTS to end production at Elkhart plant and cut 230 jobs.” *South Bend Tribune*. June 4, 2016. - http://www.southbendtribune.com/news/business/cts-to-end-production-at-elkhart-plant-and-cut-jobs/article_5a4e0148-29cf-11e6-9b0b-d79ef1c03b58.html

Combined Demographics Report

Assessment Area: Multi South Bend

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	14	8.2	5,267	3.1	2,449	46.5	34,319	20
Moderate-income	41	24	34,112	19.9	6,779	19.9	31,955	18.6
Middle-income	72	42.1	79,980	46.6	7,357	9.2	36,372	21.2
Upper-income	43	25.1	52,273	30.5	1,927	3.7	68,986	40.2
Unknown-income	1	0.6	0	0	0	0	0	0
Total Assessment Area	171	100.0	171,632	100.0	18,512	10.8	171,632	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,782	3,468	1.9	27.1	5,938	46.5	3,376	26.4
Moderate-income	66,278	31,732	17.1	47.9	23,804	35.9	10,742	16.2
Middle-income	137,715	88,719	47.9	64.4	28,801	20.9	20,195	14.7
Upper-income	77,344	61,164	33	79.1	9,762	12.6	6,418	8.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	294,119	185,083	100.0	62.9	68,305	23.2	40,731	13.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1,561	5.4	1,366	5.2	179	6.8	16	8.6
Moderate-income	5,307	18.2	4,722	17.9	559	21.2	26	14.1
Middle-income	13,113	45	11,799	44.8	1,224	46.5	90	48.6
Upper-income	9,155	31.4	8,431	32	671	25.5	53	28.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	29,136	100.0	26,318	100.0	2,633	100.0	185	100.0
	Percentage of Total Businesses:			90.3		9.0		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	4	0.3	4	0.3	0	0	0	0
Moderate-income	70	5.6	69	5.7	1	3.6	0	0
Middle-income	713	57.5	694	57.2	19	67.9	0	0
Upper-income	454	36.6	446	36.8	8	28.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,241	100.0	1,213	100.0	28	100.0	0	.0
	Percentage of Total Farms:			97.7		2.3		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
SOUTH BEND-ELKHART-MISHAWAKA IN-MI CSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “High Satisfactory.” Fifth Third has demonstrated good responsiveness to the credit needs of the community. In addition, Fifth Third originated 16 community development loans totaling \$104.3 million. Fifth Third has a good geographic distribution of loans in the area with moderate lending gaps. Fifth Third has a good distribution among borrowers of different income levels and an adequate distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. A good level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of refinance lending based on the overall volume of lending, followed by small business, home purchase, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects good responsiveness to the credit needs within the assessment area. Fifth Third originated 428 refinance, 287 home purchase, 62 home improvement, 416 small business, and 16 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 0.8% equals the percentage of total deposits at 0.8% in this area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	1	1.8%	14	25.5%	28	50.9%	12	21.8%
<i>Percentage of Owner Occupied Units</i>		<i>1.9%</i>		<i>17.1%</i>		<i>47.9%</i>		<i>33.0%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	12	21.8%	21	38.2%	13	23.6%	8	14.5%
<i>Percentage of Families by Family Income</i>		20.0%		18.6%		21.2%		40.2%

There were not enough HAMP modifications for a meaningful analysis. The percentage of other modifications in low- and moderate-income tracts were comparable to or exceeded the percentage of owner-occupied units in these geographies; therefore, modifications helped to expand lending activities in these areas.

The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area; therefore, the modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies for refinance, home purchase, and small business lending is good. Home improvement lending is adequate. There is also an overall moderate level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	14	8	42.9%
Moderate	41	13	68.3%
Middle	72	7	90.3%
Upper	43	4	90.7%
Unknown	1	1	0.0%
Total	171	33	80.7%

Overall, lending gaps are considered reasonable; however, there is a significant level of gaps in low- and moderate-income tracts. The relatively low owner-occupancy rates and high rental and vacancy rates in the low- and moderate-income tracts without lending are most likely contributing factors for not making loans in these areas.

Refinance Loans

Fifth Third made four refinance loans totaling \$188,000 in low-income tracts. This represents 0.9% of refinance loans by volume, which is below the owner-occupied units in these tracts at 1.9%. The percentage of loans by dollar amount at 0.4% is also below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 0.6% and exceeded the 2015 aggregate at 0.5%.

As Fifth Third's performance exceeded the aggregate of all lenders and the relatively low owner-occupancy rate of 27.1%, geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 60 refinance loans totaling \$14.8 million in moderate-income tracts. This represents 14.0% of refinance loans by volume, which is below the owner-occupied units in these tracts at 17.1%. The percentage of loans by dollar amount at 9.4% is also below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 13.6% and was comparable to the 2015 aggregate at 11.5%. As Fifth Third's performance was slightly below proxy and comparable to the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 237 refinance loans totaling \$28.9 million in middle-income tracts. This represents 55.4% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 47.9%. The percentage of refinance loans by dollar amount (56.6%) also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate at 47.7% and exceeded the 2015 aggregate at 47.7%.

Fifth Third made 127 refinance loans totaling \$17.1 million in upper-income tracts. This represents 29.7% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 33.0%. Also, the percentage of refinance loans by dollar amount (33.6%) is comparable to proxy. The percentage of loans by volume was below the 2014 aggregate at 38.2% and was below the 2015 aggregate at 40.5%.

Overall, the geographic distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made two home purchase loans totaling \$244,000 in low-income tracts. This represents 0.7% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 1.9%, and 0.6% by dollar amount, which is also less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate at 0.7% and was below the 2015 aggregate at 0.6%. As Fifth Third's performance exceeded the aggregate of all lenders, but was below proxy, the geographic distribution is good.

Fifth Third made 52 home purchase loans totaling \$5.0 million in moderate-income tracts. This represents 18.1% of its home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 17.1%, and 12.1% by dollar amount, which was below the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate at 13.7% and exceeded the 2015 aggregate at 13.6%. As Fifth Third's performance significantly exceeded the aggregate of all lenders and exceeded proxy, the geographic distribution is excellent.

Fifth Third made 123 home purchase loans totaling \$15.7 million in middle-income tracts. This represents 42.9% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 47.9%, and 38.0% by dollar amount, which is also below proxy in these geographies. The percentage of loans by volume was below the 2014 aggregate of 46.1% and was below the 2015 aggregate of 46.2%.

Fifth Third made 110 home purchase loans totaling \$20.3 million in upper-income tracts. This represents 38.3% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 33.0%, and 49.3% by dollar amount, which also exceeds proxy in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 39.4% and was below the 2015 aggregate of 39.6%.

Overall, the geographic distribution of home purchase loans is good.

Home Improvement Loans

Fifth Third did not originate any home improvement loans in low-income tracts. The percentage of owner-occupied units in these tracts is 1.9%. The 2014 aggregate was 1.3% and the 2015 aggregate was aggregate was 1.4%. Because the aggregate was able to originate a percentage of home improvement loans comparable to proxy, the geographic distribution is considered poor.

Fifth Third made eight home improvement loans totaling \$394,000 in moderate-income tracts. This represents 12.9% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 17.1%, and 10.8% by dollar amount, which is also below proxy in these geographies. The percentage of loans by volume was below the 2014 aggregate of 13.2% and exceeded the 2015 aggregate of 15.9%. Given that Fifth Third's performance fell below proxy, but exceeded the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is good.

Fifth Third made 40 home improvement loans totaling \$2.1 million in middle-income tracts. This represents 64.5% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 47.9%, and 56.4% by dollar amount, exceeding proxy in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 45.1% and exceeded the 2015 aggregate of 45.5%.

Fifth Third made 14 home improvement loans totaling \$1.2 million in upper-income tracts. This represents 22.6% of home improvements loans by volume, which is less than the percentage of owner-occupied units in these tracts at 33.0%, and 32.9% by dollar amount, which is below proxy in these geographies. The percentage of loans by volume was substantially below the 2014 aggregate of 40.4% and was below the 2015 aggregate of 37.2%.

Overall, the geographic distribution of home improvement loans is adequate.

Small Business Loans

Fifth Third made 27 small business loans totaling \$7.7 million in low-income tracts. This represents 6.5% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 5.2%, and 12.0% by dollar amount, which exceeds the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 5.2% and was comparable to 2015 aggregate of 5.1%. Given that Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 64 small business loans totaling \$10.9 million in moderate-income tracts. This represents 15.4% of small business loans by volume, which is slightly below the percentage of businesses in these tracts at 17.9%. This also represents 17.0% of small business loans by dollar amount, which is comparable to the percentage of businesses in these tracts. The percentage of loans by volume was below the 2014 aggregate of 16.7% and was comparable to the 2015 aggregate of 18.0%. Given that Fifth Third's performance was slightly below proxy and comparable to the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 213 small business loans totaling \$27.3 million in middle-income tracts. This represents 51.2% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 44.8%, and 42.8% by dollar amount, which also exceeds the percentage of businesses in these tracts. The percentage of loans by volume exceeded the 2014 aggregate of 44.8% and the 2015 aggregate of 43.5%.

Fifth Third made 112 small business loans totaling \$17.9 million in upper-income tracts. This represents 26.9% of small business loans by volume, which is less than the percentage of businesses in these tracts at 32.0%, and 28.1% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume was below the 2014 aggregate of 32.1% and below the 2015 aggregate of 31.6%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is good based on borrower income and adequate for businesses of different revenue sizes. Borrower distribution is excellent for home purchase loans and good for refinance and home improvement loans.

Refinance Loans

Fifth Third made 50 loans totaling \$3.3 million to low-income borrowers. This represents 11.7% of refinance loans by volume, which is significantly below the percentage of low-income families at 20.0%. The percentage of loans by dollar amount in these geographies at 6.5% is also significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.4% and exceeded the 2015 aggregate of 5.8%.

Given that Fifth Third's performance exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

Fifth Third made 86 loans totaling \$7.7 million to moderate-income borrowers. This represents 20.1% of refinance loans by volume, which exceeds the percentage of moderate-income families at 18.6% and 15.1% by dollar volume, below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.9% and in 2015 exceeded the 2015 aggregate of 15.1%. As Fifth Third's performance in refinance lending to moderate-income borrowers exceeded the aggregate and proxy, borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 109 loans totaling \$10.2 million to middle-income borrowers. This represents 25.5% of refinance loans by volume, which exceeds the percentage of middle-income families at 21.2%, and 19.9% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.7% and in 2015 was comparable to the 2015 aggregate of 20.5%.

Fifth Third made 171 loans totaling \$28.8 million to upper-income borrowers. This represents 40.0% of refinance loans by volume, which is comparable to the percentage of upper-income families at 40.2%, while the percentage of loans by dollar amount at 56.4% exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 37.4% and in 2015 exceeded the 2015 aggregate of 39.8%.

Overall, the borrower distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made 39 loans totaling \$2.5 million to low-income borrowers. This represents 13.6% of home purchase loans by volume, which is below the percentage of low-income families at 20.0%, and 6.1% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 7.8% and significantly exceeded the 2015 aggregate of 7.4%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 62 loans totaling \$5.5 million to moderate-income borrowers. This represents 21.6% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 18.6%, and 13.3% of loans by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 22.3% and the 2015 aggregate of 21.7%. Given that Fifth Third's performance exceeded proxy and was comparable to the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 61 loans totaling \$7.7 million to middle-income borrowers. This represents 21.3% of home purchase loans by volume, which is comparable to the percentage of middle-income families at 21.2%, and 18.7% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 21.1% and was comparable the 2015 aggregate of 22.8%.

Fifth Third made 110 loans totaling \$22.3 million to upper-income borrowers. This represents 38.3% of home purchase loans by volume, which is slightly below the percentage of upper-income families at 40.2%, and 54.3% of loans by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 32.9% and the 2015 aggregate of 33.6%.

With Fifth Third's excellent performance in home purchase lending to low- and moderate-income borrowers, its overall borrower distribution is considered excellent.

Home Improvement Loans

Fifth Third made four loans totaling \$169,000 to low-income borrowers. This represents 6.5% of home improvement loans by volume, which is significantly below the percentage of low-income families at 20.0%, and 4.6% by dollar amount, which is also significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 8.7% and was below the 2015 aggregate of 10.8%. Given that Fifth Third's performance was significantly below the proxy and below the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is adequate.

Fifth Third made 20 loans totaling \$957,000 to moderate-income borrowers. This represents 32.3% of its home improvement loans by volume, which substantially exceeded the percentage of moderate-income families at 18.6%, and 26.2% by dollar amount, which also exceeded proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 18.5% and exceeded the 2015 aggregate of 20.0%. Given that Fifth Third's performance exceeded the proxy and the aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 13 loans totaling \$682,000 to middle-income borrowers. This represents 21.0% of home improvement loans by volume, which is comparable to the percentage of middle-income families at 21.2%, and 18.7% by dollar amount, which is slightly below proxy. The percentage of loans by volume was slightly below the 2014 aggregate of 24.1% and exceeded the 2015 aggregate of 22.7%.

Fifth Third made 23 loans totaling \$1.8 million to upper-income borrowers. This represents 37.1% of home improvement loans by volume, which was below the percentage of upper-income families at 40.2%, and 48.4% by dollar amount, which is above proxy. The percentage of loans by volume was below the 2014 aggregate of 40.8% and was below the 2015 aggregate of 40.4%.

The overall borrower distribution of home improvement loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 45.9% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance was comparable to the 2014 aggregate of 42.1% and exceeded the 2015 aggregate of 45.1%, but was significantly below the percentage of small businesses in the assessment area at 90.3%. Also, Fifth Third made an acceptable percentage of small-dollar loans (68.5%) up to \$100,000, amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated 16 community development loans totaling \$104.3 million during the evaluation period as shown in the table below:

Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$
11	54,750,000	3	47,000,000	2	2,500,000

Community development lending in the assessment area represented 1.7% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s 17th highest percentage of community development lending during the evaluation period. Fifth Third has 9.1% of the deposit market share and has to compete for community development loans with a number of large national banks in the area. As such, Fifth Third is considered to have a relatively high level of community development lending in this assessment area.

Examples of community development lending include, but are not limited to:

- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies.
- Working capital loans that support eligible activities in designated redevelopment areas.
- Renewal of a working capital line of credit that supports a college that serves low- and moderate-income students.

Flexible Lending Programs

Fifth Third had 249 flexible lending loans in this assessment area: 110 government loans, 15 down payment assistance loans, and 124 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	0.0%	0.0%	1.9%	24.5%	18.1%	17.1%	48.2%	48.4%	47.9%	27.3%	33.5%	33.0%
Down Payment Assistance Programs	13.3%	6.1%	1.9%	40.0%	32.2%	17.1%	40.0%	49.6%	47.9%	6.7%	12.0%	33.0%
Other Flexible Lending Programs	1.6%	1.0%	1.9%	15.3%	10.0%	17.1%	54.0%	54.5%	47.9%	29.0%	34.5%	33.0%
Total	1.6%	0.7%	1.9%	20.9%	14.6%	17.1%	50.6%	51.6%	47.9%	26.9%	33.1%	33.0%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	20.9%	12.9%	20.0%	29.1%	26.4%	18.6%	29.1%	31.3%	21.2%	20.9%	29.4%	40.2%
Down Payment Assistance Programs	60.0%	57.0%	20.0%	13.3%	16.2%	18.6%	6.7%	12.2%	21.2%	20.0%	14.7%	40.2%
Other Flexible Lending Programs	12.9%	10.6%	20.0%	29.0%	30.5%	18.6%	27.4%	23.5%	21.2%	28.2%	33.5%	40.2%
Total	19.3%	13.6%	20.0%	28.1%	28.0%	18.6%	26.9%	26.6%	21.2%	24.5%	30.9%	40.2%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts, by number was comparable to the percentage of owner-occupied units, while the percentage of loans by dollar amount was below proxy. Overall, Fifth Third’s lending in moderate-income tracts by number exceeded the percentage of owner-occupied units, while the percentage of loans by dollar amount was below proxy. In particular, the percentage of loans made through down payment assistance programs in low- and moderate-income tracts significantly exceeded proxy.

Fifth Third’s lending to low-income borrowers by volume was comparable to the percentage of low-income families, while the percentage of lending by dollar amount was below proxy. In particular, the percentage of loans made through down payment assistance programs to low-income borrowers significantly exceeded proxy. Overall, the percentage of loans by volume and dollar amount to moderate-income borrowers significantly exceeded the percentage of moderate-income families.

Therefore, Fifth Third made extensive use of flexible lending practices in serving assessment area credit needs, since lending through flexible loan programs to moderate-income borrowers is excellent and lending to low-income borrowers and in moderate-income tracts is good. Lending in low-income tracts is adequate.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “Outstanding.”

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 119 investments totaling \$30.8 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
60	17,424,877	22	77,390	1	7,500	23	64,405

Also included in the total number of qualified investments are 13 prior period investments totaling \$13.3 million. Overall, Fifth Third made 1.9% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 0.8% and greater than the percentage of branch offices at 1.3%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area and programs to help low-income individuals obtain mortgages, which were needs expressed by a community contact. Included in total investments are 49 donations totaling \$153,795 that supported chambers of commerce, small businesses, education, economic development, and affordable housing. The majority of Fifth Third’s donations supported economic development and services to low- and moderate-income individuals.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “High Satisfactory.” Retail services are readily accessible and Fifth Third provides a relatively high level of community development services.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. No banking centers opened or closed since the previous evaluation period. Delivery services are readily accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 17 banking centers within this assessment area, including two in low-, six in moderate-, five in middle-, and four in upper-income census tracts. Fifth Third banking centers in this assessment area represent 1.3% of all its banking centers.

Fifth Third has a total of 18 full-service ATMs within this assessment area, including three in low-, six in moderate-, five in middle-, and four in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: Multi South Bend

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	2	11.8%	0	0	Total	3	13.0%	3	16.7%	0	0.0%	14	8.2%	3.7%	5.5%
Moderate	6	35.3%	0	0	Total	8	34.8%	6	33.3%	2	40.0%	41	24.0%	21.9%	18.2%
Middle	5	29.4%	0	0	Total	7	30.4%	5	27.8%	2	40.0%	72	42.1%	46.4%	44.7%
Upper	4	23.5%	0	0	Total	5	21.7%	4	22.2%	1	20.0%	43	25.1%	28.0%	31.6%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	1	0.6%	0.0%	0.0%
Total	17	100.0%	0	0	Total	23	100.0%	18	100.0%	5	100.0%	171	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered excellent, because the distribution of branches substantially exceeded the percentage of census tracts and households in these tracts. The branch distribution within moderate-income tracts is also considered to be excellent.

Community Development Services

Fifth Third provides a relatively high level of community development services in this assessment area. During the evaluation period, Fifth Third employees provided 1,774 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 1.5% of all community development services provided and equates to 0.85 annualized persons (ANP).

Affordable Housing	Economic Development	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
129	858	787

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development. Community development services include 953 hours serving on boards and committees, 495 hours providing technical assistance to non-profits and local business, 318 hours of providing financial literacy through local nonprofits and school programs, and eight hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy and technical assistance to small businesses. The community contacts mentioned the need for financial literacy training and assistance to first-time homebuyers and the need to provide technical assistance and financial literacy training to small business owners.

STATE OF FLORIDA

CRA RATING for State of Florida: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- An excellent responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and good to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A leader in making community development loans;
- Use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in Florida: the Orlando-Deltona-Daytona Beach CSA and the Tampa-St. Petersburg-Clearwater MSA. Limited-scope reviews were performed on the remaining six assessment areas: the Cape Coral-Fort Myers MSA, Jacksonville MSA, Lakeland MSA, Miami-Fort Lauderdale-West Palm Beach MSA, Naples-Immokalee-Marco Island MSA, and the North Port-Sarasota CSA. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

The Orlando-Deltona-Daytona Beach and the Tampa-St. Petersburg assessment areas received greater weight in determining the CRA rating for the state. These areas had the largest lending volumes and number of banking centers and ranked third and first, respectively, in this state's share of deposits during the evaluation period. Lastly, these areas represented 52.5% of the banking centers, 44.6% of deposits, and 50.8% of lending in Florida.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF FLORIDA

Lending activity accounted for 8.8% of the Fifth Third's total lending activity, while deposits accounted for 9.8% of the Fifth Third's total deposits. HMDA-reportable lending in Florida represented 7.8% of the Fifth Third's total HMDA lending, while CRA-reportable lending represented 11.5% of the Fifth Third's total CRA lending. As of June 30, 2016, Fifth Third ranked 12th among 241 insured institutions and has a deposit market share of 1.9% and 158 banking center locations within Florida.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF FLORIDA

Lending Test

Fifth Third's performance under the lending test within the assessment areas located in Florida is rated "Outstanding." Fifth Third's lending reflects an excellent responsiveness to the credit needs in the following two of its eight assessment areas: Orlando-Deltona-Daytona Beach and Tampa-St. Petersburg-Clearwater. Lending reflects a good responsiveness to credit needs in the Cape Coral-Fort Myers and the North Port-Sarasota assessment areas and an adequate responsiveness in the remaining four assessment areas: Jacksonville, Lakeland, Miami-Fort Lauderdale-West Palm Beach, and Naples-Immokalee-Marco Island.

Lending Activity

In Florida, Fifth Third originated 8,185 HMDA loans totaling \$1.8 billion and 4,503 small business loans totaling \$459.8 million during the evaluation period.

Lending activity in Florida is excellent. The Orlando-Deltona-Daytona Beach and Tampa-St. Petersburg-Clearwater assessment areas have excellent lending activity. Lending activity is good in the Cape Coral-Fort Myers and the North Port-Sarasota assessment areas and adequate in the remaining four assessment areas.

Geographic and Borrower Distribution

The distribution of loans among geographies is excellent in the assessment areas located in Florida. The geographic distribution is excellent in the Orlando-Deltona-Daytona Beach and the Tampa-St. Petersburg-Clearwater assessment areas. In the Cape Coral-Fort Myers and the Naples-Immokalee-Marco Island assessment areas, the geographic distribution is good and adequate in the remaining four assessment areas.

A low level of lending gaps was identified in five of eight assessment areas. There was a moderate level of lending gaps in the Jacksonville and Lakeland assessment areas and a high level of lending gaps in the Miami-Fort Lauderdale-West Palm Beach assessment area.

The distribution of loans among borrowers of different income levels is excellent and good to businesses of different revenue sizes in the assessment areas located in Florida. The borrower distribution is excellent in the Orlando-Deltona-Dayton Beach and the Tampa-St. Petersburg-Clearwater assessment areas and adequate in the Miami-Fort Lauderdale-West Palm Beach assessment area. Borrower distribution is good in the remaining five assessment areas. The distribution to businesses of different revenue sizes is adequate in the Jacksonville and Miami-Fort Lauderdale-West Palm Beach assessment areas and good in the remaining six assessment areas.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Florida, Fifth Third originated 96 community development loans totaling \$516.1 million, which represented 8.6% of the Fifth Third's community development lending by dollar volume. This is an outstanding level of community development lending in Florida. Fifth Third was a leader in providing community development loans in the Orlando-Deltona-Daytona Beach, Tampa-St. Petersburg-Clearwater, and Miami-Fort Lauderdale-West Palm Beach assessment areas. Fifth Third made a relatively high level of community development loans in the North Port-Sarasota assessment areas and an adequate level of community development loans in the remaining four assessment areas.

Flexible Lending

Overall, Fifth Third consistently makes use of flexible lending practices within assessment areas located in Florida.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Florida is rated "Outstanding." Fifth Third funded \$120.0 million in qualified community development investments in Florida during the current evaluation period and \$76.5 million from prior periods. Fifth Third's level of qualified investments is excellent in the Orlando-Deltona-Dayton Beach, Tampa-St. Petersburg-Clearwater, Jacksonville, Lakeland, and Miami-Fort Lauderdale-West Palm Beach assessment areas. Fifth Third has a good level of qualified community development investments in the North Port-Sarasota assessment area and adequate levels in the remaining two assessment areas.

Fifth Third was considered responsive to the credit and community development needs in the state; therefore, investments without a purpose, mandate, or function of serving Fifth Third's assessment areas in Florida was considered to positively impact state performance. Fifth Third made \$9.1 million in qualified investments, typically in the form of LIHTCs that benefited counties within the state but outside Fifth Third's delineated assessment areas within Florida.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test within the assessment areas located in Florida is rated "High Satisfactory." The Fifth Third's performance is excellent in the Tampa-St. Petersburg-Clearwater assessment area, adequate in Naples-Immokalee-Marco Island assessment area, and good in the remaining six assessment areas.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution is good in six assessment areas and adequate in the Orlando-Deltona-Daytona Beach and Naples-Immokalee-Marco Island assessment areas.

Fifth Third has 158 banking centers in Florida, which represents 12.2% of Fifth Third's total branches. Its record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. One branch opened in a moderate-income tract during the evaluation period in the Jacksonville assessment area, whereas three branches closed in moderate-income tracts during the evaluation period: one in the Jacksonville assessment area and two in the Orlando-Deltona-Daytona Beach assessment area.

Banking services and business hours do not vary in a way that inconveniences any portions of the Fifth Third's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third is a leader in providing community development services in Florida. Fifth Third's performance is excellent in the Tampa-St. Petersburg-Clearwater, Jacksonville, Lakeland, and Miami-Fort Lauderdale-West Palm Beach assessment areas. The level of community development services is good in the remaining four assessment areas.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
ORLANDO-DELTONA-DAYTONA BEACH FL CSA # 422**

The Orlando-Deltona-Daytona Beach FL CSA consists of the following two MSAs: the Deltona-Daytona Beach-Ormond Beach MSA #19660, consisting of Volusia County, but excluding Flagler County, and the Orlando-Kissimmee-Sanford MSA #36740, consisting of Lake, Orange, Osceola, and Seminole counties.

The assessment area is comprised of 13 low-, 128 moderate-, 213 middle-, and 147 upper-income tracts. There are also three tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information

As of June 30, 2016, Fifth Third ranked seventh out of 51 institutions with 3.6% of the deposit market share. SunTrust Bank had the majority of the market share 22.3% of deposits, followed by Bank of America, Wells Fargo Bank, JPMorgan Chase, Regions Bank, and BB&T with 20.8%, 16.0%, 6.7%, 3.7%, and 3.6% of the market share, respectively. Deposits in this assessment area accounted for 1.9% of the Fifth Third's total deposits. This was the third-highest percentage of deposits within the state and 14th highest within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 1,936 HMDA loans and 1,036 CRA loans, which represented 1.9% and 2.6% of the total loans originated during the evaluation period, respectively. This was the 14th largest HMDA market and 11th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 24th among 838 HMDA reporters in the assessment area and Fifth Third ranked 123rd. Wells Fargo Bank, Quicken Loans, FBC Mortgage, and Freedom Mortgage, and JPMorgan Chase were the top five HMDA lenders in the assessment area. Fifth Third ranked 16th of 145 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Bank of America, Capital One, and SunTrust Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Five community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing the business community in the Deltona-Daytona Beach area stated the local economy is improving and new residential construction is increasing. While the area's unemployment is low, most jobs are low-paying, service-sector jobs. The contact stated there is a need for less rigid credit standards so that small businesses can obtain loans more easily.

The contact believed banks are trying to meet the credit needs of the business community despite increasing regulatory burdens. Because banks are required to obtain voluminous amounts of information, customers can find the application process to be overwhelming and time-consuming. The contact specifically mentioned Gateway Bank of Florida, SeaCoast Bank, SunTrust Bank, and TD Bank as being active within the community.

The second contact, representing an affordable housing organization serving the Deltona area, stated the emphasis on credit scores typically places lower-income individuals at a disadvantage. Fewer individuals are qualifying for mortgage loans and it is taking banks longer to qualify consumers. Overall, the contact believed bankers are not out in the community as much as before, which does not make banks seem less intimidating to the unbanked. The contact indicated there is a need for banks to offer fee-free products and services to lower-income individuals and attract the unbanked. The contact specifically mentioned Fifth Third, HomeBridge Mortgage, and PNC Bank as being responsive to meeting the credit needs in the community.

The third contact, representing a business development organization that serves Volusia County, stated that while there is a higher concentration of hospitality jobs, which are typically low-paying, there has been a rise in new residential construction. The contact stated a major issue facing the community is having enough facilities to house the increasing homeless population. In regards to banking needs, area banks need to find ways to extend credit to small startup businesses. Typically, banks do not want to lend to startup businesses because they are considered to be too risky. Larger financial institutions seem to have more stringent credit requirements that have forced small business owners/entrepreneurs to seek online business loan alternatives. The contact believed that regulatory burdens affect a bank's ability to lend. The contact specifically mentioned SunTrust Bank, Bank of America, Intracoastal Bank, MainStreet Community Bank of Florida, and a few local credit unions as being particularly responsive to the credit needs in the area.

The fourth contact, representing a community development organization that serves Lake County, stated that the county is experiencing growth and consequently, there is demand for skilled labor construction. While this organization does not work directly with financial institutions, the contact stated there are several community development construction projects underway that financial institutions could support.

The fifth contact, representing an affordable housing organization in the Orlando area, stated housing prices are recovering, but are not back to pre-financial crisis levels. The contact stated there is a substantial shortage of affordable housing (i.e., rentals) for extremely low-income tenants in the Orlando-area. Increasing rental rates are making housing generally less affordable in the area. Affordable housing developers are seeing higher land prices from increased competition with luxury developers who want to convert low-cost rentals into higher-cost, luxury rentals. The contact also noted an increase in the number of unqualified homebuyers mostly due to banks' rigid underwriting standards. The contact indicated about 10.0% of the population is unbanked and typically relies on alternative lenders to meet their credit needs.

The contact believed banks could be more responsive to the needs of low-income consumers and small business owners by offering small-dollar, minimal-fee loans in order to compete with payday lenders. The contact specifically mentioned Bank of America, Wells Fargo Bank, Seaside National Bank & Trust, and First Green Bank as being responsive to credit needs in the community.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 673,596. About 25.0% of the population lived in low- and moderate-income tracts. In addition, 74.6% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Orlando-Kissimmee-Sanford MSA is the 24th largest in terms of population in the nation, while the Deltona-Daytona Beach-Ormond Beach MSA is the 90th largest.⁹⁶ Orange County is the largest county in the assessment area and the fifth most populous county in Florida.⁹⁷ Orlando (located in Orange County) is the largest city in assessment area and is the 73rd most populous city in the U.S. Orlando has 270,934 residents, its population growth increased by 39.1% between 2000 and 2015. In contrast, the next largest cities in the assessment area are Deltona, Daytona Beach, Sanford, Kissimmee, and Ormond Beach, which have 88,474; 64,736; 58,111; 69,152; and 40,970 residents, respectively.⁹⁸

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase.⁹⁹ The assessment area’s population experienced positive growth between 2010 and 2015, with Osceola County experiencing the greatest growth and Volusia County experiencing the least growth in population during this time period. According to Moody’s Analytics, the Orlando MSA is the only metropolitan area in Florida where the proportion of residents age 65 and over is less than the national average. As a result, the Orlando area can build on its large population of young adults and create job opportunities for skilled and unskilled labor. Overall, this assessment area has a robust domestic and foreign in-migration which contributes to an increasing demand for employment and housing.

County	2010 Population	2015 Population	Population Percent Change
Lake	297,052	325,875	9.7%
Orange	1,145,956	1,288,126	12.4%
Osceola	268,685	323,993	20.6%
Seminole	422,718	449,144	6.3%
Volusia	494,593	517,887	4.7%
Total	2,629,004	2,905,025	10.5%

⁹⁶ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

⁹⁷ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

⁹⁸ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

⁹⁹ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

Income Characteristics

In 2010, the assessment area’s median family income was slightly greater (\$57,708) than Florida at \$57,204. Between 2014 and 2016, the median family income decreased in the Deltona MSA, with a slight increase in 2016. However, in the Orlando MSA, the median family income increased in 2015, but slightly decreased in 2016. Moody’s Analytics noted low per capita income as an economic weakness in the Deltona MSA. In the Orlando MSA, Moody’s noted about one-third of the jobs created in 2016 have been in the leisure-hospitality industry, which is nearly double the statewide and national levels. While many of these jobs are low paying, Moody’s noted that average hourly earnings have risen at an above-average rate over the last year.

**Borrower Income Levels
Deltona-Daytona Beach-Ormond Beach, FL MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$52,600	0 - \$26,299	\$26,300 - \$42,079	\$42,080 - \$63,119	\$63,120 - & above
2015	\$51,500	0 - \$25,749	\$25,750 - \$41,199	\$41,200 - \$61,799	\$61,800 - & above
2016	\$51,700	0 - \$25,849	\$25,850 - \$41,359	\$41,360 - \$62,039	\$62,040 - & above

**Borrower Income Levels
Orlando-Kissimmee-Sanford, FL MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$54,800	0 - \$27,399	\$27,400 - \$43,839	\$43,840 - \$65,759	\$65,760 - & above
2015	\$58,300	0 - \$29,149	\$29,150 - \$46,639	\$46,640 - \$69,959	\$69,960 - & above
2016	\$57,800	0 - \$28,899	\$28,900 - \$46,239	\$46,240 - \$69,359	\$69,360 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.¹⁰⁰ Seminole County had the lowest poverty rates in 1999 and 2015. Orange County had the highest poverty rate in 1999, but Osceola County had the highest poverty rate in 2015. In 2015, Seminole, Lake, and Orange counties all had poverty rates below Florida’s. Osceola County experienced the largest increase in poverty rates during this period. Florida’s poverty rates exceeded the national poverty rates in 1999 and 2015. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.¹⁰¹

¹⁰⁰ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹⁰¹ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

A community contact specifically mentioned an insufficient amount of housing options to support the increasing homeless population in the Deltona area. The following table shows the poverty rates for 1999¹⁰² and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Lake	9.6%	12.8%	33.3%
Orange	12.1%	15.6%	28.9%
Osceola	11.5%	18.5%	60.9%
Seminole	7.4%	11.5%	55.4%
Volusia	11.6%	16.3%	40.5%
Florida	12.5%	15.8%	26.4%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 1.2 million housing units and 647,964 families in the assessment area. From an income perspective, 27.3% of housing units, 19.5% of owner-occupied units, and 24.9% of families are located in low- or moderate-income tracts. Three-quarters of the housing units in the low-income census tracts are either rental or vacant (75.1%) and 24.9% are owner-occupied. In the moderate-income census tracts, over half of the housing units are either rental or vacant (58.9%) and 41.1% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was only 24 years old and only 3.6% of the stock was built before 1950. However, within the assessment area, the median age of housing stock was 38 years in low-income tracts and 27 years in moderate-income tracts. Therefore, there appears to be limited opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$134,073, with an affordability ratio of 23.25. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Median housing values decreased between 2010 and 2011-2015, along with median family incomes; as a result, housing generally became more affordable across the assessment area. During the evaluation period, the most affordable housing was in Osceola County and the least affordable was in Orange County. Median gross rents increased across the assessment area, with renters in Volusia County experiencing the largest increase in rental rates and renters in Osceola County experiencing the smallest increase in gross rental rates. In 2010, renters with rent costs greater than 30.0% of income was greatest in Osceola and Orange counties at 60.2% and 56.7%, respectively.

¹⁰² 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

According to a community contact, there is a substantial shortage of affordable rental housing for extremely low-income tenants in the Orlando-area due to increased competition from luxury developers who want to convert low-cost rentals into luxury rentals. With above-average rental rates in this assessment area, potential homebuyers may not be able to save enough for a down payment for a home. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Florida.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Lake	\$178,400	26.05	\$140,100	33.12	\$904	\$936	3.5%
Orange	\$228,600	21.93	\$163,800	29.27	\$995	\$1,033	3.8%
Osceola	\$199,200	23.26	\$132,100	33.50	\$1,036	\$1,049	1.3%
Seminole	\$241,000	24.47	\$176,100	32.37	\$1,024	\$1,077	5.2%
Volusia	\$186,300	23.83	\$131,600	31.24	\$879	\$918	4.4%
Florida	\$205,600	23.18	\$159,000	29.88	\$957	\$1,002	4.7%

According to Bankrate.com,¹⁰³ Florida ranked sixth for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹⁰⁴

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Lake	1:1,190
Orange	1:1,042
Osceola	1:789
Seminole	1:1,201
Volusia	1:1,090
Florida	1:986
U.S.	1:1,533

In November 2016, Osceola County had the highest rate of foreclosure and Seminole County had the lowest foreclosure rate in the assessment area.

Building permits for this CSA, Florida, and the nation are included in the following table for 2014, 2015, and 2016.¹⁰⁵

¹⁰³ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹⁰⁴ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

¹⁰⁵ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Deltona-Daytona Beach-Ormond Beach MSA	1,921	2,047	6.6%	2,021	-1.3%
Orlando-Kissimmee-Sanford MSA	16,115	20,474	27.0%	23,251	13.6%
Florida	84,084	109,924	30.7%	113,912	3.6%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The assessment area experienced an increase in the number of housing permits issued between 2014 and 2015 and to a lesser extent between 2015 and 2016. There was a small decrease between 2015 and 2016 in the Deltona area. The increase in the number of permits could indicate there is a stable demand for home purchase loans in the Deltona area and an increasing demand for home purchase loans in the Orlando area. According to Moody’s Analytics, the housing revival occurred sooner and is more powerful than expected in the Orlando MSA and residential construction and house prices are slower to rebound in the Deltona MSA.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Deltona and Orlando area economies are in recovery, primarily due to strong tourism and ample job opportunities in services, strong demographics due to in-migration, a large retiree population that supports a huge healthcare industry, and major colleges in the area. While the labor market is able to absorb an influx of entrants, poor job quality (i.e., low-paying service industry jobs and high employment volatility) remains an economic weakness, along with a stubbornly high foreclosure rate.

According to *Orlando Sentinel*,¹⁰⁶ Orlando is home to one Fortune 500 company in 2016 (fell 46 places from last year after selling Red Lobster). Nationwide, Darden Restaurants has about 150,000 employees at 1,500 restaurants and is the parent company of Olive Garden, LongHorn Steakhouse, Eddie V’s, Bahama Breeze, Seasons 52, Yard House, and Capital Grille.

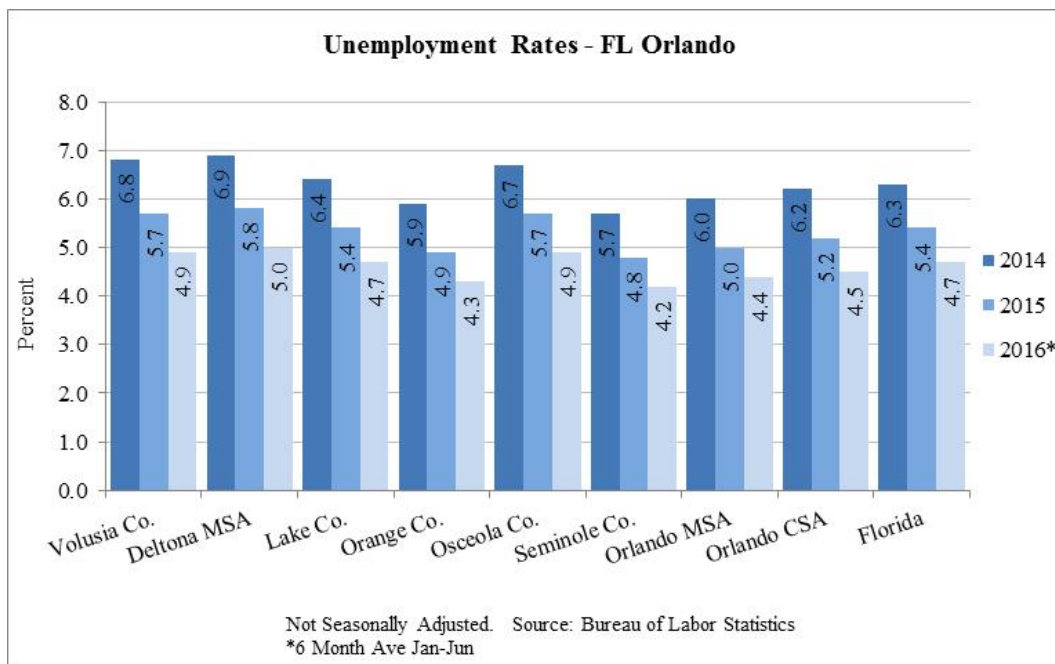
Orlando Fortune 500 Companies (2016)		
Rank	Company	Annual Revenue
371	Darden Restaurants	\$710 million

According to Moody’s Analytics the top 15 employers in the assessment area in 2015/2016 were:

¹⁰⁶ Orlando Sentinel: <http://www.orlandosentinel.com/business/consumer/os-fortune-500-publix-darden-20160606-story.html>

Company	Number of Employees
Walt Disney World Resort	74,000
Universal Orlando (Comcast)	20,000
Adventist Health System/Florida Hospital	19,304
Orlando Health	14,000
Lockheed Martin	7,000
Westgate Resorts	6,500
SeaWorld Parks & Entertainment	6,032
Darden Restaurants	5,221
Halifax Medical Center	4,709
Publix Super Markets Inc.	3,425
Florida Hospital Ormond Memorial	3,256
Wal-Mart Stores Inc.	3,194
National Association for Stock Car Racing	1,700
Vison HR Inc.	1,667
Daytona Beach Community College	1,568

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 across the CSA and Florida.



Overall, the unemployment rates declined each year in the assessment area and Florida. Unemployment rates were fairly consistent across the assessment area during this time period.

According to the *Orlando Weekly*, SeaWorld announced 311 jobs will be eliminated in the second major layoff in two years. While some employees will be let go in San Diego and Tampa, the majority of layoffs will occur in Orlando due to the number of higher-paid corporate positions located in Orlando. These layoffs are part of a companywide \$65 million cost-cutting initiative.¹⁰⁷

¹⁰⁷ Pedicini, Sandra. "SeaWorld Entertainment eliminates hundreds of jobs." *Orlando Sentinel*. December 6, 2016. - <http://www.orlandosentinel.com/business/tourism/os-seaworld-layoffs-20161206-story.html>

According to *WMFE 90.7*, 67 insurance and refund specialists will be laid off in 2017 from Florida Hospital Medical Group (the largest multi-specialty doctor's group in Central Florida), with more than 500 doctors and 2,000 employees due to outsourcing of the central billing function and new electronic medical records software.¹⁰⁸

¹⁰⁸ Aboraya, Abe. "Florida Hospital Medical Group Will Lay Off Workers Next Year." *WMFE 90.7*. December 27, 2016. - <http://www.wmfe.org/florida-hospital-medical-group-will-lay-off-workers-next-year/67837>

Combined Demographics Report

Assessment Area: FL Orlando

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	2.6	7,365	1.1	2,756	37.4	129,983	20.1
Moderate-income	128	25.4	153,902	23.8	24,451	15.9	119,931	18.5
Middle-income	213	42.3	287,717	44.4	23,031	8	135,788	21
Upper-income	147	29.2	198,967	30.7	8,899	4.5	262,262	40.5
Unknown-income	3	0.6	13	0	0	0	0	0
Total Assessment Area	504	100.0	647,964	100.0	59,137	9.1	647,964	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	17,759	4,418	0.7	24.9	9,638	54.3	3,703	20.9
Moderate-income	301,543	123,989	18.8	41.1	122,872	40.7	54,682	18.1
Middle-income	519,881	304,737	46.3	58.6	124,617	24	90,527	17.4
Upper-income	329,790	224,948	34.2	68.2	53,831	16.3	51,011	15.5
Unknown-income	50	50	0	100	0	0	0	0
Total Assessment Area	1,169,023	658,142	100.0	56.3	310,958	26.6	199,923	17.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2,206	1.1	2,015	1.1	177	1.9	14	5.1
Moderate-income	43,867	22.3	40,928	21.8	2,867	30.6	72	26.5
Middle-income	79,623	40.4	75,985	40.5	3,530	37.7	108	39.7
Upper-income	71,411	36.2	68,534	36.6	2,799	29.9	78	28.7
Unknown-income	27	0	27	0	0	0	0	0
Total Assessment Area	197,134	100.0	187,489	100.0	9,373	100.0	272	100.0
	Percentage of Total Businesses:			95.1		4.8		.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	4	0.3	4	0.3	0	0	0	0
Moderate-income	158	11.4	150	11.5	8	10.3	0	0
Middle-income	718	51.8	671	51.3	47	60.3	0	0
Upper-income	503	36.3	480	36.7	23	29.5	0	0
Unknown-income	4	0.3	4	0.3	0	0	0	0
Total Assessment Area	1,387	100.0	1,309	100.0	78	100.0	0	.0
	Percentage of Total Farms:			94.4		5.6		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
ORLANDO-DELTONA-DAYTONA BEACH FL CSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 14 community development loans totaling \$76.4 million. Fifth Third has an excellent geographic distribution of loans and minimal lending gaps. Fifth Third has an excellent distribution among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. An excellent level of community development loans and use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by small business, refinance, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 1,190 home purchase, 662 refinance, 84 home improvement, 1,036 small business, and 14 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 2.1% is greater than the percentage of total deposits at 1.9% in this area.

Fifth Third made 97.8% of HMDA and 99.8% of CRA lending within its designated assessment area. No concentrations of lending were identified in Flagler County, the only excluded county in this assessment area.

In addition to lending, Fifth Third modified existing loans to borrowers. The distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income are presented below.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	0	0.0%	20	19.8%	50	49.5%	31	30.7%
<i>Percentage of Owner Occupied Units</i>		<i>0.7%</i>		<i>18.8%</i>		<i>46.3%</i>		<i>34.2%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	11	10.9%	29	28.7%	21	20.8%	39	38.6%
<i>Percentage of Families by Family Income</i>		20.1%		18.5%		21.0%		40.5%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications for a meaningful analysis. The percentage of other real-estate secured modifications in moderate-income tracts exceeded the percentage of owner occupied units in these geographies. Therefore, modifications helped to expand lending activities in these areas.

The percentage of other modifications made to low-income borrowers was significantly less than the percentage of low-income families in the assessment area; however, the percentage of other modifications to moderate-income borrowers was substantially higher than the percentage of moderate-income families. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Home purchase, refinance, home improvement, and small business lending are all excellent. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	13	3	76.9%
Moderate	128	12	90.6%
Middle	213	14	93.4%
Upper	147	6	95.9%
Unknown	3	3	0.0%
Total	504	38	92.5%

Lending gaps are considered minimal, due to the low number of lending gaps in moderate-, middle-, and upper-income tracts. The lower penetration rate in low-income tracts can be attributed to the limited number of owner-occupied units and small businesses located in these census tracts.

Home Purchase Loans

Fifth Third made 12 home purchase loans totaling \$1.7 million in low-income tracts. This represents 1.0% of home purchase loans by volume, which exceeded the percentage of owner-occupied units in these tracts at 0.7% and 0.8% by dollar amount, which exceeded proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 0.3% and in 2015 exceeded the 2015 aggregate at 0.3%. As Fifth Third's performance exceeded the proxy and aggregate of all lenders, the geographic distribution in low-income tracts is excellent.

Fifth Third made 268 home purchase loans totaling \$34.2 million in moderate-income tracts. This represents 22.5% of its home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 18.8% and 15.9% by dollar amount, which was below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 13.9% and in 2015 exceeded the 2015 aggregate at 14.4%. As Fifth Third's performance exceeded the proxy and aggregate of all lenders, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 511 home purchase loans totaling \$80.2 million in middle-income tracts. This represents 42.9% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 46.3% and 37.2% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 46.4% and in 2015 was below the 2015 aggregate of 46.0%.

Fifth Third made 399 home purchase loans totaling \$99.4 million in upper-income tracts. This represents 33.5% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 34.2% and 46.1% by dollar amount, which exceeds the proxy. The percentage of loans by volume exceeded the 2014 aggregate of 39.4% and in 2015 was below the 2015 aggregate of 39.3%.

A community contact indicated the need for more affordable housing with fewer lending restrictions. Because Fifth Third effectively penetrated these tracts and performance in low- and moderate-income areas exceeded proxy and the aggregate of all lenders, the geographic distribution of home purchase loans is considered excellent.

Refinance Loans

Fifth Third made five refinance loans totaling \$654,000 in low-income tracts. This represents 0.8% of refinance loans by volume which slightly exceeds the percentage of owner-occupied units in these tracts at 0.7% and 0.6% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate at 0.4% and in 2015 exceeded the 2015 aggregate at 0.4%. Since Fifth Third's performance exceeds proxy and the aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is excellent.

Fifth Third made 125 refinance loans totaling \$14.4 million in moderate-income tracts. This represents 18.9% of refinance loans by volume, which slightly exceeds the owner-occupied units in these tracts at 18.8%. The percentage of loans by dollar amount at 12.7% is below proxy. The percentage of loans by volume was below the 2014 aggregate at 13.7% and in 2015

exceeded the 2015 aggregate at 12.7%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 292 refinance loans totaling \$38.6 million in middle-income tracts. This represents 44.1% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 46.3%. However, refinance loans by dollar amount (33.9%) was below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 44.1% and in 2015 was below the 2015 aggregate at 43.2%.

Fifth Third made 240 refinance loans totaling \$60.2 million in upper-income tracts. This represents 36.3% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 34.2% and the dollar amount at 52.9% also exceeds proxy. The percentage of loans by volume was below the 2014 aggregate at 41.8% and in 2015 was below the 2015 aggregate at 43.8%.

Overall, the geographic distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made two home improvement loans totaling \$198,000 in low-income tracts. This represents 2.4% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 0.7%, and 2.2% by dollar amount, which also exceeds proxy. The percentage of loans by volume substantially exceeded the 2014 aggregate of 0.8% and in 2015 substantially exceeded the 2015 aggregate of 0.8%. Given the high median age of housing in low-income tracts at 38 years and Fifth Third's lending performance in these tracts, the geographic distribution in low-income tracts is considered excellent.

Fifth Third made 18 home improvement loans totaling \$1.6 million in moderate-income tracts. This represents 21.4% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 18.8%, and 18.2% by dollar amount, which is comparable to proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 16.2% and in 2015 exceeded the 2015 aggregate of 16.6%. Given that Fifth Third's lending performance exceeded proxy and the aggregate, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 40 home improvement loans totaling \$3.6 million in middle-income tracts. This represents 47.6% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 46.3% and 40.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 46.2% and in 2015 was comparable to the 2015 aggregate of 42.9%.

Fifth Third made 24 home improvement loans totaling \$3.5 million in upper-income tracts. This represents 28.6% of home improvements loans by volume, which is less than the percentage of owner-occupied units in these tracts at 34.2% and 39.4% by dollar amount, which exceeds proxy.

The percentage of loans by volume was below the 2014 aggregate of 36.7% and in 2015 was below the 2015 aggregate of 39.7%.

Overall, the geographic distribution of home improvement loans is excellent.

Small Business Loans

Fifth Third made 23 small business loans totaling \$2.3 million in low-income tracts. This represents 2.2% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 1.1% and 2.0% by dollar amount, which also exceeds the percentage of businesses in these geographies. Fifth Third's lending by volume in 2014 exceeded the 2014 aggregate of 1.1% and in 2015 exceeded the 2015 aggregate of 1.2%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 280 small business loans totaling \$47.0 million in moderate-income tracts. This represents 27.0% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 21.8%. This also represents 40.8% small business loans by dollar amount, which significantly exceeds the percentage of businesses in these tracts. The percentage of loans by volume exceeded the 2014 aggregate of 21.3% and in 2015 exceeded the 2015 aggregate of 20.7%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 364 small business loans totaling \$34.2 million in middle-income tracts. This represents 35.1% of small business loans by volume, which is less than the percentage of businesses in these tracts at 40.5%. Lending by dollar amount at 29.7% is also less than the percentage of businesses in these tracts. The percentage of loans by volume was below the 2014 aggregate of 37.6% and in 2015 was below the 2015 aggregate of 37.8%.

Fifth Third made 369 small business loans totaling \$31.8 million in upper-income tracts. This represents 35.6% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 36.6%, and 27.6% by dollar amount, which is below proxy. The percentage of loans by volume was below to the 2014 aggregate of 38.7% and in 2015 was below the 2015 aggregate of 39.3%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for home purchase, refinance, and home improvement loans.

Home Purchase Loans

Fifth Third made 195 loans totaling \$19.0 million to low-income borrowers. This represents 16.4% of home purchase loans by volume, which is below the percentage of low-income families at 20.1%; however, the percentage of loans by dollar amount (8.8%) is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 3.4% and in 2015 significantly exceeded the 2015 aggregate of 3.9%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 227 loans totaling \$28.1 million to moderate-income borrowers. This represents 19.1% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 18.5% and 13.0% of loans by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 14.1% and in 2015 exceeded the 2015 aggregate of 15.6%. Given that Fifth Third's performance exceeded proxy and exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 192 loans totaling \$29.1 million to middle-income borrowers. This represents 16.1% of home purchase loans by volume, which is less than the percentage of middle-income families at 21.0%, and 13.5% by dollar amount, which is also below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 19.5% and in 2015 was below the 2015 aggregate of 20.3%.

Fifth Third made 413 loans totaling \$109.0 million to upper-income borrowers. This represents 34.7% of home purchase loans by volume, which is below the percentage of upper-income families at 40.5% and 50.6% of loans by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 46.1% and in 2015 was below the 2015 aggregate of 44.1%.

A community contact stated since interest rates are so closely linked to one's credit score, low- and moderate-income individuals are typically at a disadvantage which impacts the ability of these individuals to qualify for loans and buy homes. With Fifth Third's excellent performance in home purchase lending to low- and moderate-income borrowers, the overall borrower distribution is considered excellent.

Refinance Loans

Fifth Third made 111 loans totaling \$9.3 million to low-income borrowers. This represents 16.8% of refinance loans by volume, which is below the percentage of low-income families at 20.1%. The percentage of loans by dollar amount to low-income borrowers at 8.2% is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 6.2% and in 2015 significantly exceeded the 2015 aggregate of 4.9%. Given Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 119 loans totaling \$13.3 million to moderate-income borrowers. This represents 18.0% of refinance loans by volume, which is comparable to the percentage of moderate-income families at 18.5% and 11.7% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 11.8% and in 2015 significantly exceeded the 2015 aggregate of 11.2%. Since Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution to moderate-income borrowers is excellent.

Fifth Third made 118 loans totaling \$14.6 million to middle-income borrowers. This represents 17.8% of refinance loans by volume, which is below the percentage of middle-income families at 21.0%, and 12.8% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.1% and in 2015 was comparable to the 2015 aggregate of 16.4%.

Fifth Third made 273 loans totaling \$69.5 million to upper-income borrowers. This represents 41.2% of refinance loans by volume, which is comparable to the percentage of upper-income families at 40.5%, while the percentage of loans by dollar amount at 61.1% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 43.9% and in 2015 was below the 2015 aggregate of 42.3%.

Overall, the borrower distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made 12 loans totaling \$952,000 to low-income borrowers. This represents 14.3% of home improvement loans by volume, which is below the percentage of low-income families at 20.1%, and 10.6% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 8.8% and in 2015 was comparable to the 2015 aggregate of 8.1%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 20 loans totaling \$1.6 million to moderate-income borrowers. This represents 23.8% of its home improvement loans by volume, which exceeds the percentage of moderate-income families at 18.5%, and 18.0% by dollar amount, which is comparable to proxy. The percentage of loans by volume substantially exceeded the 2014 aggregate of 16.7% and in 2015 was comparable to the 2015 aggregate of 15.8%. Given that Fifth Third's performance substantially exceeded the aggregate of all lenders and exceeded proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 22 loans totaling \$2.4 million to middle-income borrowers. This represents 26.2% of home improvement loans by volume, which exceeds the percentage of middle-income families at 21.0%, and the dollar amount at 27.2% also exceeds proxy. The percentage of loans by volume substantially exceeded the 2014 aggregate of 20.9% and in 2015 slightly exceeded the 2015 aggregate of 19.2%.

Fifth Third made 29 loans totaling \$3.7 million to upper-income borrowers. This represents 34.5% of home improvement loans by volume, which was below the percentage of upper-income families at 40.5%, and 41.3% by dollar amount, which is above proxy. The percentage of loans by volume was below 2014 aggregate of 46.3% and in 2015 was below the 2015 aggregate of 52.0%.

Overall, the borrower distribution of home improvement loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 60.0% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance in 2014 exceeded the 2014 aggregate of 48.8% and in 2015 exceeded the 2015 aggregate of 54.9%, but was significantly below the percentage of small businesses in the assessment area at 95.1%. Also, during the evaluation period Fifth Third was able to make a relatively high percentage of small-dollar loans (78.3%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, several community contacts indicated the need for banks to extend credit to small businesses and make small-dollar loans.

Community Development Loans

Fifth Third originated 14 community development loans totaling \$76.4 million during the evaluation period as shown in the table below:

Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$
4	12,000,000	4	36,700,000	6	27,669,555

Community development lending in the assessment area represents 1.3% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s 19th highest percentage of community development lending during the evaluation period. Given Fifth Third’s deposit market share (3.6%) and the presence of several large financial institutions in the market and competition for community development loans, Fifth Third is a leader in community development lending in this assessment area.

Examples of community development lending include, but are not limited to:

- New loan to a university to purchase a multi-building complex to accommodate more low- and moderate-income college students
- Working capital loan that supports a nonprofit that provides a multitude of services to low- and moderate-income children and families
- Working capital loans that support a college that serves low- and moderate-income students
- Working capital loan that promotes economic development by financing businesses to support job retention of 50 jobs and adding 20 new jobs

The economic development loans aiding in retaining and expanding employment were deemed to be responsive, as a community contact indicated there is a need for small businesses to be able to obtain loans more easily in order to start up or expand operations. However, there were also no community development loans supporting affordable housing, which was an expressed need in this assessment area.

Flexible Lending Programs

Overall, Fifth Third had 339 flexible lending loans in this assessment area: 243 government loans, 14 down payment assistance loans, and 82 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	0.4%	0.5%	0.7%	16.0%	13.4%	18.8%	51.9%	48.8%	46.3%	31.7%	37.3%	34.2%
Down Payment Assistance Programs	14.3%	17.3%	0.7%	28.6%	26.6%	18.8%	42.9%	39.1%	46.3%	14.3%	16.9%	34.2%
Other Flexible Lending Programs	0.0%	0.0%	0.7%	13.4%	10.1%	18.8%	53.7%	46.1%	46.3%	32.9%	43.9%	34.2%
Total	0.9%	0.9%	0.7%	15.9%	12.9%	18.8%	51.9%	47.8%	46.3%	31.3%	38.4%	34.2%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	8.2%	4.2%	20.1%	33.3%	26.5%	18.5%	25.9%	26.4%	21.0%	31.7%	41.4%	40.5%
Down Payment Assistance Programs	35.7%	23.4%	20.1%	28.6%	36.5%	18.5%	21.4%	22.9%	21.0%	14.3%	17.3%	40.5%
Other Flexible Lending Programs	12.2%	8.8%	20.1%	9.8%	5.4%	18.5%	24.4%	21.0%	21.0%	52.4%	63.7%	40.5%
Total	10.3%	5.9%	20.1%	27.4%	21.4%	18.5%	25.4%	24.9%	21.0%	36.0%	46.3%	40.5%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number and dollar amount exceeded the percentage of owner-occupied units in these tracts, particularly for the various down payment assistance programs that are offered. The percentage of lending by volume and dollar amount in moderate-income tracts was below the percentage of owner-occupied units.

Fifth Third’s lending by volume to low-income borrowers was below the percentage of low-income families in the assessment area and lending by dollar amount was significantly below proxy. The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, especially for government loan and down payment assistance programs.

Therefore, Fifth Third made use of flexible lending practices in serving assessment area credit needs, since lending through flexible loan programs in low-income tracts and to moderate-income borrowers was excellent and the lending in moderate-income tracts was good, while lending to low-income borrowers was adequate.

Investment Test

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 96 qualified investments totaling \$46.7 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Community Services	
#	\$	#	\$	#	\$
29	30,461,896	15	529,189	44	279,852

Also included in the total number of investments are eight prior period investments totaling \$15.4 million. Overall, Fifth Third made 2.9% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 1.9% and less than the percentage of branch offices at 3.1%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area, which was an important need expressed by several community contacts. Fifth Third made 64 donations totaling \$397,021 that supported chambers of commerce, charitable organizations, small businesses, education, economic development, and affordable housing. The majority (70.4%) of Fifth Third’s donations supported services to low- and moderate-income individuals, such as after-school programs and various charitable organizations.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated good. Retail services are reasonably accessible and Fifth Third provides a relatively high level of community development services.

Retail Services

Fifth Third's record of opening and closing offices has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, eight banking centers were closed. Two banking centers closed were located in moderate-income tracts. No banking centers were opened during the evaluation period. Delivery services are reasonably accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 40 banking centers within this assessment area, including none in low-, nine in moderate-, 18 in middle-, and 13 in upper-income census tracts. Fifth Third banking centers represent 25.3% of its banking centers in Florida and 3.1% of all its banking centers.

Fifth Third has a total of 53 full-service ATMs within this assessment area, including none in low-, 12 in moderate-, 21 in middle-, and 20 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: FL Orlando

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	0	0.0%	0	0	Total	1	0.9%	0	0.0%	1	1.7%	13	2.6%	1.5%	1.1%
DTO	0		0	0	SA	1		0		1					
Moderate	9	22.5%	0	2	Total	34	30.4%	12	22.6%	22	37.3%	128	25.4%	25.5%	22.0%
DTO	0		0	0	SA	34		12		22					
Middle	18	45.0%	0	3	Total	45	40.2%	21	39.6%	24	40.7%	213	42.3%	44.3%	40.0%
DTO	0		0	0	SA	45		21		24					
Upper	13	32.5%	0	3	Total	32	28.6%	20	37.7%	12	20.3%	147	29.2%	28.8%	36.9%
DTO	0		0	0	SA	32		20		12					
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	3	0.6%	0.0%	0.0%
DTO	0		0	0	SA	0		0		0					
Total	40	100.0%	0	8	Total	112	100.0%	53	100.0%	59	100.0%	504	100.0%	100.0%	100.0%
DTO	0		0	0	SA	112		53		59					

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered poor, because of the distribution of branches was below the percentage of census tracts and households, plus no full-service ATMs in these tracts. The branch distribution within moderate-income tracts was considered good.

Community Development Services

Fifth Third provides a relatively high level of providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 2,920 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 2.5% of all community development services provided and equates to 1.4 annualized persons (ANP).

Affordable Housing	Economic Development	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
266	375	2,279

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development. Community development services include 1,357 hours serving on boards and committees, 1,255 hours of providing financial literacy through local nonprofits and school programs, 284 hours providing technical assistance to non-profits and local business, and 24 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy activities. Several community contacts mentioned the need for financial literacy training to assist individuals with the loan application process and provide technical assistance to small business owners.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
TAMPA-ST. PETERSBURG-CLEARWATER FL MSA #45300**

The Tampa-St. Petersburg-Clearwater FL MSA includes Hillsborough, Pasco, and Pinellas counties, but Fifth Third's assessment area excludes Hernando County. The assessment area is comprised of 33 low-, 177 moderate-, 278 middle-, and 201 upper-income tracts. There are also 12 tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information

As of June 30, 2016, Fifth Third ranked sixth out of 61 institutions with 3.6% of the deposit market share. Raymond James Bank had the majority of the market share 19.4% of deposits, followed by Bank of America, Wells Fargo Bank, SunTrust Bank, and Regions Bank with 16.6%, 13.5%, 11.8%, and 6.7% of the market share, respectively. Deposits in this assessment area accounted for 2.5% of the Fifth Third's total deposits. This was the highest percentage of deposits within the state and the ninth highest within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 2,073 HMDA loans and 1,403 CRA loans, which represented 2.0% and 3.6% of the total loans originated during the evaluation period, respectively. This was the 12th largest HMDA market and eighth-largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 25th among 897 HMDA reporters in the assessment area and Fifth Third ranked 129th. Wells Fargo Bank, Quicken Loans, JPMorgan Chase Bank, PennyMac Loan Services, and Bank of America were the top five HMDA lenders in the assessment area. Fifth Third ranked 16th of 145 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Bank of America, Wells Fargo Bank, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Two community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a community development organization, stated the economic situation is improving in this area. There is an increased demand for small business lending and banks appear to be originating loans to small businesses. The contact stated area banks work closely with this organization and are aggressively looking for qualified small business owners. However, the contact indicated there is a need for specialized commercial loan products, which banks typically do not offer.

The second contact, representing an affordable housing organization, stated the Tampa housing market is improving, but foreclosure rates and unemployment rates remain high. The unemployment rate fell zero percentage points at the end of last year. The contact stated there is a need for more affordable housing, as lower-income individuals and families seeking affordable housing may be on waitlists for months.

Since the economic downturn, the contact stated it has been difficult for low- and moderate-income individuals to refinance or obtain loan modifications, because banks appear to be relying on pre-recession appraised values that are above current fair market values. The contact believed there are opportunities for banks to help meet the credit needs of this community by offering ongoing support instead of one-time donations, because these types of offerings do not have a sustainable, long-term impact on the community. Additionally, there is a need for financial institutions to offer financial education and explain ways to repair credit to lower-income individuals impacted by the economic downturn.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 2.6 million. About 28.4% of the population lived in low- and moderate-income tracts. In addition, 78.7% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Tampa-St. Petersburg-Clearwater MSA is the 18th largest in terms of population in the nation.¹⁰⁹ Hillsborough County is the largest county in the assessment area and the fourth-most populous county in Florida.¹¹⁰ Tampa (located in Hillsborough County) is the largest city in the assessment area and is the 53rd most populous city in the U.S. Tampa has 369,075 residents and its population growth increased by 21.3% between 2000 and 2015. The cities of St. Petersburg and Clearwater have 257,083 and 113,003 residents, respectively, with population growth around 3.2% between 2000 and 2015. In contrast, New Port Richey only has 15,842 residents.¹¹¹

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase.¹¹² The population within the assessment area experienced positive growth between 2010 and 2015, with Hillsborough County experiencing the greatest growth and Pinellas County experiencing the least growth in population during this time period. According to Moody’s Analytics, domestic migration made up more than three-quarters of the growth and international migration accounted for nearly a quarter of the increase in 2015. This assessment area has a robust domestic and foreign in-migration, which contributes to an increasing demand for employment and housing.

County	2010 Population	2015 Population	Population Percent Change
Hillsborough	1,229,226	1,349,050	9.7%
Pasco	464,697	497,909	7.1%
Pinellas	916,542	949,827	3.6%
Total	2,610,465	2,796,786	7.1%

¹⁰⁹ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

¹¹⁰ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

¹¹¹ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

¹¹² Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

Income Characteristics

In 2010, the MSA median family income was slightly greater (\$57,801) than Florida at \$57,204. The median family income in the MSA increased between 2014 and 2016; however, Moody’s Analytics noted high living costs relative to per capita income. Moody’s also noted full employment and wage gains in the next year, primarily as a result of a rising number of high-wage jobs being created in the area’s fledgling high-tech industry. These gains should support growing retail and housing markets.

**Borrower Income Levels
Tampa-St. Petersburg-Clearwater, FL MSA**

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2014	\$57,400	0 - \$28,699	\$28,700 - \$45,919	\$45,920 - \$68,879	\$68,880 - & above
2015	\$59,000	0 - \$29,499	\$29,500 - \$47,199	\$47,200 - \$70,799	\$70,800 - & above
2016	\$59,200	0 - \$29,599	\$29,600 - \$47,359	\$47,360 - \$71,039	\$71,040 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.¹¹³ Pinellas County had the lowest poverty rate in 1999 and 2015 and Hillsborough County had the highest; however, Pasco County experienced the largest increase in poverty rate during the evaluation period. In 2015, Pasco and Pinellas counties had poverty rates below Florida’s. The poverty rates for Hillsborough County and Florida were the same and exceeded the national poverty rates in 1999 and 2015. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.¹¹⁴ The following table shows the poverty rates for 1999¹¹⁵ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Hillsborough	12.5%	15.8%	26.4%
Pasco	10.7%	14.6%	36.4%
Pinellas	10.0%	13.6%	36.0%
Florida	12.5%	15.8%	26.4%
U.S.	11.8%	13.5%	14.4%

¹¹³ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹¹⁴ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

¹¹⁵ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 1.3 million housing units and 649,472 families in the assessment area. From an income perspective, 29.1% of housing units, 23.3% of owner-occupied units, and 26.7% of families are located in low- or moderate-income tracts. Over two-thirds of the housing units in the low-income census tracts are either rental or vacant (68.7%). In the moderate-income census tracts, over half of the housing units are either rental or vacant (51.7%) and 48.3% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was only 30 years old and only 5.3% of the stock was built before 1950. However, within the assessment area, the median age of housing stock was 39 years in low-income tracts and 35 years in moderate-income tracts. Therefore, there appears to be opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$185,296 with an affordability ratio of 25.24. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Median housing values decreased between 2010 and 2011-2015 and median family incomes increased; as a result, housing became more affordable across the assessment area. During the evaluation period, the most affordable housing was in Pasco County and the least affordable was in Pinellas County. A community contact stated it has been difficult for low- and moderate-income individuals to refinance or obtain loan modifications, because banks appear to be relying on pre-recession appraised values that are above current fair market values. Moody's Analytics noted that area house prices have slowed to the weakest six-month growth rate in more than a year. Median gross rents increased across the assessment area, with renters in Pasco County experiencing the largest increase in rental rates and renters in Pinellas County experiencing the smallest increase in gross rental rates. In 2010, about 53.0% of renters across the assessment area had rent costs greater than 30.0% of income. Increasing rental rates may make it more difficult for potential homebuyers to save for a down payment for a home. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Florida.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Hillsborough	\$198,900	24.90	\$159,200	31.77	\$906	\$965	6.5%
Pasco	\$157,400	28.10	\$117,800	38.25	\$865	\$930	7.5%
Pinellas	\$185,700	24.37	\$150,200	30.51	\$904	\$952	5.3%
Florida	\$205,600	23.18	\$159,000	29.88	\$957	\$1,002	4.7%

According to Bankrate.com,¹¹⁶ Florida ranked 6th for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹¹⁷

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Hillsborough	1:857
Pasco	1:694
Pinellas	1:926
Florida	1:986
U.S.	1:1,533

In November 2016, all three counties in this assessment area had higher rates of foreclosure than Florida. A community contact mentioned the continuing high rates of foreclosure in this area.

Building permits for this MSA, Florida, and the nation are included in the following table for 2014, 2015, and 2016.¹¹⁸

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Tampa-St. Petersburg-Clearwater MSA	12,386	15,653	26.4%	17,180	9.8%
Florida	84,084	109,924	30.7%	113,912	3.6%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The assessment area experienced increases in the number of housing permits issued between 2014 and 2015 and to a lesser extent between 2015 and 2016. The increase in the number of permits could indicate there is an increasing demand for home purchase loans in this area.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Tampa metropolitan area economy is in recovery, primarily due to the increase in professional, scientific, and technical services over the next five years. The Tampa metropolitan area is the financial services capital of Florida and has grown into the hub for professional and management services in the state.

¹¹⁶ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹¹⁷ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

¹¹⁸ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

According to *Tampa Bay Times*,¹¹⁹ the Tampa Bay area is home to four Fortune 500 companies in 2016.

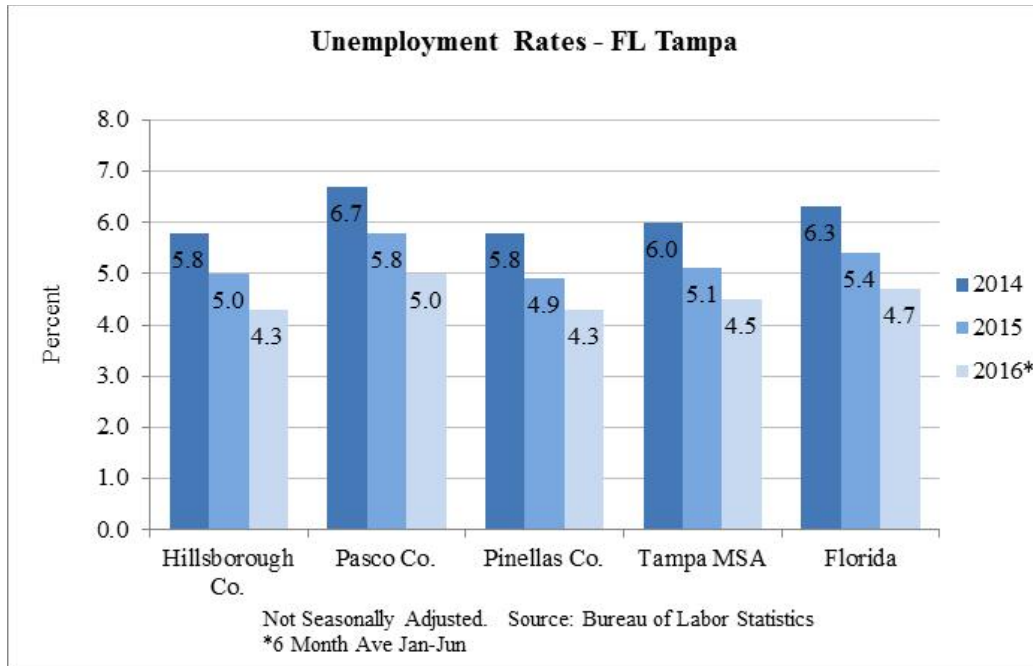
Tampa Bay Fortune 500 Companies (2016)		
Rank	Company	Annual Revenue
108	Tech Data Corp	\$26.0 billion
158	Jabil Circuit Inc.	\$17.9 billion
202	WellCare Health Plans	\$13.9 billion
482	Raymond James Financial	\$5.5 billion

According to Moody's Analytics the top 15 employers in the MSA in 2015/2016 were:

Company	Number of Employees
MacDill Air Force Base	19,000
Verizon Communications	14,000
University of South Florida	12,661
Tampa International Airport	7,060
Tampa General Hospital	6,600
Shriners Hospital for Children	5,378
St. Joseph's Hospital	5,242
JP Morgan Chase & Co.	5,237
Freedom Village	5,000
Publix Super Markets	4,630
TECO Energy Company	4,290
James A. Haley Veterans Hospital	4,240
Bay Pines VA Healthcare Center	3,800
Bank of America Corp.	3,754
Outback Steakhouse Corp.	3,625

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 across the MSA and Florida.

¹¹⁹ Tampa Bay Times: <http://www.tampabay.com/news/business/corporate/st-petersburgs-raymond-james-financial-cracks-fortune-500-rankings/2280477>



The unemployment rates declined each year in the assessment area and Florida, with Pasco County having the highest unemployment rates during this time period. A community contact stated the unemployment rate in this area remains high and that the unemployment rate fell zero percentage points at the end of last year. According to Moody’s Analytics, unemployed workers are discouraged from entering a labor market that has not seen a reduction in the joblessness rate in last six months of last year, and employed workers have seen no wage increased during this time.

According to *Tampa Bay Times*, in 2016 regional layoffs under the Worker Adjustment & Retraining Notification (WARN) rules fell sharply (a 34.0% decrease from reported layoffs in 2015); this is the first significant drop in mass area layoffs in the past five years. In 2016, the most significant reported job cuts under WARN rules was announced by Ohio-based customer management firm, Convergys Corp, which eliminated 375 jobs at a call center located in Tampa Bay. In 2015, the biggest WARN cuts were by Tampa International Airport concessionaire HMS Host, which eliminated nearly 796 jobs. In 2014, the closing of an Express Scripts facility in Tampa resulted in the loss of 422 jobs.¹²⁰

¹²⁰ Trigauz, Robert. “Mass layoffs in 2016 by Tampa Bay firms drop sharply after years of heavy job cuts.” *Tampa Bay Times*. January 6, 2017. - <http://www.tampabay.com/news/business/mass-layoffs-in-2016-by-tampa-bay-firms-drop-sharply-after-years-of-heavy/2308730>

Combined Demographics Report

Assessment Area: FL Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	33	4.7	21,504	3.3	7,795	36.2	133,528	20.6
Moderate-income	177	25.2	152,220	23.4	24,041	15.8	118,163	18.2
Middle-income	278	39.7	262,465	40.4	21,253	8.1	127,303	19.6
Upper-income	201	28.7	213,273	32.8	8,432	4	270,478	41.6
Unknown-income	12	1.7	10	0	0	0	0	0
Total Assessment Area	701	100.0	649,472	100.0	61,521	9.5	649,472	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	44,609	13,946	1.9	31.3	22,922	51.4	7,741	17.4
Moderate-income	320,424	154,755	21.4	48.3	107,359	33.5	58,310	18.2
Middle-income	511,840	304,948	42.1	59.6	129,985	25.4	76,907	15
Upper-income	376,600	250,180	34.6	66.4	68,761	18.3	57,659	15.3
Unknown-income	53	0	0	0	53	100	0	0
Total Assessment Area	1,253,526	723,829	100.0	57.7	329,080	26.3	200,617	16.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,249	2.8	4,727	2.7	508	5.2	14	5.4
Moderate-income	37,860	20.5	35,252	20.2	2,546	26	62	24
Middle-income	71,142	38.5	67,055	38.4	3,989	40.8	98	38
Upper-income	70,343	38.1	67,563	38.7	2,697	27.6	83	32.2
Unknown-income	196	0.1	155	0.1	40	0.4	1	0.4
Total Assessment Area	184,790	100.0	174,752	100.0	9,780	100.0	258	100.0
Percentage of Total Businesses:			94.6		5.3		.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	28	2.2	27	2.2	1	1.7	0	0
Moderate-income	260	20.1	248	20.1	12	20	0	0
Middle-income	536	41.4	511	41.5	23	38.3	2	66.7
Upper-income	470	36.3	445	36.1	24	40	1	33.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,294	100.0	1,231	100.0	60	100.0	3	100.0
Percentage of Total Farms:			95.1		4.6		.2	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
TAMPA-ST. PETERSBURG-CLEARWATER FL MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 18 community development loans totaling \$130.5 million. Fifth Third has an excellent geographic distribution of loans and a low level of lending gaps. Fifth Third has an excellent distribution among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of small business lending based on the overall volume of lending, followed by home purchase, refinance, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects a good responsiveness to the credit needs within the assessment area. Fifth Third originated 1,403 small business, 1,358 home purchase, 620 refinance, 95 home improvement, and 18 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 2.4% is comparable to the percentage of total deposits at 2.5% in this area.

Fifth Third made 95.4% of the HMDA and 98.9% of the CRA lending within its designated assessment area. However, a concentration of HMDA lending was identified in Hernando County, which is excluded from the assessment area. During the evaluation period, Fifth Third originated 99 loans in Hernando County, which has 14 low- and moderate-income tracts.

In addition to lending, Fifth Third modified existing loans to borrowers. The following table shows the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	1	1.1%	16	17.6%	40	44.0%	34	37.4%
<i>Percentage of Owner Occupied Units</i>		<i>1.9%</i>		<i>21.4%</i>		<i>42.1%</i>		<i>34.6%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	13	14.3%	28	30.8%	19	20.9%	30	33.0%
Percentage of Families by Family Income		20.6%		18.2%		19.6%		41.6%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications in this assessment area for a meaningful analysis. The percentage of other modifications in low- and moderate-income tracts was comparable to the percentage of owner occupied units; therefore, modifications helped to expand lending activities in these areas.

The percentage of other modifications made to low-income borrowers was below the percentage of low-income families in the assessment and the percentage of other modifications to moderate-income borrowers was substantially higher than the percentage of moderate-income families. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers. In addition, a community contact indicated the need for loan modifications within this assessment area.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Small business, the largest loan category, and home purchase are excellent. Refinance and home improvement are good. There is also a low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	33	6	81.8%
Moderate	177	23	87.0%
Middle	278	27	90.3%
Upper	201	6	97.0%
Unknown	12	12	0.0%
Total	701	74	89.4%

Lending gaps are considered minimal, due to the limited number of lending gaps in low- and moderate- income tracts and low amount of lending gaps in middle-, and upper-income tracts. The owner-occupancy rates in low- and moderate-income tracts are relatively low at 31.3% and 48.3%, respectively, which likely impacts the demand for loans in these areas.

Small Business Loans

Fifth Third made 47 small business loans totaling \$5.3 million in low-income tracts. This represents 3.3% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 2.7%, and 4.8% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 3.2% and was comparable to the 2015 aggregate of 3.3%. Given that Fifth Third's performance exceeded proxy and was comparable to the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 313 small business loans totaling \$30.8 million in moderate-income tracts. This represents 22.3% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 20.2%. This also represents 28.2% small business loans by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.7% and was comparable to the 2015 aggregate of 19.0%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 488 small business loans totaling \$44.2 million in middle-income tracts. This represents 34.8% of small business loans by volume, which is slightly below the percentage of businesses in these tracts at 38.4%, and 40.5% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 37.2% and was comparable to the 2015 aggregate of 37.9%.

Fifth Third made 555 small business loans totaling \$28.9 million in upper-income tracts. This represents 39.6% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 38.7%, and 26.5% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 38.7% and exceeded the 2015 aggregate of 38.8%.

Overall, the geographic distribution of small business loans is excellent.

Home Purchase Loans

Fifth Third made 30 home purchase loans totaling \$3.4 million in low-income tracts. This represents 2.2% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 1.9%, and 1.3% by dollar amount, which is comparable to the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate at 1.0% and exceeded the 2015 aggregate at 1.2%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders in these geographies, the geographic distribution in low-income tracts is excellent. Further, the owner-occupancy rate in low-income tracts is relatively low; therefore, Fifth Third's ability to penetrate these geographies is notable.

Fifth Third made 306 home purchase loans totaling \$35.9 million in moderate-income tracts. This represents 22.5% of its home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 21.4%, and 14.0% by dollar amount, which was below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 13.5% and exceeded the 2015 aggregate at 14.3%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 478 home purchase loans totaling \$73.5 million in middle-income tracts. This represents 35.2% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 42.1%, and 28.6% by dollar amount, which is below proxy. The percentage of loans by volume was below to the 2014 aggregate of 41.3% and was below the 2015 aggregate of 41.0%.

Fifth Third made 544 home purchase loans totaling \$143.9 million in upper-income tracts. This represents 40.1% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 34.6%, and 59.1% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 44.2% and was below the 2015 aggregate of 43.5%.

Overall, the geographic distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 14 refinance loans totaling \$1.2 million in low-income tracts. This represents 2.3% of refinance loans by volume, which exceeds the percentage of owner-occupied units at 1.9%, and 1.1% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 1.4% and exceeded the 2015 aggregate at 1.1%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is excellent.

Fifth Third made 123 refinance loans totaling \$12.4 million in moderate-income tracts. This represents 19.8% of refinance loans by volume, which is below the owner-occupied units in these tracts at 21.4%. Also, the percentage of loans by dollar amount at 11.5% is significantly below proxy. However, the percentage of loans by volume was comparable to the 2014 aggregate at 13.5% and exceeded the 2015 aggregate at 12.6%. As Fifth Third's performance significantly exceeded the aggregate of all lenders, but was below proxy, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 232 refinance loans totaling \$30.2 million in middle-income tracts. This represents 37.4% of refinance loans by volume, which is below the owner-occupied units in these tracts at 42.1%. Refinance loans by dollar amount (28.1%) was also below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 40.2% and was comparable to the 2015 aggregate at 39.6%.

Fifth Third made 251 refinance loans totaling \$63.9 million in upper-income tracts. This represents 40.5% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 34.6%. The percentage of loans by dollar amount at 59.3% also exceeded proxy. However, the percentage of loans by volume was comparable to the 2014 aggregate at 44.9% and was below the 2015 aggregate at 46.6%.

Overall, the geographic distribution of refinance loans is good.

Home Improvement Loans

There was no lending by Fifth Third in low-income tracts. The percentage of owner-occupied units in these tracts is 1.9%. The percentage of loans by volume for the 2014 aggregate is 1.4% and the 2015 aggregate is 1.9%. A community contact stated it has been difficult for low- and moderate-income individuals to obtain financing after the economic downturn due to inflated real estate values. Given the low amount of owner-occupied units and low aggregate lending in these tracts, the geographic distribution is considered adequate.

Fifth Third made 20 home improvement loans totaling \$1.3 million in moderate-income tracts. This represents 21.1% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 21.4%, and 16.8% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume was below the 2014 aggregate of 19.0% and exceeded the 2015 aggregate of 17.7%. Given that Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 38 home improvement loans totaling \$2.9 million in middle-income tracts. This represents 40.0% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 42.1%, and 37.3% by dollar amount, which is less than the percentage of owner-occupied units in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 39.9% and was below the 2015 aggregate of 40.4%.

Fifth Third made 37 home improvement loans totaling \$3.5 million in upper-income tracts. This represents 38.9% of home improvements loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 34.6%, and 45.9% by dollar amount, which exceeds the percentage of owner-occupied units in these geographies. The percentage of loans by volume was comparable to the 2014 aggregate of 39.8% and was below the 2015 aggregate of 40.1%.

Overall, the geographic distribution of home improvement loans is good. While Fifth Third did not make any home improvement loans in low-income tracts, performance is excellent in moderate-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for all three HMDA loan categories.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 58.0% of small business loans to businesses with revenues of \$1 million or less. Fifth Third's performance in 2014 exceeded the 2014 aggregate of 48.2% and exceeded the 2015 aggregate of 54.7%, but was significantly below the percentage of small businesses in the assessment area at 94.6%. Also, during the evaluation period, Fifth Third was able to make a relatively high percentage of small-dollar loans (84.3%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, a community contact indicated the need to make loans to small businesses.

Home Purchase Loans

Fifth Third made 219 loans totaling \$18.9 million to low-income borrowers. This represents 16.1% of home purchase loans by volume, which is below the percentage of low-income families at 20.6%, and 7.4% of loans by dollar amount, which is significantly below proxy. However the percentage of loans by volume exceeded the 2014 aggregate of 4.0% and significantly exceeded the 2015 aggregate of 4.1%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 226 loans totaling \$27.5 million to moderate-income borrowers. This represents 16.6% of home purchase loans by volume, which is below the percentage of moderate-income families at 18.2%, and 10.7% of loans by dollar amount, which is significantly below proxy. However, the percentage of loans by volume was comparable to the 2014 aggregate of 14.5% and exceeded the 2015 aggregate of 15.7%. Given that Fifth Third's performance was slightly below proxy and significantly exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 251 loans totaling \$36.5 million to middle-income borrowers. This represents 18.5% of home purchase loans by volume, which is comparable to the percentage of middle-income families at 19.6%, and 14.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.7% and was below the 2015 aggregate of 19.4%.

Fifth Third made 604 loans totaling \$161.8 million to upper-income borrowers. This represents 44.5% of home purchase loans by volume, which is greater than the percentage of upper-income families at 41.6%, and 63.0% of loans by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 46.4% and was below the 2015 aggregate of 44.1%.

A community contact indicated this area is still impacted by high unemployment, which could be a factor impacting the ability of lower-income individuals to purchase homes. With Fifth Third's strong performance in home purchase lending to low- and moderate-income borrowers, the overall borrower distribution is excellent.

Refinance Loans

Fifth Third made 113 loans totaling \$9.0 million to low-income borrowers. This represents 18.2% of refinance loans by volume, which is comparable to the percentage of low-income families at 20.6%. The percentage of loans by dollar amount in these geographies at 8.4% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 6.0% and significantly exceeded the 2015 aggregate of 4.7%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 112 loans totaling \$10.6 million to moderate-income borrowers. This represents 18.1% of refinance loans by volume, which is comparable to the percentage of moderate-income families at 18.2%, and 9.8% by dollar volume, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 11.3% and significantly exceeded the 2015 aggregate of 10.8%. As Fifth Third's performance was comparable to proxy and significantly exceeded the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 107 loans totaling \$14.1 million to middle-income borrowers. This represents 17.3% of refinance loans by volume, which is comparable to the percentage of middle-income families at 19.6%, and 13.1% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 17.8% and was comparable to the 2015 aggregate of 16.2%.

Fifth Third made 246 loans totaling \$65.3 million to upper-income borrowers. This represents 39.7% of refinance loans by volume, which is comparable to the percentage of upper-income families at 41.6%, while the percentage of loans by dollar amount at 60.6% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 43.4% and was below the 2015 aggregate of 42.7%.

A community contact indicated it has been difficult for low- and moderate-income borrowers to refinance. With Fifth Third's excellent performance in refinance lending to low- and moderate-income borrowers, the overall borrower distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made 18 loans totaling \$1.1 million to low-income borrowers. This represents 18.9% of home improvement loans by volume, which is comparable to the percentage of low-income families at 20.6%, and 14.7% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 8.9% and significantly exceeded the 2015 aggregate of 7.5%.

Given that Fifth Third’s performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 20 loans totaling \$1.3 million to moderate-income borrowers. This represents 21.1% of its home improvement loans by volume, which exceeded the percentage of moderate-income families at 18.2%, and is comparable to the dollar amount at 17.3%. The percentage of loans by volume exceeded the 2014 aggregate of 16.4% and exceeded the 2015 aggregate of 16.1%. Given that Fifth Third’s performance exceeded the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 23 loans totaling \$2.0 million to middle-income borrowers. This represents 24.2% of home improvement loans by volume, which exceeds the percentage of middle-income families at 19.6%, and is comparable by dollar amount at 26.0%. The percentage of loans by volume exceeded the 2014 aggregate of 19.5% and exceeded the 2015 aggregate of 19.5%.

Fifth Third made 33 loans totaling \$3.1 million to upper-income borrowers. This represents 34.7% of home improvement loans by volume, which was below the percentage of upper-income families at 41.6%, and 40.2% by dollar amount, which was also below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 50.4% and was below the 2015 aggregate of 52.1%.

The overall borrower distribution of home improvement loans is excellent.

Community Development Loans

Fifth Third originated 18 community development loans totaling \$130.5 million during the evaluation period as shown in the table below:

Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$
2	15,500,000	11	108,354,952	5	6,652,644

Community development lending in the assessment area represents 2.2% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s 14th highest percentage of community development lending during the evaluation period.

Given Fifth Third’s deposit market share (3.6%) and the presence of several large financial institutions in the market and competition for community development loans, Fifth Third is a leader in community development lending in this assessment area.

Examples of community development lending include, but are not limited to:

- Working capital loan that promotes economic development by financing a business so it can expand employment by being able to add five new jobs
- Construction loan to help build a domestic violence shelter offering a multitude of services to low- and moderate-income women and children who have experienced various forms of abuse
- Renewal of a line of credit to help rehabilitate a property located in a designated Brownfield area for commercial purposes
- Working capital loan that supports a nonprofit that provides a multitude of services to low- and moderate-income children and families
- Working capital loans that support a nonprofit that helps low- and moderate-income students successfully enter colleges and universities or the workforce through a variety of programs
- Working capital loan that supports a nonprofit that provides a multitude of healthcare services to low- and moderate-income senior citizens

The economic development loans that help to expand employment is deemed to be responsive, as a community contact indicated there is a need for small businesses to be able to obtain loans. However, there were also no community development loans supporting affordable housing which is an expressed need in this assessment area. Loans supporting services to low- and moderate income individuals are also responsive due to the area's higher poverty rates and unemployment rates.

Flexible Lending Programs

Fifth Third had 373 flexible lending loans in this assessment area: 278 government loans, 17 down payment assistance loans, and 78 were other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third's flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.4%	0.9%	1.9%	20.9%	14.7%	21.4%	40.3%	39.1%	42.1%	37.4%	45.3%	34.6%
Down Payment Assistance Programs	23.5%	21.4%	1.9%	17.6%	12.1%	21.4%	35.3%	35.2%	42.1%	23.5%	31.3%	34.6%
Other Flexible Lending Programs	0.0%	0.0%	1.9%	16.7%	10.5%	21.4%	48.7%	41.0%	42.1%	34.6%	48.5%	34.6%
Total	2.1%	1.2%	1.9%	19.8%	13.8%	21.4%	41.8%	39.4%	42.1%	36.2%	45.6%	34.6%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	7.9%	4.2%	20.6%	22.7%	17.5%	18.2%	30.9%	29.4%	19.6%	37.1%	47.5%	41.6%
Down Payment Assistance Programs	52.9%	48.1%	20.6%	23.5%	26.3%	18.2%	11.8%	17.4%	19.6%	11.8%	8.1%	41.6%
Other Flexible Lending Programs	10.3%	5.8%	20.6%	15.4%	11.4%	18.2%	14.1%	12.4%	19.6%	56.4%	67.3%	41.6%
Total	10.5%	5.7%	20.6%	21.2%	16.4%	18.2%	26.5%	25.5%	19.6%	39.9%	50.6%	41.6%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number exceeded the percentage of owner-occupied units in these tracts, especially for the various down payment assistance programs, while the percentage by dollar was below proxy. The percentage of lending by volume in moderate-income tracts was slightly less than the percentage of owner-occupied units. The percentage by dollar was also below proxy.

Fifth Third’s lending by volume to low-income borrowers was below the percentage of low-income families in the assessment area; however, various down payment assistance programs substantially exceeded proxy. Lending by dollar amount was significantly below the percentage of low-income families in the assessment area. The percentage of lending by volume to moderate-income borrowers exceeded the percentage of moderate-income families and lending by dollar amount was below proxy.

Fifth Third made use of flexible lending practices in serving assessment area credit needs, as lending through flexible loan programs to moderate-income borrowers and in low-income tracts was excellent, while lending in moderate-income tracts was good. Lending to low-income borrowers was adequate.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent.

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 95 qualified investments totaling \$68.7 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
23	43,017,424	17	119,495	5	38,000	45	262,305

Also included in the total number of investments are five prior period investments totaling \$25.3 million. Fifth Third made 4.2% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 2.5% and greater than the percentage of branch offices at 3.3%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area, which was an important need expressed by a community contact. Fifth Third made 73 donations totaling \$429,180 that supported charitable organizations, local schools, small businesses, food banks, churches, and affordable housing. The majority (61.0%) of Fifth Third’s donations supported services to low- and moderate-income individuals. Due to high poverty rates and high unemployment, there is a need in the area to support services targeted to low- and moderate-income individuals.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated excellent. Retail services are accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, one banking center was closed and none were opened, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 43 banking centers within this assessment area, including one in low-, 12 in moderate-, 10 in middle-, and 20 in upper-income census tracts. Fifth Third’s banking centers in this assessment area represent 27.2% of its banking centers in Florida and 3.3% of all its banking centers.

Fifth Third has a total of 43 full-service ATMs within this assessment area, including two in low-, 10 in moderate-, 11 in middle-, and 20 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: FL Tampa

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	1	2.3%	0	0	Total	2	2.7%	2	4.7%	0	0.0%	33	4.7%	3.5%	2.8%
DTO	0		0	0	SA	2		2		0					
Moderate	12	27.9%	0	0	Total	21	28.4%	10	23.3%	11	35.5%	177	25.2%	24.9%	20.3%
DTO	0		0	0	SA	21		10		11					
Middle	10	23.3%	0	1	Total	26	35.1%	11	25.6%	15	48.4%	278	39.7%	41.3%	38.3%
DTO	0		0	0	SA	26		11		15					
Upper	20	46.5%	0	0	Total	23	31.1%	20	46.5%	3	9.7%	201	28.7%	30.3%	38.5%
DTO	0		0	0	SA	23		20		3					
Unknown	0	0.0%	0	0	Total	2	2.7%	0	0.0%	2	6.5%	12	1.7%	0.0%	0.1%
DTO	0		0	0	SA	2		0		2					
Total	43	100.0%	0	1	Total	74	100.0%	43	100.0%	31	100.0%	701	100.0%	100.0%	100.0%
DTO	0		0	0	SA	74		43		31					

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered adequate, because the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 2,534 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 2.1% of all community development services provided and equates to 1.22 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
194	897	6	1,437

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization.

Community development services include 1,307 hours serving on boards and committees, 1,081 hours of providing financial literacy through local nonprofits and school programs, 130 hours providing technical assistance to non-profits and local business, and 16 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy, foreclosure outreach prevention, and affordable housing activities. A community contact mentioned the need for more affordable housing and financial literacy training to provide ways for low- and moderate-income individuals to repair their credit. Also, the rate of foreclosures remains significantly higher in multiple counties throughout this assessment area compared to the national foreclosure rate.

METROPOLITAN AREAS
(Limited-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
THE STATE OF FLORIDA**

- **Cape Coral-Fort Myers MSA**
 - As of June 30, 2016, Fifth Third operated 18 branches in the assessment area, representing 11.4% of its branches in Florida.
 - As of June 30, 2016, Fifth Third had \$1.2 million in deposits in this assessment area, representing a market share of 7.6% and 11.0% of its statewide deposits.
- **Jacksonville MSA**
 - As of June 30, 2016, Fifth Third operated 11 branches in the assessment area, representing 7.0% of its branches in Florida.
 - As of June 30, 2016, Fifth Third had \$477,311 in deposits in this assessment area, representing a market share of 0.8% and 4.6% of it statewide deposits.
- **Lakeland MSA**
 - As of June 30, 2016, Fifth Third operated four branches in the assessment area, representing 2.5% of its branches in Florida.
 - As of June 30, 2016, Fifth Third had \$82,027 in deposits in this assessment area, representing a market share of 1.3% and 0.8% of it statewide deposits.
- **Miami-Fort Lauderdale-West Palm Beach MSA**
 - As of June 30, 2016, Fifth Third operated seven branches in the assessment area, representing 4.4% of its branches in Florida.
 - As of June 30, 2016, Fifth Third had \$680,091 in deposits in this assessment area, representing a market share of 0.3% and 6.6% of it statewide deposits.
- **Naples-Immokalee-Marco Island MSA**
 - As of June 30, 2016, Fifth Third operated 17 branches in the assessment area, representing 10.8% of its branches in Florida.
 - As of June 30, 2016, Fifth Third had \$2.5 million in deposits in this assessment area, representing a market share of 16.0% and 23.7% of it statewide deposits.
- **North Port-Sarasota CSA**
 - As of June 30, 2016, Fifth Third operated 18 branches in the assessment area, representing 11.4% of its branches in Florida.
 - As of June 30, 2016, Fifth Third had \$905,725 in deposits in this assessment area, representing a market share of 4.0% and 8.7% of it statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE STATE OF FLORIDA**

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with Fifth Third's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Cape Coral-Fort Myers MSA	Below	Below	Consistent
Jacksonville MSA	Below	Consistent	Consistent
Lakeland MSA	Below	Consistent	Consistent
Miami-Fort Lauderdale-West Palm Beach MSA	Below	Consistent	Consistent
Naples-Immokalee-Marco Island MSA	Below	Below	Below
North Port-Sarasota CSA	Below	Below	Consistent

For the lending test, Fifth Third received an “Outstanding” rating in Florida. Performance in all six of the limited-scope assessment areas was below Fifth Third’s performance for the state. Although below the state performance, lending levels were good or adequate for the geographic and borrower distribution of loans. There was an excellent level of community development loans in the Miami-Fort Lauderdale-West Palm Beach assessment area and a good level of community development loans in the North Port-Sarasota assessment area. There were adequate levels of community development loans in the remaining four limited-scope assessment areas. A high level of lending gaps was identified in the Miami-Fort Lauderdale-West Palm Beach assessment area and moderate gaps in lending identified in the Jacksonville and Lakeland assessment areas. Overall, a low level of lending gaps was noted in the remaining three assessment areas.

For the investment test, Fifth Third received an “Outstanding” rating in Florida. While the investment activity was consistent to the state in three of the six limited-scope assessment areas, the performance in the Cape Coral-Fort Myers, Naples-Immokalee-Marco Island, and North Port-Sarasota assessment area was below Fifth Third’s performance for the state. Although below the state performance, investment activity was good in the North Port-Sarasota and adequate in the Cape Coral-Fort Myers and Naples-Immokalee-Marco Island assessment areas. The weaker performance was primarily due to a lower level of qualified investments and contributions relative to Fifth Third’s operational presence in the assessment area.

For the service test, Fifth Third received a “High Satisfactory” rating in Florida. Performance was consistent with the state in five of six limited-scope assessment areas and services in the Naples-Immokalee-Marco Island assessment area were below Fifth Third’s performance for the state. Retail services were adequate in the Naples-Immokalee-Marco Island assessment area and good in the remaining five limited-scope assessment areas. The weaker retail services performance in the Naples-Immokalee-Marco Island assessment area was primarily due to less accessibility of delivery systems in lower-income geographies. Qualified community development services were excellent in three limited-scope assessment areas and good in the Cape Coral-Fort Myers, Naples-Immokalee-Marco Island, and North Port-Sarasota assessment areas. The weaker community development services performance was primarily due to a lower level of hours dedicated to providing qualified services relative to Fifth Third’s operational presence in these assessment areas.

The performance in the limited-scope assessment areas did not change the overall state rating.

STATE OF GEORGIA

CRA RATING for State of Georgia: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- An adequate distribution of loans among borrowers of different income levels and good to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of community development loans;
- Limited use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted the Atlanta-Sandy Springs-Roswell MSA. A limited-scope review was performed on Augusta-Richmond County MSA. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

The Atlanta-Sandy Springs-Roswell assessment area received greater weight in determining the CRA rating for the state. The Atlanta-Sandy Springs-Roswell area had the largest lending volume, number of banking centers, and share of deposits during the evaluation period. Lastly, the Atlanta-Sandy Springs-Roswell area represented 90.6% of the banking centers, 88.7% of deposits, and 94.0% of lending in Georgia.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF GEORGIA

Lending activity accounted for 1.7% of the Fifth Third's total lending activity, while deposits accounted for 1.0% of the Fifth Third's total deposits. HMDA-reportable lending in Georgia represented 1.8% of the Fifth Third's total HMDA lending, while CRA-reportable lending represented 1.3% of the Fifth Third's total CRA lending. As of June 30, 2016, Fifth Third ranked 22nd among 237 insured institutions and has a deposit market share of 0.5% and 32 banking center locations within Georgia.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF GEORGIA

Lending Test

Fifth Third's performance under the lending test within the assessment areas located in Georgia is rated "High Satisfactory." Fifth Third's lending reflects a good responsiveness to the credit needs in the Atlanta-Sandy Springs-Roswell assessment area and an adequate responsiveness to the credit needs in the Augusta-Richmond County assessment area.

Lending Activity

In Georgia, Fifth Third originated 1,855 HMDA loans totaling \$510.7 million and 521 small business loans totaling \$65.7 million during the evaluation period.

Lending activity is adequate in the Atlanta-Sandy Springs-Roswell and Augusta-Richmond County assessment areas.

Geographic and Borrower Distribution

The distribution of loans among geographies is good. The geographic distribution is good in in the Atlanta-Sandy Springs-Roswell assessment area and adequate in the Augusta-Richmond County assessment area. Overall, moderate gaps in lending were identified in the assessment areas in Georgia.

The distribution of loans among borrowers of different income levels is adequate and good to businesses of different revenue sizes. Borrower distribution is adequate in in the Atlanta-Sandy Springs-Roswell assessment area and good in the Augusta-Richmond County assessment area. The distribution of loans to businesses of different revenue sizes is good in the Atlanta-Sandy Springs-Roswell assessment area and adequate in the Augusta-Richmond County assessment area.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Georgia, Fifth Third originated 22 community development loans totaling \$211.7 million, which represented 3.5% of the Fifth Third's community development lending by dollar volume. Fifth Third was a leader in providing community development loans in the Atlanta-Sandy Springs-Roswell assessment area; however, Fifth Third made no community development loans in the Augusta-Richmond County assessment area, which is considered to be a poor level of community development loans. Therefore, Fifth Third makes a relatively high level of community development loans in Georgia.

Flexible Lending

Overall, Fifth Third consistently makes limited use of flexible lending practices within assessment areas located in Georgia.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Georgia is rated "Outstanding." Fifth Third funded \$76.3 million in qualified community development investments in Georgia during the evaluation period, consisting of \$40.8 million obtained from new investments made during the current review period and \$35.5 million from prior period investments. The majority of investments were LIHTCs. Fifth Third's level of qualified investments is excellent in the Atlanta-Sandy Springs-Roswell and Augusta-Richmond County assessment areas.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test with the assessment areas located in Georgia is rated "High Satisfactory." Its performance was good in the Atlanta-Sandy Springs-Roswell and Augusta-Richmond County assessment areas.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's Service Test section in this report.

Retail Services

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution is good in Atlanta-Sandy Springs-Roswell and Augusta-Richmond County assessment areas.

Fifth Third's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. No branches were opened or closed in low- or moderate-income tracts in Georgia during the evaluation period.

Banking services and business hours do not vary in a way that inconveniences any portions of the bank's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third provides a relatively high level of community development services. Fifth Third's performance is excellent in the Atlanta-Sandy Springs-Roswell assessment area and good in the Augusta-Richmond County assessment area.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
ATLANTA-SANDY SPRINGS-ROSWELL GA MSA #12060**

The Atlanta-Sandy Springs-Roswell GA MSA includes Clayton, Cobb, DeKalb, Douglas, Forsyth, Fulton, Gwinnett, Paulding, Rockdale, and Walton counties. Fifth Third's assessment area excludes Barrow, Bartow, Butts, Cherokee, Coweta, Dawson, Fayette, Haralson, Heard, Henry, Jasper, Lamar, Morgan, Meriwether, Newton, Pickens, Pike, and Spalding counties. The assessment area is comprised of 86 low-, 179 moderate-, 227 middle-, and 249 upper-income tracts. There are also five tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked 16th out of 72 institutions with 0.7% of the deposit market share. SunTrust Bank had the majority of the market share with 30.1% of deposits, followed by Bank of America, Wells Fargo Bank, BB&T, and Synovus Bank with 19.6%, 19.1%, 5.0%, and 2.4% of the market share, respectively. Deposits in this assessment area accounted for 0.9% of the Fifth Third's total deposits, which was 88.7% of deposits within the state and the 22nd highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 1,727 HMDA loans and 507 CRA loans, which represented 1.7% and 1.3% of the total loans originated during the evaluation period, respectively. This was the 16th largest HMDA market and 17th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 55th among 745 HMDA reporters in the assessment area and Fifth Third ranked 189th. Wells Fargo Bank, Quicken Loans, SunTrust Bank, JPMorgan Chase Bank, and Fidelity Bank were the top five HMDA lenders in the assessment area. Fifth Third ranked 29th of 175 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Wells Fargo Bank, Bank of America, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Four community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a community development organization that serves Walton County, stated the local economy is improving. In the past 24 months, companies have invested \$2.5 billion in new industry. The area is attracting new businesses that will be hiring several hundred employees in the next year; as a result, there is a need for new housing construction and construction-permanent loans. The contact stated there is also a need for banks to provide more small-dollar type loans for small businesses. The contact believed financial institutions are adequately meeting area credit needs.

The second contact, representing a community development organization that serves Cobb County, stated the county lost nearly 7,000 jobs during the recession (2008-2012). However, the contact believed that about 80.0% of the lost positions have been recovered. Several economic development initiatives are being executed along the I-75/I-285 corridor (e.g., new stadium and several planned office buildings). The contact stated there are opportunities for banks to ease credit standards for small businesses and startups and fund more small-dollar loans to these types of businesses. The contact believed banks are generally meeting the credit needs of the area, particularly community banks.

The third contact, representing a neighborhood development and affordable housing organization in the Atlanta area, stated Georgia's foreclosure rates have improved in the last year (by at least 15.0%) and housing values are on the rise. The contact stated the number of people who are seriously delinquent on their mortgages continues to decrease, but lower-income people continue to struggle to pay their mortgages because incomes have not bounced back. While banks have lessened some earlier restrictions, loan modification assistance requires a good deal of paperwork and takes about 90 days to get approved. It is an exhaustive process, thus many people procrastinate in starting the process. The contact believed housing markets in lower-income neighborhoods are not rebounding as quickly due to a lack of affordable, quality homes in the area. Housing that was previously affordable has increased 40.0% within the past several years, and gentrification has played a significant role in these extreme price increases. Gentrification tends to push low- and moderate-income people and families out of their neighborhoods and eventually prices them out being able to live there. The contact stated in addition to banks investing in LIHTC programs that support affordable rental-housing for lower-income individuals, banks could make it easier for lower-income individuals to get low-cost loans to either rehabilitate existing housing or construct new housing. Increased financial access for this purpose could be incredibly impactful in helping more lower-income people own their homes.

The final contact, representing an organization that provides services to low-income individuals within Atlanta, stated the majority of individuals in the community do not have credit or are unbanked. As a result, financial literacy is needed in this community. The contact indicated Fifth Third and Delta Community Credit Union provide financial literacy programs in the community. The contact also stated monetary donations are also important to this organization to help meet its obligations.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 4.0 million. About 30.8% of the population lived in low- and moderate-income tracts. In addition, 73.6% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Atlanta-Sandy Springs-Roswell MSA is the ninth largest in terms of population in the nation.¹²¹ Fulton County is the largest county in the assessment area and the most populous county in Georgia.¹²² Atlanta (located in Fulton County) is the largest city in the MSA and is the 39th most populous city in the U.S. Atlanta has 463,878 residents, its population growth increased by 10.1% between 2000 and 2015. In contrast, the cities of Sandy Springs, Roswell, and Marietta only have 105,330; 94,501; and 59,067 residents, respectively.¹²³

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase.¹²⁴ The population within the assessment area experienced positive growth between 2010 and 2015, with Forsyth County experiencing the greatest growth and DeKalb County experiencing the least growth in population during this time period. According to Moody’s Analytics, by 2020, the Atlanta MSA is forecasted to be the eighth largest metropolitan area in the county with a population of nearly 6.4 million. Net migration to the Atlanta MSA from 2015 to 2020 is projected to reach nearly 122,700 averaging nearly 25,000 annually. Overall, this assessment area has a very robust domestic and foreign in-migration, which contributes to an increasing demand for employment and housing.

County	2010 Population	2015 Population	Population Percent Change
Clayton	192,162	273,955	42.6%
Cobb	521,535	741,334	42.1%
DeKalb	537,119	734,871	36.8%
Douglas	95,883	140,733	46.8%
Forsyth	118,897	212,438	78.7%
Fulton	696,540	1,010,562	45.1%
Gwinnett	575,496	895,823	55.7%
Paulding	97,788	152,238	55.7%
Rockdale	63,835	88,856	39.2%
Walton	61,857	88,399	42.9%
Total	2,961,112	4,339,209	46.5%

¹²¹ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

¹²² U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

¹²³ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

¹²⁴ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

Income Characteristics

In 2010 the MSA median family income was greater (\$68,992) than Georgia’s at \$58,790. The median family income in the MSA increased between 2014 and 2015 and decreased by nearly 5.0% between 2015 and 2016. Moody’s Analytics noted through 2020, Atlanta’s median household income growth of 3.4% annually will outpace that of the U.S. and will place Atlanta in the top quartile for MSA income growth.

**Borrower Income Levels
Atlanta-Sandy Springs-Roswell, GA MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$70,100	0 - \$35,049	\$35,050 - \$56,079	\$56,080 - \$84,119	\$84,120 - & above
2015	\$70,700	0 - \$35,349	\$35,350 - \$56,559	\$56,560 - \$84,839	\$84,840 - & above
2016	\$67,200	0 - \$33,599	\$33,600 - \$53,759	\$53,760 - \$80,639	\$80,640 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.¹²⁵ Forsyth and Paulding counties had the lowest poverty rates in 1999 and 2015. Fulton County had the highest poverty rate in 1999 and Clayton County had the highest rate in 2015. Clayton County also experienced the largest increase in poverty rate during the evaluation period. In 2015, Clayton and DeKalb counties had poverty rates higher than Georgia’s; in addition, poverty rates for Clayton, DeKalb, Fulton, Rockdale, and Douglas counties and Georgia all exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.¹²⁶ The following table shows the poverty rates for 1999¹²⁷ and 2015.

¹²⁵ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹²⁶ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

¹²⁷ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

County	1999 Poverty Rate	2015 Poverty Rate	Change
Clayton	10.1%	23.3%	130.7%
Cobb	6.5%	11.4%	75.4%
DeKalb	10.8%	17.8%	64.8%
Douglas	7.8%	14.1%	80.8%
Forsyth	5.5%	6.3%	14.5%
Fulton	15.7%	16.0%	1.9%
Gwinnett	5.7%	12.6%	121.1%
Paulding	5.5%	8.8%	60.0%
Rockdale	8.2%	15.9%	93.9%
Walton	9.7%	12.7%	30.9%
Georgia	13.0%	17.2%	32.3%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 1.6 million housing units and 942,615 families in the assessment area. From an income perspective, 33.2% of housing units, 20.8% of owner-occupied units, and 28.0% of families are located in low- or moderate-income tracts. Over three-quarters of the housing units in the low-income census tracts are either rental or vacant (78.0%) and only 22.0% are owner-occupied. In the moderate-income census tracts, well over half of the housing units are either rental or vacant (59.2%) and 40.8% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area. Additionally, a community contact stated there is a need for banks to make it easier for lower-income individuals to obtain low-cost loans to either rehabilitate existing housing or construct new housing. Increased financial access for this purpose could be incredibly impactful in helping more lower-income people own their homes.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was only 24 years old and only 5.5% of the stock was built before 1950. However, within the assessment area, the median age of housing stock was 37 years in low-income tracts and 28 years in moderate-income tracts. Therefore, there appears to be opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas. As stated above, a community contact stated there is a need for home improvement loans and construction loans to build new housing in lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$196,860 with an affordability ratio of 29.60. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Median housing values decreased between 2010 and 2011-2015 and median family incomes increased; as a result, housing became more affordable across the assessment area. However, Moody's Analytics noted the eroding affordability hurts in-migration.

During the evaluation period, the most affordable housing was in Clayton County and the least affordable was in Fulton County. Median gross rents increased across the assessment area, with renters in Paulding County experiencing the largest increase in rental rates and renters in Rockdale County experiencing a slight decrease in gross rental rates. In 2010, about 49.1% of renters across the assessment area had rent costs greater than 30.0% of income. Increasing rental rates may make it harder for potential homebuyers to save for a down payment for a home. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Georgia.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Clayton	\$127,800	33.89	\$85,200	48.05	\$865	\$881	1.8%
Cobb	\$211,000	31.05	\$197,400	33.37	\$933	\$1,006	7.8%
DeKalb	\$190,000	27.03	\$163,000	31.52	\$922	\$991	7.5%
Douglas	\$157,300	35.51	\$121,300	44.42	\$912	\$949	4.1%
Forsyth	\$276,700	31.66	\$267,300	33.23	\$1,078	\$1,172	8.7%
Fulton	\$253,100	22.41	\$241,300	23.71	\$929	\$1,001	7.8%
Gwinnett	\$194,200	32.55	\$167,700	35.95	\$954	\$1,043	9.3%
Paulding	\$149,600	41.68	\$133,500	45.03	\$907	\$1,018	12.2%
Rockdale	\$169,900	32.83	\$140,000	36.04	\$933	\$916	-1.8%
Walton	\$164,900	31.37	\$152,900	35.61	\$784	\$845	7.8%
Georgia	\$161,400	30.57	\$148,100	33.50	\$808	\$879	8.8%

According to Bankrate.com,¹²⁸ Georgia ranked 16th in foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹²⁹

¹²⁸ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹²⁹ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosurestrends/>

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Clayton	1:700
Cobb	1:1,865
DeKalb	1:1,549
Douglas	1:829
Forsyth	1:2,318
Fulton	1:1,643
Gwinnett	1:1,538
Paulding	1:1,500
Rockdale	1:1,121
Walton	1:1,252
Georgia	1:1,645
U.S.	1:1,533

In November 2016, Clayton and Douglas counties had the highest rates of foreclosure and Forsyth County had the lowest. In Fulton County, Atlanta had the fourth-highest foreclosure rate among municipalities at 1:1,686. A community contact mentioned the improving rates of foreclosure. As shown above, half the counties (including Fulton County) in this assessment area and Georgia have foreclosure rates that are below the nationwide foreclosure rate.

Building permits for this MSA, Georgia, and the nation are included in the following table for 2014, 2015, and 2016.¹³⁰

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Atlanta-Sandy Springs-Roswell MSA	26,683	30,342	13.7%	36,121	19.0%
Georgia	39,673	45,549	14.8%	51,052	12.1%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The assessment area experienced increases in the number of housing permits issued between 2014 and 2015 and, to a greater extent, between 2015 and 2016. The increase in the number of permits could indicate there is an increasing demand for home purchase loans in this area. Two community contacts mentioned the need for new housing construction and construction-permanent loans in the area to meet the growing in-migration of residents. Moody’s Analytics noted that construction remains strong, as builders accommodate robust residential and commercial demand.

¹³⁰ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Atlanta metropolitan area economy is in expansion, primarily due to diverse economy, distribution and cultural center, business-friendly environment, and strong demographics. The Atlanta area has a large and well-educated workforce pool and low corporate tax rates that aid in attracting new businesses and residents to the area. Atlanta is considered to be a major logistics hub, as 80.0% of the U.S. population can be reached from Atlanta in two days by truck. Additionally, Atlanta has proximity to the Port of Savannah (one of the largest regional container ports on the eastern seaboard), which is a bonus for trade and is considered to be a leading U.S. railroad hub. Atlanta is also considered to be a hub for research and development in that partnerships with local researchers have been instrumental to attracting businesses to the metropolitan area.

According to the Metro Atlanta Chamber,¹³¹ Metropolitan Atlanta ranks third among cities with the highest Fortune 500 concentration, behind New York and Houston. In 2016, this MSA was home to 16 headquarters, including 14 in Atlanta.

Atlanta MSA Fortune 500 Companies (2016)		
Rank	Company	Annual Revenue
28	Home Depot	\$88.5 billion
48	United Parcel Service (UPS)	\$58.4 billion
62	Coca-Cola Company	\$44.3 billion
68	Delta Air Lines	\$40.7 billion
162	The Southern Company	\$17.5 billion
183	Genuine Parts Company (GPC)	\$15.3 billion
249	First Data	\$11.5 billion
320	HD Supply Holdings	\$8.8 billion
323	Veritiv Corporation ¹³²	\$8.7 billion
329	SunTrust Banks	\$8.5 billion
360	AGCO Corporation	\$7.5 billion
393	Asbury Automotive Group	\$6.6 billion
397	Coca-Cola European Partners	\$6.5 billion
409	NCR Corporation	\$6.4 billion
433	PulteGroup, Inc.	\$6.0 billion
434	Newell Brands	\$5.9 billion

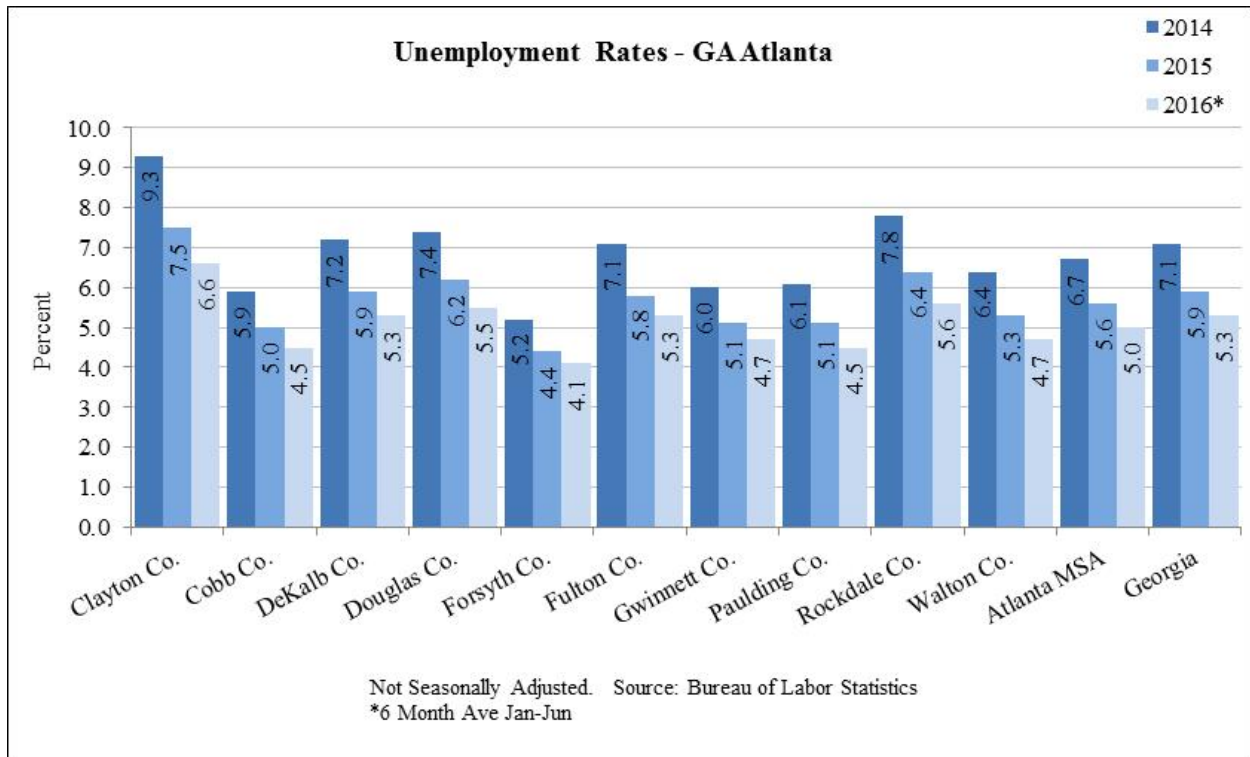
According to Moody’s Analytics the top 15 employers in the MSA in 2016 were:

¹³¹ Metro Atlanta Chamber: www.metroatlantachamber.com/resources/most-popular/fortune-500-fortune-1000-in-metro-atlanta

¹³² Bold type indicates company new to the list in 2016. Veritiv was established in 2014 as a result of a merger within International Paper Company.

Company	Number of Employees
Delta Air Lines	29,970
Emory University	27,090
Wal-Mart Stores	26,000
AT&T	16,794
WellStar Health System	14,000
Piedmont Healthcare	11,000
Publix Supermarkets	9,819
Georgia Institute of Technology	9,564
Northside Hospital	9,467
Children’s Healthcare of Atlanta	9,200
Home Depot	9,000
Emory Healthcare	8,648
Centers for Disease Control	8,639
Coca-Cola Company	8,000
Coreslab Structures	7,571

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 across the MSA and Georgia.



Unemployment rates declined each year in the assessment area and Georgia, with Clayton County having the highest and Forsyth County having the lowest unemployment rates during this time period. Two community contacts stated that since the recession, about 80.0% of the lost jobs in this area have been recovered; however, lower-income people continue to struggle to pay their mortgages because incomes have not rebounded to pre-recession levels.

According to *WSB-TV Atlanta*, in 2015 Coca-Cola Company announced 1,800 layoffs in North America and internationally; about 500 jobs are in Atlanta. The layoffs are to streamline and simplify the company's structure and accelerate the growth of its global business. An economics professor stated while 500 local layoffs is a significant number of people, Atlanta has more than 2.5 million people working here and added nearly 60,000 jobs to payrolls over the past 12 months.¹³³ According to *The Atlanta Journal-Constitution*, even as Georgia's unemployment rate declines, companies continue to shut down or shed operations in moves impacting thousands of employees. The annual job cut total has risen steadily in recent years, from 6,820 in 2012 to 10,683 in 2015. However, by other measures Georgia's job market has vastly improved. Unemployment is falling, employers are adding tens of thousands of jobs, and pay is rising at a modest pace. The rising job cuts could reflect the trend in the large firms, as the law requires them to report job cuts and large firms have been hit harder by weakness in overseas markets and mergers. Filed layoff notices with Worker Adjustment and Retraining Notification Act (WARN) in 2016 include notices from the following companies warning of job cuts:

- Georgia Power (Atlanta) – 270 employees , layoff
- WellStar Health Systems (Marietta) – 521 employees, layoff
- Concentrix Corp. (Norcross/Gwinnett County) – 454 employees, facility closure
- MARTA (Atlanta) – 371 employees, layoff
- Delta Global Services (Atlanta) – 275 employees, contract.¹³⁴

¹³³ WSB-TV Atlanta. "Coca-Cola Company announces 1,800 layoffs, 500 are local." *WSB-TV Atlanta*. January 8, 2015. - <http://www.wsbtv.com/news/local/coca-cola-company-announces-1800-layoffs/54019331>

¹³⁴ Grantham, Russell. "Layoff warnings up despite falling jobless rate." *The Atlanta Journal-Constitution*. August 22, 2016. - <http://www.myajc.com/business/layoff-warnings-despite-falling-jobless-rate/RyjBrOw42FV2shJXk7qFzL/>

Combined Demographics Report

Assessment Area: GA Atlanta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	86	11.5	61,003	6.5	19,626	32.2	205,602	21.8
Moderate-income	179	24	202,695	21.5	34,226	16.9	156,322	16.6
Middle-income	227	30.4	336,219	35.7	26,602	7.9	176,142	18.7
Upper-income	249	33.4	342,698	36.4	12,728	3.7	404,549	42.9
Unknown-income	5	0.7	0	0	0	0	0	0
Total Assessment Area	746	100.0	942,615	100.0	93,182	9.9	942,615	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	143,908	31,639	3.4	22	78,976	54.9	33,293	23.1
Moderate-income	398,607	162,547	17.4	40.8	170,796	42.8	65,264	16.4
Middle-income	543,772	349,403	37.5	64.3	138,094	25.4	56,275	10.3
Upper-income	545,976	388,923	41.7	71.2	109,826	20.1	47,227	8.7
Unknown-income	33	0	0	0	33	100	0	0
Total Assessment Area	1,632,296	932,512	100.0	57.1	497,725	30.5	202,059	12.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	13,723	5.2	12,333	5	1,338	7.7	52	9.5
Moderate-income	53,696	20.3	49,287	20	4,253	24.4	156	28.5
Middle-income	86,593	32.7	81,553	33	4,870	28	170	31
Upper-income	110,683	41.8	103,600	42	6,915	39.7	168	30.7
Unknown-income	152	0.1	116	0	34	0.2	2	0.4
Total Assessment Area	264,847	100.0	246,889	100.0	17,410	100.0	548	100.0
Percentage of Total Businesses:			93.2		6.6		.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	37	3.6	34	3.3	3	15.8	0	0
Moderate-income	139	13.4	137	13.5	2	10.5	0	0
Middle-income	395	38.2	385	37.9	10	52.6	0	0
Upper-income	461	44.5	459	45.2	2	10.5	0	0
Unknown-income	3	0.3	1	0.1	2	10.5	0	0
Total Assessment Area	1,035	100.0	1,016	100.0	19	100.0	0	.0
Percentage of Total Farms:			98.2		1.8		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
ATLANTA-SANDY SPRINGS-ROSWELL GA MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated good. Fifth Third has demonstrated a good responsiveness to the credit needs of the community. In addition, Fifth Third originated 22 community development loans totaling \$211.7 million. Fifth Third has a good geographic distribution of loans and moderate lending gaps. Fifth Third has a good distribution among borrowers of different income levels and to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and limited use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance and small business lending. There were an insufficient number of home improvement loans to analyze performance. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an adequate responsiveness to the credit needs within the assessment area. Fifth Third originated 974 home purchase, 721 refinance, 30 home improvement, 507 small business, and 22 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 1.6% exceeded the percentage of total deposits at 0.9% in this area.

Fifth Third made 82.8% of the HMDA and 90.4% of the CRA lending within its designated assessment area. However, while the majority of loans were made within the assessment area, a concentration of lending was identified in the excluded Cherokee County with 132 loans. No concentrations of lending were identified in other excluded counties within the assessment area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	11	21.2%	16	30.8%	13	25.0%	12	23.1%
<i>Percentage of Families by Family Income</i>		21.8%		16.6%		18.7%		42.9%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications in this assessment area for a meaningful analysis. Also, there was an insufficient volume of other modifications to analyze the distribution of modifications by census tract income. However, the percentage of other modifications made to low-income borrowers was comparable to the percentage of low-income families in the assessment area and the percentage of other modifications to moderate-income borrowers was substantially higher than the percentage of moderate-income families. Therefore, modifications helped Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. Home purchase and refinance lending are adequate. Small business lending is excellent. Further, moderate lending gaps were noted for the assessment area, as shown in the following table.

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	86	56	34.9%
Moderate	179	58	67.6%
Middle	227	39	82.8%
Upper	249	13	94.8%
Unknown	5	5	0.0%
Total	746	171	77.1%

While overall lending gaps are considered reasonable, there was a significant level of lending gaps in low-income tracts. However, most of the low-income tracts with no loans are located in Atlanta, and these tracts have low owner-occupancy rates (22.0%) and high rental/vacancy rates (78.0%).

Home Purchase Loans

Fifth Third made 17 home purchase loans totaling \$1.9 million in low-income tracts. This represents 1.7% of home purchase loans by volume, which is significantly below the percentage of owner-occupied units in these tracts at 3.4%, and 0.7% by dollar amount, which is substantially below proxy. The percentage of loans by volume was below the 2014 aggregate at 2.0% and slightly exceeded the 2015 aggregate at 2.0%. Since Fifth Third’s performance was below proxy, but exceeded the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is good.

Fifth Third made 95 home purchase loans totaling \$14.1 million in moderate-income tracts. This represents 9.8% of home purchase loans by volume, which is significantly below the percentage of owner-occupied units in these tracts at 17.4%, and 5.2% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 12.7% and was below the 2015 aggregate at 13.4%. Given that Fifth Third’s performance was below proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is adequate.

Fifth Third made 301 home purchase loans totaling \$64.1 million in middle-income tracts. This represents 30.9% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 37.5%, and 23.5% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 35.6% and was below the 2015 aggregate of 37.0%.

Fifth Third made 561 home purchase loans totaling \$192.2 million in upper-income tracts. This represents 57.6% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 41.7%, and 70.6% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 49.7% and exceeded the 2015 aggregate of 47.6%.

Overall, the geographic distribution of home purchase loans is adequate.

Refinance Loans

Fifth Third made 11 refinance loans totaling \$1.9 million in low-income tracts. This represents 1.5% of refinance loans by volume and 0.9% by dollar amount, which is below the percentage of owner-occupied units at 3.4%. The percentage of loans by volume was below the 2014 aggregate at 1.9% and exceeded the 2015 aggregate at 1.8%. As Fifth Third's performance exceeded the aggregate of all lenders and only 22.0% of the housing units in low-income tracts are owner occupied, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 49 refinance loans totaling \$6.4 million in moderate-income tracts. This represents 6.8% of refinance loans by volume and 3.2% by dollar amount, which is significantly below than the owner-occupied units at 17.4%. The percentage of loans by volume was significantly below the 2014 aggregate at 14.0% and was significantly below the 2015 aggregate at 11.4%. As Fifth Third's lending was significantly below proxy and the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is considered poor.

Fifth Third made 204 refinance loans totaling \$38.7 million in middle-income tracts. This represents 28.3% of refinance loans by volume, which is less than the owner-occupied units in these tracts at 37.5%. Refinance loans by dollar amount (19.3%) was also below proxy. The percentage of loans by volume was below the 2014 aggregate at 35.7% and was below the 2015 aggregate at 33.7%.

Fifth Third made 457 refinance loans totaling \$153.5 million in upper-income tracts. This represents 63.4% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 41.7%, and 76.6% by dollar amount, which exceeded proxy. The percentage of loans by volume also exceeded the 2014 aggregate at 48.4% and exceeded the 2015 aggregate at 53.2%.

Overall, the geographic distribution of refinance loans is adequate.

Small Business Loans

Fifth Third made 23 small business loans totaling \$2.6 million in low-income tracts. This represents 4.5% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 5.0%, and 3.9% by dollar amount, which is comparable to proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 4.6% and was comparable to the 2015 aggregate of 4.7%. Given that Fifth Third's performance was comparable to proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is good.

Fifth Third made 126 small business loans totaling \$20.8 million in moderate-income tracts. This represents 24.9% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 20.0%, and 32.1% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.6% and exceeded the 2015 aggregate of 18.0%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 132 small business loans totaling \$11.0 million in middle-income tracts. This represents 26.0% of small business loans by volume, which is below the percentage of businesses in these tracts at 33.0%, and 16.9% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 28.7% and was below the 2015 aggregate of 28.9%.

Fifth Third made 226 small business loans totaling \$30.5 million in upper-income tracts. This represents 44.6% of small business loans by volume, which exceeded the percentage of businesses in these tracts at 42.0%, and 47.0% by dollar amount, which exceeded proxy. The percentage of loans by volume was below the 2014 aggregate of 48.0% and was below the 2015 aggregate of 47.4%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is adequate based on borrower income and good for businesses of different revenue sizes. The borrower distribution is poor for home purchase loans and adequate for refinance loans.

Home Purchase Loans

Fifth Third made 36 loans totaling \$3.4 million to low-income borrowers. This represents 3.7% of home purchase loans by volume and 1.2% by dollar amount, which is significantly below the percentage of low-income families at 21.8%. The percentage of loans by volume was below the 2014 aggregate of 8.1% and was below the 2015 aggregate of 7.4%. Given that Fifth Third's performance was significantly below proxy and below the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is poor.

Fifth Third made 78 loans totaling \$10.7 million to moderate-income borrowers. This represents 8.0% of home purchase loans by volume and 3.9% by dollar amount, which is significantly below the percentage of moderate-income families at 16.6%. The percentage of loans by volume was significantly below the 2014 aggregate of 16.5% and was significantly below the 2015 aggregate of 16.9%. Given that Fifth Third's performance was significantly below proxy and aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is poor.

Fifth Third made 97 loans totaling \$18.1 million to middle-income borrowers. This represents 10.0% of home purchase loans by volume, which is less than the percentage of middle-income families at 18.7%, and 6.6% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 17.1% and was below the 2015 aggregate of 17.3%.

Fifth Third made 475 loans totaling \$177.1 million to upper-income borrowers. This represents 48.8% of home purchase loans by volume, which exceeds the percentage of upper-income families at 42.9%, and 65.0% of loans by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 38.0% and was below the 2015 aggregate of 37.6%.

Overall, the borrower distribution of home purchase loans is poor.

Refinance Loans

Fifth Third made 31 loans totaling \$3.2 million to low-income borrowers. This represents 4.3% of refinance loans by volume, which is significantly below percentage of low-income families at 21.8%. The percentage of loans by dollar amount in these geographies at 1.6% is also significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 6.9% and was below the 2015 aggregate of 5.0%. Given that Fifth Third's performance was significantly below proxy and the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is adequate.

Fifth Third made 49 loans totaling \$6.7 million to moderate-income borrowers. This represents 6.8% of refinance loans by volume, which is significantly below the percentage of moderate-income families at 16.9%, and 3.4% by dollar amount, which is also significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 12.3% and the 2015 aggregate of 10.7%. Given that Fifth Third's performance was significantly below proxy and below the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is adequate.

Fifth Third made 104 loans totaling \$16.4 million to middle-income borrowers. This represents 14.4% of refinance loans by volume, which is below the percentage of middle-income families at 18.7%, and 8.2% by dollar amount, which is also below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 15.7% and was below the 2015 aggregate of 15.6%.

Fifth Third made 342 loans totaling \$132.2 million to upper-income borrowers. This represents 47.4% of refinance loans by volume, which exceeds the percentage of upper-income families at 42.9%. The percentage of loans by dollar amount at 66.0% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 40.0% and was slightly below the 2015 aggregate of 42.5%.

Overall, the borrower distribution of refinance loans is adequate.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 57.4% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance in 2014 exceeded the 2014 aggregate of 51.9% and was comparable to the 2015 aggregate of 56.6%, but was significantly below the percentage of small businesses in the assessment area at 93.2%. Also, Fifth Third made a reasonable percentage of small-dollar loans (74.6%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, several community contacts indicated there is a need for small-dollar loans to small businesses.

Community Development Loans

Fifth Third originated 22 community development loans totaling \$211.7 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
2	23,003,998	9	52,920,000	10	134,926,984	1	800,000

Community development lending in the assessment area represents 3.5% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s seventh-highest percentage of community development lending during the evaluation period. Fifth Third’s performance is especially strong because of the high competition for community development loans and a number of large national banks in the area. Fifth Third only has 0.7% of the deposit market share. As such, Fifth Third is considered a leader in community development lending.

Examples of community development lending include, but are not limited to:

- Loan to a private equity firm that partners with developers and investors who develop affordable housing and expand renewable energy through the use of state tax credits
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations, such as one company was able to add 17 new jobs and retain 206 jobs in a low-income geography
- Loan that supports eligible activities in a designated Empowerment Zone

- Working capital loan that supports a nonprofit that provides creative arts activities to low- and moderate-income students to encourage innovation

The affordable housing loans were deemed to be responsive, as community contacts specifically mentioned the need for these types of loans. The economic development loans were also considered to be responsive, since job creation is a significant need in this assessment area.

Flexible Lending Programs

Fifth Third had 170 flexible lending loans in this assessment area: 119 government loans, nine down payment assistance loans, and 42 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	0.8%	0.5%	3.4%	10.1%	7.1%	17.4%	51.3%	43.5%	37.5%	37.8%	48.9%	41.7%
Down Payment Assistance Programs	33.3%	43.3%	3.4%	44.4%	29.2%	17.4%	11.1%	12.7%	37.5%	11.1%	14.8%	41.7%
Other Flexible Lending Programs	0.0%	0.0%	3.4%	11.9%	8.9%	17.4%	42.9%	40.0%	37.5%	45.2%	51.1%	41.7%
Total	2.4%	1.5%	3.4%	12.4%	8.2%	17.4%	47.1%	41.8%	37.5%	38.2%	48.5%	41.7%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	15.1%	8.5%	21.8%	21.8%	15.9%	16.6%	25.2%	23.5%	18.7%	36.1%	51.1%	42.9%
Down Payment Assistance Programs	44.4%	36.0%	21.8%	22.2%	20.7%	16.6%	11.1%	11.6%	18.7%	22.2%	31.7%	42.9%
Other Flexible Lending Programs	21.4%	14.9%	21.8%	11.9%	7.7%	16.6%	21.4%	19.6%	18.7%	42.9%	54.0%	42.9%
Total	18.2%	10.9%	21.8%	19.4%	14%	16.6%	23.5%	22.2%	18.7%	37.1%	51.3%	42.9%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts, by number and dollar amount, was below the percentage of owner-occupied units in these tracts; however, down payment assistance programs in these tracts significantly exceeded proxy. The percentage of lending in moderate-income tracts, by volume and dollar amount, was below the percentage of owner-occupied units; however, down payment assistance programs in these tracts significantly exceeded proxy.

Fifth Third’s lending by volume and dollar amount to low-income borrowers was below the percentage of low-income families in the assessment area. The percentage of lending by volume to moderate-income borrowers exceeded the percentage of moderate-income families for government loan and down payment assistance programs. The percentage of dollar amount to moderate-income borrowers was slightly below the moderate-income families in the assessment area.

Fifth Third made limited use of flexible lending practices in serving assessment area credit needs, as lending through flexible loan programs to moderate-income borrowers was excellent. Lending in moderate-income geographies and to low-income borrowers was good and adequate in low-income geographies.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent.

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 142 qualified investments totaling \$73.6 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
30	39,681,392	33	121,993	4	7,175	68	248,066

Also included in the total number of investments are seven prior period investments totaling \$33.5 million. Overall, Fifth Third made 4.5% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 0.9% and greater than the percentage of branch offices at 2.2%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area, which was an important need expressed by several community contacts. Fifth Third made 116 donations totaling \$422,124 that supported charitable organizations, local schools, small businesses, food banks, churches, and affordable housing. The majority (58.0%) of Fifth Third’s donations supported services to low- and moderate-income individuals. Due to the high poverty and unemployment rates, services to low- and moderate-income individuals are deemed to be responsive to needs in the assessment area.

Service Test

Fifth Third's performance under the service test in this assessment area is rated good. Retail services are accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, no banking centers were opened or closed. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 29 banking centers within this assessment area, including one in low-, six in moderate-, 11 in middle-, and 11 in upper-income census tracts. Fifth Third banking centers in this assessment area represent 2.2% of all its banking centers.

Fifth Third has a total of 39 full-service ATMs within this assessment area, including two in low-, 11 in moderate-, 14 in middle-, and 12 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: GA Atlanta

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	1	3.5%	0	0	Total	3	3.4%	2	5.1%	1	2.1%	86	11.5%	7.7%	5.1%
DTO	0		0	0	SA	3		2		1					
Moderate	6	20.7%	0	0	Total	29	33.3%	11	28.2%	18	37.5%	179	24.0%	23.3%	20.0%
DTO	0		0	0	SA	29		11		18					
Middle	11	37.9%	0	0	Total	31	35.6%	14	35.9%	17	35.4%	227	30.4%	34.1%	32.4%
DTO	0		0	0	SA	31		14		17					
Upper	11	37.9%	0	0	Total	24	27.6%	12	30.8%	12	25.0%	249	33.4%	34.9%	42.4%
DTO	0		0	0	SA	24		12		12					
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	5	0.7%	0.0%	0.1%
DTO	0		0	0	SA	0		0		0					
Total	29	100.0%	0	0	Total	87	100.0%	39	100.0%	48	100.0%	746	100.0%	100.0%	100.0%
DTO	0		0	0	SA	87		39		48					

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered poor, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, Fifth Third’s branch distribution within moderate-income tracts was considered good.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 2,932 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 2.5% of all community development services provided and equates to 1.41 annualized persons (ANP).

Affordable Housing	Economic Development	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
58	668	2,206

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development. Community development services include 1,418 hours of providing financial literacy through local nonprofits and school programs, 1,148 hours serving on boards and committees, 334 hours providing technical assistance to non-profits and local business, and 32 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy and other community services to low- and moderate-income individuals. Several community contacts mentioned the need for financial literacy training to provide assistance with establishing or re-establishing access to credit.

METROPOLITAN AREA
(Limited-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF GEORGIA

- Augusta-Richmond County GA-SC MSA
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 9.4% of its branches in Georgia.
 - As of June 30, 2016, Fifth Third had \$120,106 in deposits in this assessment area, representing a market share of 2.3% and 11.3% of its statewide deposits.

Since there are no branches in the South Carolina portion of the MSA and Fifth Third only takes the counties in Georgia that are part of this MSA, the Augusta-Richmond County GA-SC MSA is evaluated under Georgia and not as a separate MSA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE STATE OF GEORGIA**

Through the use of available data, including performance and demographic information, the assessment area’s performance was evaluated and compared with Fifth Third’s performance, resulting in a weaker performance in the assessment area. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Augusta-Richmond County MSA	Below	Consistent	Consistent

For the lending test, Fifth Third received a “High Satisfactory” rating in Georgia. Performance in the Augusta-Richmond County assessment area was below Fifth Third’s performance for the state. A lesser geographic distribution of loans and no community development loans contributed to weaker performance in the Augusta-Richmond County assessment area. The Augusta-Richmond County assessment area had a moderate level of lending gaps, which was consistent to the performance for the state.

For the investment test, Fifth Third received an “Outstanding” rating for Georgia. The investment activity in the Augusta-Richmond County assessment area was consistent to the performance for the state.

For the service test, Fifth Third received a “High Satisfactory” rating for Georgia. Overall, performance in the Augusta-Richmond County assessment area was consistent with Fifth Third’s performance for the state. Retail services were consistent with performance for the state. Qualified community development services were good. The weaker community development services performance was primarily due to a lower level of hours dedicated to providing qualified services relative to Fifth Third’s operational presence in this assessment area.

The performance in the limited-scope assessment area did not change the overall state rating.

STATE OF ILLINOIS

CRA RATING for State of Illinois:¹³⁵ Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Low Satisfactory

The major factors supporting this rating include:

- A adequate responsiveness to credit needs;
- An adequate geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and an adequate distribution to businesses of different revenue sizes;
- Exhibits adequate record of serving the credit needs of low-income individuals and areas and very small businesses;
- An adequate level of community development loans;
- A significant level of qualified community development investments and grants;
- Occasionally in a leadership position in providing community development investments and grants;
- Retail delivery systems are reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that generally has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for non-metropolitan Southern Illinois and limited-scope reviews were performed on the remaining three assessment areas: the Carbondale-Marion MSA, the Rockford MSA and non-metropolitan Northern Illinois. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the “Institution” section of this report.

¹³⁵ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF ILLINOIS

Lending activity accounted for 0.4% of Fifth Third's total lending activity, while deposits accounted for 0.4% of its total deposits. HMDA-reportable lending in Illinois represented 0.4% of the bank's total HMDA lending, while CRA-reportable lending represented 0.4% of the bank's total CRA lending. Due to Fifth Third's extensive CRA footprint in the Chicago multi-state assessment area, Fifth Third collectively ranks ninth among 550 insured institutions in Illinois. For the purpose of this evaluation, Fifth Third only has 12 banking centers in Illinois.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS

Lending Test

Fifth Third's performance under the lending test within the assessment areas located in Illinois is rated "Low Satisfactory." Fifth Third's lending reflects an adequate responsiveness to the credit needs in all four of the following assessment areas in Illinois: non-metropolitan Southern Illinois, Carbondale-Marion, non-metropolitan Northern Illinois, and Rockford.

Lending Activity

In Illinois, Fifth Third originated 432 HMDA loans totaling \$41.0 million and 172 small business loans totaling \$17.7 million during the evaluation period.

Lending activity in all four assessment areas is adequate in Illinois.

Geographic and Borrower Distribution

The distribution of loans among geographies is adequate. The geographic distribution is good in non-metropolitan Southern Illinois and adequate in the remaining three assessment areas.

A low level of lending gaps was identified. There was a low level of lending gaps in non-metropolitan Southern Illinois and the Carbondale-Marion assessment areas and a low level of lending gaps in non-metropolitan Northern Illinois. The Rockford assessment area had a moderate level of lending gaps.

The distribution of loans among borrowers of different income levels is good and adequate to businesses of different revenue sizes. Borrower distribution is good in non-metropolitan Southern Illinois and adequate in the remaining three assessment areas. The distribution of loans to businesses of different revenue sizes is adequate in all four assessment areas.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Illinois, Fifth Third originated five community development loans totaling \$52.8 million, which represented 0.9% of the Fifth Third's community development lending by dollar volume and resulted in an adequate level of community development lending in Illinois. Fifth Third made an adequate level of community development loans in non-metropolitan Southern Illinois, non-metropolitan Northern Illinois, and the Rockford assessment area. Fifth Third did not make any community development loans in Carbondale-Marion assessment area, which is considered to be a poor level of community development lending.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Illinois is rated "High Satisfactory." Fifth Third funded \$13.7 million in qualified community development investments in Illinois during the evaluation period, consisting of \$3.1 million obtained from new investments made during the current review period and \$10.6 million from prior period investments. The majority of investments were LIHTCs. Fifth Third's level of qualified investments is excellent in non-metropolitan Northern Illinois and good in the Carbondale-Marion assessment area. The level of qualified investments is adequate in the remaining two assessment areas.

Fifth Third was considered responsive to the credit and community development needs in the state; therefore, investments without a purpose, mandate, or function of serving Fifth Third's assessment areas in Illinois were considered to positively impact state performance. Fifth Third made \$301,240 in qualified investments, typically in the form of LIHTCs that benefited counties within the state, but outside Fifth Third's delineated assessment areas within Illinois.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test with the assessment areas located in Illinois is rated "Low Satisfactory." Fifth Third's performance is adequate in non-metropolitan Southern Illinois and in the Carbondale-Marion assessment areas and good in the remaining two assessment areas.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are reasonably accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution is adequate in non-metropolitan Southern Illinois and the Rockford assessment area and good in the remaining two assessment areas.

Fifth Third's record of opening and closing banking centers has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. No branches were opened or closed in low – or moderate-income tracts during the evaluation period.

Banking services and business hours do not vary in a way that inconveniences any portions of the bank's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third provides an adequate level of community development services. Fifth Third's performance is excellent in the Rockford assessment area and good in non-metropolitan Northern Illinois. The level of community development services is adequate in the remaining two assessment areas.

NON-METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN SOUTHERN ILLINOIS**

Non-metropolitan Southern Illinois consists of Effingham and Jefferson counties. The assessment area is comprised of one low-, two moderate-, 12 middle-, and four upper-income tracts. There were no distressed/underserved middle-income tracts in the assessment area during the evaluation period.

As of June 30, 2016, Fifth Third ranked eighth out of 20 institutions with 5.2% of the deposit market share. Midland States Bank had the majority of the market share 18.8% of deposits, followed by JP Morgan Chase Bank, Dieterich Bank, and Washington Savings Bank with 15.0%, 12.9%, and 8.6% of the market share, respectively. Deposits in this assessment area accounted for 0.1% of the Fifth Third's total deposits. This was 34.8% of deposits within the state and the 41st highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 158 HMDA loans and 73 CRA loans, which represented 0.2% and 0.2% of the total loans originated during the evaluation period, respectively. This was the 50th largest HMDA market and 48th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third ranked ninth among 118 HMDA reporters in the assessment area and Fifth Third Mortgage Company ranked 12th. First National Bank of Dieterich, U.S. Bank, Peoples National Bank, State Bank of Lincoln, and Midland States Bank, and JPMorgan Chase Bank, were the top six HMDA lenders in the assessment area. Fifth Third ranked 19th of 45 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Chase Bank USA, PNC Bank, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Four community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an economic development organization, stated the economy is still struggling in Southern Illinois area. Unemployment and poverty rates remain high and property values have not rebounded. The contact stated financial institutions serving this area tend to be smaller community banks or larger regional or multi-regional institutions actively competing for bankable loans and engaged in business development and outreach. The contact believed while Illinois' ongoing fiscal problems are a major obstacle to getting large-scale infrastructure and economic development projects funded in this region, there are opportunities for financial institutions and other private sector businesses to partner with the public sector and invest in small scale public works projects. Generally, lenders are trying to meet the credit needs in this community and to work with borrowers having financial difficulties.

The second contact, representing a community action agency that assists lower-income individuals, stated the local economy varies by county; some counties are faring better than others. The contact believed financial institutions are actively involved in the community. The contact specifically mentioned Midland State Bank and Fifth Third as being particularly active within the community.

The third contact, representing an organization that offers regional economic, research-based information, stated the economic situation differs from county to county in this area. For example, some counties in this area have lower unemployment rates, while others have unemployment rates above state and national averages. The contact believed low- and moderate-income individuals are still not able to buy homes and the need for a sufficient supply of quality, affordable, and stable rental housing is increasingly important. The contact stated that community banks appear to be actively involved in the community.

The fourth contact, representing an organization that provides services to entrepreneurs and small business owners, stated the economic conditions in Southern Illinois are still in recovery. The contact believed there is a need for financial institutions to fund smaller-dollar loans for start-up businesses and established small businesses. The contact indicated that there is also a need for financial literacy programs to help children become better-informed consumers and more prudent borrowers in the future.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 73,069. Less than 10.0% the population lived in the three low- and moderate-income tracts. In addition, 76.7% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, Effingham is the largest city in Effingham County, which has 12,604 residents, a 2.2% increase in population since April 1, 2010. Mount Vernon is the largest city in Jefferson County and has 15,087 residents, a 1.3% decrease in population since April 1, 2010.¹³⁶

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase and decrease.¹³⁷ The population within the assessment area experienced overall negative growth between 2010 and 2015, with Effingham County experiencing slight positive growth in population during this time period. Overall, this assessment area's population appears to be fairly steady; however, according to multiple community contacts, economic conditions contributed to a decreasing demand for home purchase loans.

¹³⁶ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

¹³⁷ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Effingham	34,242	34,371	0.4%
Jefferson	38,827	38,358	-1.2%
Total	73,069	72,729	-0.5%

Income Characteristics

In 2010 the assessment area’s median family income was less (\$55,777) than Illinois’ at \$68,236. The median family income in the assessment area increased between 2014 and 2015 and decreased slightly between 2015 and 2016.

**Borrower Income Levels
Illinois State Non-Metropolitan Area**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$58,600	0 - \$29,299	\$29,300 - \$46,879	\$46,880 - \$70,319	\$70,320 - & above
2015	\$60,100	0 - \$30,049	\$30,050 - \$48,079	\$48,080 - \$72,119	\$72,120 - & above
2016	\$58,000	0 - \$28,999	\$29,000 - \$46,399	\$46,400 - \$69,599	\$69,600 - & above

Poverty rates increased in the assessment area from 1999 to 2015.¹³⁸ Jefferson County had the highest poverty rates in 1999 and 2015 and experienced the largest increase in poverty rates during the evaluation period. In 2015, Jefferson County and Illinois poverty rates exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. A community contact stated the economic situation differs from county to county in this area and that poverty rates remain high. The following table shows the poverty rates for 1999¹³⁹ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Effingham	8.1%	9.8%	21.0%
Jefferson	12.3%	16.7%	35.8%
Illinois	10.7%	13.6%	27.1%
U.S.	11.8%	13.5%	14.4%

¹³⁸ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹³⁹ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 31,637 housing units and 19,315 families in the assessment area. From an income perspective, 10.8% of housing units, 7.5% of owner-occupied units, and 8.6% of families are located in low- or moderate-income tracts. Three-quarters of the housing units in the low-income census tracts are either rental or vacant (75.0%) and 25.1% are owner-occupied. In the moderate-income census tracts, 44.7% of the housing units are either rental or vacant and 55.4% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be limited credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 37 years old and 22.3% of the stock was built before 1950. However, within the assessment area, the median age of housing stock was 57 years in low- and moderate-income tracts. Therefore, there appears to be opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$95,758 with an affordability ratio of 46.51. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Median housing values increased between 2010 and 2011-2015, as did median family incomes; as a result, housing became more affordable in Effingham County and slightly less affordable in Jefferson County during the evaluation period. Median gross rents increased across the assessment area, with renters in Jefferson County experiencing the largest increase in rental rates. In 2010, about 39.8% of renters across the assessment area had rent costs greater than 30.0% of income. Increasing rental rates may make it more difficult for potential homebuyers to save for a down payment for a home. A community contact stated that low- and moderate-income individuals are still not able to buy homes, which means the need for a sufficient supply of quality, affordable, and stable rental housing has become increasingly important. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Illinois.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Effingham	\$106,500	46.49	\$128,200	40.74	\$541	\$581	7.4%
Jefferson	\$85,800	47.97	\$87,300	49.54	\$546	\$590	8.1%
Illinois	\$202,500	27.52	\$173,800	31.01	\$834	\$907	8.8%

According to Bankrate.com,¹⁴⁰ Illinois ranked seventh for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹⁴¹

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Effingham	1:3,045
Jefferson	1:995
Illinois	1:1,036
U.S.	1:1,533

In November 2016, Jefferson County had the highest rate of foreclosure. In addition, the Jefferson County rate of foreclosure exceeded Illinois and nationwide foreclosure rates.

Labor, Employment, and Economic Characteristics

According to Effingham Regional Alliance,¹⁴² the top ten employees represent a diverse set of industries:

Effingham County Major Employers	
Company	Number of Employees
Quad Graphics (manufacturing)	826
HSHA St. Anthony’s Memorial Hospital (health care)	784
Sherwin-Williams Company (paint products/distribution)	451
Patterson Companies, Inc. (dental software)	440
Stevens Industries, Inc. (manufacturing)	400
Three Z Printing (commercial printing)	375
Heartland Dental Care (professional services)	343
Effingham Equity (agriculture)	338
FedEx (distribution)	320
Martin’s IGA (grocery store)	285

According to Jefferson County Development Corporation,¹⁴³ the employee base for business is regional and is drawn from eight surrounding counties. The economic strength, stability, and growth of Jefferson County have significant impact on the Southern Illinois region. Jefferson County is home to three of the largest employers in Southern Illinois:

¹⁴⁰ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

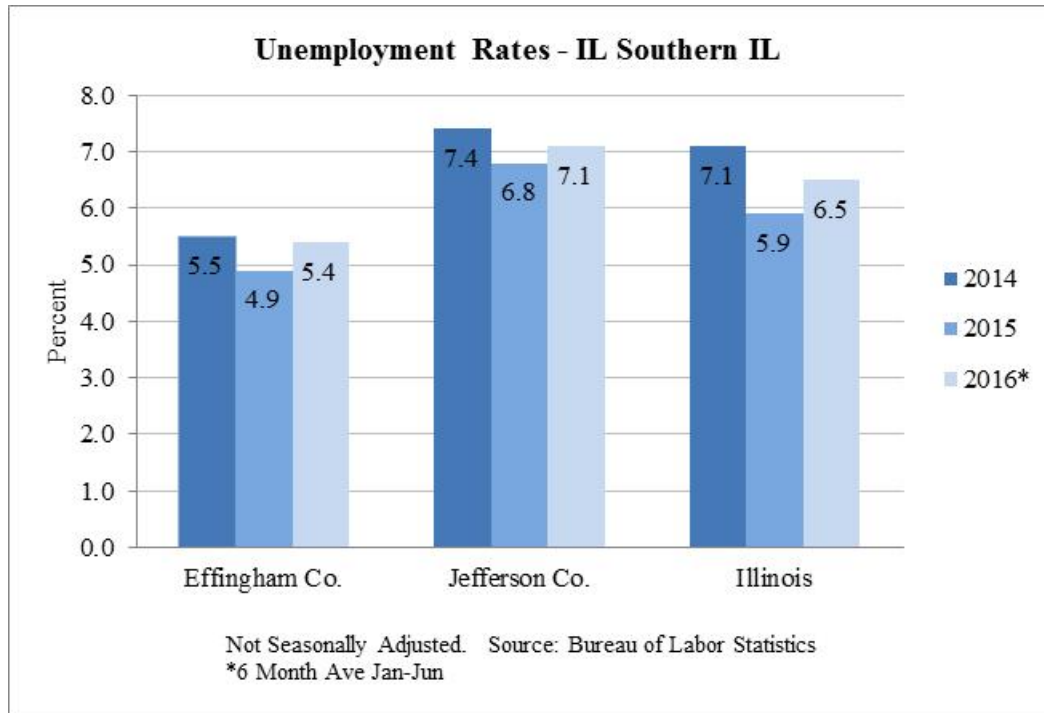
¹⁴¹ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

¹⁴² Effingham Regional Alliance: <http://www.effinghamregionalalliance.com/regional-employers/>

¹⁴³ Jefferson County Development Corporation: http://www.jeffcodev.org/profile_jeffersoncounty.html

Jefferson County Major Employers	
Company	Number of Employees
Continental Tire the Americas	3,200
Walgreens Distribution Center	1,385
Good Samaritan Regional Health Center	1,108

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 across the assessment area and Illinois.



Effingham County had unemployment rates below Jefferson County and Illinois, while Jefferson County’s unemployment rate was above Illinois’ and Effingham County’s rates. Three community contacts stated the economic situation differs from county to county, as some counties in this area have lower unemployment rates, while other counties have unemployment rates above state and national averages. These comments are reflected in the table above.

No major layoffs were noted in this assessment area during the evaluation period.

Combined Demographics Report

Assessment Area: IL Southern IL

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	5.3	269	1.4	161	59.9	3,750	19.4
Moderate-income	2	10.5	1,396	7.2	322	23.1	3,214	16.6
Middle-income	12	63.2	12,834	66.4	1,255	9.8	4,437	23
Upper-income	4	21.1	4,816	24.9	240	5	7,914	41
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	19	100.0	19,315	100.0	1,978	10.2	19,315	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	733	184	0.8	25.1	355	48.4	194	26.5
Moderate-income	2,670	1,478	6.7	55.4	735	27.5	457	17.1
Middle-income	20,682	14,491	65.4	70.1	4,591	22.2	1,600	7.7
Upper-income	7,552	6,009	27.1	79.6	983	13	560	7.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	31,637	22,162	100.0	70.1	6,664	21.1	2,811	8.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	213	6.3	179	6	29	9.2	5	10.2
Moderate-income	170	5.1	151	5	18	5.7	1	2
Middle-income	2,099	62.6	1,884	63	184	58.4	31	63.3
Upper-income	873	26	777	26	84	26.7	12	24.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3,355	100.0	2,991	100.0	315	100.0	49	100.0
	Percentage of Total Businesses:		89.2		9.4		1.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2	0.5	2	0.5	0	0	0	0
Middle-income	276	70.8	274	70.8	2	66.7	0	0
Upper-income	112	28.7	111	28.7	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	390	100.0	387	100.0	3	100.0	0	.0
	Percentage of Total Farms:		99.2		.8		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
NON-METROPOLITAN SOUTHERN ILLINOIS**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated adequate. Fifth Third has demonstrated an adequate responsiveness to the credit needs of the community. In addition, Fifth Third originated one community development loan totaling \$28.3 million in the area. Fifth Third has a good geographic distribution of loans, with no lending gaps. Fifth Third has a good distribution among borrowers of different income levels and adequate to businesses of different revenue sizes and exhibits an adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less.

Greatest consideration was given to the evaluation of refinance lending based on the overall volume of lending, followed by small business, and home purchase lending. There were an insufficient number of home improvement loans to analyze performance. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding aggregate lending, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an adequate responsiveness to the credit needs within the assessment area. Fifth Third originated 77 refinance, 56 home purchase, 25 home improvement, 73 small business, and one community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 0.2% is slightly greater than the percentage of total deposits at 0.1% in this area.

Geographic Distribution of Loans

Overall, the geographic distribution of loans is good. Refinance lending, which is the largest loan category, is good, while performance for home purchase is adequate. Small business lending is good. Further, no lending gaps were noted for the assessment area, as shown in the following table.

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	1	0	100.0%
Moderate	2	0	100.0%
Middle	12	0	100.0%
Upper	4	0	100.0%
Total	19	0	100.0%

Fifth Third’s excellent penetration of loans throughout the assessment area helped to enhance performance, resulting in an overall good loan penetration throughout the assessment area.

Refinance Loans

Fifth Third did not originate any loans in the one low-income tract in the assessment area and there were no loans made by the aggregate of all lenders. However, only 2.0% of the population in this assessment area lives in the low-income census tracts. Also, only 0.8% of the owner-occupied housing units are located in the low-income tract, leaving little opportunity for home mortgage lending. Therefore, the geographic distribution of refinance loans in low-income tracts is considered adequate.

Fifth Third made four refinance loans totaling \$173,000 in moderate-income tracts. This represents 5.2% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 6.7%. The percentage of loans by dollar amount at 2.7% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 3.9% and the 2015 aggregate at 2.4%. As Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 47 refinance loans totaling \$3.6 million in middle-income tracts. This represents 61.0% of refinance loans by volume, which is below the owner-occupied units in these tracts at 65.4%. Also, refinance loans by dollar amount (56.1%) was below proxy. The percentage of loans by volume was below the 2014 aggregate at 67.1% and with the 2015 aggregate at 64.8%.

Fifth Third made 26 refinance loans totaling \$2.6 million in upper-income tracts. This represents 33.8% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 27.1%, and 41.2% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate at 29.1% and the 2015 aggregate at 31.9%.

Overall, the geographic distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made one home purchase loan totaling \$22,000 in the low-income tract. This represents 1.8% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 0.8%, and 0.3% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 0.5% and the 2015 aggregate at 0.1%. While Fifth Third's performance exceeded the proxy, the volume of loans was small; therefore, the geographic distribution of home purchase loans in low-income tracts is good.

Fifth Third made one home purchase loan totaling \$21,000 in moderate-income tracts. This represents 1.8% of its home purchase loans by volume, which is significantly below the percentage of owner-occupied units in these tracts at 6.7%, and 0.3% by dollar amount, which was significantly below proxy. The percentage of loans by volume was below the 2014 aggregate at 4.9% and was below the 2015 aggregate at 3.1%. As Fifth Third's performance was significantly below proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is poor.

Fifth Third made 35 home purchase loans totaling \$4.4 million in middle-income tracts. This represents 62.5% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 65.4%, and 63.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 60.9% and exceeded the 2015 aggregate of 68.4%.

Fifth Third made 19 home purchase loans totaling \$2.5 million in upper-income tracts. This represents 33.9% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 27.1%, and 36.2% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 33.7% and was below the 2015 aggregate of 31.6%.

Overall, the geographic distribution of home purchase loans is adequate.

Small Business Loans

Fifth Third made one small business loans totaling \$5,000 in the low-income tract. This represents 1.4% of small business loans by volume, which is below the percentage of businesses in these tracts at 6.0%, and <0.1% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 5.8% and was below the 2015 aggregate of 6.1%. A community contact indicated the economic conditions in Southern Illinois as generally adverse with limited opportunities due to high unemployment and poverty. Financial institutions are actively competing for bankable loans and are engaged in business development. Therefore, the geographic distribution of small business loans in low-income tracts is adequate.

Fifth Third made four small business loans totaling \$66,000 in moderate-income tracts, which represents 5.5% of small business loans by volume, which slightly exceeds the percentage of businesses in these tracts at 5.0%. This also represents 0.5% small business loans by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 6.2% and was below the 2015 aggregate of 5.2%. Given that Fifth Third's performance slightly exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 50 small business loans totaling \$10.3 million in middle-income tracts. This represents 68.5% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 63.0%, and 83.2% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 62.0% and exceeded the 2015 aggregate of 63.9%.

Fifth Third made 18 small business loans totaling \$2.0 million in upper-income tracts. This represents 24.7% of small business loans by volume, which is below the percentage of businesses in these tracts at 26.0%, and 16.3% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.4% and slightly exceeded the 2015 aggregate of 21.2%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is good based on borrower income and adequate for businesses of different revenue sizes. Borrower distribution is good for refinance and excellent for home purchase loans.

Refinance Loans

Fifth Third made nine loans totaling \$445,000 to low-income borrowers. This represents 11.7% of refinance loans by volume, which is below the percentage of low-income families at 19.4%. The percentage of loans by dollar amount in these geographies at 6.9% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.0% and the 2015 aggregate of 7.3%. Given that Fifth Third's performance exceeded the aggregate of all lenders, but was below proxy, the borrower distribution of refinance loans to low-income borrowers is good.

Fifth Third made 20 loans totaling \$1.2 million to moderate-income borrowers. This represents 26.0% of refinance loans by volume, which significantly exceeds the percentage of moderate-income families at 16.6%, and 19.3% by dollar volume, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 12.8% and significantly exceeded the 2015 aggregate of 17.3%. As Fifth Third's performance significantly exceeded proxy and the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 19 loans totaling \$1.5 million to middle-income borrowers. This represents 24.7% of refinance loans by volume, which exceeds the percentage of middle-income families at 23.0%, and 23.1% by dollar amount, which is comparable to proxy. The percentage of loans by volume was below the 2014 aggregate of 24.5% and was comparable to the 2015 aggregate of 24.8%.

Fifth Third made 27 loans totaling \$3.0 million to upper-income borrowers. This represents 35.1% of refinance loans by volume, which is below the percentage of upper-income families at 41.0%, while the percentage of loans by dollar amount at 47.0% exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 46.5% and was below the 2015 aggregate of 39.8%.

Overall, the borrower distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made eight loans totaling \$538,000 to low-income borrowers. This represents 14.3% of home purchase loans by volume, which is below the percentage of low-income families at 19.4%, and 7.7% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 6.9% and significantly exceeded the 2015 aggregate of 8.3%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders and was below proxy, the borrower distribution of home purchase loans to low-income borrowers is good.

Fifth Third made ten loans totaling \$641,000 to moderate-income borrowers. This represents 17.9% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 16.6%, and 9.2% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 22.8% and was below the 2015 aggregate of 19.3%. Because Fifth Third's performance exceeded proxy, the borrower distribution of home purchase loans to moderate-income borrowers is good.

Fifth Third made 20 loans totaling \$2.4 million to middle-income borrowers. This represents 35.7% of home purchase loans by volume, which significantly exceeds the percentage of middle-income families at 23.0%, and 34.1% by dollar amount, which exceeds proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 22.2% and exceeded the 2015 aggregate of 21.4%.

Fifth Third made 17 loans totaling \$3.2 million to upper-income borrowers. This represents 30.4% of home purchase loans by volume, which is less than the percentage of upper-income families at 41.0%, and 45.9% of loans by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 24.3% and exceeded the 2015 aggregate of 28.8%.

A community contact indicated low-and moderate-income individuals are not able to buy homes due to the high percentage of rentals in more affordable areas; therefore, Fifth Third's strong performance in home purchase lending to low- and moderate-income borrowers compared to proxy and the aggregate of all lenders is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 27.4% of small business loans to businesses with revenues of \$1 million or less. Fifth Third's performance in 2014 was below the 2014 aggregate of 35.9% and was below the 2015 aggregate of 39.8% and was significantly below the percentage of small businesses in the assessment area at 89.2%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (56.2%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated one community development loan totaling \$28.3 million during the evaluation period. The loan was a working capital loan to promote economic development by financing a small business to support retention of jobs for low- and moderate-income workers.

Community development lending in this assessment area represents 0.5% of the total dollar volume of community development loans originated during the evaluation period. This ranks as Fifth Third's 36th highest percentage of community development lending during the evaluation period. As such, Fifth Third made an adequate level of community development loans.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated adequate.

Fifth Third made an adequate level of qualified community development investments and grants. Fifth Third has 20 qualified investments totaling \$330,256 during the evaluation period. Shown in the table below are the total current period investments:

Economic Development		Community Services	
#	\$	#	\$
9	18,010	10	9,700

Also included in the total number of qualified investments is one prior period investment totaling \$302,546. Fifth Third made less than 0.1% of its total community development investments in this assessment area, which is slightly less than the percentage of total deposits at 0.1% and less than the percentage of branch offices at 0.2%.

Fifth Third exhibited an adequate responsiveness to credit and community development needs in the assessment area. Included in total investments are 19 donations totaling \$27,710 that supported local chambers of commerce, charitable organizations, small businesses, and churches. The majority of Fifth Third’s donations (65.0%) supported economic development, which is an important need expressed by several community contacts due to the high unemployment and poverty rates in portions of the assessment area.

Service Test

Fifth Third’s performance under the service test in the assessment area is rated adequate. Retail services are reasonably accessible to essentially all of Fifth Third’s assessment areas and Fifth Third provides an adequate level of community development services.

Retail Services

Fifth Third’s record of opening and closing offices has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation period, no banking centers were opened or closed.

Delivery services are reasonably accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains two banking centers within this assessment area, including none in low-, none in moderate-, one in middle-, and one in upper-income census tracts. Fifth Third banking centers in this assessment area represent 0.2% of all its banking centers.

Fifth Third has a total of two full-service ATMs within this assessment area, including none in low-, none in moderate-, one in middle-, and one in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Assessment Area: IL Southern IL

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	1	5.3%	1.9%	6.6%
Moderate	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	2	10.5%	7.7%	5.2%
Middle	1	50.0%	0	0	Total	1	50.0%	1	50.0%	0	0.0%	12	63.2%	66.2%	62.7%
Upper	1	50.0%	0	0	Total	1	50.0%	1	50.0%	0	0.0%	4	21.1%	24.3%	25.4%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Total	2	100.0%	0	0	Total	2	100.0%	2	100.0%	0	0.0%	19	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low- and moderate-income tracts was considered poor, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, these tracts have low population levels.

Community Development Services

Fifth Third provides an adequate level of providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 126 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 0.1% of all community development services provided and equates to 0.06 annualized persons (ANP).

Economic Development	Community Services
<i># of Hours</i>	<i># of Hours</i>
72	54

Employees provided financial expertise through leadership positions in several community organizations that promote community and economic development. Community development services include 94 hours serving on boards and committees, 24 hours providing technical assistance to local business, and eight hours participating in foreclosure prevention outreach.

METROPOLITAN and NON-METROPOLITAN AREAS
(Limited-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF ILLINOIS

- **Carbondale-Marion MSA**
 - As of June 30, 2016, Fifth Third operated two branches in the assessment area, representing 16.7% of its branches in Illinois.
 - As of June 30, 2016, Fifth Third had \$56,462 in deposits in this assessment area, representing a market share of 4.8% and 14.9% of its statewide deposits.
- **Non-metropolitan Northern Illinois**
 - As of June 30, 2016, Fifth Third operated five branches in the assessment area, representing 41.7% of its branches in Illinois.
 - As of June 30, 2016, Fifth Third had \$133,311 in deposits in this assessment area, representing a market share of 3.8% and 35.1% of it statewide deposits.
- **Rockford MSA**
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 25.0% of its branches in Illinois.
 - As of June 30, 2016, Fifth Third had \$58,217 in deposits in this assessment area, representing a market share of 1.0% and 15.3% of it statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE STATE OF ILLINOIS**

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with Fifth Third’s performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Carbondale-Marion MSA	Consistent	Consistent	Consistent
Non-metropolitan Northern Illinois	Consistent	Above	Above
Rockford MSA	Consistent	Below	Above

For the lending test, Fifth Third received a “Low Satisfactory” rating for Illinois. Performance in all three limited-scope assessment areas was consistent with Fifth Third’s performance for the state. Lending levels were adequate for the geographic and borrower distribution of loans. Non-metropolitan Northern Illinois and the Rockford assessment area had adequate levels of community development loans. No community development lending was noted in the Carbondale-Marion assessment area. A high level of lending gaps was identified in the Rockford assessment area and a moderate level of lending gaps was identified in non-metropolitan Northern Illinois. There were no gaps in lending in the Carbondale-Marion assessment area.

For the investment test, Fifth Third received a “High Satisfactory” rating for Illinois. While performance in the Carbondale-Marion assessment area was consistent to the state, performance in the non-metropolitan Northern Illinois assessment area was stronger. The stronger performance was primarily attributable to several low-income housing tax credit investments in the assessment area. Although below the state’s performance, investment activity in the Rockford assessment area was adequate.

For the service test, Fifth Third received a “Low Satisfactory” rating for Illinois. Performance in the Carbondale-Marion assessment area was consistent to the state, while performance in non-metropolitan Northern Illinois and the Rockford assessment areas was stronger. The stronger performance in the non-metropolitan Northern Illinois and the Rockford assessment areas was primarily due higher levels of hours dedicated to providing qualified community development services relative to Fifth Third’s operational presence in these assessment areas. Retail services were good in the Carbondale-Marion and non-metropolitan Northern Illinois assessment areas and adequate in the Rockford assessment area. The stronger retail services performance in the Carbondale-Marion and non-metropolitan Northern Illinois assessment areas was primarily due to greater accessibility of delivery systems in lower-income geographies.

The performance in the limited-scope assessment areas did not change the overall state rating.

STATE OF INDIANA

CRA RATING for State of Indiana:¹⁴⁴ Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors supporting this rating include:

- An excellent responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and good to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A leader in making community development loans;
- Extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in Indiana: the Indianapolis-Carmel-Muncie CSA and non-metropolitan Southern Indiana. Limited-scope reviews were performed on the remaining five assessment areas: the Bloomington MSA, Fort Wayne MSA, Lafayette-W. Lafayette MSA, non-metropolitan Northern Indiana, and the Terre Haute MSA.

¹⁴⁴ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the “Institution” section of this report.

The Indianapolis-Carmel-Muncie and non-metropolitan Southern Indiana assessment areas received greater weight in determining the CRA rating for the state. These areas had the largest lending volumes and number of banking centers and ranked first and second, respectively, in the state’s share of deposits during the evaluation period. Lastly, these areas represented 70.6% of the banking centers, 86.4% of deposits, and 74.8% of lending in Indiana.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF INDIANA

Lending activity accounted for 7.2% of Fifth Third’s total lending activity, while deposits accounted for 6.6% of Fifth Third’s total deposits. HMDA-reportable lending in Indiana represented 8.0% of Fifth Third’s total HMDA lending, while CRA-reportable lending represented 5.2% of Fifth Third’s total CRA lending. As of June 30, 2016, Fifth Third ranked third among 155 insured institutions and has a deposit market share of 7.2% and 128 banking center locations within Indiana.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF INDIANA

Lending Test

Fifth Third’s performance under the lending test within the assessment areas located in Indiana is rated “Outstanding.” Fifth Third’s lending reflects an excellent responsiveness to the credit needs in the following two of seven assessment areas: Indianapolis-Carmel-Muncie and non-metropolitan Southern Indiana. Lending reflects a good responsiveness to credit needs in the Fort Wayne assessment area and an adequate responsiveness in the remaining four assessment areas: Bloomington, Lafayette-W. Lafayette, non-metropolitan Northern Indiana, and Terre Haute.

Lending Activity

In Indiana, Fifth Third originated 8,304 HMDA loans totaling \$1.1 billion and 2,051 small business loans totaling \$256.4 million during the evaluation period.

Lending activity in Indiana is excellent. The Indianapolis-Carmel-Muncie and non-metropolitan Southern Indiana assessment areas have excellent lending activity. Lending activity is good in the Bloomington, Fort Wayne, and Terre Haute assessment areas and adequate in the remaining two assessment areas.

Geographic and Borrower Distribution

The distribution of loans among geographies is excellent in the assessment areas located in Indiana. The geographic distribution is excellent in the Indianapolis-Carmel-Muncie and non-metropolitan Southern Indiana assessment areas. In the Fort Wayne assessment area, the geographic distribution is good and adequate in the remaining four assessment areas.

A low level of lending gaps was identified in five of the seven assessment areas. There were no gaps in lending in either the Terre Haute or the non-metropolitan Northern Indiana assessment areas.

The distribution of loans among borrowers of different income levels is excellent and good to businesses of different revenue sizes in the assessment areas located in Indiana. The borrower distribution is excellent in the Indianapolis-Carmel-Muncie, non-metropolitan Southern Indiana, and the remaining five assessment areas. The distribution to businesses of different revenue sizes is excellent in the Bloomington and Fort Wayne assessment areas, good in the Indianapolis-Carmel-Muncie and non-metropolitan Southern Indiana assessment areas, and adequate in the remaining three assessment areas.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Indiana, Fifth Third originated 47 community development loans totaling \$427.0 million, which represents 7.1% of the Fifth Third's community development lending by dollar volume. This is an outstanding level of community development lending in Indiana. Fifth Third was a leader in providing community development loans in the Indianapolis-Carmel-Muncie assessment area. Fifth Third made a relatively high level of community development loans in non-metropolitan Southern Indiana and the Fort Wayne assessment areas and an adequate level of community development loans in the remaining four assessment areas.

Flexible Lending

Fifth Third consistently made an extensive use of flexible lending practices within assessment areas located in Indiana.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Indiana is rated "Outstanding." Fifth Third funded \$155.3 million in qualified community development investments in Indiana during the evaluation period, consisting of \$102.0 million obtained from new investments made during the current review period and \$53.3 million from prior period investments. The majority of investments were LIHTCs. Fifth Third's level of qualified investments is excellent in four of seven assessment areas. The level of qualified investments is good in the Lafayette-W. Lafayette and Terre Haute assessment areas and adequate in non-metropolitan Northern Indiana.

Fifth Third was considered responsive to the credit and community development needs in the state; therefore, investments without a purpose, mandate, or function of serving Fifth Third's assessment areas in Indiana was considered to positively impact state performance. Fifth Third made \$1.9 million in qualified investments, typically in the form of LIHTCs that benefited counties within the state, but outside Fifth Third's delineated assessment areas within Indiana. Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test within the assessment areas located in Indiana is rated "Outstanding." Fifth Third's performance is excellent in the Indianapolis-Carmel-Muncie assessment area, adequate in the non-metropolitan Southern Indiana assessment area, and poor in the Bloomington assessment area. Fifth Third's performance was good in the remaining four assessment areas.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in Fifth Third's assessment areas. Retail service distribution is good in six assessment areas and adequate in the Bloomington assessment area.

Fifth Third has 226 banking centers in Indiana, which represents 17.4% of Fifth Third's total branches. Fifth Third's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. One branch closed in a moderate-income tract during the evaluation period in the Indianapolis-Carmel-Muncie assessment area.

Banking services and business hours do not vary in a way that inconveniences any portions of the Fifth Third's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third is a leader in providing community development services in Indiana. Fifth Third's performance is excellent in the Indianapolis-Carmel-Muncie, Lafayette-W. Lafayette, and non-metropolitan Northern Indiana assessment areas. The level of community development services is adequate in non-metropolitan Southern Indiana and poor in the Bloomington assessment area. Fifth Third's performance is good in the remaining two assessment areas.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
INDIANAPOLIS-CARMEL-MUNCIE IN CSA #294**

The Indianapolis-Carmel-Muncie IN CSA consists of the following two MSAs: Columbus IN MSA #18020, consisting of Bartholomew County, and Indianapolis-Carmel-Anderson IN MSA #26900, consisting of Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Putnam, and Shelby counties.

The assessment area is comprised of 51 low-, 111 moderate-, 159 middle-, and 90 upper-income tracts. There is also one tract with no income designation that does not report income information.

As of June 30, 2016, Fifth Third ranked third out of 50 institutions with 9.2% of the deposit market share. JP Morgan Chase Bank had the majority of the market share 23.3% of deposits, followed by PNC Bank with 16.3% of the market share, respectively. Deposits in this assessment area accounted for 4.0% of the Fifth Third's total deposits. This was 73.0% of deposits within the state and the seventh-highest within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 4,925 HMDA loans and 1,359 CRA loans, which represented 4.7% and 3.5% of the total loans originated during the evaluation period, respectively. This was the seventh-largest HMDA market and ninth-largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 21st among 587 HMDA reporters in the assessment area, Fifth Third Mortgage Company ranked sixth, and Fifth Third ranked 80th. Wells Fargo Bank, Union Savings Bank, Caliber Home Loans, JP Morgan Chase Bank, and Huntington Bank were the top five HMDA lenders in the assessment area. Fifth Third ranked 19th of 118 CRA reporters in the assessment area in 2015. The top five CRA lenders in the assessment area were American Express, Chase Bank USA, PNC Bank, Capital One, and Synchrony Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Four community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an organization that provides economic development services for local businesses and government, stated the economy is strong and expanding. However, the contact believed banks make it difficult for individuals with poor credit history to obtain financing for car loans and other types consumer loans; therefore, there is an opportunity for banks to counsel and provide financial literacy training to consumers with poor credit history to assist them in gaining and restoring access to credit.

The second contact, representing an organization that advocates for various neighborhood development projects, stated one of the most significant needs in the community is to garner more support for neighborhoods to become more economically diverse by helping them attract businesses that are connected to nearby economic engines and to develop more affordable housing. The primary challenge in the area of housing is that while there is available capital for home purchase loans for new houses, there is not as much available capital for renovating existing homes, particularly in lower-income neighborhoods. As a result, there are an increasing number of older homes that require renovation and there is an opportunity for banks to originate home improvement loans. The contact believed local community banks do not have the resources to invest in large community development projects and larger financial institutions prefer to support programs that can be implemented across their entire footprint, which may not benefit the local economy. The contact stated that small businesses need access to small-dollar loans up to \$100,000. Without access to these types of loans, area businesses might find it difficult to grow or expand.

The third contact, representing an organization that supports services to low- and moderate-income individuals, stated about 12.0% of area households are below the poverty level, which makes it difficult to participate in the growing economy. The contact believed there is a need for banks to participate in financial literacy programs to help lower-income individuals feel less financially excluded. The contact mentioned the following banks as being active in participating in financial literacy education: Main Source Bank, 1st Financial Bank, PNC Bank, Old National Bank, and Central Credit Union.

The fourth contact, representing a government housing agency that provides low-income families, seniors, and individuals with disabilities access to affordable housing, stated the local economy is favorable and the housing market is rebounding since the recession and housing is mostly affordable; however, there are opportunities for financial institutions to offer financial literacy classes targeted to lower-income individuals and the unbanked, since a lack of economic opportunities makes it difficult to start or grow a business or own a home.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 2.0 million. About 30.7% of the population lived in low- and moderate-income tracts. In addition, 74.1% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Indianapolis-Carmel-Anderson MSA is the 34th largest in terms of population in the nation, while the Columbus MSA is the 375th largest.¹⁴⁵ Marion County is the largest county in the assessment area and Indiana.¹⁴⁶ Indianapolis (located in Marion County) is the largest city in assessment area and is the 14th most populous city in the U.S. Indianapolis has 853,173 residents and its population increased by 9.0% between 2000 and 2015.

¹⁴⁵ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

¹⁴⁶ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

In contrast, the next largest cities in the CSA are Carmel, Anderson, and Columbus, which have 88,713, 55,305, and 46,690 residents, respectively.¹⁴⁷

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease.¹⁴⁸ The population within the assessment area experienced positive growth between 2010 and 2015, with Hamilton County experiencing the greatest growth and Brown County experiencing the least growth in population during this time period. Moody’s Analytics noted positive population growth and steady immigration trends in the Indianapolis and the Columbus MSAs. These trends could indicate an increased demand in prospective homebuyers in those metropolitan areas.

County	2010 Population	2015 Population	Population Percent Change
Bartholomew	76,794	81,162	5.7%
Boone	56,640	63,344	11.8%
Brown	15,242	14,977	-1.7%
Hamilton	274,569	309,697	12.8%
Hancock	70,002	72,520	3.6%
Hendricks	145,448	158,192	8.8%
Johnson	139,654	149,633	7.1%
Madison	131,636	129,723	-1.5%
Marion	903,393	939,020	3.9%
Morgan	68,894	69,648	1.1%
Putnam	37,963	37,585	-1.0%
Shelby	44,436	44,478	0.1%
Total	1,964,671	2,069,979	5.4%

Income Characteristics

In 2010 the assessment area median family income was greater (\$64,596) than Indiana at \$58,944. Between 2014 and 2016, in spite of a slight decrease in 2015, the median family income generally increased in the Columbus MSA. In the Indianapolis MSA, median family income increased in 2014 and 2015, but decreased by nearly 5.0% between 2015 and 2016. Moody’s Analytics noted high affordability for residents and businesses, strong population growth, and sturdy job market induces more residents to relocate to the metropolitan area.

¹⁴⁷ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

¹⁴⁸ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

**Borrower Income Levels
Columbus, IN MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$66,900	0 - \$33,449	\$33,450 - \$53,519	\$53,520 - \$80,279	\$80,280 - & above
2015	\$65,800	0 - \$32,899	\$32,900 - \$52,639	\$52,640 - \$78,959	\$78,960 - & above
2016	\$67,700	0 - \$33,849	\$33,850 - \$54,159	\$54,160 - \$81,239	\$81,240 - & above

**Borrower Income Levels
Indianapolis-Carmel-Anderson, IN MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$67,900	0 - \$33,949	\$33,950 - \$54,319	\$54,320 - \$81,479	\$81,480 - & above
2015	\$68,900	0 - \$34,449	\$34,450 - \$55,119	\$55,120 - \$82,679	\$82,680 - & above
2016	\$65,600	0 - \$32,799	\$32,800 - \$52,479	\$52,480 - \$78,719	\$78,720 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.¹⁴⁹ Hamilton County had the lowest poverty rate and Marion County had the highest poverty rate in 1999 and 2015. In 2015, only Marion County and Madison County had poverty rates greater than Indiana. Hancock County and Marion County experienced the largest increase in poverty rates during this period. In 2015, Indiana’s poverty rate exceeded the national rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.¹⁵⁰ A community contact indicated that about 12.0% of area households are below the poverty level, which makes it difficult to participate in the growing economy. The contact believed there is a need for banks to participate in financial literacy programs to help lower-income individuals feel less financially excluded. According to 2010 U.S. Census data, 11.5% of households in the assessment area were below the poverty level and Marion County and Madison County had the highest levels of households below the poverty at 15.4% and 13.7%, respectively. The following table shows the poverty rates for 1999¹⁵¹ and 2015.

¹⁴⁹ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹⁵⁰ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

¹⁵¹ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

County	1999 Poverty Rate	2015 Poverty Rate	Change
Bartholomew	7.3%	11.9%	63.0%
Boone	5.2%	6.0%	15.4%
Brown	8.9%	11.4%	28.1%
Hamilton	2.9%	4.7%	62.1%
Hancock	3.0%	6.0%	100.0%
Hendricks	3.6%	5.5%	52.8%
Johnson	5.6%	8.0%	42.9%
Madison	9.3%	16.7%	79.6%
Marion	11.4%	20.6%	80.7%
Morgan	6.6%	11.4%	72.7%
Putnam	8.0%	13.6%	70.0%
Shelby	7.6%	11.9%	56.6%
Indiana	9.5%	14.4%	51.6%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 839,990 housing units and 493,743 families in the assessment area. From an income perspective, 35.0% of housing units, 23.0% of owner-occupied units, and 28.0% of families are located in low- or moderate-income tracts. Over two-thirds of the housing units in the low-income census tracts are either rental or vacant (68.9%) and 31.1% are owner-occupied. In the moderate-income census tracts, over half of the housing units are either rental or vacant (56.6%) and 43.4% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 36 years old, with 19.5% of the stock built before 1950. The oldest housing stock was in Madison County with a median age of 48 years. The newest housing stock was 16 years in Hamilton County. However, within the assessment area, the median age of housing stock was 58 years in low-income tracts and 46 years in moderate-income tracts. A community contact stated there is an increasing number of older homes in lower-income neighborhoods requiring renovation; therefore, there appears to be a need and ample opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income neighborhoods.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$139,808, with an affordability ratio of 37.33. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Median housing values varied between 2010 and 2011-2015, along with median family incomes; as a result, housing became slightly more affordable in the Columbus MSA (Bartholomew County) and slightly less affordable in half the counties in the Indianapolis MSA, whereas housing affordability in Marion County (the most populous county in assessment area) remained stable. During the evaluation period, the most affordable housing was in Madison County and the least affordable was in Brown County. Median gross rents increased across the assessment area, with renters in Brown County experiencing the largest increase in rental rates and renters in Putnam County experiencing the smallest increase in gross rental rates. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Indiana. According to Moody’s Analytics, housing is highly affordable for residents in the Columbus MSA and Indianapolis MSA. Above-average job and income gains and stable housing market may lead to a growth in prospective homebuyers in 2017. According to 2010 U.S. Census data, 45.5% of renters in the assessment area had rent costs greater than 30.0% of their income and combined with increased rental rates across the assessment area, potential homebuyers may not be able to save for a down payment for a home.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Bartholomew	\$133,100	39.63	\$136,000	40.48	\$731	\$818	11.9%
Boone	\$174,300	39.35	\$187,600	36.01	\$758	\$796	5.0%
Brown	\$158,500	31.63	\$162,300	33.65	\$793	\$932	17.5%
Hamilton	\$211,200	38.80	\$222,900	38.68	\$903	\$1,016	12.5%
Hancock	\$159,200	38.35	\$156,300	42.61	\$763	\$832	9.0%
Hendricks	\$161,100	41.70	\$162,400	43.20	\$860	\$958	11.4%
Johnson	\$143,400	42.98	\$145,400	42.74	\$781	\$849	8.7%
Madison	\$96,300	44.92	\$90,400	48.89	\$647	\$702	8.5%
Marion	\$122,200	35.63	\$118,300	35.64	\$715	\$788	10.2%
Morgan	\$141,200	39.25	\$143,700	38.57	\$716	\$754	5.3%
Putnam	\$119,800	40.89	\$122,800	41.82	\$682	\$693	1.6%
Shelby	\$126,400	41.37	\$120,800	44.36	\$671	\$711	6.0%
Indiana	\$123,000	38.78	\$124,200	39.66	\$683	\$747	9.4%

According to Bankrate.com,¹⁵² Indiana ranked 15th for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹⁵³

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Bartholomew	1:2,412
Boone	1:1,291
Brown	1:3,933
Hamilton	1:10,038
Hancock	1:1,653
Hendricks	1:1,829
Johnson	1:2,876
Madison	1:1,261
Marion	1:2,050
Morgan	1:896
Putnam	1:788
Shelby	1:1,887
Indiana	1:1,590
U.S.	1:1,533

In November 2016, Putnam County had the highest rate of foreclosure and Hamilton County had the lowest foreclosure rate in the assessment area. In Marion County (Indianapolis MSA), Indianapolis has the highest foreclosure rate at 1:2,044. In Bartholomew County (Columbus MSA), Columbus has the second highest foreclosure rate at 1:2,685, but according to Moody's Analytics, the Columbus MSA has a stable housing market with few foreclosures.

Building permits for this assessment area, Indiana, and the nation are included in the following table for 2014, 2015, and 2016.¹⁵⁴

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Columbus MSA	254	233	-8.3%	300	28.8%
Indianapolis-Carmel-Anderson MSA	8,005	8,735	9.1%	7,554	-13.5%
Indiana	17,813	18,483	3.8%	18,317	-0.9%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

¹⁵² Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹⁵³ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

¹⁵⁴ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

The Columbus MSA experienced a decrease in the number of housing permits issued between 2014 and 2015 and significant increase between 2015 and 2016. While the Indianapolis MSA experienced an increase in the number of housing permits issued between 2014 and 2015 and decrease between 2015 and 2016. The decrease in the number of permits could indicate there is a declining demand for home purchase loans in the Indianapolis MSA and an increasing demand for single-family residential homes in the Columbus MSA.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Columbus and Indianapolis assessment area economies are in expansion, primarily due to their large manufacturing base, strong population growth, flourishing high-tech industry, highly skilled workforce, and low business costs. Overall, the area’s central location makes it a natural logistics hub (within a day’s drive of over half of the country) and rising workforce skill level attracts more business investments.

According to *Inside Indiana*,¹⁵⁵ seven Indiana-based corporations are among the 500 largest in the country. Indiana gained two Fortune 500 companies and lost one in 2016. Indianapolis-based Calumet Specialty Product Partners dropped out of the Fortune 500 in 2016 after being ranked 457th in 2015. All four companies increased their standing in the past year.

Indianapolis Metro Fortune 500 Companies (2016) ¹⁵⁶		
Rank	Company	Annual Revenue
33	Anthem Inc.	\$79.2 billion
141	Eli Lilly and Company (Columbus-based)	\$20.0 billion
148	Cummins Engine Co. Inc.	\$1.4 billion
488	Simon Property Group Inc.	\$5.3 billion

According to Moody’s Analytics the top 15 employers in the CSA in 2015/2016 were:

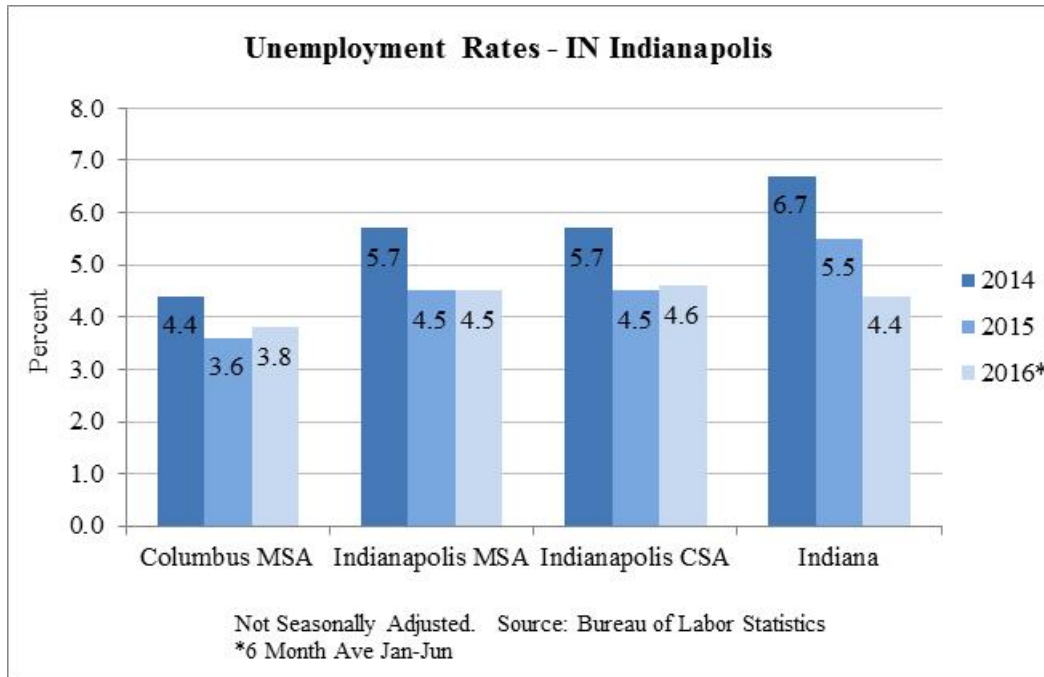
Company ¹⁵⁷	Number of Employees
Indiana University Health	21,712
St. Vincent Hospitals & Health Services	15,285
Purdue University	14,558
Community Health Network	11,245
Eli Lilly and Co.	10,840
Marsh Supermarkets Inc.	8,000
Cummins Engine Co. Inc. (Col)	7,937
Anthem	4,900
Rolls-Royce Corp	4,300
AT&T	4,000
Amazon.com	3,000
NTN Driveshaft Inc. (Col)	2,000
Columbus Regional Hospital (Col)	1,850
Faurecia (Col)	1,593
Toyota Industrial Equipment Manufacturing Inc. (Col)	1,141

¹⁵⁵Inside Indiana: <http://www.insideindianabusiness.com/story/32221981/indiana-businesses-shuffle-around-on-fortune-500>

¹⁵⁶ Bold type indicates company new to the list in 2016

¹⁵⁷ (Col) Columbus MSA

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 for the two MSAs, the CSA, and Indiana.



The unemployment rates declined from 2014 to 2015 and remained steady from 2014 to 2015 in the assessment area. The Columbus MSA unemployment rates were considerably below the Indianapolis MSA’s rates. Overall, the CSA had unemployment rates significantly below Indiana’s all three years.

According to *USA Today*, Cummins, a manufacturer of diesel and natural-gas engines, plans to cut 2,000 employees, or about 4.0% of its global workforce, by the end of 2016 due to weakening sales of engines and power generators around the world. The job eliminations are expected to save the company around \$200 million in ongoing expenses, consisting mostly of professional employees, not those on the factory floor. Up to 500 job eliminations could occur in Indiana, where Cummins employs 8,000 people. Cummins global workforce tops 54,000.¹⁵⁸ According to *IndyStar*, Elli Lilly and Co. announced it will eliminate 485 sales jobs nationwide due to the failure of a drug aimed to treat Alzheimer’s disease effective March 31, 2017. The company said 75 employees in Indiana will be affected.¹⁵⁹

¹⁵⁸ Swiatek, Jeff. “Engine Maker Cummins to cut 2,000 jobs.” *USA Today*. October 27, 2015. - <http://www.usatoday.com/story/money/nation-now/2015/10/27/cummins-engine-layoffs/74694300/>

¹⁵⁹ Rudavsky, Shari. “Lilly to lay off about 500 in wake of drug fail.” *IndyStar*. January 19, 2017. - <http://www.indystar.com/story/news/2017/01/19/lilly-layoff-500-wake-drug-fail/96787082/>

Combined Demographics Report

Assessment Area: IN Indianapolis

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	51	12.4	34,372	7	11,456	33.3	103,635	21
Moderate-income	111	26.9	103,535	21	17,277	16.7	86,210	17.5
Middle-income	159	38.6	204,150	41.3	12,962	6.3	103,192	20.9
Upper-income	90	21.8	151,686	30.7	4,023	2.7	200,706	40.6
Unknown-income	1	0.2	0	0	0	0	0	0
Total Assessment Area	412	100.0	493,743	100.0	45,718	9.3	493,743	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	78,632	24,464	4.8	31.1	33,428	42.5	20,740	26.4
Moderate-income	215,018	93,389	18.3	43.4	89,955	41.8	31,674	14.7
Middle-income	330,231	223,401	43.7	67.6	75,810	23	31,020	9.4
Upper-income	216,099	170,191	33.3	78.8	32,612	15.1	13,296	6.2
Unknown-income	10	0	0	0	10	100	0	0
Total Assessment Area	839,990	511,445	100.0	60.9	231,815	27.6	96,730	11.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	4,483	5	3,872	4.7	592	8	19	3.7
Moderate-income	17,221	19	15,466	18.7	1,660	22.4	95	18.7
Middle-income	37,649	41.6	34,068	41.2	3,258	44	323	63.5
Upper-income	31,150	34.4	29,188	35.3	1,890	25.5	72	14.1
Unknown-income	5	0	2	0	3	0	0	0
Total Assessment Area	90,508	100.0	82,596	100.0	7,403	100.0	509	100.0
	Percentage of Total Businesses:			91.3		8.2		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	21	0.9	21	0.9	0	0	0	0
Moderate-income	109	4.7	108	4.8	1	3.8	0	0
Middle-income	1,711	74.5	1,690	74.4	21	80.8	0	0
Upper-income	457	19.9	453	19.9	4	15.4	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,298	100.0	2,272	100.0	26	100.0	0	.0
	Percentage of Total Farms:			98.9		1.1		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
INDIANAPOLIS-CARMEL-MUNCIE IN CSA**

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 23 community development loans totaling \$293.4 million. Fifth Third has an excellent geographic distribution of loans and minimal lending gaps in the assessment area. Fifth Third has an excellent distribution among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 2,556 home purchase, 2,219 refinance, 149 home improvement, 1,359 small business, and 23 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 4.4% is greater than the percentage of total deposits at 4.0% in this area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	12	5.3%	43	18.9%	114	50.2%	58	25.6%
<i>Percentage of Owner Occupied Units</i>		<i>4.8%</i>		<i>18.3%</i>		<i>43.7%</i>		<i>33.3%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	69	30.4%	82	36.1%	54	23.8%	21	9.3%
<i>Percentage of Families by Family Income</i>		21.0%		17.5%		20.9%		40.6%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications to conduct an analysis. The percentage of other modifications in low- and moderate-income tracts exceeded the percentage of owner-occupied units in these geographies; therefore, modifications helped to expand lending activities in these areas. The percentage of other modifications made to low- and moderate-income income borrowers exceeded the percentage of low- and moderate-income income families in the assessment area; therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Home purchase lending, which was the largest loan category, is excellent. Home improvement lending is also excellent. Refinance and small business lending are good. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
Low	51	4	92.2%
Moderate	111	1	99.1%
Middle	159	1	99.4%
Upper	90	0	100.0%
Unknown	1	0	100.0%
Total	412	6	98.5%

Lending gaps are considered minimal, because of the low number of lending gaps in low-, moderate-, and middle-income tracts and no lending gaps in upper-income tracts.

Home Purchase Loans

Fifth Third made 106 home purchase loans totaling \$9.5 million in low-income tracts. This represents 4.1% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 4.8% and 2.2% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 1.5% and significantly exceeded the 2015 aggregate at 1.8%. As Fifth Third’s performance exceeded the aggregate of all lenders and was comparable to proxy, the geographic distribution in low-income tracts is good.

Fifth Third made 519 home purchase loans totaling \$54.3 million in moderate-income tracts. This represents 20.3% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 18.3%, and 12.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 12.5% and significantly exceeded the 2015 aggregate at 13.4%. As Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 1,030 home purchase loans totaling \$142.9 million in middle-income tracts. This represents 40.3% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 43.7%, and 33.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 42.7% and was below the 2015 aggregate of 42.4%.

Fifth Third made 901 home purchase loans totaling \$219.1 million in upper-income tracts. This represents 35.3% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 33.3%, and 51.5% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 43.3%, but was below the 2015 aggregate of 42.4%.

Overall, geographic distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 76 refinance loans totaling \$5.1 million in low-income tracts. This represents 3.4% of refinance loans by volume and 1.6% by dollar amount, which is below the percentage of owner-occupied units at 4.8%. The percentage of loans by volume was below the 2014 aggregate at 2.3% and exceeded the 2015 aggregate at 1.6%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 379 refinance loans totaling \$32.4 million in moderate-income tracts. This represents 17.1% of refinance loans by volume, which is comparable to the percentage of owner-occupied units at 18.3%, and 10.2% by dollar amount, which is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 13.4% and exceeded the 2015 aggregate at 11.2%. As Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 925 refinance loans totaling \$104.9 million in middle-income tracts. This represents 41.7% of refinance loans by volume, which is below the owner-occupied units in these tracts at 43.7%, and 33.2% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 44.3% and was below the 2015 aggregate at 41.1%.

Fifth Third made 839 refinance loans totaling \$174.0 million in upper-income tracts. This represents 37.8% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 33.3%, and 55.0% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate at 40.0% and was below the 2015 aggregate at 46.1%.

Overall, the geographic distribution of refinance loans is good.

Home Improvement Loans

Fifth Third made 10 home improvement loans totaling \$423,000 in low-income tracts. This represents 6.7% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 4.8%, and 4.1% by dollar amount, which is below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 2.4% and exceeded the 2015 aggregate of 2.4%. Given the high median age of housing in low-income tracts at 58 years, which may indicate the need for home improvement loans, and since Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is excellent.

Fifth Third made 36 home improvement loans totaling \$1.7 million in moderate-income tracts. This represents 24.2% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 18.3%, and 16.0% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 13.4% and the 2015 aggregate of 13.4%. Given that Fifth Third's performance exceeded the proxy and aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 60 home improvement loans totaling \$3.6 million in middle-income tracts. This represents 40.3% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 43.7%, and 35.0% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 46.9%, but was below the 2015 aggregate of 44.4%.

Fifth Third made 43 home improvement loans totaling \$4.7 million in upper-income tracts. This represents 28.9% of home improvements loans by volume, which is below the percentage of owner-occupied units in these tracts at 33.3%, and 45.0% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 37.2% and was below the 2015 aggregate of 39.9%.

Overall, the geographic distribution of home improvement loans is excellent.

Small Business Loans

Fifth Third made 57 small business loans totaling \$9.0 million in low-income tracts. This represents 4.2% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 4.7%, and 4.8% by dollar amount, which is comparable to proxy. The percentage of loans by volume was below the 2014 aggregate of 4.5% and was comparable to the 2015 aggregate of 5.1%. As Fifth Third's performance is comparable to proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is good.

Fifth Third made 224 small business loans totaling \$37.8 million in moderate-income tracts. This represents 16.5% of small business loans by volume, which is below the percentage of businesses in these tracts at 18.7%, and 20.1% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 16.6% and was comparable to the 2015 aggregate of 16.9%. Given that Fifth Third's performance exceeded the aggregate of all lenders, but was below proxy, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 588 small business loans totaling \$80.4 million in middle-income tracts. This represents 43.3% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 41.2%, and 42.6% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 39.9% and exceeded the 2015 aggregate of 39.3%.

Fifth Third made 489 small business loans totaling \$61.3 million in upper-income tracts. This represents 36.0% of small business loans by volume, which is comparable with the percentage of businesses in these tracts at 35.3%, and 32.5% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 37.5% and was comparable to the 2015 aggregate of 37.6%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for home purchase, refinance, and home improvement loans.

Home Purchase Loans

Fifth Third made 565 loans totaling \$50.8 million to low-income borrowers. This represents 22.1% of home purchase loans by volume, which is comparable to the percentage of low-income families at 21.0%, and 11.9% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 9.3% and the 2015 aggregate of 10.5%.

Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 538 loans totaling \$61.3 million to moderate-income borrowers. This represents 21.0% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.5%, and 14.4% of loans by dollar amount, which is below proxy. The percentage of loans by volume was comparable with the 2014 aggregate of 21.5% and was below the 2015 aggregate of 21.4%. Given that Fifth Third's performance exceeded proxy and was comparable to the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 451 loans totaling \$66.9 million to middle-income borrowers. This represents 17.6% of home purchase loans by volume, which is below the percentage of middle-income families at 20.9%, and 15.7% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.5% and was below the 2015 aggregate of 19.6%.

Fifth Third made 802 loans totaling \$212.9 million to upper-income borrowers. This represents 31.4% of home purchase loans by volume, which is significantly below the percentage of upper-income families at 40.6%, and 50.0% of loans by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 32.0% and was below the 2015 aggregate of 31.6%.

A community contact indicated that low- and moderate-income individuals have difficulty qualifying for home purchase homes. Since Fifth Third's lending to low- and moderate-income borrowers was at an excellent level, the borrower distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 397 loans totaling \$31.2 million to low-income borrowers. This represents 17.9% of refinance loans by volume, which is slightly below the percentage of low-income families at 21.0%. The percentage of loans by dollar amount in these geographies at 9.9% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 8.8% and significantly exceeded the 2015 aggregate of 6.8%. Given that Fifth Third's performance was slightly below proxy and significantly exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 462 loans totaling \$42.5 million to moderate-income borrowers. This represents 20.8% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.5%, and 13.4% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.2% and exceeded the 2015 aggregate of 14.7%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 466 loans totaling \$55.7 million to middle-income borrowers. This represents 21.0% of refinance loans by volume, which is comparable to the percentage of middle-income families at 20.9%, and 17.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.5% and exceeded the 2015 aggregate of 17.7%.

Fifth Third made 758 loans totaling \$166.7 million to upper-income borrowers. This represents 34.2% of refinance loans by volume, which is below the percentage of upper-income families at 40.6%, while the percentage of loans by dollar amount at 52.7% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 32.8% and was below the 2015 aggregate of 35.4%.

Overall, the borrower distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made 33 loans totaling \$1.6 million to low-income borrowers. This represents 22.1% of home improvement loans by volume, which slightly exceeds the percentage of low-income families at 21.0%, and 15.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 8.7% and in 2015 significantly exceeded the 2015 aggregate of 9.6%. Given that Fifth Third's performance exceeded proxy and significantly exceeded the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 29 loans totaling \$1.6 million to moderate-income borrowers. This represents 19.5% of its home improvement loans by volume, which exceeds the percentage of moderate-income families at 17.5%, and 15.1% by dollar amount, which is below proxy. The percentage of loans by volume exceeds the 2014 aggregate of 19.5% and was below the 2015 aggregate of 18.5%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 37 loans totaling \$2.3 million to middle-income borrowers. This represents 24.8% of home improvement loans by volume, which exceeds the percentage of middle-income families at 20.9%, and 22.1% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 23.9% and was below the 2015 aggregate of 23.7%.

Fifth Third made 49 loans totaling \$4.9 million to upper-income borrowers. This represents 32.9% of home improvement loans by volume, which is below the percentage of upper-income families at 40.6%, and 47.0% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 43.3% and the 2015 aggregate of 45.5%.

The overall borrower distribution of home improvement loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 51.8% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 40.3% and the 2015 aggregate of 41.9%, but was significantly below the percentage of small businesses in the assessment area at 91.3%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (70.9%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, a community contact indicated small businesses need access to small-dollar loans. Without access to these types of loans, area businesses might find it difficult to grow and expand.

Community Development Loans

Fifth Third originated 23 community development loans totaling \$293.4 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization	
#	\$	#	\$	#	\$
5	210,000,000	3	28,132,178	15	55,300,000

Community development lending in the assessment area represent 4.9% of the total dollar volume of community development loans originated during the evaluation period. This ranks as Fifth Third’s fifth-highest percentage of community development lending during the evaluation period. Fifth Third’s performance is especially strong because of the high competition for community development loans and several large national banks in the area. Fifth Third only has 9.2% of the deposit market share. As such, Fifth Third is considered a leader in community development lending.

Examples of community development lending include, but are not limited to:

- A new loan and several renewals of a revolving line of credit to a city real estate advisors group that provides loans to LIHTC projects and commercial real estate developments in target communities
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies or for low- and moderate-income workers
- Multiple working capital loans to help retain and expand businesses located in designated areas specifically designated by the city to promote revitalization and economic development

The economic development and revitalization loans were deemed to be responsive, as a community contact indicated the need for these types of loans. Additionally, a community contact stated one of the most significant needs in the community is to garner more support for neighborhoods to become more economically diverse by helping them attract businesses.

Flexible Lending Programs

Fifth Third had 988 flexible lending loans in the assessment area: 557 loans were government loan programs, 41 were down payment assistance programs, and 390 were other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in the assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	2.3%	1.3%	4.8%	12.4%	8.9%	18.3%	56.6%	52.9%	43.7%	28.7%	37.0%	33.3%
Down Payment Assistance Programs	26.8%	24.7%	4.8%	19.5%	17.5%	18.3%	41.5%	42.4%	43.7%	12.2%	15.4%	33.3%
Other Flexible Lending Programs	3.1%	1.7%	4.8%	22.1%	14.1%	18.3%	51.0%	43.6%	43.7%	23.8%	40.6%	33.3%
Total	3.6%	2.0%	4.8%	16.5%	11.0%	18.3%	53.7%	49.2%	43.7%	26.1%	37.7%	33.3%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	13.8%	9.1%	21.0%	33.4%	29.4%	17.5%	26.8%	28.7%	20.9%	19.9%	26.9%	40.6%
Down Payment Assistance Programs	73.2%	72.7%	21.0%	12.2%	8.4%	17.5%	9.8%	12.5%	20.9%	4.9%	6.4%	40.6%
Other Flexible Lending Programs	20.0%	13.5%	21.0%	24.6%	18.2%	17.5%	19.0%	17.3%	20.9%	31.5%	47.3%	40.6%
Total	18.7%	12.4%	21.0%	29.0%	24.7%	17.5%	23%	24.1%	20.9%	23.9%	33.9%	40.6%

*Unknown tract data is not included in the above table.

Overall, Fifth Third’s lending in low-income tracts by number and dollar amount was below the percentage of owner-occupied units in these tracts; however, the number and dollar amount of down payment assistance programs significantly exceeded proxy. The percentage of lending by volume and dollar amount was below the percentage of owner-occupied units in moderate-income tracts.

Fifth Third’s lending by volume and dollar amount to low-income borrowers was below the percentage of low-income families in the assessment area. The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, particularly for government loan programs.

Fifth Third made extensive use of flexible lending practices in serving assessment area credit needs, as lending through flexible loan programs to moderate-income borrowers was excellent and lending in low- and moderate-income tracts and to low-income borrowers was good.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent. Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 284 qualified investments totaling \$93.9 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Community Services	
#	\$	#	\$	#	\$
120	59,829,606	12	63,150	116	600,469

Also included in the total number of qualified investments are 36 prior period investments totaling \$33.4 million. Overall, Fifth Third made 5.8% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 4.0% and greater than the percentage of branch offices at 3.4%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in affordable housing projects throughout the assessment area, which was an important need expressed by a community contact along with the need for a variety of services to lower-income individuals and families. Fifth Third made 140 donations totaling \$801,369 that supported local schools, small businesses, churches, food banks, health care, and affordable housing. The majority of Fifth Third’s donations (74.9%) supported services to low- and moderate-income individuals. Additionally 14.0% of the donation money supported an organization dedicated to affordable housing, better schools, safer streets, growing businesses and programs improving financial stability, which are all needs expressed by several community contacts.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated excellent. Retail services are accessible and Fifth Third is a leader in providing community development services in this assessment area.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation period, no banking centers were opened and four were closed. One of the closed banking centers was located in a moderate-income tract. Delivery services are accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 44 banking centers within this assessment area, including one in low-, 17 in moderate-, 12 in middle-, and 14 in upper-income census tracts. Fifth Third’s banking centers in this assessment area represent 3.4% of all its banking centers.

Fifth Third has a total of 51 full-service ATMs within this assessment area, including one in low-, 17 in moderate-, 18 in middle-, and 15 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: IN Indianapolis

Tract Category	Branches				Stand Alone ATMs						Demographics			
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %
	#	%			#	%	#	%	#	%	#	%		
Low	1	2.3%	0	0	Total 2	3.7%	1	2.0%	1	33.3%	51	12.4%	7.8%	4.9%
Moderate	17	38.6%	0	1	Total 18	33.3%	17	33.3%	1	33.3%	111	26.9%	24.7%	18.9%
Middle	12	27.3%	0	0	Total 19	35.2%	18	35.3%	1	33.3%	159	38.6%	40.3%	41.7%
Upper	14	31.8%	0	3	Total 15	27.8%	15	29.4%	0	0.0%	90	21.8%	27.3%	34.5%
Unknown	0	0.0%	0	0	Total 0	0.0%	0	0.0%	0	0.0%	1	0.2%	0.0%	0.0%
Total	44	100.0%	0	4	Total 54	100.0%	51	100.0%	3	100.0%	412	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered poor, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 4,550 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 3.8% of all community development services provided and equates to 2.19 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
158	472	54	3,866

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization. Community development services include 2,781 hours of providing financial literacy through local nonprofits and school programs, 1,514 hours serving on boards and committees, 143 hours providing technical assistance to non-profits and local business, and 112 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy activities. Several community contacts mentioned the need for banks to provide financial literacy training to consumers with poor credit history in order for them to restore and gain access to credit and help lower-income individuals feel less financially excluded.

NON-METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN SOUTHERN INDIANA**

Non-metropolitan Southern Indiana consists of Decatur, Dubois, Fayette, Franklin, Gibson, Knox, Orange, Parke, Perry, Pike, Ripley, Rush, and Spencer counties. The assessment area is comprised of 13 moderate-, 52 middle-, and 12 upper-income tracts. There are no low-income tracts or tracts with no-income designation in this assessment area. In 2014, 2015, and 2016, there were two¹⁶⁰ underserved/remote rural, middle-income tracts in Spencer County.

As of June 30, 2016, Fifth Third ranked third out of 34 institutions with 12.6% of the deposit market share. German American Bancorp had the majority of the market share with 17.2% of deposits, followed by Old National Bank with 13.7% of the market share. Deposits in this assessment area accounted for 0.7% of the Fifth Third's total deposits. This was 13.4% of deposits within the state and the 26th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 1,126 HMDA loans and 339 CRA loans, which represented 1.1% and 0.9% of the total loans originated during the evaluation period, respectively. This was the 23rd largest HMDA market and 27th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked fourth among 295 HMDA reporters in the assessment area and Fifth Third ranked 19th. German American Bancorp, MainSource Bank, and BB&T were the top three HMDA lenders in the assessment area. Fifth Third ranked 14th of 61 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were German American Bank, U.S. Bank, Old National Bank, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Three community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an organization focused on economic development in a rural county in Southern Indiana, stated this area has one of the strongest local economies in the state; therefore, unemployment is not a major issue. The contact also stated area builders are focused on constructing more expensive homes that generate higher profit margins, resulting in opportunities for banks to fund affordable housing projects. Otherwise, the contact believed banks are meeting the credit needs of the community.

The second contact, representing an organization that works to improve the quality of life in rural America, stated the job market and unemployment rates are stable. The contact stated that area banks are adequately involved and meeting credit needs in the community. The contact specifically mentioned Old National, Owen Community Bank, and Home Bank as being active working partners with the organization.

¹⁶⁰ Tracts 9529.00 and 9531.00

The third contact, representing a chamber of commerce in rural Southern Indiana, stated the local economy is growing and has an above-average rate of employment. The contact believed the level of banking competition in Southern Indiana is high and possibly overbanked. The contact specifically mentioned Heritage State Bank and German American Bancorp as being particularly active in the community.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 323,460. Less than 14.6% the population lived in moderate-income tracts. In addition, 75.9% of the population was 18 years of age or older, the legal age to enter into a contract.

Vincennes, located in Knox County, is the largest city in the assessment area. As of July 1, 2015, Vincennes had 18,012 residents and experienced a 2.2% decrease in population since April 1, 2010.¹⁶¹ The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase and decrease.¹⁶² The population within the assessment area experienced slight negative growth between 2010 and 2015, with Decatur County experiencing the largest increase and Rush County experiencing the largest decrease in population during this time period. Overall, this assessment area’s population appears to be fairly steady.

County	2010 Population	2015 Population	Population Percent Change
Decatur	25,740	26,521	3.0%
Dubois	41,889	42,461	1.4%
Fayette	24,277	23,434	-3.5%
Franklin	23,087	22,872	-0.9%
Gibson	33,503	33,775	0.8%
Knox	38,440	37,927	-1.3%
Orange	19,840	19,605	-1.2%
Parke	17,339	16,901	-2.5%
Perry	19,338	19,347	0.0%
Pike	12,845	12,594	-2.0%
Ripley	28,818	28,701	-0.4%
Rush	17,392	16,672	-4.1%
Spencer	20,952	20,715	-1.1%
Total	323,460	321,525	-0.6%

¹⁶¹ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

¹⁶² Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

Income Characteristics

In 2010 the assessment area’s median family income was less (\$55,148) than Indiana’s at \$58,944. The median family income in the assessment area increased each year during the evaluation period.

**Borrower Income Levels
Indiana State Non-Metropolitan Area**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$56,100	0 - \$28,049	\$28,050 - \$44,879	\$44,880 - \$67,319	\$67,320 - & above
2015	\$56,700	0 - \$28,349	\$28,350 - \$45,359	\$45,360 - \$68,039	\$68,040 - & above
2016	\$57,100	0 - \$28,549	\$28,550 - \$45,679	\$45,680 - \$68,519	\$68,520 - & above

Poverty rates increased in the assessment area from 1999 to 2015.¹⁶³ Knox County had the highest and Dubois County had the lowest poverty rate in 1999 and 2015 and Fayette County experienced the largest increase in poverty rate during this time period. In 2015, poverty rates for Knox, Parke, Fayette, Orange, and Rush counties and Indiana exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. The following table shows the poverty rates for 1999¹⁶⁴ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Decatur	9.3%	13.0%	39.8%
Dubois	5.3%	7.6%	43.4%
Fayette	7.9%	16.2%	105.1%
Franklin	7.1%	9.9%	39.4%
Gibson	8.2%	11.0%	34.1%
Knox	16.0%	19.1%	19.4%
Orange	12.4%	15.7%	26.6%
Parke	11.5%	17.2%	49.6%
Perry	9.4%	13.2%	40.4%
Pike	8.0%	11.1%	38.8%
Ripley	7.5%	10.6%	41.3%
Rush	7.3%	13.9%	90.4%
Spencer	6.9%	9.4%	36.2%
Indiana	9.5%	14.4%	51.6%
U.S.	11.8%	13.5%	14.4%

¹⁶³ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015):

<https://data.ers.usda.gov/reports.aspx?ID=17826>

¹⁶⁴ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 124,706 housing units and 87,079 families in the assessment area. From an income perspective, 14.6% of housing units, 11.5% of owner-occupied units, and 12.4% of families are located in moderate-income tracts. In the moderate-income census tracts, 46.1% of the housing units are either rental or vacant and 53.9% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in moderate-income census tracts, there appears to be limited credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 42 years old and 30.6% of the stock was built before 1950. However, within the assessment area, the median age of housing stock was 57 years in moderate-income tracts; therefore, there appears to be opportunity for Fifth Third to provide home improvement and rehabilitation loans in moderate-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$106,393 with an affordability ratio of 42.25. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Overall, median housing values decreased between 2010 and 2011-2015 and median family incomes increased; as a result, housing became more affordable in eight counties and slightly less affordable in five counties in this assessment area during the evaluation period. Median gross rents increased across the assessment area, with renters in Perry and Decatur counties experiencing the largest increase in rental rates. In 2010, about 35.1% of renters across the assessment area had rent costs greater than 30.0% of income. Increasing rental rates may make it harder for potential homebuyers to save up enough money toward a down payment for a home. A community contact stated there are opportunities for banks to fund affordable housing projects in Southern Indiana. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Indiana.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Decatur	\$118,500	39.57	\$115,100	43.27	\$610	\$739	21.1%
Dubois	\$129,600	40.80	\$137,700	38.86	\$613	\$605	-1.3%
Fayette	\$84,900	43.63	\$81,900	48.08	\$592	\$648	9.5%
Franklin	\$144,500	35.74	\$147,600	35.06	\$615	\$649	5.5%
Gibson	\$99,100	47.30	\$103,000	46.90	\$561	\$658	17.3%
Knox	\$84,700	46.66	\$84,700	50.44	\$549	\$623	13.5%
Orange	\$90,500	41.02	\$89,400	44.53	\$535	\$580	8.4%
Parke	\$91,600	44.23	\$88,200	46.24	\$541	\$579	7.0%
Perry	\$93,600	48.19	\$100,800	47.09	\$466	\$608	30.5%
Pike	\$80,700	51.08	\$88,400	50.23	\$528	\$620	17.4%
Ripley	\$138,200	34.80	\$129,800	39.42	\$659	\$678	2.9%
Rush	\$106,800	43.71	\$100,700	44.81	\$566	\$630	11.3%
Spencer	\$111,600	46.69	\$116,100	47.59	\$521	\$587	12.7%
Indiana	\$123,000	38.78	\$124,200	39.66	\$683	\$747	9.4%

According to Bankrate.com,¹⁶⁵ Indiana ranked 15th for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹⁶⁶

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Decatur	1:4,590
Dubois	1:1,863
Fayette	1:1,751
Franklin	1:402
Gibson	1:1,040
Knox	1:987
Orange	1:1,089
Parke	1:1,533
Perry	1:1,410
Pike	1:491
Ripley	1:1,600
Rush	1:4,956
Spencer	1:672
Indiana	1:1,590
U.S.	1:1,533

In November 2016, Franklin, Pike, Spencer, and Knox counties had the highest rates of foreclosure and Rush and Decatur counties had the lowest. In addition, seven counties had higher rates of foreclosure than Indiana and the nation.

Labor, Employment, and Economic Characteristics

According to the Indiana Department of Workforce Development,¹⁶⁷ manufacturing plays a prominent role in Southern Indiana's economy, but research and development, financial services, medical sector, and educational institutions also play a role. Below are some of the major employers in this assessment area:

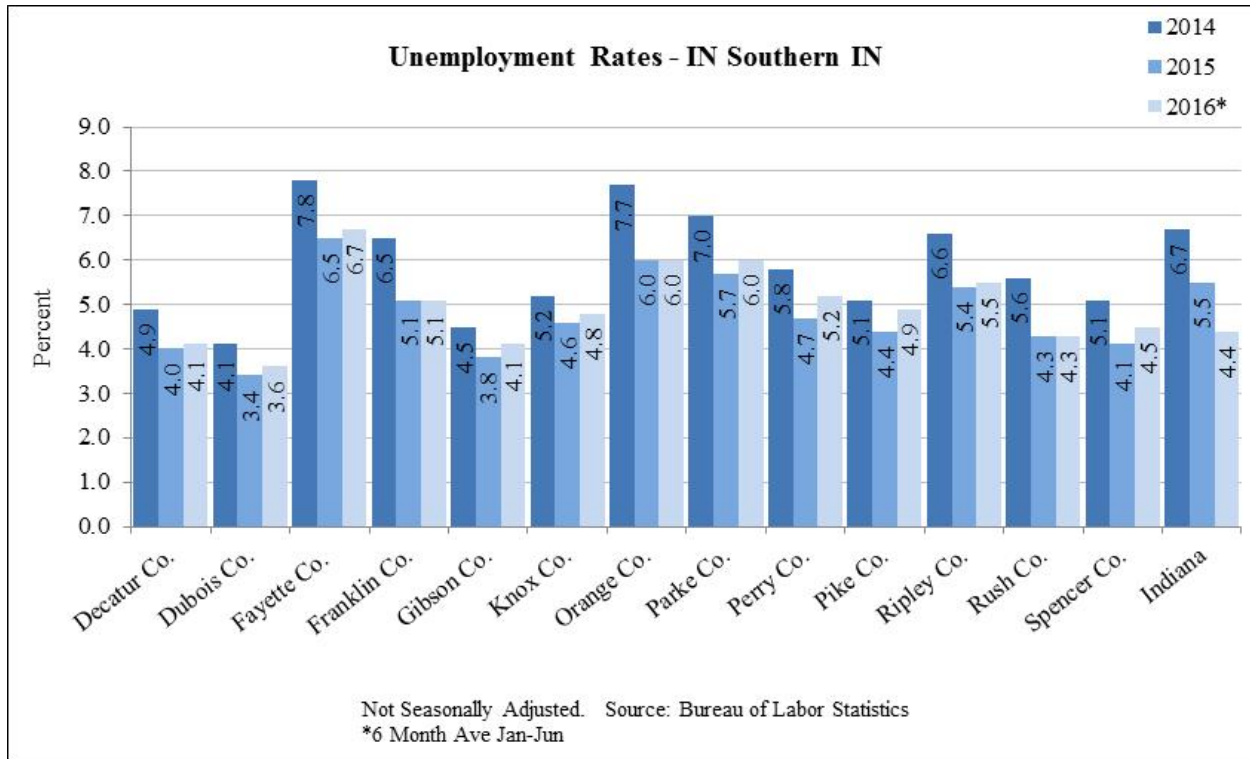
¹⁶⁵ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹⁶⁶ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

¹⁶⁷ Hoosiers by the Numbers: <http://www.hoosierdata.in.gov/nav.asp?id=197>

Major Employers by County	
Company	Location
Decatur County	
Delta Faucet Co	Greensburg
Decatur County Memorial Hospital	Greensburg
Indiana Auto & RV	Milford
Dubois County	
Ofs Brands	Huntingburg
Master Brand Cabinets	Ferdinand
Memorial Hospital-Healthcare	Jasper
Fayette County	
Fayette Regional Health System	Connersville
Stant Corp	Connersville
National Guard Armory	Connersville
Franklin County	
Hillenbrand Inc	Batesville
Margaret Mary Health/Community Hospital	Batesville
Sperry & Rice Manufacturing	Brookville
Gibson County	
Toyota Motor Manufacturing	Princeton
Duke Energy	Owensville
Gibson General Hospital	Princeton
Knox County	
Good Samaritan Hospital/Hospice	Vincennes
Schott Home Tech North America	Vincennes
Five Star Mining	Oaktown
Orange County	
West Baden Springs Hotel	West Baden Springs
French Lick Resort	French Lick
Wildwood Association	Paoli
Parke County	
Applied Extrusion Technologies	Rosedale
Formflex	Bloomingsdale
Rockville Correctional Facility	Rockville
Perry County	
Waupaca Foundry	Tell City
Branchville Correctional Facility	Branchville
Perry County Memorial Hospital	Tell City
Pike County	
Aes Corp	Petersburg
Indianapolis Power & Light Company	Petersburg
Solar Sources Inc.	Petersburg
Ripley County	
Ripley County Auditor	Versailles
McPhersons Inc.	Sunman
Kroger	Milan
Rush County	
Rush Memorial Hospital	Rushville
UAW	Rushville
Trane Commercial Systems	Rushville
Spencer County	
Holiday World Splashin' Safari	Santa Claus
AK Steel Corporation	Rockport
St. Meinrad of School of Theology/Archabbey	St. Meinrad

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 across the assessment area and Indiana.



Overall, Dubois County had the lowest and Fayette County had the highest unemployment rates during the evaluation period. In 2014 and 2015, only three counties (Fayette, Orange, Parke) had unemployment rates higher than Indiana’s; however, in 2016, only four counties (Decatur, Dubois, Gibson, Rush) had unemployment rates below Indiana’s. However, three community contacts stated that unemployment rates are stable and that Southern Indiana has above-average rates of employment.

According to *NewsNow Dubois County*,¹⁶⁸ Toyota Motor Manufacturing announced the investment of \$600 million into the Gibson County plant and adding 400 jobs in the process. Officials said the plant’s workforce will approach 6,000. Most of the funds will be applied to improving technology and infrastructure. The production of the new Highlanders will begin in the fall of 2019. Application for 400 new jobs will likely begin in early 2019. Toyota is a major employer in Gibson, Vanderburgh, and Knox counties.

¹⁶⁸ Ft. Branch (WTVW/WEHT). “Toyota Announces Gibson County Plant Expansion.” *NewsNow Dubois County*. January 25, 2017. - <http://newsnowdc.com/2017/01/25/toyota-announces-gibson-county-plant-expansion-to-add-400-jobs-wvideo/>

Combined Demographics Report

Assessment Area: IN Southern IN

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	15,304	17.6
Moderate-income	13	16.9	10,762	12.4	2,029	18.9	15,436	17.7
Middle-income	52	67.5	58,024	66.6	5,259	9.1	19,968	22.9
Upper-income	12	15.6	18,293	21	606	3.3	36,371	41.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	77	100.0	87,079	100.0	7,894	9.1	87,079	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	20,432	11,019	11.5	53.9	6,202	30.4	3,211	15.7
Middle-income	92,933	63,873	66.5	68.7	18,764	20.2	10,296	11.1
Upper-income	26,897	21,155	22	78.7	3,693	13.7	2,049	7.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	140,262	96,047	100.0	68.5	28,659	20.4	15,556	11.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,860	14.2	1,707	14.2	113	13.1	40	17.9
Middle-income	8,229	62.7	7,582	63	495	57.2	152	67.9
Upper-income	3,037	23.1	2,748	22.8	257	29.7	32	14.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	13,126	100.0	12,037	100.0	865	100.0	224	100.0
Percentage of Total Businesses:			91.7		6.6		1.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	72	3.4	70	3.3	2	11.1	0	0
Middle-income	1,554	72.3	1,541	72.3	13	72.2	0	0
Upper-income	522	24.3	519	24.4	3	16.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,148	100.0	2,130	100.0	18	100.0	0	.0
Percentage of Total Farms:			99.2		.8		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
NON-METROPOLITAN SOUTHERN INDIANA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated nine community development loans totaling \$59.2 million. Fifth Third has an excellent geographic distribution of loans and no gaps in lending. Fifth Third has an excellent distribution among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The good level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of refinance and home purchase lending based on the equal overall volume of lending, followed by small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding aggregate lending, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 513 refinance, 513 home purchase, 100 home improvement, 339 small business, and nine community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 1.0% is greater than the percentage of total deposits at 0.7% in this area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of Home Affordable Modification Program and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	0	0.0%	7	13.0%	42	77.8%	5	9.3%
<i>Percentage of Owner Occupied Units</i>		<i>0.0%</i>		<i>11.5%</i>		<i>66.5%</i>		<i>22.0%</i>

*Unknown tract data is not included in the above table.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	10	18.5%	20	37.0%	16	29.6%	3	5.6%
Percentage of Families by Family Income		17.6%		17.7%		22.9%		41.8%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications for a meaningful analysis. The percentage of other modifications in moderate-income tracts exceeded the percentage of owner occupied units in these geographies. Therefore, modifications helped to expand lending activities in these areas.

The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Refinance and home purchase lending had an equal number of originations. Refinance lending is excellent and home purchase lending is good. Performance for home improvement loans is also excellent. Small business lending is good. There were also no gaps in lending in the assessment area as shown in the table below:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Moderate	13	0	100.0%
Middle	52	0	100.0%
Upper	12	0	100.0%
Total	77	0	100.0%

Refinance Loans

Fifth Third made 61 refinance loans totaling \$4.1 million in moderate-income tracts. This represents 11.5% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 11.5%. The percentage of loans by dollar amount at 8.2% is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 11.9% and was comparable to the 2015 aggregate at 10.0%. As Fifth Third’s performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 328 refinance loans totaling \$30.9 million in middle-income tracts. This represents 63.9% of refinance loans by volume, which is below the owner-occupied units in these tracts at 66.5%. The percentage of refinance loans by dollar amount (61.2%) was below proxy. The percentage of loans by volume was below the 2014 aggregate at 68.7% and was below the 2015 aggregate at 67.3%.

Fifth Third made 124 refinance loans totaling \$15.4 million in upper-income tracts. This represents 24.2% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 22.0% and the dollar amount at 30.6% exceeded proxy. The percentage of loans by volume exceeded the 2014 aggregate at 19.0% and the 2015 aggregate at 22.6%.

Overall, the geographic distribution of refinance loans is excellent.

Home Purchase Loans

Fifth Third made 53 home purchase loans totaling \$4.6 million in moderate-income tracts. This represents 10.3% of its home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 11.5%, and 7.8% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 10.3% and was below the 2015 aggregate at 10.8%. As Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is good.

Fifth Third made 284 home purchase loans totaling \$30.1 million in middle-income tracts. This represents 55.4% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 66.5%, and 51.1% by dollar amount, which is also below proxy. The percentage of loans by volume was below the 2014 aggregate of 65.8% and was below the 2015 aggregate of 66.0%.

Fifth Third made 176 home purchase loans totaling \$24.2 million in upper-income tracts. This represents 34.3% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 22.0%, and 41.1% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 23.6% and exceeded the 2015 aggregate of 23.1%.

A community contact indicated the need for affordable housing since there are not many lower-cost housing options being constructed in the area. Because Fifth Third effectively penetrated moderate-income tracts, the overall geographic distribution of home purchase loans is good.

Home Improvement Loans

Fifth Third made 18 home improvement loans totaling \$593,000 in moderate-income tracts. This represents 18.0% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 11.5%, and 13.8% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 10.1% and the 2015 aggregate of 12.9%. As Fifth Third's performance exceeded the proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 66 home improvement loans totaling \$2.5 million in middle-income tracts. This represents 66.0% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 66.5%, and 58.7% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 73.3% and was below the 2015 aggregate of 70.3%.

Fifth Third made 16 home improvement loans totaling \$1.2 million in upper-income tracts. This represents 16.0% of home improvements loans by volume, which is below the percentage of owner-occupied units in these tracts at 22.0%, and 27.5% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 16.5% and was below the 2015 aggregate of 16.7%.

Based on the median age of housing stock in moderate-income tracts (57 years), there appears to be opportunities for Fifth Third to provide home improvement and rehabilitation loans. Because Fifth Third's level of penetration in moderate-income tracts was excellent, the overall geographic distribution of home improvement loans is excellent.

Small Business Loans

Fifth Third made 32 small business loans totaling \$6.3 million in moderate-income tracts. This represents 9.4% of small business loans by volume, which is below the percentage of businesses in these tracts at 14.2%. This also represents 19.0% of business loans by dollar amount, which exceeds the percentage of businesses in these tracts. The percentage of loans by volume was below the 2014 aggregate of 12.2% and the 2015 aggregate of 11.7%. Given that Fifth Third's performance was slightly below the aggregate of all lenders and proxy, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 188 small business loans totaling \$18.6 million in middle-income tracts. This represents 55.5% of small business loans by volume, which is below the percentage of businesses in these tracts at 63.0%, and 56.3% by dollar amount, also below proxy. The percentage of loans by volume was below the 2014 aggregate of 60.2% and the 2015 aggregate of 60.6%.

Fifth Third made 119 small business loans totaling \$8.2 million in upper-income tracts. This represents 35.1% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 22.8%, and 24.7% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 24.1% and exceeded the 2015 aggregate of 25.4%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for refinance, home purchase, and home improvement loans.

Refinance Loans

Fifth Third made 68 loans totaling \$4.2 million to low-income borrowers. This represents 13.3% of refinance loans by volume, which is below the percentage of low-income families in these tracts at 17.6%. The percentage of loans by dollar amount at 8.3% is below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 9.7% and the 2015 aggregate of 7.3%. Given Fifth Third's performance significantly exceeded the aggregate of all lenders and was slightly below proxy, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 131 loans totaling \$9.9 million to moderate-income borrowers. This represents 25.5% of refinance loans by volume, which exceeds the percentage of moderate-income families in these tracts at 17.7%, and 19.6% by dollar volume, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.0% and exceeded the 2015 aggregate of 17.0%. As Fifth Third's performance in refinance lending to moderate-income borrowers exceeded proxy and the aggregate of all borrowers, borrower distribution to moderate-income borrowers is excellent.

Fifth Third made 122 loans totaling \$11.3 million to middle-income borrowers. This represents 23.8% of refinance loans by volume, which exceeds the percentage of middle-income families at 22.9%, and 22.4% by dollar amount, which is comparable to the proxy. The percentage of loans by volume exceeded the 2014 aggregate of 23.3% and was comparable to the 2015 aggregate of 20.7%.

Fifth Third made 173 loans totaling \$22.6 million to upper-income borrowers. This represents 33.7% of refinance loans by volume, which is below the percentage of upper-income families at 41.8%, while the percentage of loans by dollar amount at 44.8% exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 32.6% and was comparable to the 2015 aggregate of 35.5%.

Overall, the borrower distribution of refinance loans is excellent.

Home Purchase Loans

Fifth Third made 78 loans totaling \$5.7 million to low-income borrowers. This represents 15.2% of home purchase loans by volume, which is below the percentage of low-income families at 17.6%, and 9.7% by dollar amount, which is also below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 7.7% and the 2015 aggregate of 8.8%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders and was slightly below proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 160 loans totaling \$15.3 million to moderate-income borrowers. This represents 31.2% of home purchase loans by volume, which significantly exceeds the percentage of moderate-income families at 17.7%, and 26.0% of loans by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.1% and exceeded the 2015 aggregate of 23.4%.

Because Fifth Third's performance significantly exceeded proxy and exceeded the aggregate of all borrowers, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 136 loans totaling \$16.0 million to middle-income borrowers. This represents 26.5% of home purchase loans by volume, which exceeds the percentage of middle-income families at 22.9%, and 27.2% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.9% and exceeded the 2015 aggregate of 21.2%.

Fifth Third made 127 loans totaling \$20.4 million to upper-income borrowers. This represents 24.8% of home purchase loans by volume, which is significantly below the percentage of upper-income families at 41.8%, and 34.6% of loans by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 28.4% and was slightly below the 2015 aggregate of 26.4%.

Overall, the borrower distribution of home purchase loans is excellent.

Home Improvement Loans

Fifth Third made 16 loans totaling \$567,000 to low-income borrowers. This represents 16.0% of home improvement loans by volume, which is comparable to the percentage of low-income families at 17.6%, and 13.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 12.6% and in 2015 was below the 2015 aggregate of 12.3%. Given that Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 31 loans totaling \$1.1 million to moderate-income borrowers. This represents 31.0% of home improvement loans by volume, which significantly exceeded the percentage of moderate-income families at 17.7%, and 25.1% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.3% and the 2015 aggregate of 20.2%. Given that Fifth Third’s performance exceeded the aggregate of all lenders and significantly exceeded proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 25 loans totaling \$1.1 million to middle-income borrowers. This represents 25.0% of home improvement loans by volume, which exceeds the percentage of middle-income families at 22.9%, and 24.6% by dollar amount, which also exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 26.9% and was comparable to the 2015 aggregate of 27.1%.

Fifth Third made 27 loans totaling \$1.6 million to upper-income borrowers. This represents 27.0% of home improvement loans by volume, which is significantly below the percentage of upper-income families at 41.8%, and 37.0% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 35.5% and was below the 2015 aggregate of 37.5%.

The overall borrower distribution of home improvement loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 61.1% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance in 2014 exceeded the 2014 aggregate of 42.8% and the 2015 aggregate of 46.9%, but was significantly below the percentage of small businesses in the assessment area at 91.7%. Also, during the evaluation period, Fifth Third was able to makes a relatively high percentage of small-dollar loans (80.5%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated nine community development loans totaling \$59.2 million during the review period as shown in the table below:

Economic Development		Revitalization and Stabilization	
#	\$	#	\$
5	34,000,000	4	25,227,366

Community development lending in the assessment area represents 1.0% of the total dollar volume of community development loans originated by Fifth Third during the review period. This ranks as Fifth Third's 26th highest percentage of community development lending during the evaluation period, as there are fewer opportunities to originate community development loans in a non-metropolitan assessment area and there is significant competition in the area. As such, Fifth Third's makes a relatively high level of community development loans in this assessment area.

Examples of community development lending include, but are not limited to:

- Working capital loans to promote economic development by financing small businesses to support retention of low- and moderate-income workers
- Working capital loans to help retain and expand businesses located in areas specifically designated to promote revitalization and economic development

Flexible Lending Programs

Fifth Third had 425 flexible lending loans in this assessment area: 328 government loans, ten down payment assistance loans, and 87 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third's flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	0.0%	0.0%	0.0%	12.5%	10.4%	11.5%	60.7%	58.3%	66.5%	26.8%	31.3%	22.0%
Other Flexible Lending Programs	0.0%	0.0%	0.0%	14.9%	10.9%	11.5%	62.1%	61.6%	66.5%	23.0%	27.6%	22.0%
Total	0.0%	0.0%	0.0%	12.7%	10.3%	11.5%	61.6%	59.4%	66.5%	25.6%	30.3%	22.0%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	15.2%	10.8%	17.6%	39.9%	35.4%	17.7%	28.0%	32.1%	22.9%	14.3%	19.6%	41.8%
Down Payment Assistance Programs	100.0%	100.0%	17.6%	0.0%	0.0%	17.7%	0.0%	0.0%	22.9%	0.0%	0.0%	41.8%
Other Flexible Lending Programs	13.8%	12.0%	17.6%	33.3%	27.3%	17.7%	20.7%	21.4%	22.9%	28.7%	37.6%	41.8%
Total	16.9%	12.7%	17.6%	37.6%	33.3%	17.7%	25.9%	29.6%	22.9%	16.9%	22.4%	41.8%

*Unknown tract data is not included in the above table.

Overall, Fifth Third’s lending in moderate-income tracts by number and dollar amount exceeded the percentage of owner-occupied units for government loans and other flexible lending programs. There were no down payment assistance loans made in the moderate-income tracts.

Fifth Third’s lending by volume and dollar amount to low-income borrowers was slightly below percentage of low-income families and exceeded the percentage of moderate-income families in the assessment area.

Fifth Third made extensive use of flexible lending practices in serving the assessment area’s credit needs, as lending through flexible loan programs to moderate-income borrowers and in moderate-income tracts was excellent, while lending to low-income borrowers was good.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent.

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 84 qualified investments totaling \$20.6 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Community Services	
#	\$	#	\$	#	\$
20	15,109,539	29	49,038	27	36,900

Also included in the total number of qualified investments are eight prior period investments totaling \$5.4 million. Overall, Fifth Third made 1.3% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 0.7% and slightly greater than the percentage of branch offices at 1.2%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area, which was an important need expressed by a community contact. Fifth Third made 57 donations totaling \$87,438 that supported chambers of commerce, charitable organizations, and small businesses. The majority of Fifth Third’s donations (56.1%) supported economic development, particularly to various local chambers of commerce.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated adequate. Retail services are accessible and Fifth Third provided an adequate level of community development services in the assessment area.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and to low- and moderate-income households. Since the previous evaluation period, no banking centers were opened or closed. Delivery services are accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 16 banking centers within this assessment area, including four in moderate-, six in middle-, and six in upper-income census tracts. Fifth Third’s banking centers in this assessment area represent 1.2% of all its banking centers. Fifth Third has a total of 21 full-service ATMs within this assessment area, including four in moderate-, ten in middle-, and seven in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts. There are no low-income geographies in this assessment area.

Geographic Distribution of Branches & ATMS

Assessment Area: IN Southern IN

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches				Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%	Open #	Closed #	#	%	#	%	#	%	#	%	%	%	
Low	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Moderate	4	25.0%	0	0	Total	4	18.2%	4	19.0%	0	0.0%	13	16.9%	13.8%	14.3%
Middle	6	37.5%	0	0	Total	10	45.5%	10	47.6%	0	0.0%	52	67.5%	66.3%	62.3%
Upper	6	37.5%	0	0	Total	8	36.4%	7	33.3%	1	100.0%	12	15.6%	19.9%	23.4%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Total	16	100.0%	0	0	Total	22	100.0%	21	100.0%	1	100.0%	77	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within moderate-income tracts was considered excellent, as the distribution of branches exceeded the percentage of census tracts and households in these tracts.

Community Development Services

Fifth Third provided an adequate level of community development services in this assessment area. During the evaluation period, Fifth Third employees provided 813 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 0.7% of all community development services provided and equates to 0.39 annualized persons (ANP).

Economic Development	Community Services
<i># of Hours</i>	<i># of Hours</i>
221	592

Employees provided financial expertise through leadership positions in multiple community organizations that promote community and economic development. Community development services include 705 hours serving on boards and committees, 42 hours of providing financial literacy through local nonprofits and school programs, 38 hours participating in foreclosure prevention outreach, and 28 hours providing technical assistance to non-profits.

METROPOLITAN and NON-METROPOLITAN AREAS
(Limited-scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF INDIANA

- **Bloomington MSA**
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 3.5% of its branches in Indiana.
 - As of June 30, 2016, Fifth Third had \$194,432 in deposits in this assessment area, representing a market share of 7.8% and 3.3% of its statewide deposits.
- **Fort Wayne MSA**
 - As of June 30, 2016, Fifth Third operated eight branches in the assessment area, representing 9.4% of its branches in Indiana.
 - As of June 30, 2016, Fifth Third had \$211,105 in deposits in this assessment area, representing a market share of 3.1% and 3.6% of it statewide deposits.
- **Lafayette-W. Lafayette MSA**
 - As of June 30, 2016, Fifth Third operated four branches in the assessment area, representing 4.7% of its branches in Indiana.
 - As of June 30, 2016, Fifth Third had \$106,469 in deposits in this assessment area, representing a market share of 4.0% and 1.8% of it statewide deposits.
- **Terre Haute MSA**
 - As of June 30, 2016, Fifth Third operated seven branches in the assessment area, representing 8.2% of its branches in Indiana.
 - As of June 30, 2016, Fifth Third had \$224,805 in deposits in this assessment area, representing a market share of 8.9% and 3.9% of it statewide deposits.
- **Non-metropolitan Northern Indiana**
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 3.5% of its branches in Indiana.
 - As of June 30, 2016, Fifth Third had \$57,127 in deposits in this assessment area, representing a market share of 4.9% and 1.0% of it statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE STATE OF INDIANA**

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with Fifth Third's performance in the state. The conclusions regarding performance are provided in the following table. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Bloomington MSA	Below	Consistent	Below
Fort Wayne MSA	Below	Consistent	Below
Lafayette-W. Lafayette MSA	Below	Below	Below
Non-metropolitan Northern Indiana	Below	Below	Below
Terre Haute MSA	Below	Below	Below

For the lending test, Fifth Third received an “Outstanding” rating in Indiana. Performance in all five of the limited-scope assessment areas was below Fifth Third’s performance for the state. Although below the state performance, lending levels were good or adequate for the geographic distribution of loans and good for the borrower geographic distribution of loans in all five limited-scope assessment areas. There was a good level of community development loans in the Fort Wayne assessment area and adequate levels of community development loans in the remaining four limited-scope assessment areas. A low level of lending gaps was noted in three limited-scope assessment areas and no gaps in lending were identified the Terre Haute and non-metropolitan Northern Indiana assessment areas.

For the investment test, Fifth Third received an “Outstanding” rating in Indiana. While investment activity was consistent with the state in two of the five limited-scope assessment areas, performance in the Lafayette-W. Lafayette, Terre Haute, and non-metropolitan Northern Indiana assessment areas was below Fifth Third’s performance for the state. Although below the state performance, investment activity was good in the Lafayette-W. Lafayette, Terre Haute, and non-metropolitan Northern Indiana assessment areas. The weaker performance was primarily due to a lower level of qualified investments and contributions relative to Fifth Third’s operational presence in the assessment area.

For the service test, Fifth Third received an “Outstanding” rating in Indiana. Performance in all five of the limited-scope assessment areas was below Fifth Third’s performance for the state. Retail services were good in four limited-scope assessment areas and adequate in the Bloomington assessment area. The weaker retail services performance in the Bloomington assessment area was primarily due to less accessibility of delivery systems in lower-income geographies. Qualified community development services were good in the Fort Wayne and Terre Haute assessment areas and poor in the Bloomington assessment area. The weaker community development services performance was primarily due to a lower level of hours dedicated to providing qualified services relative to Fifth Third’s operational presence in these assessment areas. Qualified community development services were excellent in the remaining two limited-scope assessment areas.

The performance in the limited-scope assessment areas did not change the overall state rating.

COMMONWEALTH OF KENTUCKY

CRA RATING for Commonwealth of Kentucky:¹⁶⁹ Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and good to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- An adequate level of community development loans;
- Extensive use of flexible lending practices in serving the assessment area's credit needs;
- A significant level of qualified community development investments and grants;
- Occasionally in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A relatively high level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted the Lexington-Fayette MSA. Limited-scope reviews were performed on the remaining three assessment areas, the Owensboro MSA, and non-metropolitan Eastern and Western Kentucky. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

¹⁶⁹ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The Lexington-Fayette assessment area received greater weight in determining the CRA rating for Kentucky, as it had the largest lending volumes and number of banking centers and ranked first in Kentucky's share of deposits during the evaluation period. Lastly, the Lexington-Fayette assessment area represented 46.4% of the banking centers, 70.5% of deposits, and 62.5% of lending in Kentucky.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COMMONWEALTH OF KENTUCKY

Lending activity accounted for 1.9% of the Fifth Third's total lending activity, while deposits accounted for 1.5% of the Fifth Third's total deposits. HMDA-reportable lending in Kentucky represented 1.9% of the Fifth Third's total HMDA lending, while CRA-reportable lending represented 1.6% of the Fifth Third's total CRA lending. As of June 30, 2016, Fifth Third ranked fourth among 190 insured institutions and has a deposit market share of 7.3% and 28 banking center locations within Kentucky.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF KENTUCKY

Lending Test

Fifth Third's performance under the lending test within the assessment areas located in Kentucky is rated "High Satisfactory." Fifth Third's lending reflects a good responsiveness to the credit needs in the Lexington-Fayette assessment area. Lending reflects an adequate responsiveness to credit needs in non-metropolitan Eastern, non-metropolitan Western Kentucky, and the Owensboro assessment area.

Lending Activity

In Kentucky, Fifth Third originated 8,304 HMDA loans totaling \$1.1 billion and 2,051 small business loans totaling \$256.4 million during the evaluation period.

Lending activity in Kentucky is good. Lending activity in the Lexington-Fayette assessment area is good and adequate in the remaining three assessment areas.

Geographic and Borrower Distribution

The distribution of loans among geographies is excellent in the assessment areas located in Kentucky. The geographic distribution is excellent in the Lexington-Fayette assessment area and good in non-metropolitan Western Kentucky and the Owensboro assessment area. The geographic distribution is adequate in non-metropolitan Eastern Kentucky.

Further, a low level of lending gaps was identified within all four assessment areas located in Kentucky.

Overall, the distribution of loans among borrowers of different income levels is excellent and good to businesses of different revenue sizes is good in the assessment areas located in Kentucky. The borrower distribution is excellent in the Lexington-Fayette assessment area and good in the remaining three assessment areas. The distribution to businesses of different revenue sizes is good in the Lexington-Fayette and non-metropolitan Eastern Kentucky assessment areas and adequate in the remaining two assessment areas.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Kentucky, Fifth Third originated 13 community development loans totaling \$91.0 million, which represented 1.5% of its community development lending by dollar volume. This represents an adequate level of community development lending in Kentucky. Fifth Third made an adequate level of community development loans in the Lexington-Fayette assessment area and a good level of community development loans in non-metropolitan Eastern Kentucky. Fifth Third did not make any community development loans in non-metropolitan Western Kentucky or the Owensboro assessment area, which is considered to be a poor level of community development lending.

Flexible Lending

Fifth Third made extensive use of flexible lending practices within the assessment areas in Kentucky.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Kentucky is rated "Outstanding." Fifth Third funded \$25.2 million in qualified community development investments in Kentucky during the evaluation period that consisted of \$15.9 million obtained from new investments made during the current review period and \$9.3 million from prior period investments. The majority of investments were LIHTCs. Fifth Third's level of qualified investments is excellent in the Owensboro assessment area. The level of qualified investments is considered good in the Lexington-Fayette and non-metropolitan Eastern Kentucky assessment areas and poor in non-metropolitan Western Kentucky.

Fifth Third was considered responsive to the credit and community development needs in the state; therefore, investments without a purpose, mandate, or function of serving Fifth Third's assessment areas in Kentucky was considered to positively impact state performance. Fifth Third made \$16.1 million in qualified investments, typically in the form of LIHTCs that benefited counties within Kentucky, but outside Fifth Third's delineated assessment areas.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test within the assessment areas located in Kentucky is rated "High Satisfactory." Its performance is good in the Lexington-Fayette and Owensboro assessment areas and adequate in non-metropolitan Eastern Kentucky and non-metropolitan Western Kentucky.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution is good in all four assessment areas.

Fifth Third's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. No branches opened or closed in low- or moderate-income tracts during the evaluation period.

Banking services and business hours do not vary in a way that inconveniences any portions of Fifth Third's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third provides a relatively high level of community development services in Kentucky. Fifth Third's performance is excellent in non-metropolitan Western Kentucky and good in the Lexington-Fayette assessment area. The level of community development services is adequate in non-metropolitan Eastern Kentucky and poor in the Owensboro assessment area.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
LEXINGTON-FAYETTE KY MSA #30460**

The Lexington-Fayette KY MSA consists of Bourbon, Clark, Fayette, Jessamine, Scott, and Woodford counties. The assessment area is comprised of 12 low-, 32 moderate-, 47 middle-, and 38 upper-income tracts.

As of June 30, 2016, Fifth Third ranked third out of 37 institutions with 11.9% of the deposit market share. Central Bank & Trust Company had the majority of the market share 16.6% of deposits, and JPMorgan Chase ranked second with 14.8% of the market share. Deposits in this assessment area accounted for 1.1% of the Fifth Third's total deposits. This was 70.5% of deposits within the state and 19th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 1,220 HMDA loans and 441 CRA loans, which represented 1.2% and 1.1% of the total loans originated during the evaluation period, respectively. This was the 21st largest HMDA market and 20th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked eighth among 318 HMDA reporters in the assessment area and Fifth Third ranked 47th. Wells Fargo Bank, Central Bank & Trust Company, Guardian Savings Bank, and JPMorgan Chase Bank were the top four HMDA lenders in the assessment area. Fifth Third ranked 11th of 65 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Central Bank & Trust Company, Chase Bank USA, and Synchrony Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Two community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a philanthropic health legacy foundation that awards grants to nonprofits that address social determinants related to health, particularly in urban areas, stated there is a significant need for financial institutions to fund small businesses and entrepreneurs with small-dollar loans to promote economic development in the community. The contact also believed there is a large unbanked population in the area, who do not have access to credit, making them invisible to the mainstream financial system. These individuals tend to be lower-income and because they do not have access to financial services are typically unable to buy homes or build businesses. Financial institutions have an opportunity to attract the unbanked by conducting community outreach and offering financial literacy training and fee-free banking products. Lastly, the contact indicated smaller banks experience difficulties in competing with larger banks, which have more resources to deal with increasing regulatory burdens.

The second contact, representing a micro-lender who extends small-dollar loans to support entrepreneurship, stated the economic conditions are improving and the regional economy is attracting more advanced manufacturing jobs with higher average wages. The contact believed area banks could be more proactive in working with and providing financial literacy training to individuals with poor or no credit, as a good credit score allows people to save money with lower interest rates, be approved for loans (personal and business) and rentals more easily, obtain better insurance rates, and avoid security deposits on cell phones and utilities.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 472,099. About 35.3% of the population lived in low- and moderate-income tracts. In addition, 77.3% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Lexington-Fayette MSA is the 106th largest in terms of population in the nation.¹⁷⁰ Fayette County is the largest county in the assessment area and the second-most populous county in Kentucky.¹⁷¹ Lexington (located in Fayette County) is the largest city in assessment area and is the 61st most populous city in the U.S. Lexington has 314,488 residents and its population growth increased by 20.4% between 2000 and 2015.¹⁷² According to Moody’s Analytics, in 2015, the migration flow into Lexington was 2,844 residents, with a positive annual net migration from 2012 through 2015. In contrast, the next largest cities in the assessment area are Georgetown, Nicholasville, Winchester, Paris, and Versailles, which have 32,356, 29,754, 18,446, 9,870, and 9,146, respectively.¹⁷³

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase.¹⁷⁴ The population within the assessment area experienced positive growth between 2010 and 2015, with Scott County experiencing the greatest growth and Clark County experiencing the least growth in population during this time period. Moody’s Analytics cited strong population trends are supporting housing demand.

County	2010 Population	2015 Population	Population Percent Change
Bourbon	19,985	20,116	0.7%
Clark	35,613	35,757	0.4%
Fayette	295,803	314,488	6.3%
Jessamine	48,586	51,961	6.9%
Scott	47,173	52,420	11.1%
Woodford	24,939	25,793	3.4%
Total	472,099	500,535	6.0%

Income Characteristics

¹⁷⁰ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

¹⁷¹ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

¹⁷² U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

¹⁷³ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

¹⁷⁴ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):
<http://www.census.gov/quickfacts/table/PST045216/00>

In 2010 the MSA median family income was greater (\$62,624) than Kentucky’s at \$52,046. The MSA median family income increased in 2014, 2015, and declined slightly in 2016.

**Borrower Income Levels
Lexington-Fayette, KY MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2014	\$67,800	0	- \$33,899	\$33,900	- \$54,239	\$54,240	- \$81,359	\$81,360	- & above
2015	\$68,200	0	- \$34,099	\$34,100	- \$54,559	\$54,560	- \$81,839	\$81,840	- & above
2016	\$66,100	0	- \$33,049	\$33,050	- \$52,879	\$52,880	- \$79,319	\$79,320	- & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.¹⁷⁵ Woodford County had the lowest poverty rates in 1999 and 2015, while Bourbon County had highest poverty rate in 1999 and Fayette County had the highest poverty rate in 2015. Jessamine County experienced the largest increase in poverty rates during this period. In 2015, Fayette County’s poverty rate exceeded and Jessamine County’s poverty rate was equivalent to the state-level poverty rate of Kentucky. In 2015, Kentucky’s poverty rates exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.¹⁷⁶ The following table shows the poverty rates for 1999¹⁷⁷ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Bourbon	14.0%	14.8%	5.7%
Clark	10.6%	15.4%	45.3%
Fayette	12.9%	19.1%	48.1%
Jessamine	10.5%	18.3%	74.3%
Scott	8.8%	13.1%	48.9%
Woodford	7.3%	11.6%	58.9%
Kentucky	15.8%	18.3%	15.8%
U.S.	11.8%	13.5%	14.4%

¹⁷⁵ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹⁷⁶ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

¹⁷⁷ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 205,317 housing units and 118,564 families in the assessment area. From an income perspective, 36.8% of housing units, 25.9% of owner-occupied units, and 31.3% of families are located in low- or moderate-income tracts. Nearly three-quarters of the housing units in the low-income census tracts are either rental or vacant (72.6%). In the moderate-income census tracts, over half of the housing units are either rental or vacant (57.8%) and 42.2% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 32 years old, with 13.0% of the stock built before 1950. The oldest housing stock was in Bourbon County with a median age of 40 years, while the newest was 19 years in Scott County. Within the assessment area, the median age of housing stock was 40 years in low-income tracts and 37 years in moderate-income tracts. Therefore, there appears to be some opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$156,580 with an affordability ratio of 30.98. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. While median housing values increased between 2010 and 2011-2015, housing affordability varied across the assessment area due to median household incomes. During the evaluation period, the most affordable housing was in Scott County and the least affordable was in Fayette County. Overall, median gross rents increased at a fairly substantial rate across the assessment area, with renters in Bourbon and Jessamine counties experiencing the largest increase in rental rates and renters in Woodford County experiencing the smallest increase in gross rental rates. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Kentucky. According to Moody's Analytics, households are forming more quickly, and house prices in the Lexington area have appreciated more over the last year than in any other part of the state. Continued population growth will keep demand for single-family housing high.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Bourbon	\$137,700	29.67	\$139,600	32.38	\$581	\$690	18.8%
Clark	\$134,500	34.63	\$142,700	33.61	\$631	\$698	10.6%
Fayette	\$159,200	29.82	\$168,100	29.61	\$693	\$778	12.3%
Jessamine	\$150,200	31.62	\$160,400	31.52	\$670	\$771	15.1%
Scott	\$158,700	36.56	\$164,600	38.29	\$684	\$760	11.1%
Woodford	\$180,800	31.27	\$181,300	32.40	\$724	\$725	0.1%
Kentucky	\$116,800	35.60	\$123,200	35.50	\$601	\$675	12.3%

According to Bankrate.com,¹⁷⁸ Kentucky ranked 43rd for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹⁷⁹

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Bourbon	N/A
Clark	N/A
Fayette	1:3,790
Jessamine	1:1,366
Scott	N/A
Woodford	N/A
Kentucky	1:4,270
U.S.	1:1,533

In November 2016, Jessamine County had the highest rate of foreclosure in the assessment area and the third highest rate in Kentucky. According to Moody’s Analytics, a 2015 state law allowing foreclosures to clear the housing market more quickly is benefiting Lexington disproportionately, as foreclosures have plummeted and home price increases no longer lag the U.S. pace. As shown above, the foreclosure rate in Fayette County is far below the national rate, but is still higher than Kentucky’s rate of foreclosure.

Building permits for this MSA, Kentucky, and the nation are included in the following table for 2014, 2015, and 2016.¹⁸⁰

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Lexington-Fayette MSA	1,888	2,206	16.8%	2,732	23.8%
Kentucky	9,421	10,566	12.2%	12,798	21.1%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The MSA experienced a significant increase in the number of housing permits issued between 2014 and 2016. The increase in the number of permits could indicate there is a growing demand for home purchase loans in the MSA and in Kentucky during the evaluation period. According to Moody’s Analytics, demand for new housing starts has increased and projected population growth will keep demand high for single-family housing in the Lexington area.

¹⁷⁸ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹⁷⁹ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

¹⁸⁰ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Lexington area economy is in expansion due to a strong healthcare industry, competitive business costs, favorable population trends, and a highly educated workforce. Contributing to the area’s economic strengths is the large insurance industry in Kentucky, which benefits from Medicaid expansion, low business costs (especially office rents), and the presence of a large research university. Economic weaknesses include a nationwide push to close coal power plants, rising energy costs, and high tuition rates limit students’ disposable incomes. A community contact stated the regional economy is attracting more advanced manufacturing jobs with higher average wages. According to Moody’s Analytics, machinery manufacturing, the second largest factory segment, is well-positioned to rebound in 2017. The prominent auto industry has been adding jobs and construction equipment manufacturing is benefiting from increased nationwide residential construction.

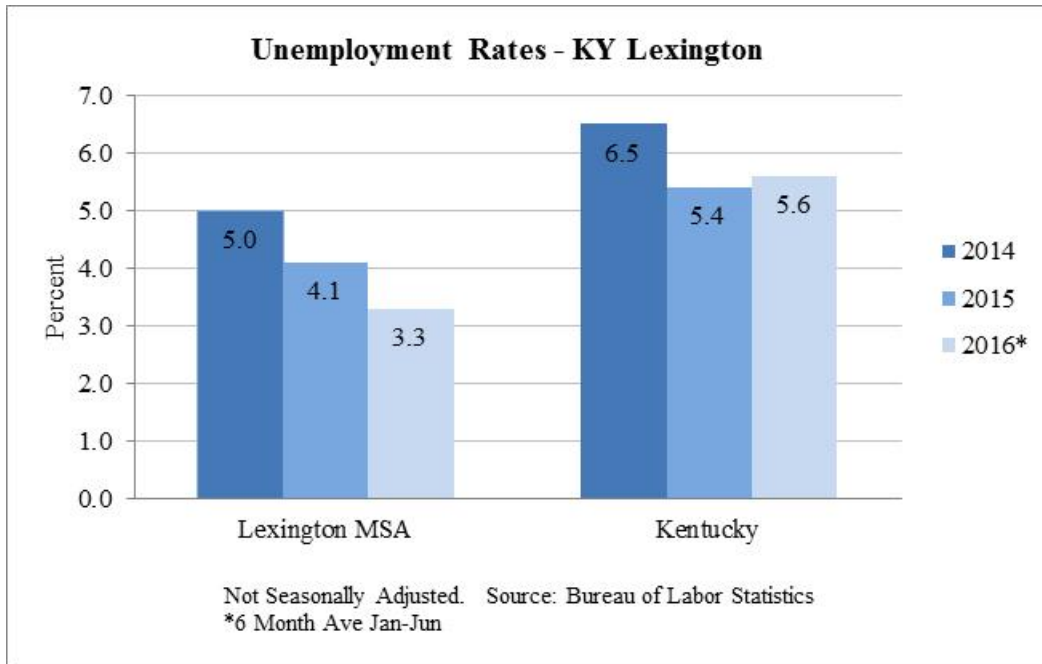
According to Commerce Lexington Economic Development¹⁸¹ the top 15 employers in the MSA in 2016 were:

Company (County)	Number of Employees
University of Kentucky (Fayette)	12,500
Toyota Motor Manufacturing (Scott)	7,900
Kentucky Health & Family Services Cabinet (Franklin)	7,444
Fayette County Public Schools	5,172
Transportation Cabinet of Kentucky (Franklin)	4,848
Conduent (Fayette)	3,100
Lexington-Fayette Urban County Government (Fayette)	2,837
Eastern Kentucky University (Madison)	2,240
Lexmark International Inc. ¹⁸² (Fayette)	2,200
Wal-Mart (Fayette)	2,027
KentuckyOne Health (Fayette)	1,757
Scott County Public Schools	1,655
Veterans Medical Center (Fayette)	1,565
Baptist Health (Fayette)	1,558
Kentucky Department of Education (Franklin)	1,475

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 for the MSA and Kentucky.

¹⁸¹ Commerce Lexington ED: <http://www.locateinlexington.com/Data-Facts-Figures-Major-Employers.aspx>

¹⁸² In the Fortune 1000 are Lexmark International (#638)and Tempur Sealy International (#699) with 420 employees - <https://www.geolounge.com/fortune-1000-companies-list-2016/>



The unemployment rates declined each year in the MSA and were considerably lower than Kentucky’s during this time period.

According to *WKYT News*, in February 2016, Lexmark International, Inc. announced it was cutting 500 jobs (4.0% of its workforce), at least 143 employees in Lexington will be affected by the layoffs. The company said the layoffs, affecting part of its worldwide workforce, are part of a 12-month restructuring plan expected to save the company \$67 million in 2016 and \$100 million in 2017. According to a University of Kentucky professor of economics, even if all 500 layoffs happened at Lexmark’s headquarters, it would impact less than 1.0% of employment in the Lexington area.¹⁸³

¹⁸³ WKYT News Staff. “Lexmark to layoff 143 Lexington employees.” *WKYT News*. March 23, 2016. - <http://www.wkyt.com/content/news/373219481.html>

Combined Demographics Report

Assessment Area: KY Lexington

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	9.3	6,987	5.9	2,158	30.9	27,630	23.3
Moderate-income	32	24.8	30,127	25.4	5,350	17.8	19,368	16.3
Middle-income	47	36.4	45,050	38	4,483	10	23,784	20.1
Upper-income	38	29.5	36,400	30.7	1,450	4	47,782	40.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	129	100.0	118,564	100.0	13,441	11.3	118,564	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	16,433	4,502	4	27.4	9,843	59.9	2,088	12.7
Moderate-income	59,071	24,909	21.9	42.2	28,309	47.9	5,853	9.9
Middle-income	74,924	46,136	40.5	61.6	23,498	31.4	5,290	7.1
Upper-income	54,889	38,390	33.7	69.9	12,722	23.2	3,777	6.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	205,317	113,937	100.0	55.5	74,372	36.2	17,008	8.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,547	6.1	1,363	5.8	182	10.1	2	3
Moderate-income	6,033	23.9	5,535	23.7	462	25.5	36	54.5
Middle-income	9,686	38.4	8,892	38.1	774	42.8	20	30.3
Upper-income	7,926	31.5	7,527	32.3	391	21.6	8	12.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	25,192	100.0	23,317	100.0	1,809	100.0	66	100.0
Percentage of Total Businesses:			92.6		7.2		.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	11	1	11	1	0	0	0	0
Moderate-income	170	15.6	168	16	2	4.9	0	0
Middle-income	525	48.1	501	47.7	24	58.5	0	0
Upper-income	386	35.3	371	35.3	15	36.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,092	100.0	1,051	100.0	41	100.0	0	.0
Percentage of Total Farms:			96.2		3.8		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE LEXINGTON-FAYETTE KY MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated good. Fifth Third has demonstrated good responsiveness to the credit needs of the community. In addition, Fifth Third originated 11 community development loans totaling \$44.6 million. Fifth Third has an excellent geographic distribution of loans and minimal lending gaps in the assessment area. Fifth Third has an excellent distribution among borrowers of different income levels and a good distribution to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The adequate level of community development loans and extensive use of flexible lending practices supported Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase, based on the overall volume of lending, followed by refinance, and small business. There were an insufficient number of home improvement loans to analyze performance. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects good responsiveness to the credit needs within the assessment area. Fifth Third originated 611 home purchase, 570 refinance, 39 home improvement, 441 small business, and 11 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 1.2% is greater than the percentage of total deposits at 1.1% in this area.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Home purchase, the largest loan category, is good. Refinance lending is also good. Small business lending is excellent. In addition, there is a low level of lending gaps as shown in the following table:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	12	0	100.0%
Moderate	32	1	96.9%
Middle	47	0	100.0%
Upper	38	0	100.0%
Total	129	1	99.2%

Lending gaps are considered minimal, as there was only one tract in the entire assessment area in which there were no loans.

Home Purchase Loans

Fifth Third made 13 home purchase loans totaling \$1.3 million in low-income tracts. This represents 2.1% of home purchase loans by volume, which is significantly below the percentage of owner-occupied units in these tracts at 4.0%, and 1.2% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 2.8% and was below the 2015 aggregate at 3.3%. As Fifth Third's performance was significantly below proxy and below the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is adequate.

Fifth Third made 88 home purchase loans totaling \$9.5 million in moderate-income tracts. This represents 14.4% of its home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 21.9%, and 8.4% by dollar volume, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 16.5% and was below the 2015 aggregate at 16.5%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is good.

Fifth Third made 235 home purchase loans totaling \$36.6 million in middle-income tracts. This represents 38.5% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 40.5%, and 32.4% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 41.1% and the 2015 aggregate of 39.9%.

Fifth Third made 275 home purchase loans totaling \$65.5 million in upper-income tracts. This represents 45.0% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 33.7%, and 58.0% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 39.5% and exceeded the 2015 aggregate of 40.3%.

Overall, geographic distribution of home purchase loans is good.

Refinance Loans

Fifth Third made 18 refinance loans totaling \$1.8 million in low-income tracts. This represents 3.2% of refinance loans by volume and 2.0% by dollar amount, which is below the percentage of owner-occupied units at 4.0%. The percentage of loans by volume was comparable to the 2014 aggregate at 4.1% and the 2015 aggregate at 3.2%. As Fifth Third's performance was slightly below proxy and was comparable to the aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 103 refinance loans totaling \$10.5 million in moderate-income tracts. This represents 18.1% of refinance loans by volume, which is slightly below the owner-occupied units in these tracts at 21.9%. The percentage of loans by dollar amount at 11.7% is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 20.8% and slightly exceeded the 2015 aggregate at 17.8%.

As Fifth Third's performance was slightly below proxy and slightly exceeded the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 198 refinance loans totaling \$26.4 million in middle-income tracts. This represents 34.7% of refinance loans by volume, which is below the owner-occupied units in these tracts at 40.5%. However, the percentage of refinance loans by dollar amount (29.4%) was significantly below proxy. The percentage of loans by volume was below the 2014 aggregate at 38.9% and was below the 2015 aggregate at 38.9%.

Fifth Third made 251 refinance loans totaling \$51.4 million in upper-income tracts. This represents 44.0% of refinance loans by volume, which significantly exceeds the owner-occupied units in these tracts at 33.7%, and 57.0% by dollar volume, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate at 36.2% and exceeded the 2015 aggregate at 40.1%.

Overall, the geographic distribution of refinance loans is good.

Small Business Loans

Fifth Third made 31 small business loans totaling \$4.5 million in low-income tracts. This represents 7.0% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 5.8%, and 8.1% by dollar amount, which also exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 7.5% and exceeded the 2015 aggregate of 7.4%. Given that Fifth Third's performance exceeded proxy and slightly exceeded the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is good.

Fifth Third made 106 small business loans totaling \$18.3 million in moderate-income tracts. This represents 24.0% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 23.7%, and 32.9% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.3% and was below the 2015 aggregate of 20.3%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 149 small business loans totaling \$18.7 million in middle-income tracts. This represents 33.8% of small business loans by volume, which is below the percentage of businesses in these tracts at 38.1%, and 33.6% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 37.9% and the 2015 aggregate of 37.9%.

Fifth Third made 155 small business loans totaling \$14.1 million in upper-income tracts. This represents 35.1% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 32.3%, and 25.4% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 33.2% and exceeded the 2015 aggregate of 33.3%.

Overall, the geographic distribution of small business loans is excellent, primarily due to the strong performance in moderate-income tracts.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for home purchase loans and refinances.

Home Purchase Loans

Fifth Third made 83 loans totaling \$8.0 million to low-income borrowers. This represents 13.6% of home purchase loans by volume, which is below the percentage of low-income families at 23.3%, and 7.1% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 8.6% and exceeded the 2015 aggregate of 8.4%. Given that Fifth Third's performance was below proxy, but significantly exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is good.

Fifth Third made 146 loans totaling \$19.2 million to moderate-income borrowers. This represents 23.9% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 16.3% and 17.0% of loans by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.1% and exceeded the 2015 aggregate of 20.6%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 128 loans totaling \$18.8 million to middle-income borrowers. This represents 20.9% of home purchase loans by volume, which exceeds the percentage of middle-income families at 20.1%, and 16.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.4% and was comparable to the 2015 aggregate of 19.9%.

Fifth Third made 239 loans totaling \$63.8 million to upper-income borrowers. This represents 39.1% of home purchase loans by volume, which is comparable to the percentage of upper-income families at 40.3%, and 56.4% of loans by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 31.3% and the 2015 aggregate of 32.2%.

Overall, the borrower distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 78 loans totaling \$6.7 million to low-income borrowers. This represents 13.7% of refinance loans by volume, which is below percentage of low-income families at 23.3%. The percentage of loans by dollar amount at 7.4% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 8.6% and exceeded the 2015 aggregate of 8.3%. Given that Fifth Third's performance exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

Fifth Third made 122 loans totaling \$11.8 million to moderate-income borrowers. This represents 21.4% of refinance loans by volume, which exceeds the percentage of moderate-income families at 16.3%, and 13.1% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 16.0% and the 2015 aggregate of 15.2%. As Fifth Third's performance exceeded proxy and aggregate of all lenders, the borrower distribution to moderate-income borrowers is excellent.

Fifth Third made 147 loans totaling \$20.0 million to middle-income borrowers. This represents 25.8% of refinance loans by volume, which exceeds the percentage of middle-income families at 20.1%, and 22.2% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.9% and the 2015 aggregate of 19.2%.

Fifth Third made 197 loans totaling \$47.0 million to upper-income borrowers. This represents 34.6% of refinance loans by volume, which is below the percentage of upper-income families at 40.3, and 52.2% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 32.9% and was below the 2015 aggregate of 35.4%.

Overall, the borrower distribution of refinance loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 58.3% of small business loans to businesses with revenues of \$1 million or less. Fifth Third's performance exceeded the 2014 aggregate of 47.2% and exceeded the 2015 aggregate of 49.9%, but was significantly below the percentage of small businesses in the assessment area at 92.6%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (71.9%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, a community contact indicated a need for small-dollar loans to small businesses.

Community Development Loans

Fifth Third originated 11 community development loans totaling \$44.6 million during the evaluation period. These loans were primarily working capital loans to help retain and expand businesses located in areas specifically designated to promote revitalization and economic development. In particular, several loans supported businesses located in the downtown core area designated by Lexington to revitalize 17 specific neighborhoods.

Community development lending in this assessment area represents 0.7% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s 31st highest percentage of community development lending during the evaluation period. In this assessment area, Fifth Third ranks third with 11.9% of the deposit market share and deposits accounting for 1.1% of the Fifth Third’s total deposits; therefore, Fifth Third’s performance is adequate in community development lending.

Flexible Lending Programs

Fifth Third had 338 flexible lending loans in this assessment area: 222 government loans, 15 down payment assistance loans, and 101 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	3.2%	1.9%	4.0%	22.5%	17.4%	21.9%	46.4%	46.4%	40.5%	27.9%	34.4%	33.7%
Down Payment Assistance Programs	26.7%	22.5%	4.0%	26.7%	27.7%	21.9%	40.0%	39.2%	40.5%	6.7%	10.7%	33.7%
Other Flexible Lending Programs	9.9%	8.2%	4.0%	23.8%	20.4%	21.9%	37.6%	37.0%	40.5%	28.7%	34.4%	33.7%
Total	6.2%	4.1%	4.0%	23.1%	18.4%	21.9%	43.5%	43.9%	40.5%	27.2%	33.6%	33.7%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	13.1%	9.5%	23.3%	34.7%	30.7%	16.3%	30.6%	31.0%	20.1%	20.3%	27.2%	40.3%
Down Payment Assistance Programs	80.0%	81.6%	23.3%	13.3%	9.6%	16.3%	6.7%	8.8%	20.1%	0.0%	0.0%	40.3%
Other Flexible Lending Programs	24.8%	22.5%	23.3%	33.7%	28.7%	16.3%	18.8%	21.2%	20.1%	22.8%	27.7%	40.3%
Total	19.5%	15%	23.3%	33.4%	29.5%	16.3%	26%	27.9%	20.1%	20.1%	26.4%	40.3%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number and dollar amount exceeded the percentage of owner-occupied units in these tracts, especially for various down payment assistance programs. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units, while the percentage of lending by dollar amount was slightly below proxy.

Fifth Third’s lending to low-income borrowers by volume and dollar amount was below the percentage of low-income families in the assessment area; however, lending for various down payment assistance programs significantly exceeded the percentage of low-income families. The percentage of lending to moderate-income borrowers by volume and dollar amount significantly exceeded the percentage of moderate-income families.

Therefore, Fifth Third made extensive use of flexible lending practices and is serving the assessment area’s credit needs, as lending through flexible loan programs to moderate-income borrowers was good and lending in low-and moderate-income tracts and to low-income borrowers was excellent.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated good.

Fifth Third made significant level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was occasionally in a leadership position. Fifth Third has 115 qualified investments totaling \$17.8 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
36	10,722,003	17	77,554	1	5,000	52	143,319

Also included in the total number of qualified investments are nine prior period investments totaling \$6.9 million. Fifth Third made 1.1% of its total community development investments in this assessment area, which is comparable to the percentage of total deposits at 1.1% and slightly greater than the percentage of branch offices at 1.0%.

Fifth Third exhibits a good responsiveness to credit and community development needs in the assessment area. Fifth Third made 75 donations totaling \$238,373 that supported local schools, small businesses, churches, food banks, health care, and affordable housing. The majority of Fifth Third's donations (60.1%) supported services to low- and moderate-income individuals, which is an important need based on the excessive poverty rates present in several counties within the assessment area.

Service Test

Fifth Third's performance under the service test in this assessment area is rated good. Retail services are accessible and Fifth Third provided a relatively high level of community development services in the assessment area.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, two banking centers were closed, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 13 banking centers within this assessment area, including none in low-, six in moderate-, three in middle-, and four in upper-income census tracts. Fifth Third's banking centers in this assessment area represent 1.0% of all its banking centers.

Fifth Third has a total of 15 full-service ATMs within this assessment area, including none in low-, eight in moderate-, three in middle-, and four in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: KY Lexington

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	0	0.0%	0	0	Total	3	12.0%	0	0.0%	3	30.0%	12	9.3%	7.6%	6.2%
Moderate	6	46.2%	0	0	Total	11	44.0%	8	53.3%	3	30.0%	32	24.8%	28.3%	24.0%
Middle	3	23.1%	0	2	Total	5	20.0%	3	20.0%	2	20.0%	47	36.4%	37.0%	38.1%
Upper	4	30.8%	0	0	Total	6	24.0%	4	26.7%	2	20.0%	38	29.5%	27.1%	31.7%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Total	13	100.0%	0	2	Total	25	100.0%	15	100.0%	10	100.0%	129	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered poor, because Fifth Third has no branches in these tracts and the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third provided a relatively high level of community development services in the assessment area. During the evaluation period, Fifth Third employees provided 1,175 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 1.0% of all community development services provided and equates to 0.56 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
# of Hours	# of Hours	# of Hours	# of Hours
6	66	45	1,058

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization. Community development services include 493 hours of providing financial literacy through local nonprofits and school programs, 441 hours serving on boards and committees, 153 hours providing technical assistance to non-profits and local business, and 88 hours participating in foreclosure prevention outreach.

METROPOLITAN and NON-METROPOLITAN AREAS
(Limited-scope Review)

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN
THE COMMONWEALTH OF KENTUCKY**

- **Non-metropolitan Eastern Kentucky**
 - As of June 30, 2016, Fifth Third operated four branches in the assessment area, representing 14.3% of its branches in Kentucky.
 - As of June 30, 2016, Fifth Third had \$177,096 in deposits in this assessment area, representing a market share of 6.5% and 11.2% of it statewide deposits.
- **Owensboro MSA**
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 10.7% of its branches in Kentucky.
 - As of June 30, 2016, Fifth Third had \$55,982 in deposits in this assessment area, representing a market share of 1.8% and 3.5% of it statewide deposits.
- **Non-metropolitan Western Kentucky**
 - As of June 30, 2016, Fifth Third operated eight branches in the assessment area, representing 28.6% of its branches in Kentucky.
 - As of June 30, 2016, Fifth Third had \$233,213 in deposits in this assessment area, representing a market share of 19.1% and 14.8% of it statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
COMMONWEALTH OF KENTUCKY**

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with Fifth Third’s performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Non-metropolitan Eastern Kentucky	Below	Consistent	Below
Owensboro MSA	Below	Above	Consistent
Non-metropolitan Western Kentucky	Below	Below	Below

For the lending test, Fifth Third received a “High Satisfactory” rating in Kentucky. Performance in all three of the limited-scope assessment areas was below Fifth Third’s performance for Kentucky. Although below the commonwealth’s performance, lending levels were good or adequate for the geographic and borrower distribution of loans. Non-metropolitan Eastern Kentucky had a good level of community development loans. No community development lending was noted in the Owensboro or non-metropolitan Western Kentucky assessment areas. A low level of lending gaps was noted in all three of the limited-scope assessment areas.

For the investment test, Fifth Third received a “High Satisfactory” rating in Kentucky. Investment activity was consistent with the commonwealth in non-metropolitan Eastern Kentucky. However, investment activity was above Fifth Third’s performance for the commonwealth in the Owensboro assessment area and below performance for the commonwealth in the non-metropolitan Western Kentucky assessment area. The stronger performance in the Owensboro assessment area was primarily attributable to several LIHTC investments in the assessment area. The weaker performance in non-metropolitan Western Kentucky was primarily due to a lower level of qualified investments and contributions relative to Fifth Third’s operational presence in the assessment area.

For the service test, Fifth Third received a “High Satisfactory” rating in Kentucky. Performance was consistent to the state in the Owensboro assessment area and below Fifth Third’s performance for Kentucky in the remaining two limited-scope assessment areas. Retail services performance was consistent with performance for Kentucky in all three assessment areas. Qualified community development services were adequate and poor in the non-metropolitan Eastern and Western Kentucky assessment areas, respectively. The weaker community development services performance was primarily due to a lower level of hours dedicated to providing qualified services relative to Fifth Third’s operational presence in these assessment areas. Qualified community development services were excellent in the Owensboro assessment area. The stronger performance was due to a higher level of hours dedicated to providing qualified services.

The performance in the limited-scope assessment areas did not change the overall rating for the commonwealth.

STATE OF MICHIGAN

CRA RATING for State of Michigan:¹⁸⁴ Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors supporting this rating include:

- An excellent responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and to businesses of different revenue sizes;
- Exhibits an excellent record of serving the credit needs of low-income individuals and areas and very small businesses;
- A leader in making community development loans;
- Use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in Michigan: the Detroit-Warren-Ann Arbor CSA and the Grand Rapids-Wyoming-Muskegon CSA. Limited-scope reviews were performed on the remaining seven assessment areas: the Battle Creek MSA, Jackson MSA, Kalamazoo-Portage MSA, Lansing-East Lansing MSA, non-metropolitan Northern Michigan, non-metropolitan Southern Michigan, and Saginaw-Midland-Bay City CSA. The time period,

¹⁸⁴ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the “Institution” section of this report.

The Detroit-Warren-Ann Arbor and Grand Rapids-Wyoming-Muskegon assessment areas received greater weight in determining the CRA rating for the state. These areas had the largest lending volumes and number of banking centers and ranked first and second, respectively, in this state’s share of deposits during the evaluation period. Lastly, these areas represented 67.3% of the banking centers, 75.5% of deposits, and 70.2% of lending in Michigan.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF MICHIGAN

Lending activity accounted for 23.1% of the Fifth Third’s total lending activity, while deposits accounted for 14.6% of Fifth Third’s total deposits. HMDA-reportable lending in Michigan represented 22.9% of Fifth Third’s total HMDA lending, while CRA-reportable lending represented 23.5% of Fifth Third’s total CRA lending. As of June 30, 2016, Fifth Third ranked fifth among 136 insured institutions and has a deposit market share of 8.0% and 215 banking center locations within Michigan.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MICHIGAN

Lending Test

Fifth Third’s performance under the lending test within the assessment areas located in Michigan is rated “Outstanding.” Fifth Third’s lending reflects an excellent responsiveness to the credit needs in the following two of nine assessment areas: Detroit-Warren-Ann Arbor and Grand Rapids-Wyoming-Muskegon assessment areas. Lending reflects a good responsiveness to credit needs in the Jackson, Kalamazoo-Portage, Lansing-East Lansing, and Saginaw-Midland-Bay City assessment areas and an adequate responsiveness in the remaining three assessment areas: Battle Creek, non-metropolitan Northern Michigan, and non-metropolitan Southern Michigan.

Lending Activity

In Michigan, Fifth Third originated 23,911 HMDA loans totaling \$3.4 billion and 9,217 small business loans totaling \$1.5 billion during the evaluation period.

Lending activity in Michigan is excellent. The Detroit-Warren-Ann Arbor and Grand Rapids-Wyoming-Muskegon assessment areas have excellent lending activity. Lending activity is adequate in the Battle Creek, non-metropolitan Northern Michigan, and non-metropolitan Southern Michigan assessment areas, and good in the remaining four assessment areas.

Geographic and Borrower Distribution

The distribution of loans among geographies is excellent in Michigan. The geographic distribution is excellent in the Detroit-Warren-Ann Arbor and Grand Rapids-Wyoming-Muskegon assessment areas. The geographic distribution is adequate in the Lansing-East Lansing and non-metropolitan Northern Michigan assessment areas and good in the remaining

five assessment areas.

A low level of lending gaps was identified in five of the nine assessment areas. There was a moderate level of lending gaps in the Detroit-Warren-Ann Arbor and Saginaw-Midland-Bay City assessment areas, and no lending gaps in the Grand Rapids-Wyoming-Muskegon and Battle Creek assessment areas.

The distribution of loans among borrowers of different income levels and to businesses of different revenue sizes is good in the assessment areas located in Michigan. The borrower distribution is excellent in the Detroit-Warren-Ann Arbor and Grand Rapids-Wyoming-Muskegon assessment areas and adequate in the Saginaw-Midland-Bay City assessment area. Borrower distribution is good in the remaining six assessment areas. The distribution to businesses of different revenue sizes is good in the Grand Rapids-Wyoming-Muskegon, Lansing-East Lansing, and Saginaw-Midland-Bay City assessment areas and adequate in the Detroit-Warren-Ann Arbor, non-metropolitan Northern Michigan, and non-metropolitan Southern Michigan assessment areas. The distribution to businesses of different revenue sizes is poor in the Battle Creek and Jackson assessment areas.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Michigan, Fifth Third originated 248 community development loans totaling \$1.2 billion, which represents 19.9% of the Fifth Third's community development lending by dollar volume, representing an outstanding level of community development lending in Michigan. Fifth Third was a leader in providing community development loans in the Detroit-Warren-Ann Arbor, Grand Rapids-Wyoming-Muskegon, and Lansing-East Lansing assessment areas. Fifth Third made a relatively high level of community development loans in the Saginaw-Midland-Bay City assessment area and an adequate level of community development loans in the remaining five assessment areas.

Flexible Lending

Fifth Third consistently makes use of flexible lending practices within assessment areas located in Michigan.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Michigan is rated "Outstanding." Fifth Third funded \$257.3 million in qualified community development investments in Michigan during the evaluation period, consisting of \$155.2 million obtained from new investments made during the current review period and \$102.1 million from prior period investments. The majority of investments were LIHTCs.

Fifth Third's level of qualified investments is excellent in the Detroit-Warren-Ann Arbor, Battle Creek, Kalamazoo-Portage, non-metropolitan Northern Michigan, non-metropolitan Southern Michigan, and Saginaw-Midland-Bay City assessment areas and adequate in the Jackson assessment area. The remaining three assessment areas had good levels of qualified community development investments.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test within the assessment areas located in Michigan is rated "Outstanding." The Fifth Third's performance is excellent in the Detroit-Warren-Ann Arbor, Grand Rapids-Wyoming-Muskegon, and Lansing-East Lansing assessment areas. Performance is good in the remaining six assessment areas.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in Michigan. Retail service distribution is good in eight assessment areas and adequate in non-metropolitan Northern Michigan.

Fifth Third has 226 banking centers in Michigan, which represents 17.4% of Fifth Third's total branches. Fifth Third's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. No branches in Michigan opened or closed in low- or moderate-income tracts during the evaluation period.

Banking services and business hours do not vary in a way that inconveniences any portion of Fifth Third's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third is a leader in providing community development services in Michigan. Fifth Third's performance is excellent in the Detroit-Warren-Ann Arbor, Grand Rapids-Wyoming-Muskegon, Jackson, Lansing-East Lansing, non-metropolitan Northern Michigan, non-metropolitan Southern Michigan, and Saginaw-Midland-Bay City assessment areas. The level of community development services is good in the remaining two assessment areas.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
DETROIT-WARREN-ANN ARBOR MI CSA #220**

The Detroit-Warren-Ann Arbor MI CSA consists of the following four MSAs:

- Ann Arbor MI MSA #11460, consisting of Washtenaw County
- Detroit-Warren-Dearborn MI MSA #19820, consists of the following two MDs:
 - Detroit-Livonia-Dearborn MI MD #19804, consisting of Wayne County
 - Warren-Farmington Hills-Troy MI MD #47644, consisting of Livingston, Macomb, Oakland, and St. Clair counties, but excluding Lapeer County
- Flint MI MSA #22420, consisting of Genesee County
- Monroe MI MSA #33780, consisting of Monroe County

The assessment area is comprised of 174 low-, 362 moderate-, 565 middle-, and 422 upper-income tracts. There are also 24 tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked sixth out of 53 institutions with 5.1% of the deposit market share. JPMorgan Chase had the majority of the market share with 27.8% of deposits. The next four largest institutions, Comerica Bank, Bank of America, PNC Bank, and Flagstar Bank, had 18.2%, 11.2%, 9.4%, and 5.5% of the market share, respectively. Deposits in this assessment area accounted for 6.5% of the Fifth Third's total deposits. This was 44.9% of deposits within the state and the third-highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 9,435 HMDA loans and 3,659 CRA loans, which represented 9.0% and 9.3% of the total loans originated during the evaluation period, respectively. This was the third-largest HMDA and CRA markets for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked sixth among 624 HMDA reporters in the assessment area, while Fifth Third Mortgage Company-Michigan ranked 17th and Fifth Third ranked 71st. Quicken Loans, Wells Fargo Bank, JPMorgan Chase, and Flagstar Bank were the top four HMDA lenders in the assessment area. Fifth Third ranked 12th of 139 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, U.S. Bank, Chase Bank USA, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Eight community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an economic development organization, stated the Detroit economy is recovering at a slow, but steady pace. The contact indicated that banks are working to originate needed small business and mortgage loans in this market and there are a number of down-payment assistance programs in place to assist low- and moderate-income individuals with becoming first-time homebuyers. The contact believed there is a substantial need for financial literacy education within the community and specifically mentioned Chase Bank USA, FirstMerit, and Chemical Bank as consistently participating in community development projects.

The second contact, representing an organization that provides technical assistance to nonprofit community development organizations, stated that housing is a priority for the city. Detroit is working hard to demolish dilapidated homes in blighted areas, as demolishing these blighted homes can raise property values. The contact indicated banks are performing adequately and believes the new housing market analysis will generate opportunities for financial institutions to support affordable housing endeavors.

The third contact, representing a financial intermediary that provides grant monies to area nonprofits, stated the most significant needs for lower-income individuals and in lower-income neighborhoods are blight removal, home improvement, home rehabilitation, home weatherization, access to healthy foods, and financial literacy. The contact indicated that area banks are adequately meeting the credit needs of the community.

The fourth contact, representing an organization that works to attract new businesses to the area, stated start-up businesses are in need of small-dollar loans up to \$100,000 to help with operating costs and working capital. The contact believed banks could improve upon originating these types of loans. The contact specifically mentioned Chase Bank USA, Wells Fargo Bank, and Bank of America as being responsive to the credit needs of the small businesses in the community.

The fifth contact, representing an organization that provides affordable housing, stated Detroit has experienced a 25.0% loss in population from 2000 to 2010. Unemployment rose continuously from 2000 to 2010, reaching a high of 14.2% in August 2009; however, in December 2014, the unemployment rate reached a low of 6.3%. Although housing prices across metropolitan Detroit continue to regain lost ground, rising about 4.0% in the last year, prices remain off by approximately 20.0% from their peak in early 2006 and late 2015. Rental vacancy rates remain high in the Detroit market due to the loss of population, along with a large number of single-family homes for rent. The contact indicated that decent, affordable housing and eliminating blight are major needs in the Detroit metropolitan area. The contact believed banks are not actively participating in the community and are not supporting community development programs or implementing lending-assistance programs to low-income individuals. On the other hand, the contact indicated credit unions are more involved in supporting the credit needs of the community.

The sixth contact, representing an economic development organization, stated incomes have been stagnant, but are beginning to trend upwards. Unemployment rates are beginning to decline due to the creation of new higher-paying jobs in advanced manufacturing. The contact specifically mentioned Goldman Sachs and Quicken Loans as investing in the community and creating jobs in the area.

The seventh contact, representing an economic development organization, stated there is no shortage of small businesses seeking loans; therefore, there are opportunities for banks to finance small businesses in the community. Overall, the contact believed area banks are actively involved in the community, as they donate time and money to a multitude of organizations.

The final contact, representing a non-profit organization that attracts and retains businesses to the area, stated there are opportunities for banks to participate in more financial educational programs targeted to entrepreneurs. The contact believed that business owners, management, and staff need to better understand financial statements and business planning, as many companies went out of business during the recession because they did not have the right skill set to adapt and survive.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 5.1 million. Less than a third (30.0%) of the population lived in low- and moderate-income tracts. In addition, 75.9% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Detroit MSA is the 14th largest in terms of population in the nation, while the Flint MSA is the 131st, the Ann Arbor MSA is the 146th, and the Monroe MSA is the 278th largest.¹⁸⁵ Wayne County is the most populous county in the assessment area and in Michigan. Oakland County is the second most populous, while Macomb, Oakland, and Genesee counties are the third, fourth, and fifth most populous counties in Michigan, respectively. However, according to *The Detroit News*, Washtenaw County (sixth most populous county), led southeastern Michigan in population growth, outpacing Macomb, Oakland, and Wayne counties. Like Washtenaw, Macomb and Oakland experienced increases in population, while Wayne County continued to experience a decline in population, although it was the smallest decline in population in Wayne County since 2004. According to 2016 U.S. Census data, Wayne County lost about 7,696 people, bringing its total population to 1.74 million, and Detroit lost 3,107 residents in the last year. Meanwhile, Washtenaw County grew nearly 5.5%, or 19,141 residents, in the past year. For the second year, Wayne County was second in the nation in the largest population decline, behind Illinois' Cook County, home of Chicago.¹⁸⁶

¹⁸⁵ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

¹⁸⁶ MacDonald, Christine. "Census: Washtenaw leads region in population growth." *The Detroit News*. March 23, 2017. - <http://www.detroitnews.com/story/news/local/michigan/2017/03/23/census-washtenaw-leads-region-population-growth/99519598/>

Detroit is the largest city in Michigan and is the 19th most populous city in the U.S. with 677,116 residents. Despite being the largest city in Michigan, Detroit’s population growth declined by 28.3% between 2000 and 2015, but only declined by 5.1% from April 1, 2010 to July 1, 2015. According to 2015 U.S. Census data,¹⁸⁷ Warren is the third-largest city in Michigan, with 135,358 residents. Ann Arbor is the fifth-largest city in the state with 117,070 residents.

Flint is seventh-largest in Michigan with 98,310 residents, followed by Dearborn (eighth), Livonia (ninth), Troy (10th), and Farmington Hills (12th) with 95,171, 94,635, 83,280, and 81,330 residents, respectively. In contrast, Monroe had only 20,092 residents, representing a 3.1% decline in population since April 1, 2010.

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease.¹⁸⁸ For the most part, the population within the assessment remained relatively stable between 2010 and 2015, with Washtenaw County experiencing the greatest growth and Genesee and Wayne counties experiencing the greatest declines in population.

County	2010 Population	2015 Population	Population Percent Change
Genesee	425,790	410,849	-3.5%
Livingston	180,967	187,316	3.5%
Macomb	840,978	864,840	2.8%
Monroe	152,021	149,568	-1.6%
Oakland	1,202,362	1,242,304	3.3%
St. Clair	163,040	159,875	-1.9%
Washtenaw	344,791	358,880	4.1%
Wayne	1,820,584	1,759,335	-3.4%
Total	5,130,533	5,132,967	0.0%

According to Moody’s Analytics, from 2012 and 2015, Detroit’s population growth remained negative and weak, but the rate of decline appears to be slowing. The uptick in growth can be attributed to an increase in foreign in-migration and a slight reduction in domestic out-migration. Flint’s population growth also remains negative and weak, but the rate of decline has progressively slowed, primarily due to decreasing domestic out-migration. Monroe’s population growth also remains negative with a slowing rate of decline. Conversely, Ann Arbor experienced overall positive net migration, primarily due to growing foreign in-migration.

¹⁸⁷ US Census Bureau: <http://www.census.gov/quickfacts/table/PST045216/00> (main page – must enter state, county, city, town or zip code)

¹⁸⁸ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

Income Characteristics

The 2010 assessment area median family income was significantly higher (\$65,426) than Michigan at \$60,341. As shown in the table below, since 2010, the median family income increased across all assessment area, except in the Flint MSA. Between 2014 and 2015, the median family income increased in all areas, except the Ann Arbor MSA. However, between 2015 and 2016, the median family income only increased in the Ann Arbor MSA and the Monroe MSA and decreased in all other areas within the assessment area.

FFIEC Estimated Median Family Income	2010	2014	2015	2016
Ann Arbor MI MSA	\$82,184	\$87,400	\$84,300	\$91,600
Detroit-Dearborn-Livonia MI MD	\$52,946	\$51,000	\$53,700	\$53,500
Warren-Troy-Farmington Hills MI MD	\$75,314	\$73,800	\$77,300	\$77,000
Flint MI MSA	\$54,072	\$53,300	\$53,800	\$52,200
Monroe MI MSA	\$66,549	\$63,800	\$65,000	\$69,200

Poverty rates increased in each county in the assessment area from 1999 to 2015.¹⁸⁹ Wayne and Genesee counties had the highest poverty rates in 1999 and 2015 and Livingston County had the lowest poverty rates. In 2015, Wayne and Genesee counties had poverty rates higher than Michigan and, in addition to Washtenaw County, had poverty rates that exceeded the national rate. However, Macomb County experienced the largest increase in poverty rate during this period. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.¹⁹⁰ The following table shows the poverty rates for 1999¹⁹¹ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Genesee	13.1%	20.5%	56.5%
Livingston	3.4%	6.5%	91.2%
Macomb	5.6%	11.7%	108.9%
Monroe	7.0%	10.6%	51.4%
Oakland	5.5%	9.3%	69.1%
St. Clair	7.8%	12.8%	64.1%
Washtenaw	11.1%	14.2%	27.9%
Wayne	16.4%	24.8%	51.2%
Michigan	10.5%	15.7%	49.5%
U.S.	11.8%	13.5%	14.4%

¹⁸⁹ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

¹⁹⁰ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

¹⁹¹ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 2.3 million housing units and 1.3 million families in the assessment area. From an income perspective, 33.5% of housing units, 23.4% of owner-occupied units, and 27.7% of families are located in low- or moderate-income tracts.

Over two-thirds of the housing units in the low-income census tracts are either rental or vacant (69.5%). In the moderate-income census tracts, nearly half (49.2%) of the housing units are either rental or vacant and 50.8% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 46 years old, with 24.2% of the stock built before 1950. The oldest housing stock was in Wayne County with a median age of 56 years, while the newest was 24 years in Livingston County. However, within the assessment area, the median age of housing stock was 58 years in low-income tracts and 55 years in moderate-income tracts, which indicates that there is ample opportunity for Fifth Third to make home improvement and rehabilitation loans. Three community contacts indicated there is a need for revitalizing blighted neighborhoods and providing home improvement and rehabilitation loans in lower-income areas and felt there are ample opportunities for banks to make these types of loans. Lastly, one contact believed banks could improve upon implementing lending-assistance programs to low-income individuals.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$156,989, with an affordability ratio of 33.13. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The median housing value decreased between 2010 and 2011-2015 and household incomes increased; as a result, housing became more affordable across the assessment area. During the evaluation period, the most affordable housing was in Genesee County, with the least affordable in Washtenaw County. Median gross rents increased at a substantial rate across the assessment area, with renters in Macomb County experiencing the largest increase in rental rates and renters in Wayne County experiencing the smallest increase. In 2010, about 50.3% of renters across the assessment area had rent costs greater than 30.0% of income. Increasing rental rates may make it harder for potential homebuyers to save up enough money toward a down payment for a home. According to Moody's Analytics, residential real estate prices will appreciate in 2017 before weaker demand slows growth. Sales of single-family homes have been steadily rising over the last two years, spurring new construction. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Michigan.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Genesee	\$118,200	36.85	\$88,500	47.83	\$662	\$715	8.0%
Livingston	\$216,400	33.33	\$192,500	39.07	\$860	\$917	6.6%
Macomb	\$157,000	34.39	\$126,000	43.32	\$752	\$861	14.5%
Monroe	\$161,800	34.22	\$137,200	40.56	\$733	\$784	7.0%
Oakland	\$204,300	32.50	\$178,900	37.71	\$871	\$942	8.2%
St. Clair	\$150,300	32.68	\$120,800	41.17	\$691	\$736	6.5%
Washtenaw	\$216,200	27.32	\$208,200	29.30	\$866	\$953	10.0%
Wayne	\$121,100	34.88	\$83,000	49.64	\$759	\$794	4.6%
Michigan	\$144,200	33.59	\$122,400	40.50	\$723	\$783	8.3%

According to the Washtenaw Office of Community and Economic Development, the Ann Arbor area was ranked as the eighth most economically segregated metropolitan area in the nation. The agency describes the disparity as economically dangerous and is looking at housing affordability issues as a way to combat the disparity.¹⁹²

According to Bankrate.com,¹⁹³ Michigan ranked 26th for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:¹⁹⁴

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Genesee	1:987
Livingston	1:2,102
Macomb	1:1,766
Monroe	1:1,823
Oakland	1:1,871
St. Clair	1:1,683
Washtenaw	1:4,669
Wayne	1:1,325
Michigan	1:2,036
U.S.	1:1,533

¹⁹² <http://www.detroitnews.com/story/news/local/michigan/2017/03/23/census-washtenaw-leads-region-population-growth/99519598/>

¹⁹³ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

¹⁹⁴ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

In November 2016, Genesee County had the highest rate of foreclosure in the assessment area and Michigan; Wayne County had the fourth highest foreclosure rate in the state. Washtenaw County had the lowest foreclosure rate within the assessment area.

Building permits in the four MSAs, Michigan, and the nation are included in the following table for 2014, 2015, and 2016.¹⁹⁵

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Ann Arbor MSA	570	420	-26.3%	216	-48.6%
Detroit-Warren-Dearborn MSA	6,295	7,304	16.0%	7,536	3.2%
Flint MSA	343	413	20.4%	174	-57.9%
Monroe MSA	240	291	21.3%	13	-95.5%
Michigan	15,836	18,226	15.1%	22,426	23.0%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The Monroe, Flint, and Detroit MSAs experienced the greatest increase in housing permits between 2014 and 2015. However, between 2015 and 2016, there was a significant decline in the number of housing permits in the Monroe and Flint MSAs, although the Detroit MSA experienced a slight increase in housing permits. Population losses, in addition to the decrease in the number of permits could indicate a softening in demand for home purchase loans across the assessment area.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Detroit area economy is in recovery, but seems to be losing momentum. Job growth is lagging behind the rest of Michigan and residential construction has eased. The auto industry employs approximately 80.0% more workers than in mid-2009, when employment bottomed; however, auto employment has waned. Outside of the auto industry, healthcare and green and advanced manufacturing hold the most promise for the area’s economic recovery. Nonetheless, population losses may limit the area’s ability to make a full recovery. Monroe’s economy is also in recovery primarily due to less reliance on auto parts manufacturing and more reliance on non-auto machinery manufacturing, shipping, and wholesale industries. However, Monroe’s economic recovery may be limited by its weakening demographics and inadequately educated workforce. Flint’s economy is at risk primarily due to the water crisis, which prompted a surge of out-migration. Declining population trends are weakening healthcare demand and consumer spending. While Flint has experienced job gains in professional/business services and construction, it suffers from low labor force participation and an inadequately educated workforce.

¹⁹⁵ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Conversely, Ann Arbor’s economy is performing better than other parts of Michigan. Ann Arbor’s economic expansion is primarily due to a highly educated workforce, low living and business costs, and the strong presence of the University of Michigan and Eastern Michigan University. Ann Arbor is also becoming a technology center for alternative energy and automotive battery industries.

The Detroit metropolitan area is home to six Fortune 500 headquarters:¹⁹⁶

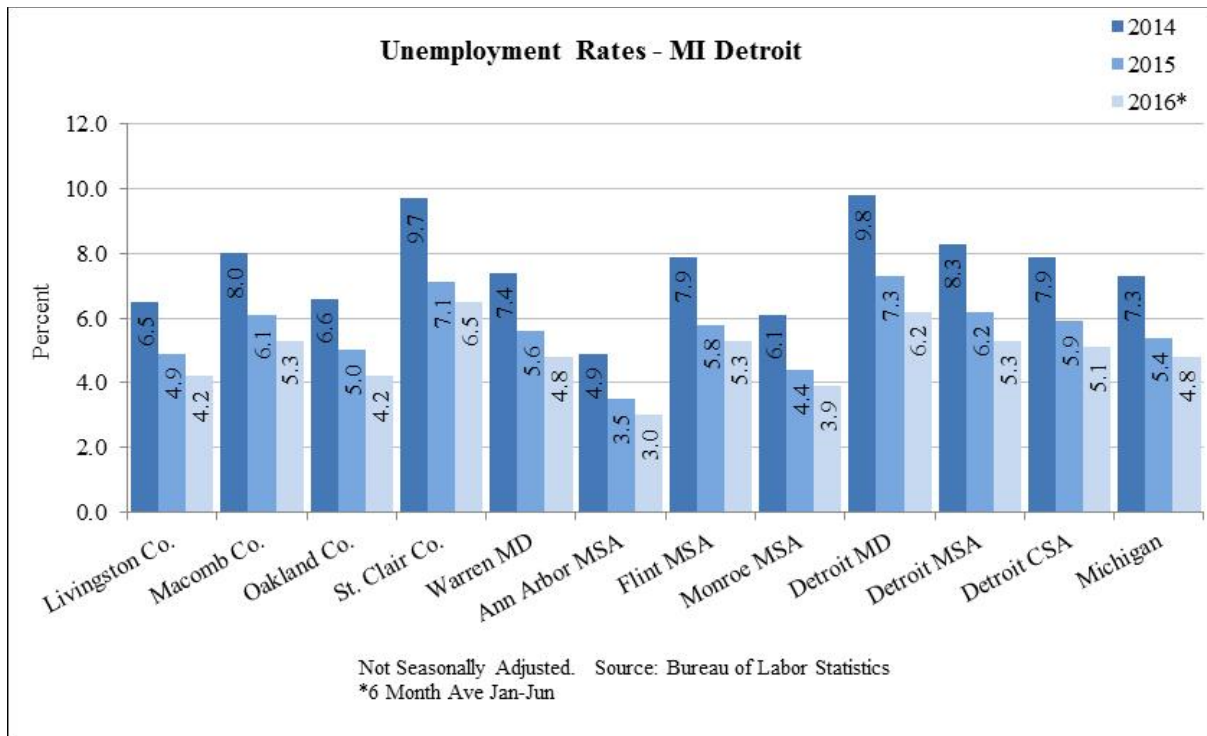
Detroit Metro Fortune 500 Companies (2016)		
Rank	Company	Location
8	General Motors	Detroit, MI
9	Ford Motor	Dearborn, MI
274	DTE Energy	Detroit, MI
298	Ally Financial	Detroit, MI
467	Kelly Services	Troy, MI
470	Visteon	Monroe, MI

According to Moody’s Analytics, the top 15 employers in the CSA in 2015/2016 were:

Company	Number of Employees
Ford Motor Co.	43,977
Chrysler Group LLC	32,106
General Motors Corp.	30,570
University of Michigan Medical Center	18,191
Henry Ford Health System	17,492
CHE Trinity Health	14,341
Detroit Medical Center	13,458
Beaumont Health System	13,228
Rock Ventures	11,563
St. John Providence Health System	11,337
University of Michigan	10,877
Quicken Loans	9,424
Trinity Health Corp.	5,834
Genesys Regional Medical Center	3,000
Hurley Medical Center	2,500

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the CSA and Michigan.

¹⁹⁶ www.craindetroit.com/article/20160606/NEWS/160609759/southeast-michigan-representation-on-furtune-500-shrinks



Unemployment rates have declined each year. The Ann Arbor MSA and Monroe MSA had the lowest unemployment rates all three years and these rates were lower than the state rate. The Detroit MSA and Flint MSA had the highest unemployment rates all three years and these rates were higher than the state rate.

According to an article in *CNN Money*, another sign of slowing auto sales, the Detroit-Hamtramck plant will eliminate its second shift and approximately 1,300 of its 3,000 jobs. The layoffs will take place in March 2017. The Detroit facility is the third GM plant to eliminate the second shift. Plants in Lansing, Michigan and Lordstown, Ohio announced layoffs in November (2016), the first permanent cuts by GM at its U.S. plants since 2010. In total, GM will eliminate about 3,300 jobs at all three plants.¹⁹⁷ According to an article in *The Detroit News*, about 1,420 production workers face indefinite layoffs at the Sterling Heights Assembly (Fiat Chrysler Automobiles) plant that build the Chrysler 200 mid-size sedan, largely due to changing consumer preference from cars to SUVs and trucks.¹⁹⁸

¹⁹⁷ Isidore, Chris. "GM cutting 1,300 jobs at only plant inside Detroit." *CNN Money*. December 20, 2016. - <http://money.cnn.com/2016/12/20/news/companies/gm-plant-layoff/index.html>

¹⁹⁸ Wayland, Michael. "FCA indefinitely laying off 1,420 Detroit-area workers." *The Detroit News*. April 6, 2016. - <http://www.detroitnews.com/story/business/autos/chrysler/2016/04/06/fca-sterling-heights/82706794/>

Combined Demographics Report

Assessment Area: MI Detroit

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	174	11.2	90,469	6.9	36,017	39.8	286,164	21.9
Moderate-income	362	23.4	272,496	20.8	53,787	19.7	225,150	17.2
Middle-income	565	36.5	520,868	39.8	36,227	7	262,686	20.1
Upper-income	422	27.3	425,583	32.5	13,780	3.2	535,463	40.9
Unknown-income	24	1.6	47	0	0	0	0	0
Total Assessment Area	1,547	100.0	1,309,463	100.0	139,811	10.7	1,309,46	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	216,156	65,753	4.5	30.4	95,850	44.3	54,553	25.2
Moderate-income	539,681	273,963	18.9	50.8	177,566	32.9	88,152	16.3
Middle-income	874,928	607,218	42	69.4	189,532	21.7	78,178	8.9
Upper-income	625,132	500,022	34.6	80	85,500	13.7	39,610	6.3
Unknown-income	787	53	0	6.7	162	20.6	572	72.7
Total Assessment Area	2,256,684	1,447,009	100.0	64.1	548,610	24.3	261,065	11.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	14,588	6.1	12,642	5.8	1,877	9.6	69	9.4
Moderate-income	41,955	17.6	37,680	17.3	4,151	21.2	124	16.9
Middle-income	92,914	39	85,473	39.2	7,118	36.3	323	44.1
Upper-income	87,913	36.9	81,518	37.4	6,185	31.5	210	28.7
Unknown-income	972	0.4	680	0.3	286	1.5	6	0.8
Total Assessment Area	238,342	100.0	217,993	100.0	19,617	100.0	732	100.0
Percentage of Total Businesses:			91.5		8.2		.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	34	1.5	33	1.5	1	2.4	0	0
Moderate-income	205	9	200	8.9	5	11.9	0	0
Middle-income	1,460	63.9	1,437	64.1	23	54.8	0	0
Upper-income	585	25.6	572	25.5	13	31	0	0
Unknown-income	1	0	1	0	0	0	0	0
Total Assessment Area	2,285	100.0	2,243	100.0	42	100.0	0	.0
Percentage of Total Farms:			98.2		1.8		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE DETROIT-WARREN-ANN ARBOR MI CSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 92 community development loans totaling \$574.1 million. Fifth Third has an excellent geographic distribution of loans and a moderate level of lending gaps. Fifth Third has an excellent distribution among borrowers of different income levels and an adequate distribution of loans to businesses of different revenue sizes. Fifth Third exhibits an excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and use of flexible lending practices augments Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending, based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 4,798 home purchase, 4,180 refinance, 456 home improvement, 3,659 small business, and 92 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 9.1% is greater than the percentage of total deposits at 6.5% in this area.

Fifth Third made 98.6% of the HMDA and 99.9% of the CRA lending within its designated assessment area. While a substantial majority of loans was made within the assessment area, a concentration of lending was noted in the excluded Lapeer County (137 HMDA loans).

In addition to lending, Fifth Third modified existing loans to borrowers. Below shows the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	9	3.3%	56	20.8%	118	43.9%	86	32.0%
<i>Percentage of Owner Occupied Units</i>		4.5%		18.9%		42.0%		34.6%

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	64	23.8%	83	30.9%	75	27.9%	46	17.1%
Percentage of Families by Family Income		21.9%		17.2%		20.1%		40.9%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications for a meaningful analysis. The percentage of other modifications made in low-income tracts was comparable to the percentage of owner-occupied units in these geographies and exceed proxy in moderate-income tracts; therefore, modifications helped to expand lending activities in these areas. The percentage of other modifications made to low- and moderate-income income borrowers exceeded the percentage of low- and moderate-income-income families in the assessment area; therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Home purchase lending, which was the largest loan category, is excellent. Refinance and small business lending are also excellent and home improvement lending is good. Moderate lending gaps were noted for the assessment area, as shown in the following table.

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	174	85	51.2%
Moderate	362	96	73.5%
Middle	565	38	93.3%
Upper	422	5	98.8%
Unknown	24	19	20.8%
Total	1,547	243	84.3%

Lending gaps are considered reasonable. While there are a significant number of gaps in low-income tracts, the owner-occupancy rate is relatively low at 30.4% and the rental/vacancy rate is high at 69.5%. Additionally, only 6.1% of businesses are located in low-income tracts. These factors were considered in evaluating lending gaps, as they likely negatively impacted the demand for mortgage and business loans.

Home Purchase Loans

Fifth Third made 154 home purchase loans totaling \$15.0 million in low-income tracts. This represents 3.2% of home purchase loans by volume, which is slightly below the percentage of owner-occupied units in these tracts at 4.5% and 1.9% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 1.2% and exceeded the 2015 aggregate at 1.2%.

As Fifth Third's performance exceeded the aggregate of all lenders and was slightly below proxy, the geographic distribution in low-income tracts is excellent. There is also limited opportunity to extend home purchase loans in low-income tracts due to the low owner-occupancy and high rental/vacancy rates.

Fifth Third made 930 home purchase loans totaling \$100.5 million in moderate-income tracts. This represents 19.4% of its home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 18.9%, and 12.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 10.8% and significantly exceeded the 2015 aggregate at 12.1%. As Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 2,043 home purchase loans totaling \$279.7 million in middle-income tracts. This represents 42.6% of home purchase loans by volume, which slightly exceeds the percentage of owner-occupied units in these tracts at 42.0%, and 35.5% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 44.5% and the 2015 aggregate of 44.4%.

Fifth Third made 1,671 home purchase loans totaling \$391.7 million in upper-income tracts. This represents 34.8% of home purchase loans by volume, which slightly exceeds the percentage of owner-occupied units in these tracts at 34.6%, and 49.8% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 43.3% and was below the 2015 aggregate of 42.2%.

Due to the low owner-occupancy and high rental/vacancy rates in low- and moderate-income tracts and Fifth Third's excellent level of lending penetration in these tracts, the geographic distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 73 refinance loans totaling \$6.9 million in low-income tracts. This represents 1.7% of refinance loans by volume and 1.0% by dollar amount, which is significantly below the percentage of owner-occupied units at 4.5%. The percentage of loans by volume exceeded the 2014 aggregate at 1.2% and the 2015 aggregate at 0.9%. Although Fifth Third's performance was substantially below proxy, its performance exceeded the aggregate of all lenders. Further, the owner-occupancy rate in low-income tracts is only 30.4%, which would indicate less of a demand for refinance loans. Therefore, the geographic distribution in low-income tracts is good.

Fifth Third made 750 refinance loans totaling \$79.6 million in moderate-income tracts. This represents 17.9% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 18.9%. The percentage of loans by dollar amount at 11.7% is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 10.1% and significantly exceeded the 2015 aggregate at 8.6%.

Given that Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders and the relatively low owner-occupancy rate in moderate-income tracts at 50.8%, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 1,701 refinance loans totaling \$223.5 million in middle-income tracts. This represents 40.7% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 42.0%. However, refinance loans by dollar amount (32.9%) is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 42.5% and was below the 2015 aggregate at 42.0%.

Fifth Third made 1,656 refinance loans totaling \$368.7 million in upper-income tracts. This represents 39.6% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 34.6%, but the dollar amount at 54.3% is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 46.1% and in 2015 was below the 2015 aggregate at 48.5%.

Overall, the geographic distribution of refinance loans is excellent. Fifth Third's performance in the moderate-income tracts was especially strong, considering the economic challenges that still persist in the Detroit area.

Home Improvement Loans

Fifth Third made eight home improvement loans totaling \$482,000 in low-income tracts. This represents 1.8% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 4.5%, and 1.3% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 2.4% and was comparable the 2015 aggregate of 2.5%. Given the need for these types of loans (as expressed by several community contacts), the median age of housing stock at 58 years, and Fifth Third's significant presence in this market, the geographic distribution of home improvements loans in low-income tracts is adequate.

Fifth Third made 103 home improvement loans totaling \$6.8 million in moderate-income tracts. This represents 22.6% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 18.9%, and 17.8% by dollar amount, which is slightly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 14.3% and significantly exceeded the 2015 aggregate of 12.6%. Given that Fifth Third exceeded proxy significantly exceeded the aggregate of all lenders, the need for these types of loans expressed by several community contacts, and the median age of housing stock at 55 years, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 206 home improvement loans totaling \$15.3 million in middle-income tracts. This represents 45.2% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 42.0%, and 39.8% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 42.8% and was below the 2015 aggregate of 42.8%.

Fifth Third made 139 home improvement loans totaling \$15.8 million in upper-income tracts. This represents 30.5% of home improvements loans by volume, which is below the percentage of owner-occupied units in these tracts at 34.6%, and 41.1% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 40.4% and the 2015 aggregate of 42.1%.

Overall, Fifth Third's overall geographic distribution of home improvement loans is good, considering comments from three community contacts, who indicated there are ample opportunities for banks to make home improvement and rehabilitation loans in lower-income areas, as well as a need for revitalizing blighted neighborhoods,

Small Business Loans

Fifth Third made 226 small business loans totaling \$57.3 million in low-income tracts. This represents 6.2% of small business loans by volume, which exceeds the percentage of small businesses in these tracts at 5.8%, and 9.2% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 5.1% and the 2015 aggregate of 5.2%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 657 small business loans totaling \$144.2 million in moderate-income tracts. This represents 18.0% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 17.3%, and 23.2% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 16.2% and exceeded the 2015 aggregate of 16.8%. Given that Fifth Third's performance exceeded proxy and aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 1,420 small business loans totaling \$201.3 million in middle-income tracts. This represents 38.8% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 39.2%, and 32.4% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 37.3% and was below the 2015 aggregate of 37.0%.

Fifth Third made 1,335 small business loans totaling \$212.0 million in upper-income tracts. This represents 36.5% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 37.4%, and 34.1% by dollar amount, which is slightly below proxy. The percentage of loans by volume was below the 2014 aggregate of 39.9% and was comparable to the 2015 aggregate of 39.7%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is excellent based on borrower income and adequate for businesses of different revenue sizes. Borrower distribution is excellent for home purchase, refinance, and home improvement loans.

Home Purchase Loans

Fifth Third made 1,058 loans totaling \$97.8 million to low-income borrowers. This represents 22.1% of home purchase loans by volume, which is comparable to the percentage of low-income families at 21.9%, and 12.4% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 8.8% and significantly exceeded the 2015 aggregate of 9.6%. Given that Fifth Third's performance was comparable to proxy and significantly exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 1,197 loans totaling \$143.3 million to moderate-income borrowers. This represents 24.9% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.2%, and 18.2% of loans by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.5% and exceeded the 2015 aggregate of 20.7%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 918 loans totaling \$136.7 million to middle-income borrowers. This represents 19.1% of home purchase loans by volume, which is comparable to the percentage of middle-income families at 20.1%, and 17.4% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.9% and was below the 2015 aggregate of 22.5%.

Fifth Third made 1,364 loans totaling \$356.4 million to upper-income borrowers. This represents 28.4% of home purchase loans by volume, which is significantly below the percentage of upper-income families at 40.9% and 45.3% of loans by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 34.4% and in 2015 was below the 2015 aggregate of 32.6%.

Fifth Third's excellent distribution to low- and moderate-income borrowers is noteworthy and the borrower distribution for home purchase loans is excellent, considering that a community contact indicated there are significant economic factors currently impacting the ability of lower-income individuals to buy homes.

Refinance Loans

Fifth Third made 698 loans totaling \$62.9 million to low-income borrowers. This represents 16.7% of refinance loans by volume, which is below the percentage of low-income families at 21.9%. The percentage of loans by dollar amount at 9.3% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.6% and significantly exceeded the 2015 aggregate of 6.1%. Given that Fifth Third's performance was below proxy and significantly exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 757 loans totaling \$78.3 million to moderate-income borrowers. This represents 18.1% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.2%, and 11.5% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.0% and exceeded the 2015 aggregate of 14.0%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 838 loans totaling \$108.3 million to middle-income borrowers. This represents 20.0% of refinance loans by volume, which is comparable to the percentage of middle-income families at 20.1%, and 16.0% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.3% and was below the 2015 aggregate of 20.3%.

Fifth Third made 1,506 loans totaling \$352.5 million to upper-income borrowers. This represents 36.0% of refinance loans by volume, which is below the percentage of upper-income families at 40.9%, and 51.9% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 41.9% and was below the 2015 aggregate of 40.5%.

Fifth Third's excellent distribution to low- and moderate-income borrowers is noteworthy and the borrower distribution for refinance loans is excellent, considering that a community contact indicated there are significant economic factors currently impacting the ability of lower-income individuals to buy homes.

Home Improvement Loans

Fifth Third made 92 loans totaling \$6.0 million to low-income borrowers. This represents 20.2% of home improvement loans by volume, which is comparable to the percentage of low-income families at 21.9%, and 15.5% by dollar amount, which is below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 10.2% and the 2015 aggregate of 10.5%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 120 loans totaling \$7.7 million to moderate-income borrowers. This represents 26.3% of its home improvement loans by volume, which substantially exceeds the percentage of moderate-income families at 17.2%, and 20.1% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.4% and exceeded the 2015 aggregate of 20.0%. Given that Fifth Third’s performance exceeded the aggregate of all lenders and substantially exceeded proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 106 loans totaling \$8.4 million to middle-income borrowers. This represents 23.2% of home improvement loans by volume, which is exceeds the percentage of middle-income families at 20.1%, and 21.9% by dollar amount, which slightly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 23.7% and was below the 2015 aggregate of 25.4%.

Fifth Third made 134 loans totaling \$15.8 million to upper-income borrowers. This represents 29.4% of home improvement loans by volume, which is below the percentage of upper-income families at 40.9%, and 41.1% by dollar amount, which slightly exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 41.0% and was below the 2015 aggregate of 40.8%.

Overall, the borrower distribution of home improvement loans is excellent, based on the excellent distribution of loans among low- and moderate-income borrowers and the need for these types of loans expressed by several community contacts.

Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 48.3% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 40.7% and the 2015 aggregate of 46.3%, but was significantly below the percentage of small businesses in the assessment area at 91.5%. Also, during the evaluation period, Fifth Third made an acceptable percentage of small-dollar loans (63.0%) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, several community contacts indicated a need for small-dollar loans to small businesses and that banks could improve upon originating these types of loans.

Community Development Loans

Fifth Third originated 92 community development loans totaling \$574.1 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
2	2,545,087	25	151,683,487	55	535,251,943	17	59,794,055

Community development lending in the assessment area represents 9.6% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third's third-highest percentage of community development lending during the evaluation period. Fifth Third's performance is especially strong, considering the high competition for community development loans and the number of large national banks in the area. Fifth Third only has 5.1% of the deposit market share. As such, Fifth Third is considered a leader in community development lending.

Examples of community development lending include, but are not limited to:

- Renewal of revolving lines of credit to two local for-profit companies to rehabilitate existing apartment buildings to provide affordable rental housing to low- and moderate-income individuals and families. Over half of the occupants pay less than fair market rent as determined by HUD
- One SBA 504 loan that promotes economic development by financing a small business
- A renewal of a revolving line of credit to a Community Development Financial Institution (CDFI) that provides loans to LIHTC projects and commercial real estate developments in target communities or to small businesses that are unable to access traditional financing
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies. These loans helped to retain at least 50 jobs.
- Multiple working capital loans to help retain and expand businesses located in areas specifically designated by cities with master plans to promote revitalization and economic development
- Working capital loans that support two schools that serves low- and moderate-income students
- Working capital loans that support two nonprofits that provides services to developmentally disabled LMI individuals
- Loan to support a nonprofit that conducts a 30-week empowerment and mentoring program that teaches low- and moderate-income young adults life skills, financial literacy, college preparation, and community activism.
- Working capital loans to a nonprofit that provides job training to low- and moderate-income individuals
- Loan refinance a building to nonprofit located in an Empowerment Zone that provides a multitude of services to low- and moderate-income individuals in an extremely impoverished neighborhood in Detroit

These loans were deemed to be responsive, as community contacts specifically mentioned the need for these types of loans to help deal with affordable housing, financial literacy, high poverty rates, and high unemployment rates.

Flexible Lending Programs

Fifth Third had 1,469 flexible lending loans in this assessment area: 798 government loans, 107 down payment assistance loans, and 564 were other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.1%	0.8%	4.5%	12.2%	8.5%	18.9%	55.1%	53.8%	42.0%	31.6%	36.8%	34.6%
Down Payment Assistance Programs	16.8%	16.5%	4.5%	24.3%	18.4%	18.9%	40.2%	39.7%	42.0%	18.7%	25.5%	34.6%
Other Flexible Lending Programs	1.6%	0.9%	4.5%	18.3%	14.7%	18.9%	49.5%	49.1%	42.0%	30.7%	35.3%	34.6%
Total	2.5%	1.5%	4.5%	15.4%	11.2%	18.9%	51.9%	51.5%	42.0%	30.3%	35.8%	34.6%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	12.9%	7.6%	21.9%	29.3%	25.2%	17.2%	31.5%	33.2%	20.1%	23.9%	31.4%	40.9%
Down Payment Assistance Programs	59.3%	57.0%	21.9%	28.7%	26.3%	17.2%	6.5%	8.7%	20.1%	3.7%	6.5%	40.9%
Other Flexible Lending Programs	14.5%	11.6%	21.9%	25.6%	20.4%	17.2%	23.5%	23.5%	20.1%	33.6%	41.9%	40.9%
Total	16.9%	11.1%	21.9%	27.9%	23.5%	17.2%	26.6%	28.6%	20.1%	26.2%	34.1%	40.9%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts, by number and dollar amount, was below the percentage of owner-occupied units in these tracts. However, down payment assistance programs significantly exceeded proxy. The percentage of lending, by volume and dollar amount, in moderate-income tracts was below the percentage of owner-occupied units.

Fifth Third’s lending, by volume and dollar amount, to low-income borrowers was below the percentage of low-income families in the assessment area. However, down payment assistance programs significantly exceeded proxy. The percentage of lending, by volume and dollar amount, to moderate-income borrowers substantially exceeded the percentage of moderate-income families.

Despite the high foreclosure rates in this assessment area, Fifth Third was able to assist low- and moderate-income borrowers or borrowers in purchasing properties in a low- or moderate-income area to purchase homes through the use of several down payment assistance programs. Therefore, Fifth Third made use of flexible lending practices and is serving the assessment area’s credit needs.

Lending through flexible loan programs to moderate-income borrowers was excellent and lending to low-income borrowers and in moderate-income tracts was good. Lending in low-income tracts was adequate. Flexible lending and other down-payment assistance programs to help low- and moderate-income individuals become first-time homebuyers was a need specifically identified by a community contact in the assessment area.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent.

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 662 qualified investments totaling \$125.2 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
335	80,496,531	63	319,918	11	1,546,198	192	1,138,739

Also included in the total number of qualified investments are 61 prior period investments totaling \$41.7 million. Fifth Third made 7.7% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 6.5% and greater than the percentage of branch offices at 6.9%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects and services supporting low- and moderate-income individuals throughout the assessment area, which was an important need expressed by several community contacts. Fifth Third made 283 donations totaling \$1.79 million that supported local schools, small businesses, churches, food banks, health care, and affordable housing. The majority of Fifth Third’s donations (63.5%) supported services to low- and moderate-income individuals. Also, \$150,000 of the donations supported Northwest Community Programs, a nonprofit that provides programs and activities that enhance the quality of life for low-income youth, families, and seniors in the Detroit community.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated excellent. Retail services are accessible and Fifth Third is a leader in providing community development services in this assessment area.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation period, two banking centers were opened and four were closed, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 90 banking centers within this assessment area, including nine in low-, 11 in moderate-, 38 in middle-, and 32 in upper-income census tracts. Fifth Third banking centers in this assessment area represent 6.9% of all its banking centers.

Fifth Third has a total of 111 full-service ATMs within this assessment area, including six in low-, 22 in moderate-, 44 in middle-, and 37 in upper-income census tracts. There are also two full-service ATMs located in unknown-income tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: MI Detroit

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open	Closed	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds	Total Businesses	
	#	%			#	%	#	%	#	%	#	%			
Low	9	10.0%	0	0	Total	6	5.1%	6	5.4%	0	0.0%	174	11.2%	8.1%	6.1%
Moderate	11	12.2%	0	0	Total	23	19.5%	22	19.8%	1	14.3%	362	23.4%	22.6%	17.4%
Middle	38	42.2%	0	0	Total	49	41.5%	44	39.6%	5	71.4%	565	36.5%	39.9%	38.9%
Upper	32	35.6%	2	4	Total	38	32.2%	37	33.3%	1	14.3%	422	27.3%	29.3%	37.1%
Unknown	0	0.0%	0	0	Total	2	1.7%	2	1.8%	0	0.0%	24	1.6%	0.0%	0.4%
Total	90	100.0%	2	4	Total	118	100.0%	111	100.0%	7	100.0%	1547	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered excellent, as the distribution of branches was comparable to the percentage of census tracts and exceeded households in these tracts. However, branch distribution within moderate-income tracts was considered adequate.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 11,412 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 9.6% of all community development services provided and equates to 5.49 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
2,983	1,314	591	6,524

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization. Community development services include 5,526 hours providing technical assistance to non-profits and local business, 2,833 hours serving on boards and committees, 2,817 hours of providing financial literacy through local nonprofits and school programs, and 236 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy and foreclosure outreach prevention activities, as several community contacts mentioned the need for financial literacy training to provide debt counseling and assist first-time homebuyers and entrepreneurs. In addition, the foreclosure rate remains significantly higher in several counties in this assessment area compared to the foreclosure rates in Michigan and the nation.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
GRAND RAPIDS-WYOMING-MUSKEGON MI CSA #266**

The Grand Rapids-Wyoming-Muskegon MI CSA consists of the following two MSAs: the Grand Rapids-Wyoming MI MSA #24340, consisting of Barry, Kent, Montcalm, and Ottawa counties, and the Muskegon MI MSA #34740, consisting of Muskegon County.

The assessment area is comprised of 15 low-, 56 moderate-, 123 middle-, and 53 upper-income tracts. There are also two tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third had the majority of the market share 21.5% of the deposits out of 32 institutions. The next three largest institutions, Huntington National Bank, JPMorgan Chase Bank, and Wells Fargo Bank had 11.9%, 9.7%, and 9.45% of the market share, respectively. Deposits in this assessment area accounted for 4.5% of the Fifth Third's total deposits. This was 30.6% of deposits within the state and the seventh-highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 7,449 HMDA loans and 2,708 CRA loans, which represented 7.1% and 6.9% of the total loans originated during the evaluation period, respectively. This was the seventh-largest HMDA market and ninth-largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company and Fifth Third Mortgage Company-Michigan ranked second and third, respectively among 420 HMDA reporters in the assessment area, while Fifth Third ranked 19th. Lake Michigan Credit Union ranked first among HMDA lenders in the assessment area. Fifth Third ranked seventh of 82 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Capital One, Chase Bank USA, and U.S. Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Four community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an organization that helps businesses recruit talent, stated the economic conditions in the area are very good and the area's diverse economy helped it through the recession better than other municipalities in the state. The contact indicated that unemployment is low the Grand Rapids area, particularly in Ottawa and Kent counties. However, there are areas with high unemployment, low median family incomes, and low educational attainment. The contact stated local area banks are actively involved in the community and regularly provide financial literacy training.

The second contact, representing an affordable housing agency, stated current economic conditions in the area are improving and area unemployment has steadily declined since the recession (2008). The contact noted that rental rates are rising, making it increasingly difficult for low-income individuals to find affordable housing. In addition, local financial institutions are actively involved in meeting the credit needs of the community; however, the contact believed there is an ongoing need for banks to extend low-cost (fee-free) credit to lower-income individuals to encourage them to work with banks to obtain necessary funding.

The third contact, representing an economic development organization, indicated there is an opportunity for banks and local government to fund infrastructure and transportation projects to boost the city's appeal. The contact believed the lack of cost-effective transportation is one of the primary factors limiting lower-income individuals from finding meaningful employment. The contact stated the competition among banks in the area translates into active support for the entrepreneurial community and a willingness to offer more innovative products.

The final contact, representing an agency that serves the needs of low- and moderate-income individuals and families, stated the agency has good partnerships with area financial institutions. The contact believed there is always a need to help the unbanked and underbanked (mostly lower-income households) gain access to mainstream financial systems. The contact specifically mentioned First General Credit Union and Fifth Third as being active agency partners.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 1.2 million. One quarter (25.0%) of the population lived in low- and moderate-income tracts. In addition, 74.2% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Grand Rapids MSA is the 52nd largest in terms of population in the nation, while the Muskegon MSA is the 239th largest.¹⁹⁹ Among the most populous counties in Michigan, Barry County is 15th, Kent County is 81st, Montcalm County is 117th, Muskegon County is 121st, and Ottawa County is 139th.

According to 2015 U.S. Census data,²⁰⁰ Grand Rapids is the second largest city in Michigan with 195,097 residents and is the 122nd largest city in the nation. Wyoming is the 14th largest city in the state with 75,275 residents and Muskegon is the 30th largest with 38,401 residents.²⁰¹ The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease.²⁰²

¹⁹⁹ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²⁰⁰ US Census Bureau: <http://www.census.gov/quickfacts/table/PST045216/00> (main page – must enter state, county, city, town or zip code)

²⁰¹ Michigan – 2015 City Populations: <https://www.biggestuscities.com/mi>

²⁰² Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):
<http://www.census.gov/quickfacts/table/PST045216/00>

For the most part, the population within the CSA experienced positive growth between 2010 and 2015, with Ottawa and Kent counties experiencing the greatest growth and only Malcolm County experiencing a decline in population.

County	2010 Population	2015 Population	Population Percent Change
Barry	59,173	59,314	0.2%
Kent	602,622	636,369	5.6%
Montcalm	63,342	62,945	-0.6%
Muskegon	172,188	172,790	0.3%
Ottawa	263,801	279,955	6.1%
Total	1,161,126	1,211,373	4.3%

According to U.S. Census data, Grand Rapids and its surrounding area is the fastest-growing population center in Michigan. From July 2014 to July 2015, the rate of increase in the Grand Rapids metropolitan area was 15 times higher than the state as a whole (an increase of 9,621 people or 0.9%). The Muskegon metropolitan area grew 0.3% during this time period.²⁰³

According to Moody’s Analytics, between 2012 and 2015, Grand Rapids’ population growth remains positive and strong compared to other places in Michigan. Population growth can be attributed to a steady increase in domestic and foreign in-migration. Between 2012 and 2015, Muskegon’s population growth was minimal.

Income Characteristics

The 2010 assessment area median family income was significantly lower (\$59,489) than Michigan at \$60,341. As shown in the table below, the median family income increased across the assessment area, except for a slight decrease in the Muskegon MSA between 2010 and 2014.

FFIEC Estimated Median Family Income	2010	2014	2015	2016
Grand Rapids-Wyoming MI MSA	\$61,182	\$64,600	\$65,700	\$65,800
Muskegon MI MSA	\$50,101	\$49,400	\$51,900	\$52,200

²⁰³ Vande Bunte, Matt. “Michigan’s fastest-growing metro area is Grand Rapids.” *MLive*. March 24, 2016. - http://www.mlive.com/news/grand-rapids/index.ssf/2016/03/michigans_fastest-growing_metr.html

Poverty rates increased in each county in the assessment area from 1999 to 2015.²⁰⁴ Muskegon County had the highest poverty rate in 1999 and Montcalm County had the highest poverty rate in 2015. Barry and Ottawa counties had the lowest poverty rates in 1999 and Ottawa County had the lowest poverty rate in 2015. In 2015, Muskegon and Montcalm counties had poverty rates higher than Michigan and these counties, in addition to Kent County, had poverty rates that exceeded the national rate. However, Barry County experienced the largest increase in poverty rates during this period. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²⁰⁵ The following table shows the poverty rates for 1999²⁰⁶ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Barry	5.5%	9.3%	69.1%
Kent	8.9%	14.5%	62.9%
Montcalm	10.9%	17.9%	64.2%
Muskegon	11.4%	16.1%	41.2%
Ottawa	5.5%	8.6%	56.4%
Michigan	10.5%	15.7%	49.5%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 475,649 housing units and 299,503 families in the assessment area. From an income perspective, 26.2% of housing units, 18.4% of owner-occupied units, and 21.8% of families are located in low- or moderate-income tracts. Nearly two-thirds of the housing units in the low-income census tracts are either rental or vacant (65.0%). In the moderate-income census tracts, nearly half (49.9%) of the housing units are either rental or vacant, and 50.1% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 38 years old, with 23.3% of the stock built before 1950. The oldest housing stock was in Muskegon County with a median age of 45 years, while the newest was 29 years in Ottawa County. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 54 years in moderate-income tracts, which indicates that there is ample opportunity.

²⁰⁴ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

²⁰⁵ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²⁰⁶ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

According to 2010 U.S. Census data, the median housing value in the assessment area was \$144,427, with an affordability ratio of 33.91. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The median housing value decreased between 2010 and 2011-2015 and household incomes increased and as a result, housing became more affordable across the assessment area. During the evaluation period, the most affordable housing was in Montcalm County, with the least affordable in Ottawa County. Median gross rents increased at a substantial rate across the assessment area, with renters in Barry County experiencing the largest increase in rental rates and renters in Muskegon County experiencing the smallest increase. In 2010, about 48.9% of renters across the assessment area had rent costs greater than 30.0% of income. A contact noted rental rates are rising, thereby making it increasingly difficult for low income individuals to find affordable housing, as increasing rental rates may make it harder for potential homebuyers to save enough money for a down payment for a home. According to Moody’s Analytics, houses prices in the Grand Rapids metropolitan area are rising faster than in any other Michigan metropolitan areas and are well above the pre-recession peak. The average price on a pending home sale has increased by 8.1%. In December 2016, Trulia.com concluded that Grand Rapids area was the fourth hottest real estate market in the nation due to its growing economy and affordable housing inventory. Rental rates also were on the rise in Grand Rapids, according to Trulia’s report. The median rental rate was \$1,200, an increase of 20.0% from one year ago (2016 to 2017), but down from its summer peak of \$1,300.²⁰⁷ The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Michigan.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Barry	\$147,300	35.21	\$134,700	40.88	\$652	\$762	16.9%
Kent	\$147,600	33.56	\$139,300	38.09	\$699	\$767	9.7%
Montcalm	\$112,700	35.29	\$94,100	44.19	\$618	\$692	12.0%
Muskegon	\$112,800	36.05	\$99,000	43.33	\$628	\$673	7.2%
Ottawa	\$161,200	34.18	\$155,400	36.03	\$726	\$792	9.1%
Michigan	\$144,200	33.59	\$122,400	40.50	\$723	\$783	8.3%

According to Bankrate.com,²⁰⁸ Michigan ranked 26th for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:²⁰⁹

²⁰⁷ Harger, Jim. “Housing market begins 2017 on a ‘hot’ note.” *MLive*. January 13, 2017. –

www.mlive.com/business/west-michigan/index.ssf/2017/01/west_michigan_housing_market_b.html

Isidore, Chris. “GM cutting 1,300 jobs at only plant inside Detroit.” *CNN Money*. December 20, 2016. -

<http://money.cnn.com/2016/12/20/news/companies/gm-plant-layoff/index.html>

²⁰⁸ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²⁰⁹ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Barry	1:2,493
Kent	1:4,747
Montcalm	1:1,998
Muskegon	1:1,791
Ottawa	1:3,331
Michigan	1:2,036
U.S.	1:1,533

In November 2016, Muskegon County had the highest rate of foreclosure and Kent County had the lowest foreclosure rate within the assessment area.

Building permits in the MSAs, Michigan, and the nation are included in the following table for 2014, 2015, and 2016.²¹⁰

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Grand Rapids-Wyoming MSA	3,171	3,672	15.8%	3,655	-0.5%
Muskegon MSA	172	241	40.1%	16	-93.4%
Michigan	15,836	18,226	15.1%	22,426	23.0%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The Muskegon MSA experienced the greatest increase of housing permits between 2014 and 2015 and the greatest decrease of housing permits between 2015 and 2016. In the Grand Rapids MSA, the percentage of housing permits mirrored Michigan’s percentage between 2014 and 2015, but fell far below the state’s percentage of housing permits between 2015 and 2016. Based on the high demand for permits between 2014 and 2015 and performance context indicating a strong housing market in 2017, this could indicate an increased demand for home purchase loans across the assessment area during the evaluation period.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Grand Rapids area economy is expanding due to growing biotech and healthcare, and a diverse manufacturing base. Personal income, industrial production, and home prices are on an upward trajectory. Population growth is exceeding expectations and the booming downtown and high-paying biotech jobs are helping Grand Rapids to retain more college graduates.

²¹⁰ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

While job growth eased slightly, it is on pace to comfortably exceed the rest of the state and the nation. The Muskegon area economy is in recovery. The metropolitan area is adding jobs at a faster pace, but high-wage industry jobs represent less than 10.0% of total area employment. This unfavorable mix is preventing average hourly earnings from increasing; as a result, Muskegon area incomes lag the state and national averages. Weak population growth, low educational attainment, and a comparatively small working-age population constrain Muskegon’s prospects for sustained economic growth.

The Grand Rapids metropolitan area is home to the headquarters of one Fortune 500 company:²¹¹

Grand Rapids Metro Fortune 500 Companies (2016)		
Rank	Company	Revenue
351	SpartanNash	\$7.9 billion

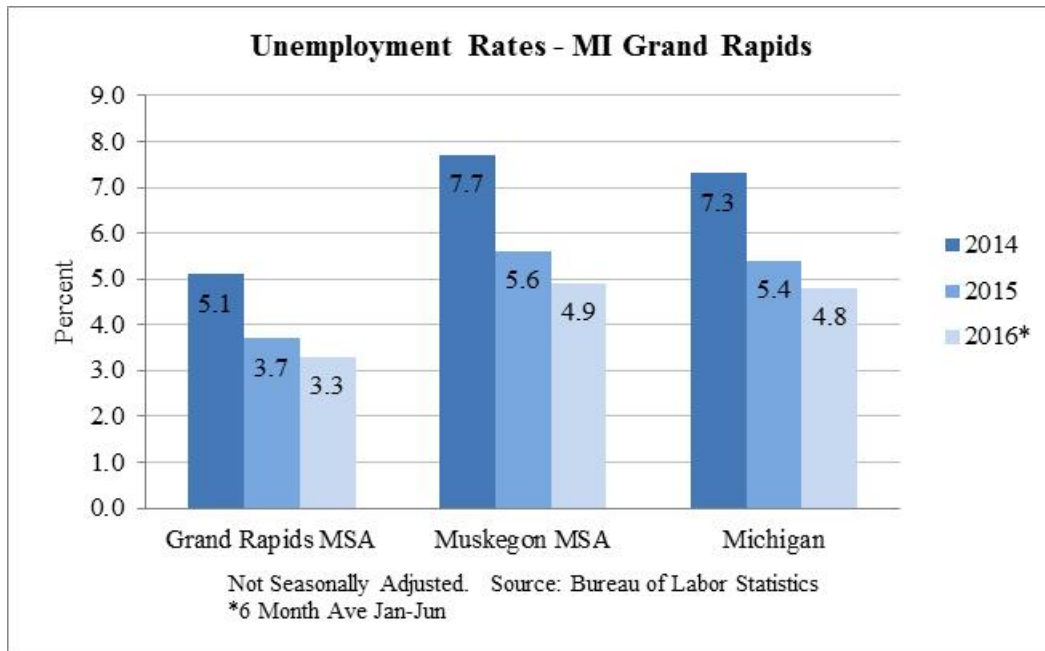
SpartanNash is a food distributor and grocery store retailer headquartered in Byron Center, Michigan. In terms of revenue, it is the largest food distributor serving military commissaries and exchanges in the U.S.

According to Moody’s Analytics, the top 12 employers in the CSA in 2015/2016 were:

Company	Number of Employees
Spectrum Health	21,800
Meijer Inc.	20,686
Mercy Health	6,500
Axios Inc.	5,000
Amway Corp.	4,000
Johnson Controls Inc.	3,900
Centex Corp.	3,900
Grand Valley State University	3,306
SpartanNash	2,585
Alcoa Howmet	2,200
ADAC Automotive Inc.	1,000
Hines Corp.	690

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the CSA and Michigan.

²¹¹ www.craindetroit.com/article/20160606/NEWS/160609759/southeast-michigan-representation-on-furtune-500-shrinks



Overall, unemployment rates in the assessment area declined each year. The Grand Rapids MSA had the lowest unemployment rates all three years and were below Michigan’s rates of unemployment. The Muskegon MSA had the highest unemployment rates all three years and were above Michigan’s.

According to MLive, GE Aviation says the company is laying off 74 employees from its Grand Rapids area operations after sales fell short in 2016. The majority of the employees being laid off were engineers, although the cuts were across several departments. In total, the company is laying off 107 workers, primarily in Grand Rapids and Clearwater, Florida.²¹² News 8 also reported that SAF-Holland is shutting down two of its manufacturing plants in West Michigan as part of its restructuring efforts. The truck and trailer parts suppliers blamed the continued market weakness for its decision. SAF-Holland is not moving out of Muskegon, as the company indicated that it plans to use the site for its Americas region headquarters and corporate offices. SAF-Holland also plans to build a cutting-edge engineering and technology center in Muskegon and consolidate the Holland testing center and administrative offices. Production work handled by these plants will be moved to the company’s other three sites in Ohio, Arkansas, and Texas. Around 97 employees are expected to lose their jobs at the Holland plant and it is unclear how many workers will be affected by the layoffs at the Muskegon plant.²¹³

²¹² Martinez, Shandra. “GE Aviation trims Grand Rapids workforce.” *MLive*. January 19, 2017. - http://www.mlive.com/news/grand-rapids/index.ssf/2017/01/ge_aviation_shedding_74_grand.html

²¹³ Web Staff. “SAF-Holland to shutter plants in Holland and Muskegon.” *WoodTV News 8*. March 28, 2017. - <http://woodtv.com/2017/01/18/saf-holland-to-shutter-plants-in-holland-muskegon/>

Combined Demographics Report

Assessment Area: MI Grand Rapids

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	15	6	10,084	3.4	3,984	39.5	59,343	19.8
Moderate-income	56	22.5	55,137	18.4	11,324	20.5	54,917	18.3
Middle-income	123	49.4	156,768	52.3	11,358	7.2	66,862	22.3
Upper-income	53	21.3	77,514	25.9	2,573	3.3	118,381	39.5
Unknown-income	2	0.8	0	0	0	0	0	0
Total Assessment Area	249	100.0	299,503	100.0	29,239	9.8	299,503	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	18,284	6,400	2	35	9,114	49.8	2,770	15.1
Moderate-income	106,490	53,308	16.4	50.1	38,685	36.3	14,497	13.6
Middle-income	246,361	177,013	54.6	71.9	48,385	19.6	20,963	8.5
Upper-income	104,514	87,597	27	83.8	10,955	10.5	5,962	5.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	475,649	324,318	100.0	68.2	107,139	22.5	44,192	9.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2,003	4	1,593	3.6	404	8.3	6	2.5
Moderate-income	9,318	18.7	8,203	18.3	1,050	21.5	65	26.9
Middle-income	24,433	49	22,105	49.4	2,208	45.1	120	49.6
Upper-income	14,118	28.3	12,835	28.7	1,232	25.2	51	21.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	49,872	100.0	44,736	100.0	4,894	100.0	242	100.0
	Percentage of Total Businesses:			89.7		9.8		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3	0.2	3	0.2	0	0	0	0
Moderate-income	143	9.4	133	9.2	9	12.5	1	100
Middle-income	1,055	69.4	1,009	69.7	46	63.9	0	0
Upper-income	319	21	302	20.9	17	23.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,520	100.0	1,447	100.0	72	100.0	1	100.0
	Percentage of Total Farms:			95.2		4.7		.1

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GRAND
RAPIDS-WYOMING-MUSKEGON MI CSA MI CSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 74 community development loans totaling \$230.7 million. Fifth Third has an excellent overall geographic distribution of loans and no gaps in lending were noted. Fifth Third has an excellent distribution of loans among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits an excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of refinance lending based on the overall volume of lending, followed by home purchase, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 3,694 refinance, 3,447 home purchase, 305 home improvement, 2,708 small business, and 74 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 7.1% is greater than the percentage of total deposits at 4.5% in this area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	2	0.8%	52	21.1%	131	53.0%	62	25.1%
<i>Percentage of Owner Occupied Units</i>		<i>2.0%</i>		<i>16.4%</i>		<i>54.6%</i>		<i>27.0%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	67	27.1%	97	39.3%	53	21.5%	28	11.3%
Percentage of Families by Family Income		19.8%		18.3%		22.3%		39.5%

*Unknown tract data is not included in the above table.

There were not enough HAMP loans for a meaningful analysis. The percentage of other modifications was below the percentage of owner-occupied units in low-income tracts and exceeded proxy in moderate-income tracts. Therefore, modifications helped to expand lending activities in these areas. The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Refinance lending, which was the largest loan category, is good. Home purchase lending is excellent and home improvement lending is good. Small business lending is excellent. Also, no lending gaps were noted in the assessment area, as shown in the following table.

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	15	0	100.0%
Moderate	56	0	100.0%
Middle	123	0	100.0%
Upper	53	0	100.0%
Unknown	2	2	0.0%
Total	249	2	99.2%

There were no lending gaps in the low,-moderate,-middle,-and upper-income tracts. Although Fifth Third did not make any loans in the two unknown-income tracts, there is no population in these tracts and therefore, there is no demand for loans in these areas.

Refinance Loans

Fifth Third made 59 refinance loans totaling \$3.8 million in low-income tracts. This represents 1.6% of refinance loans by volume, which is slightly below the percentage of owner-occupied units at 2.0%, and 0.8% by dollar amount, which is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 1.3% and was comparable to the 2015 aggregate at 1.1%. As Fifth Third’s performance was slightly below proxy and comparable to the aggregate of all lenders, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 522 refinance loans totaling \$45.4 million in moderate-income tracts. This represents 14.1% of refinance loans by volume, which is below the owner-occupied units in these tracts at 16.4%. The percentage of loans by dollar amount at 9.4% is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 12.9% and exceeded the 2015 aggregate at 11.3%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 1,925 refinance loans totaling \$299.1 million in middle-income tracts. This represents 52.1% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 54.6%. However, refinance loans by dollar amount (47.6%) was below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 53.1% and exceeded the 2015 aggregate at 51.9%.

Fifth Third made 1,888 refinance loans totaling \$203.4 million in upper-income tracts. This represents 32.2% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 27.0%, and the dollar amount at 42.2% also exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 32.6% and was below the 2015 aggregate at 35.7%.

Overall, the geographic distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made 74 home purchase loans totaling \$6.5 million in low-income tracts. This represents 2.1% of home purchase loans by volume, which slightly exceeds the percentage of owner-occupied units in these tracts at 2.0%, and 1.3% by dollar amount, which is comparable proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 1.2% and exceeded the 2015 aggregate at 1.6%. As Fifth Third's performance exceeded the aggregate of all lenders and slightly exceeded proxy, the geographic distribution of home purchase loans in low-income tracts is excellent.

Fifth Third made 573 home purchase loans totaling \$52.5 million in moderate-income tracts. This represents 16.6% of its home purchase loans by volume, which slightly exceeds the percentage of owner-occupied units in these tracts at 16.4%, and 10.4% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 14.6% and exceeded the 2015 aggregate at 14.8%. As Fifth Third's performance exceeded the aggregate of all lenders and slightly exceeded proxy, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

Fifth Third made 1,801 home purchase loans totaling \$243.5 million in middle-income tracts. This represents 52.2% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 54.6% and 48.4% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 53.9% and was comparable to the 2015 aggregate of 54.3%.

Fifth Third made 999 home purchase loans totaling \$200.3 million in upper-income tracts. This represents 29.0% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 27.0%, and 39.8% by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 30.3% and was below the 2015 aggregate of 29.4%.

Overall, the geographic distribution of home purchase loans is excellent.

Home Improvement Loans

Fifth Third made three home improvement loans totaling \$131,000 in low-income tracts. This represents 1.0% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 2.0%, and 0.6% by loan amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 1.2% and was below the 2015 aggregate of 0.9%. Given the median age of housing in low-income tracts at 61 years, which is a likely indicator of the need for home improvement loans and Fifth Third's lending performance in these tracts; the geographic distribution of home improvement loans in low-income tracts is good.

Fifth Third made 76 home improvement loans totaling \$3.8 million in moderate-income tracts. This represents 24.9% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 16.4%, and 18.7% by dollar amount, which also exceeded proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.7% and exceeded the 2015 aggregate of 15.9%. Given the age of the housing stock in the moderate-income tracts at 54 years, a likely indicator of the need for home improvement loans and Fifth Third's lending performance in these tracts, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 140 home improvement loans totaling \$9.4 million in middle-income tracts. This represents 45.9% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 54.6%, and 45.7% by dollar amount, which is also below proxy. The percentage of loans by volume was below the 2014 aggregate of 53.9% and comparable to the 2015 aggregate of 52.5%.

Fifth Third made 86 home improvement loans totaling \$7.2 million in upper-income tracts. This represents 28.2% of home improvements loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 27.0%, and 35.0% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 29.2% and was below the 2015 aggregate of 30.7%.

Overall, the geographic distribution of home improvement loans is good.

Small Business Loans

Fifth Third made 176 small business loans totaling \$36.9 million in low-income tracts. This represents 6.5% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 3.6%, and 9.5% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 4.5% and exceeded the 2015 aggregate of 4.5%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 502 small business loans totaling \$70.4 million in moderate-income tracts. This represents 18.5% of small business loans by volume, which slightly exceeds the percentage of businesses in these tracts at 18.3%. This also represents 18.2% small business loans by dollar amount, which is also comparable to proxy. However, the percentage of loans by volume exceeded the 2014 aggregate of 17.4% and was comparable to the 2015 aggregate of 17.2%. Given that Fifth Third's performance exceeded the aggregate of all lenders and slightly exceeded proxy, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 1,197 small business loans totaling \$174.1 million in middle-income tracts. This represents 44.2% of small business loans by volume, which is below the percentage of businesses in these tracts at 49.4%, and 44.9% by dollar amount, which is comparable to proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 45.8% and was below the 2015 aggregate of 46.2%.

Fifth Third made 833 small business loans totaling \$106.0 million in upper-income tracts. This represents 30.8% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 28.7%, and 27.4% by dollar amount, which is comparable to proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 31.0% and the 2015 aggregate of 31.1%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for home purchase and home improvement loans and good for refinance loans.

Refinance Loans

Fifth Third made 507 loans totaling \$38.9 million to low-income borrowers. This represents 13.7% of refinance loans by volume, which is below percentage of low-income families at 19.8%. The percentage of loans by dollar amount at 8.1% is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 8.7% and significantly exceeded the 2015 aggregate of 6.7%. Given Fifth Third's performance is below proxy, but significantly exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is good.

Fifth Third made 826 loans totaling \$76.8 million to moderate-income borrowers. This represents 22.4% of refinance loans by volume, which exceeds the percentage of moderate-income families at 18.3% and 15.9% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.8% and exceeded the 2015 aggregate of 17.6%. Given Fifth Third's performance in exceeded proxy and the aggregate of all lenders, borrower distribution is considered excellent.

Fifth Third made 878 loans totaling \$97.9 million to middle-income borrowers. This represents 23.8% of refinance loans by volume, which slightly exceeds the percentage of middle-income families at 22.3%, and 20.3% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.2% and exceeded the 2015 aggregate of 20.7%.

Fifth Third made 1,271 loans totaling \$234.6 million to upper-income borrowers. This represents 34.4% of refinance loans by volume, which is below the percentage of upper-income families at 39.5%, while the percentage of loans by dollar amount at 48.7% exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 32.7% and was comparable to the 2015 aggregate of 33.9%.

Overall, the borrower distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made 629 loans totaling \$51.9 million to low-income borrowers. This represents 18.2% of home purchase loans by volume, which is comparable to the percentage of low-income families at 19.8%, and 10.3% of loans by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 10.8% and exceeded the 2015 aggregate of 10.0%. Because Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 882 loans totaling \$99.0 million to moderate-income borrowers. This represents 25.6% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 18.3%, and 19.7% of loans by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.9% and exceeded the 2015 aggregate of 23.8%. Given Fifth Third/s performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 654 loans totaling \$91.8 million to middle-income borrowers. This represents 19.0% of home purchase loans by volume, which is below the percentage of middle-income families at 22.3%, and 18.3% by dollar amount, which is also below proxy. The percentage of loans by volume was below the 2014 aggregate of 21.5% and was below the 2015 aggregate of 21.0%.

Fifth Third made 1,015 loans totaling \$217.7 million to upper-income borrowers. This represents 29.4% of home purchase loans by volume, which is below the percentage of upper-income families at 39.5%, and 43.3% of loans by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 28.4% and was below the 2015 aggregate of 28.6%.

A community contact and performance context indicate that rental rates are increasing, making it increasingly difficult for lower-income individuals to save enough for a down payment to purchase a home. Given Fifth Third's performance to low- and moderate-income borrowers exceeded proxy and all aggregate lenders, the overall borrower distribution of home purchase loans is excellent.

Home Improvement Loans

Fifth Third made 48 loans totaling \$2.3 million to low-income borrowers. This represents 15.7% of home improvement loans by volume, which is below the percentage of low-income families at 19.8%, and 11.3% by dollar amount, which is also below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 10.9% and significantly exceeded the 2015 aggregate of 10.0%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 91 loans totaling \$4.9 million to moderate-income borrowers. This represents 29.8% of its home improvement loans by volume, which substantially exceeds the percentage of moderate-income families at 18.3%, and 23.7% by dollar amount, which also exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 22.1% and exceeded the 2015 aggregate of 21.5%. Given that Fifth Third's performance exceeded the aggregate of all lenders and substantially exceeded proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 86 loans totaling \$4.5 million to middle-income borrowers. This represents 28.2% of home improvement loans by volume, which exceeds the percentage of middle-income families at 22.3%, and 21.8% by dollar amount, which is slightly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 26.8% and exceeded the 2015 aggregate of 24.9%.

Fifth Third made 73 loans totaling \$8.2 million to upper-income borrowers. This represents 23.9% of home improvement loans by volume, which is below the percentage of upper-income families at 39.5%, and 40.0% by dollar amount, which is comparable to proxy. The percentage of loans by volume was below the 2014 aggregate of 35.6% and the 2015 aggregate of 40.9%.

The overall borrower distribution of home improvement loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 49.4% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance significantly exceeded the 2014 aggregate of 39.5% and exceeded the 2015 aggregate of 41.7%, but was significantly below the percentage of small businesses in the assessment area at 89.7%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (69.7%) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, a community contact cited the lack infrastructure improvements and mass transportation options limit economic development prospects and small business lending opportunities.

Community Development Loans

Fifth Third originated 74 community development loans totaling \$230.7 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
4	16,895,000	35	118,928,407	14	65,703,658	21	29,185,614

Community development lending in the assessment area represents 3.8% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s sixth-highest percentage of community development lending during the evaluation period. Although Fifth Third has the majority of the market share with 21.5% of the deposits in this market, it must still compete with several large national banks in the area for community development loans. Deposits in this assessment area accounted for 4.5% of the Fifth Third’s total deposits during the evaluation period. As such, Fifth Third is considered a leader in community development lending.

Examples of community development lending include, but are not limited to:

- Two new loans to support a federally subsidized public housing (Section 8) development project, where old buildings were demolished and replaced with 47 new apartments for low- and moderate-income individuals and families
- Renewal of a revolving line of credit to Habitat for Humanity to build and construct multiple single-family dwellings for low- and moderate-income individuals/families.
- Renewal of working capital loan to a community action partnership that provides a multitude of services low-income families, seniors and disabled persons
- Renewal of a revolving line of credit to continue operations for a university where 55.0% of the student body is considered low- or moderate-income
- Working capital loan to a nonprofit that provides emergency shelter to low- and moderate-income women and children

- Working capital loan to a nonprofit that provides transportation for low- and moderate-income individuals to linkages to other transit systems in order to gain access to employment opportunities
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies (162 jobs retained and 36 jobs added)
- Renewal of line of credit to a nonprofit that helps increase economic opportunities for small businesses in the area and provides start-up businesses with business literacy training
- Multiple working capital loans to help retain and expand businesses located in areas specifically designated by the city to promote revitalization and economic development

The loans that supported services to low- and moderate-income individuals, affordable housing, and, in particular, providing transportation to gain meaningful employment opportunities were deemed to be responsive, as community contacts specifically mentioned the need for these types of loans.

Flexible Lending Programs

Fifth Third had 1,682 flexible lending loans in this assessment area: 907 government loans, 128 were down payment assistance loans, and 647 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.4%	1.0%	2.0%	20.6%	15.1%	16.4%	56.6%	55.8%	54.6%	21.4%	28.1%	27.0%
Down Payment Assistance Programs	19.5%	14.6%	2.0%	25.8%	23.4%	16.4%	44.5%	47.9%	54.6%	10.2%	14.1%	27.0%
Other Flexible Lending Programs	2.5%	1.2%	2.0%	16.5%	12.9%	16.4%	54.1%	51.2%	54.6%	26.9%	34.8%	27.0%
Total	3.2%	1.8%	2.0%	19.4%	14.7%	16.4%	54.7%	53.6%	54.6%	22.7%	29.9%	27.0%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	21.1%	15.3%	19.8%	40.4%	38.0%	18.3%	21.6%	24.4%	22.3%	11.8%	16.3%	39.5%
Down Payment Assistance Programs	76.2%	72.5%	19.8%	11.9%	11.2%	18.3%	7.9%	10.8%	22.3%	3.2%	4.5%	39.5%
Other Flexible Lending Programs	19.7%	15.5%	19.8%	23.7%	20.5%	18.3%	21.7%	19.7%	22.3%	29.3%	39.2%	39.5%
Total	25.0%	18.9%	19.8%	31.1%	28.9%	18.3%	20.5%	21.6%	22.3%	18.4%	25.4%	39.5%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number and dollar amount exceeded the percentage of owner-occupied units in these tracts, especially for the various down payment assistance programs. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units in tracts, while the percentage of lending by dollar amount was below proxy.

Fifth Third’s lending by volume to low-income borrowers exceeded the percentage of low-income families, while lending by dollar amount was below proxy. The percentage of lending, by volume and dollar amount, to moderate-income borrowers exceeded the percentage of moderate-income families, especially for government loan programs.

Therefore, Fifth Third made extensive use of flexible lending practices in serving the assessment area’s credit needs, as lending through flexible loan programs was excellent in moderate-income geographies and to low- and moderate-income borrowers. Lending through flexible loan programs was good in low-income geographies.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated good.

Fifth Third makes a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was occasionally in a leadership position. Fifth Third has 339 qualified investments totaling \$47.7 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
146	28,370,391	57	397,072	1	5,000	105	1,023,554

Also included in the total number of qualified investments are 30 prior period investments totaling \$17.9 million. Fifth Third made 2.9% of its total community development investments in this assessment area, which is below the percentage of total deposits at 4.5% and the percentage of branch offices at 4.8%.

Fifth Third exhibits a good responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects and community services throughout the assessment area, which are important needs expressed by several community contacts. Fifth Third made 168 donations totaling \$1.4 million that supported local schools, small businesses, churches, food banks, health care, and affordable housing. The majority of Fifth Third's donations (71.0%) supported services to low- and moderate-income individuals.

Service Test

Fifth Third's performance under the service test in this assessment area is rated excellent. Retail services are accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, no branches were opened and four were closed, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 62 banking centers within this assessment area, including two in low-, 14 in moderate-, 30 in middle-, and 16 in upper-income census tracts. Fifth Third banking centers in this assessment area represent 4.8% of all its banking centers.

Fifth Third has a total of 91 full-service ATMs within this assessment area, including four in low-, 18 in moderate-, 47 in middle-, and 22 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: MI Grand Rapids

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	2	3.2%	0	0	Total	6	5.4%	4	4.4%	2	9.5%	15	6.0%	3.6%	4.1%
Moderate	14	22.6%	0	0	Total	30	26.8%	18	19.8%	12	57.1%	56	22.5%	21.3%	18.8%
Middle	30	48.4%	0	2	Total	49	43.8%	47	51.6%	2	9.5%	123	49.4%	52.2%	48.7%
Upper	16	25.8%	0	2	Total	27	24.1%	22	24.2%	5	23.8%	53	21.3%	22.8%	28.3%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	2	0.8%	0.0%	0.0%
Total	62	100.0%	0	4	Total	112	100.0%	91	100.0%	21	100.0%	249	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered good, as the distribution of branches was comparable the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 6,519 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 5.5% of all community development services provided and equates to 3.13 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
363	1,073	11	5,072

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization.

Community development services include 3,108 hours serving on boards and committees, 1,868 hours of providing financial literacy through local nonprofits and school programs, 1,504 hours providing technical assistance to non-profits and local business, and 39 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy and affordable housing. A community contact indicated there is a need for financial literacy training to assist first-time homebuyers and lower-income individuals gain access to mainstream financial systems. Another community contact mentioned the need for more access to affordable housing, an increasing critical need in this assessment area.

METROPOLITAN AREAS and NON-METROPOLITAN AREAS
(Limited-scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF MICHIGAN

- **Battle Creek MSA**
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 1.3% of its branches in Michigan.
 - As of June 30, 2016, Fifth Third had \$107,088 in deposits in this assessment area, representing a market share of 10.1% and 0.7% of its statewide deposits.
- **Jackson MSA**
 - As of June 30, 2016, Fifth Third operated two branches in the assessment area, representing 0.9% of its branches in Michigan.
 - As of June 30, 2016, Fifth Third had \$82,622 in deposits in this assessment area, representing a market share of 4.5% and 0.5% of its statewide deposits.
- **Kalamazoo-Portage MSA**
 - As of June 30, 2016, Fifth Third operated 16 branches in the assessment area, representing 7.1% of its branches in Michigan.
 - As of June 30, 2016, Fifth Third had \$799,943 in deposits in this assessment area, representing a market share of 21.5% and 5.2% of its statewide deposits.
- **Lansing-East Lansing MSA**
 - As of June 30, 2016, Fifth Third operated 16 branches in the assessment area, representing 7.1% of its branches in Michigan.
 - As of June 30, 2016, Fifth Third had \$780,275 in deposits in this assessment area, representing a market share of 12.9% and 5.1% of its statewide deposits.
- **Non-metropolitan Northern Michigan**
 - As of June 30, 2016, Fifth Third operated 25 branches in the assessment area, representing 11.1% of its branches in Michigan.
 - As of June 30, 2016, Fifth Third had \$1.3 million in deposits in this assessment area, representing a market share of 16.1% and 8.7% of its statewide deposits.
- **Saginaw-Midland-Bay City CSA**
 - As of June 30, 2016, Fifth Third operated four branches in the assessment area, representing 1.8% of its branches in Michigan.
 - As of June 30, 2016, Fifth Third had \$109,419 in deposits in this assessment area, representing a market share of 2.3% and 0.7% of its statewide deposits.
- **Non-metropolitan Southern Michigan**
 - As of June 30, 2016, Fifth Third operated eight branches in the assessment area, representing 3.5% of its branches in Michigan.
 - As of June 30, 2016, Fifth Third had \$553,899 in deposits in this assessment area, representing a market share of 15.7% and 3.6% of its statewide deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MICHIGAN

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with Fifth Third’s performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Battle Creek MSA	Below	Consistent	Below
Jackson MSA	Below	Below	Below
Kalamazoo-Portage MSA	Below	Consistent	Below
Lansing-East Lansing MSA	Below	Below	Consistent
Non-metropolitan Northern Michigan	Below	Below	Below
Saginaw-Midland-Bay City CSA	Below	Consistent	Below
Non-metropolitan Southern Michigan	Below	Consistent	Below

For the lending test, Fifth Third received an “Outstanding” rating in Michigan. Performance in all seven of the limited-scope assessment areas was below Fifth Third’s performance for the state. Although below the state performance, lending levels for the geographic and borrower distribution of loans were good or adequate. There was an excellent level of community development loans in the Lansing-East Lansing assessment area and a good level in the Saginaw-Midland-Bay City assessment area. The remaining five assessment areas had adequate levels of community development loans. A moderate level of lending gaps was identified in the Saginaw-Midland-Bay City assessment area and no gaps in lending were identified in the Battle Creek assessment area. A low level of lending gaps was noted in the remaining five assessment areas.

For the investment test, Fifth Third received an “Outstanding” rating in Michigan. While the investment activity was consistent to the state in four of the seven limited-scope assessment areas, the performance in the Jackson, Lansing-East Lansing, and non-metropolitan Northern Michigan assessment areas was below Fifth Third’s performance in the state. The weaker performance was primarily attributable to a lower level of qualified investments and contributions relative to Fifth Third’s operational presence in the assessment area.

For the service test, Fifth Third received an “Outstanding” rating in Michigan. While performance was consistent to the state in the Lansing-East Lansing assessment area, performance was below Fifth Third’s performance for the state in the remaining six limited-scope assessment areas. Retail services were adequate in non-metropolitan Northern Michigan and good in the remaining six assessment areas. The weaker retail services performance in the non-metropolitan Northern Michigan assessment area was primarily due to less accessibility of delivery systems in lower-income geographies. Qualified community development services were excellent in five of the limited-scope assessment areas. Qualified community development services were good in the Battle Creek and Kalamazoo-Portage assessment areas; the weaker performance was primarily due to a lower level of hours dedicated to providing qualified services relative to Fifth Third’s operational presence in these assessment areas.

The performance in the limited-scope assessment areas did not change the overall state rating.

STATE OF MISSOURI

CRA RATING for State of Missouri: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

The major factors supporting this rating include:

- An adequate responsiveness to the credit needs of the community;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution among borrowers of different income levels and to businesses of different revenue sizes;
- Exhibits an adequate record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of community development loans;
- An adequate level of qualified community development investments and grants;
- Retail delivery systems are reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the St. Louis MSA assessment area, which represents Fifth Third's entire banking operations for Missouri. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
ST. LOUIS MO-IL MSA #41180**

The St. Louis MO-IL MSA consists of St. Louis City, St. Louis County, and St Charles County in Missouri. Fifth Third's assessment area excludes Bond, Calhoun, Clinton, Jersey, Macoupin, Madison, Monroe, and St. Clair counties in Illinois and Franklin, Jefferson, Lincoln, and Warren counties in Missouri. The assessment area is comprised of 56 low-, 75 moderate-, 114 middle-, and 137 upper-income tracts. There are also two tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

Fifth Third exited the St. Louis market as of January 29, 2016; therefore, the summary of deposit information for 2015 was used to determine the appropriate deposit market share for this assessment area, along with the branches that were open during the evaluation period. As of June 30, 2015, Fifth Third ranked ninth out of 68 institutions with 2.1% of the deposit market share. Scottrade Bank had the majority of the market share 19.9% of deposits. The next four largest institutions, U.S. Bank, Bank of America, Commerce Bank, and Stifel Bank and Trust, had 17.5%, 13.8%, 7.9%, and 6.0% of the market share, respectively. Deposits in this assessment area accounted for 1.4% of the Fifth Third's total deposits. This was the 15th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 702 HMDA loans and 298 CRA loans, which represented 0.7% and 0.8% of the total loans originated during the evaluation period, respectively. This was the 28th largest HMDA market and 29th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 52nd among 514 HMDA reporters in the assessment area and Fifth Third ranked 148th. Wells Fargo Bank, DAS Acquisition, JPMorgan Chase Bank, and U.S. Bank were the top four HMDA lenders in the assessment area. Fifth Third ranked 27th of 128 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were U.S. Bank, American Express, Bank of America, and Citibank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Three community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an economic development organization, stated that small businesses are doing well and start-up businesses appear to be able to obtain funding and to expand their businesses. The contact stated the St. Louis banking market is very competitive, which can benefit small business borrowers. Overall, the contact believed the credit needs of the area are being met.

The second contact, representing an economic development organization, stated the economic profile of the city has been slowly improving since the financial crisis, with an uptick in commercial development. Employment opportunities in the central city have been increasing and there has also been steady improvement in the residential real estate market. The contact stated that local financial institutions continue to show interest in subsidizing affordable housing and mixed-use real estate projects in economically distressed areas. The contact believed there are opportunities for financial institutions to continue to support community development projects in distressed areas and to increase their presence in lower-income neighborhoods with higher percentages of unbanked residents.

The third contact, representing an organization that helps revitalize communities and neighborhoods, stated the local economy is slowly improving, but still lags behind the national economy. The unemployment rate is declining; however, certain segments of the population, especially young African Americans, remain disproportionately unemployed or underemployed. Although the housing market is somewhat affordable, the contact noted there is a significant need for quality, affordable housing in the area. As the majority of affordable housing is substandard, the contact indicated there is a need for home improvement lending. The contact also believed even in this highly competitive market, it is becoming increasingly difficult for lower-income individuals with less-than-desirable credit to obtain permanent financing.

Population Characteristics

According to 2010 U.S. Census data, the population in the assessment area was 1.7 million. About 28.2% of the population lived in low- and moderate-income tracts. In addition, 76.5% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the St. Louis MSA is the 20th largest in terms of population in the nation.²¹⁴ St. Louis County is the largest county in the assessment area and Missouri.²¹⁵ Florissant is the largest city in this county with 52,268 residents; its population decreased by 3.0% between 2000 and 2015.²¹⁶ St. Charles County is the third-largest county in Missouri. St. Charles is the largest city in the county with 68,796 residents; its population increased by 13.3% between 2000 and 2015. St. Louis City (considered to be a county unto itself) is the 60th largest city in the nation with 315,685 residents and its population decreased by 8.9% between 2000 and 2015. According to Moody's Analytics, the St. Louis MSA has struggled to retain population and continues to experience persistent out-migration. However, between 2012 and 2015, while the MSA experienced negative net migration, the rate of loss decreased each year.

²¹⁴ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²¹⁵ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

²¹⁶ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease.²¹⁷ The population within the assessment area experienced positive growth between 2010 and 2015, with St. Charles County experiencing the greatest growth and St. Louis City experiencing the least growth in population during this time period.

County	2010 Population	2015 Population	Population Percent Change
St. Louis County	998,954	1,003,362	0.4%
St. Louis City	319,294	315,685	-1.1%
St. Charles County	360,485	385,590	7.0%
Total	1,678,733	1,704,637	1.5%

Income Characteristics

In 2010, the assessment area median family income was \$70,408, which exceeded both the MSA median family income at \$66,798 and Missouri’s at \$57,661. The MSA median family income substantially increased between 2010 and 2014. The median family income increased again in 2015 and declined to some extent in 2016.

**Borrower Income Levels
St. Louis, MO-IL MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$71,000	0 - \$35,499	\$35,500 - \$56,799	\$56,800 - \$85,199	\$85,200 - & above
2015	\$72,200	0 - \$36,099	\$36,100 - \$57,759	\$57,760 - \$86,639	\$86,640 - & above
2016	\$70,000	0 - \$34,999	\$35,000 - \$55,999	\$56,000 - \$83,999	\$84,000 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.²¹⁸ St. Charles County had the lowest poverty rates in 1999 and 2015, while St. Louis City had the highest poverty rate in 1999 and 2015. In 2015, only St. Louis City’s poverty rate exceeded Missouri’s poverty rate. In 2015, Missouri’s poverty rate exceeded the national poverty rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²¹⁹ The following table shows the poverty rates for 1999²²⁰ and 2015.

²¹⁷ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):

<http://www.census.gov/quickfacts/table/PST045216/00>

²¹⁸ U.S. Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015):

<https://data.ers.usda.gov/reports.aspx?ID=17826>

²¹⁹ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²²⁰ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

County	1999 Poverty Rate	2015 Poverty Rate	Change
St. Louis County	6.9%	10.3%	49.3%
St. Louis City	24.6%	25.5%	3.7%
St. Charles County	4.0%	6.3%	57.5%
Missouri	11.7%	14.8%	26.5%
U.S.	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 751,122 housing units and 427,738 families in the assessment area. From an income perspective, 31.3% of housing units, 21.5% of owner-occupied units, and 26.3% of families are located in low- or moderate-income tracts. About 70.5% of the housing units in the low-income census tracts are either rental or vacant and only 29.5% are owner-occupied. In the moderate-income census tracts, half of the housing units are either rental or vacant (50.5%) and 49.5% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be more credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area in moderate-income tracts than in low-income tracts.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 45 years old, with 13.4% of the stock built before 1950. The oldest housing stock was in St. Louis City with a median age of 71 years. The oldest housing stock in St. Louis County was 43 years, while the median age of housing stock in St. Charles County was only 20 years. Within the assessment area, the median age of housing stock was 61 years in low-income tracts and 58 years in moderate-income tracts. Therefore, there appears to be opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas. In addition, a community contact stated there is a significant need for quality, affordable housing in the area. The majority of affordable housing is substandard and the contact believed there is a need for home improvement lending.

According to 2010 U.S. Census data, the median housing value in the assessment area was \$175,312, with an affordability ratio of 30.91. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Median housing values decreased between 2010 and 2011-2015, and housing affordability became more affordable across the assessment area primarily due to median household incomes. During the evaluation period, the most affordable housing was in St. Charles County, with the least affordable in St. Louis City. According to Moody’s Analytics, home prices are appreciating in line with those in the state, but lag the pace of growth nationally. Housing starts have more than doubled from their 2012 low, but are still 50% below their mid-2000s peak. Overall, median gross rents increased at a fairly substantial rate across the assessment area, with renters in St. Louis City and St. Charles County experiencing the largest increase in rental rates. The following table presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Missouri.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
St. Louis County	\$179,300	32.00	\$173,400	34.46	\$789	\$882	11.8%
St. Louis City	\$122,200	27.54	\$120,400	29.57	\$658	\$748	13.7%
St. Charles County	\$197,300	35.65	\$188,200	38.48	\$819	\$931	13.7%
Missouri	\$137,700	33.60	\$138,400	34.81	\$667	\$746	11.8%

According to Bankrate.com,²²¹ Missouri ranked 32nd for foreclosure filings in November 2016. The national average for foreclosure filings was one in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:²²²

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
St. Louis County	1:1,356
St. Louis City	1:1,651
St. Charles County	1:1,751
Missouri	1:2,232
U.S.	1:1,533

In November 2016, St. Louis County had the highest and St. Charles County had the lowest rate of foreclosure in the assessment. The foreclosure rate in Missouri is below the national rate.

Building permits for this MSA, Missouri, and the nation are included in the following table for 2014, 2015, and 2016.²²³

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
St. Louis MSA	6,998	7,698	10.0%	7,943	3.2%
Missouri	16,314	18,344	12.4%	19,004	3.6%
U.S.	1,052,124	1,182,582	12.4%	1,190,191	0.6%

²²¹ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²²² Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

²²³ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

The MSA experienced a greater increase in the number of housing permits issued between 2014 and 2015, with a smaller increase between 2015 and 2016. The increase in the number of permits could indicate there is a growing demand for home purchase loans in the MSA and in Missouri during the evaluation period.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the St. Louis area economy is in recovery and is growing at a modest pace. Aerospace accounts for around 15.0% of all local manufacturing jobs, compared with 4.0% nationally. While the area is favorable to businesses, office space costs are rising, making the Kansas City area is more attractive for new businesses. Persistent out-migration trends prevent the housing market from making a full recovery and reduce the labor force, making it more difficult for firms to find qualified workers.

According to *St. Louis Business Journal*,²²⁴ the St. Louis metropolitan area is home to nine Fortune 500 headquarters. In the past year, the Centene Corporation jumped up 62 places on the list, while Peabody Energy fell 60 places.

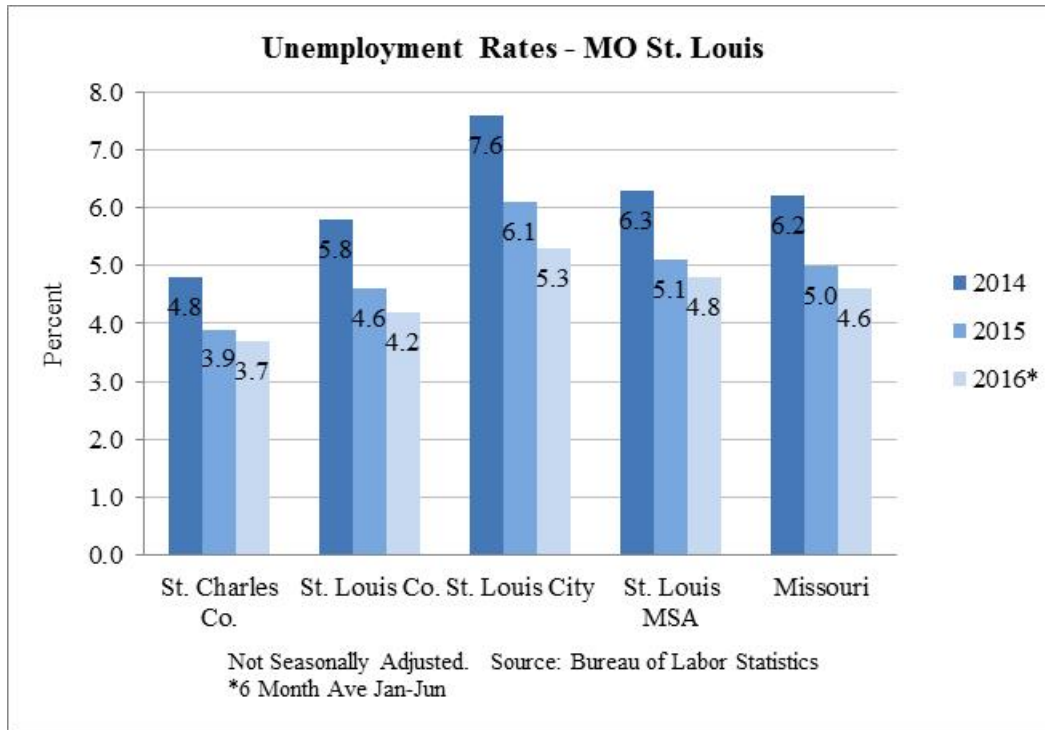
St. Louis Fortune 500 Companies (2016)		
Rank	Company	Revenue
22	Express Scripts	\$100.7 billion
124	Centene Corporation	\$22.7 billion
128	Emerson Electric Co.	\$22.3 billion
189	Monsanto Company	\$15.0 billion
271	Reinsurance Group of America	\$10.4 billion
382	Jones Financial	\$6.6 billion
423	Graybar Electric Company	\$6.1 billion
425	Ameren Corporation	\$6.0 billion
458	Peabody Energy	\$5.6 billion

According to Moody’s Analytics, the top ten employers in the St. Louis MSA in 2015 were:

Company	Number of Employees
Local Government	118,054
BJC Healthcare	24,182
Wal-Mart Stores, Inc.	22,006
SSM Health Care System	15,949
Washington University in St. Louis	14,692
Boeing Defense, Space & Security	14,617
Mercy Health Care	13,715
Scott Air Force Base	13,000
Schnuck Markets, Inc.	10,897
AT&T	10,015

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 for the assessment area, MSA, and Missouri.

²²⁴ St. Louis Business Journal: <http://www.bizjournals.com/stlouis/blog/2016/06/9-st-louis-companies-make-fortune-500-list.html>



The unemployment rates declined each year in the assessment area; however, St. Louis City’s rates were higher than the MSA and state during this time period.

According to *St. Louis Business Journal*, Hazelwood-based GKN Aerospace plans to shut down its local Composites Department, which will leave 300 workers without jobs. GKN, which builds parts for Boeing, Lockheed Martin, and other aerospace manufacturers, is expected to move these jobs to Alabama. Speculation is that in order to save money, GKN has decided to ship jobs to plants in which workers are paid nearly half the wages of workers in St. Louis. GKN workers do not have a union and a means to demand fair wages and a safe work environment.²²⁵

²²⁵ Feldt, Brian. “Hazelwood aerospace company to lay off 300.” *St. Louis Business Journal*. October 26, 2016. - <http://www.bizjournals.com/stlouis/news/2016/10/28/hazelwood-aerospace-company-to-layoff-300.html>

Combined Demographics Report

Assessment Area: MO St Louis

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	56	14.6	35,424	8.3	11,901	33.6	85,867	20.1
Moderate-income	75	19.5	77,035	18	12,286	15.9	69,466	16.2
Middle-income	114	29.7	129,325	30.2	7,012	5.4	85,083	19.9
Upper-income	137	35.7	185,942	43.5	4,318	2.3	187,322	43.8
Unknown-income	2	0.5	12	0	0	0	0	0
Total Assessment Area	384	100.0	427,738	100.0	35,517	8.3	427,738	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	80,564	23,768	5.1	29.5	38,197	47.4	18,599	23.1
Moderate-income	154,415	76,470	16.4	49.5	55,927	36.2	22,018	14.3
Middle-income	234,849	152,647	32.7	65	64,062	27.3	18,140	7.7
Upper-income	280,694	214,196	45.9	76.3	50,522	18	15,976	5.7
Unknown-income	600	7	0	1.2	393	65.5	200	33.3
Total Assessment Area	751,122	467,088	100.0	62.2	209,101	27.8	74,933	10.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,290	6.4	4,584	6.2	669	8.2	37	13.1
Moderate-income	12,422	15	10,898	14.7	1,468	18	56	19.8
Middle-income	23,612	28.6	21,244	28.6	2,274	27.9	94	33.2
Upper-income	41,234	49.9	37,463	50.5	3,677	45.2	94	33.2
Unknown-income	112	0.1	57	0.1	53	0.7	2	0.7
Total Assessment Area	82,670	100.0	74,246	100.0	8,141	100.0	283	100.0
Percentage of Total Businesses:			89.8		9.8		.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	11	1.7	8	1.3	3	17.6	0	0
Moderate-income	52	8.1	50	8	2	11.8	0	0
Middle-income	191	29.7	189	30.1	2	11.8	0	0
Upper-income	389	60.4	379	60.4	10	58.8	0	0
Unknown-income	1	0.2	1	0.2	0	0	0	0
Total Assessment Area	644	100.0	627	100.0	17	100.0	0	.0
Percentage of Total Farms:			97.4		2.6		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE ST. LOUIS MO-IL MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “High Satisfactory.” Fifth Third has demonstrated an adequate responsiveness to the credit needs of the community. In addition, Fifth Third originated ten community development loans totaling \$74.5 million. Fifth Third has a good geographic distribution of loans and a moderate level of lending gaps. Fifth Third has a good distribution among borrowers of different income levels and to businesses of different revenue sizes. Fifth Third exhibits an adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance and small business lending. There were an insufficient number of home improvement loans to analyze performance. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding aggregate lending, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an adequate responsiveness to the credit needs within the assessment area. Fifth Third originated 370 home purchase, 319 refinance, 12 home improvement, 298 small business, and ten community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 0.7% is less than the percentage of total deposits at 1.4% in this area.

Fifth Third made 85.9% of the HMDA and 85.6% of the CRA lending within its designated assessment area. No concentrations of lending were identified in any particular county. Therefore, a good amount of the loans was made within the defined assessment area.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. Home purchase lending, which was the largest loan category, is adequate. Refinance lending is adequate and small business lending is excellent. There is also a moderate level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	56	39	30.4%
Moderate	75	36	52.0%
Middle	114	20	82.5%
Upper	137	13	90.5%
Unknown	2	2	0.0%
Total	384	110	71.4%

Overall, the lending gaps are considered reasonable; however, there are significant gaps in lending in low- and moderate-income income tracts. The gaps in low-income tracts can be attributed to an owner-occupancy rate of only 29.5% and a high percentage of rental and vacant units at 70.5%. To a lesser extent, lending gaps in moderate-income tracts can be attributed to an owner-occupancy rate of 49.5% and 50.5% of housing units being either rentals or vacancies. A community contact also mentioned a need for financial institutions to increase their presence in lower-income neighborhoods.

Home Purchase Loans

Fifth Third made four home purchase loans totaling \$785,000 in low-income tracts. This represents 1.1% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 5.1%, and 0.7% by dollar amount, which is also below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 1.9% and was below the 2015 aggregate at 2.1%. As Fifth Third's performance was below proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is adequate.

Fifth Third made 30 home purchase loans totaling \$5.7 million in moderate-income tracts. This represents 8.1% of home purchase loans by volume, which is substantially below the percentage of owner-occupied units in these tracts at 16.4%, and 5.4% by dollar amount, which is also substantially below proxy. The percentage of loans by volume was below the 2014 aggregate at 10.6% and was comparable to the 2015 aggregate at 10.0%. As Fifth Third's performance was substantially below proxy and comparable to the aggregate of all lenders, the geographic distribution of home purchase loans in moderate-income tracts is adequate.

Fifth Third made 116 home purchase loans totaling \$23.4 million in middle-income tracts. This represents 31.4% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 32.7%, and 22.1% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 32.9% and was comparable to the 2015 aggregate of 34.5%.

Fifth Third made 220 home purchase loans totaling \$76.2 million in upper-income tracts. This represents 59.5% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 45.9%, and 71.9% by dollar amount, which substantially exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 54.6% and the 2015 aggregate of 53.3%.

Overall, the geographic distribution of home purchase loans is adequate.

Refinance Loans

Fifth Third made seven refinance loans totaling \$800,000 in low-income tracts. This represents 2.2% of refinance loans by volume and 1.0% by dollar amount, which is below the percentage of owner-occupied units at 5.1%. The percentage of loans by volume was below the 2014 aggregate at 2.4% and exceeded the 2015 aggregate at 1.6%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders, plus the relatively low owner-occupancy rate of 29.5% (which likely prevents opportunities for refinance lending), the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 24 refinance loans totaling \$2.3 million in moderate-income tracts. This represents 7.5% of refinance loans by volume, which is below the owner-occupied units in these tracts at 16.4%. The percentage of loans by dollar amount at 2.8% is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 11.6% and was below the 2015 aggregate at 8.8%. As Fifth Third's performance was below the aggregate of all lenders and proxy, the geographic distribution of refinance loans in moderate-income tracts is adequate.

Fifth Third made 66 refinance loans totaling \$9.9 million in middle-income tracts. This represents 20.7% of refinance loans by volume, which is below the owner-occupied units in these tracts at 32.7%. The percentage of loans by dollar amount at 12.2% is also significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 32.2% and was below the 2015 aggregate at 30.1%.

Fifth Third made 222 refinance loans totaling \$68.4 million in upper-income tracts. This represents 69.6% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 45.9%, and 84.0% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate at 53.8% and exceeded the 2015 aggregate at 59.5%.

Overall, the geographic distribution of refinance loans is adequate.

Small Business Loans

Fifth Third made 33 small business loans totaling \$9.5 million in low-income tracts. This represents 11.1% of small business loans by volume, which exceeds the percentage of small businesses in these tracts at 6.2%, and 19.9% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 5.3% and substantially exceeded the 2015 aggregate of 5.5%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 45 small business loans totaling \$5.9 million in moderate-income tracts. This represents 15.1% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 14.7%. This also represents 12.4% of small business loans by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 13.9% and was comparable to the 2015 aggregate of 14.4%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 90 small business loans totaling \$12.9 million in middle-income tracts. This represents 30.2% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 28.6%, and 27.0% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 27.8% and the 2015 aggregate of 27.7%.

Fifth Third made 130 small business loans totaling \$19.5 million in upper-income tracts. This represents 43.6% of small business loans by volume, which below the percentage of businesses in these tracts at 50.5%, and 40.7% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 52.2% and exceeded the 2015 aggregate of 51.7%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is good based on borrower income and for businesses of different revenue sizes. Borrower distribution is adequate for home purchase lending and good for refinance lending.

Home Purchase Loans

Fifth Third made 17 loans totaling \$1.4 million to low-income borrowers. This represents 4.6% of home purchase loans by volume, which is significantly below the percentage of low-income families at 20.1%, and 1.3% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 8.7% and was below the 2015 aggregate of 8.8%. As Fifth Third's performance was significantly below proxy and below the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is poor.

Fifth Third made 81 loans totaling \$13.6 million to moderate-income borrowers. This represents 21.9% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 16.2%, and 12.8% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 18.0% and substantially exceeded the 2015 aggregate of 16.9%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 46 loans totaling \$7.8 million to middle-income borrowers. This represents 12.4% of home purchase loans by volume, which is below the percentage of middle-income families at 19.9%, and 7.4% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 18.0% and was below the 2015 aggregate of 17.7%.

Fifth Third made 209 loans totaling \$79.9 million to upper-income borrowers. This represents 56.5% of home purchase loans by volume, which exceeds the percentage of upper-income families at 43.8%, and 75.4% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 32.1% and the 2015 aggregate of 31.5%.

Overall, the borrower distribution of home purchase loans is adequate.

Refinance Loans

Fifth Third made 19 loans totaling \$1.8 million to low-income borrowers. This represents 6.0% of refinance loans by volume, which is significantly below the percentage of low-income families at 20.1%. The percentage of loans by dollar amount at 2.2% is also significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.0% and was below the 2015 aggregate of 5.2%. Given that Fifth Third's performance was significantly below proxy, but exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is adequate.

Fifth Third made 36 loans totaling \$4.3 million to moderate-income borrowers. This represents 11.3% of refinance loans by volume, which is below the percentage of moderate-income families at 16.2%, and 5.3% by dollar volume, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 13.4% and exceeded the 2015 aggregate of 11.6%. As Fifth Third's performance was below proxy, but exceeded the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is good.

Fifth Third made 65 loans totaling \$10.0 million to middle-income borrowers. This represents 20.4% of refinance loans by volume, which exceeds the percentage of middle-income families at 19.9%, and 12.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.2% and the 2015 aggregate of 16.4%.

Fifth Third made 175 loans totaling \$61.0 million to upper-income borrowers. This represents 54.9% of refinance loans by volume, which exceeds the percentage of upper-income families at 43.8%, while the percentage of loans by dollar amount at 74.9% significantly exceeds proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 35.8% and the 2015 aggregate of 36.1%.

Overall, the borrower distribution of refinance loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 38.9% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 43.2% and was below the 2015 aggregate of 45.4% and was significantly below the percentage of small businesses in the assessment area at 89.8%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (64.1%) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, a community contact indicated there is a tremendous amount of competition for commercial loans in the area.

Community Development Loans

Fifth Third originated 10 community development loans totaling \$74.5 million during the evaluation period as shown in the table below:

Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$
3	16,650,000	3	56,800,000	4	1,050,000

Community development lending in the assessment area represents 1.2% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s 20th highest percentage of community development lending during the evaluation period. Fifth Third’s performance is relatively high in community development lending.

Examples of community development lending include, but are not limited to:

- Working capital loan to a not-for-profit that provides low- and moderate-income women with resources and support to create and sell hand-crafted items. The women receive 70-100% of the selling price, which allows the women to achieve financial independence and gain entrepreneurial job skills.
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “Low Satisfactory.”

Fifth Third made an adequate level of qualified community development investments and grants. Fifth Third made 100 qualified investments totaling \$12.0 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Community Services	
#	\$	#	\$	#	\$
46	11,791,159	7	39,095	47	182,616

Overall, Fifth Third made 0.7% of its total community development investments in this assessment area, which is less than the percentage of total deposits at 1.4% and less than the percentage of branch offices at 1.3%.

Fifth Third exhibited an adequate responsiveness to credit and community development needs in the assessment area. A community contact indicated there is a significant need for quality, affordable housing in the area. Fifth Third made 54 donations totaling \$221,711 that supported local schools, small businesses, social and charitable organizations. The majority of Fifth Third’s donations (82.4%) supported services to low- and moderate-income individuals. Additionally, \$30,000 (13.5%) of the donations supported the Justine Petersen organization, which helps low- and moderate-income individuals and families buy homes and build financial assets for the long term.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “Low Satisfactory.” Retail services were reasonably accessible and Fifth Third provides an adequate level of community development services in this assessment area.

Retail Services

Although Fifth Third exited the St. Louis market as of January 29, 2016, the branches that were open during the evaluation period were evaluated. As a result, the following branching information is as of June 30, 2015 and Fifth Third’s record of opening and closing banking centers during the evaluation period was not weighed.

Fifth Third maintained 17 banking centers within this assessment area, including two in low-, two in moderate-, two in middle-, and 11 in upper-income census tracts. Fifth Third banking centers in this assessment area represented 1.3% of all its banking centers.

Fifth Third had 33 ATMs within this assessment area, including seven in low-, six in moderate-, five in middle-, and 15 in upper-income census tracts.

The following table illustrates the percentage of banking centers in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts and the percentage of households and total businesses in those tracts.

Tract Category	Total Branches		Demographics			
			Census Tracts		Households	Total Businesses
	#	%	#	%	%	%
Low	2	11.8%	56	14.6%	9.2%	6.4%
Moderate	2	11.8%	75	19.5%	19.6%	15.0%
Middle	2	11.8%	114	29.7%	32.0%	28.5%
Upper	11	64.7%	137	35.7%	39.1%	49.9%
Unknown	0	0.0%	0	0.5%	0.1%	0.1%
Total	17	100.0%	382	100.0%	100.0%	100.0%

Branch distribution within low-income tracts was considered excellent, as the distribution of branches exceeded the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered adequate.

Community Development Services

Fifth Third provided an adequate level of community development services in this assessment area. During the evaluation period, Fifth Third employees provided 738 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 0.6% of all community development services provided and equates to 0.35 annualized persons (ANP).

Affordable Housing	Community Services
<i># of Hours</i>	<i># of Hours</i>
50	688

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community development. Community development services include 462 hours of providing financial literacy through local nonprofits and school programs, 126 hours serving on boards and committees, 120 hours providing technical assistance to non-profits, and 30 hours participating in foreclosure prevention outreach.

STATE OF NORTH CAROLINA

CRA RATING for State of North Carolina: Outstanding

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of community development loans;
- Extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Charlotte-Gastonia-Concord MSA in North Carolina. Limited-scope reviews were performed on the remaining four assessment areas: the Asheville MSA, Hickory-Lenoir-Morganton MSA, non-metropolitan Western North Carolina, and Raleigh-Cary MSA. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

The Charlotte-Gastonia-Concord assessment areas received greater weight in determining the CRA rating for the state. This area had the largest lending volume and number of banking centers and ranked first in this state's share of deposits during the evaluation period. Lastly, this area represented 69.0% of the banking centers, 73.9% of deposits, and 75.1% of lending in North Carolina.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF NORTH CAROLINA

Lending activity accounted for 4.4% of the Fifth Third's total lending activity, while deposits accounted for 3.0% of the Fifth Third's total deposits. HMDA-reportable lending in North Carolina represented 4.1% of the Fifth Third's total HMDA lending, while CRA-reportable lending represented 5.0% of the Fifth Third's total CRA lending. As of June 30, 2016, Fifth Third ranked tenth among 93 insured institutions and has a deposit market share of 0.9% and 58 banking center locations within North Carolina.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NORTH CAROLINA

Lending Test

Fifth Third's performance under the lending test within the assessment areas located in North Carolina is rated "High Satisfactory." Fifth Third's lending reflects a good responsiveness to the credit needs in the Charlotte-Gastonia-Concord and non-metropolitan Western North Carolina assessment areas. Lending reflects an adequate responsiveness in the remaining three assessment areas: Asheville, Hickory-Lenoir-Morganton, and Raleigh-Cary.

Lending Activity

In North Carolina, Fifth Third originated 4,317 HMDA loans totaling \$756.8 million and 1,970 small business loans totaling \$188.6 million during the evaluation period.

Lending activity in North Carolina is good. The Charlotte-Gastonia-Concord and non-metropolitan Western North Carolina assessment areas have good lending activity. Lending activity is adequate in the remaining three assessment areas.

Geographic and Borrower Distribution

The distribution of loans among geographies is good in the assessment areas located in North Carolina. The geographic distribution is good in the Charlotte-Gastonia-Concord assessment area and adequate in the remaining four assessment areas.

A low level of lending gaps was identified in North Carolina. There was a low level of lending gaps in the Charlotte-Gastonia-Concord and non-metropolitan Western North Carolina assessment areas and a moderate level of lending gaps in the remaining three assessment areas.

Overall, the distribution of loans is excellent among borrowers of different income levels and to businesses of different revenue sizes in the assessment areas located in North Carolina. The borrower distribution is excellent in the Charlotte-Gastonia-Concord assessment area and good in non-metropolitan Western North Carolina.

Borrower distribution is adequate in the remaining three assessment areas. The distribution to businesses of different revenue sizes is excellent in the Charlotte-Gastonia-Concord assessment area and non-metropolitan Western North Carolina and adequate in remaining three assessment areas.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In North Carolina, Fifth Third originated 49 community development loans totaling \$327.7 million, which represents 5.5% of the Fifth Third's community development lending by dollar volume. This is a relatively high level of community development lending in North Carolina. Fifth Third made a relatively high level of community development loans in the Charlotte-Gastonia-Concord, Asheville, Hickory-Lenoir-Morganton, and Raleigh-Cary assessment areas and an adequate level of community development loans in non-metropolitan Western North Carolina.

Flexible Lending

Fifth Third consistently made extensive use of flexible lending practices within assessment areas located in North Carolina.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in North Carolina is rated "Outstanding." Fifth Third funded \$66.2 million in qualified community development investments in North Carolina during the evaluation period, consisting of \$48.2 million obtained from new investments made during the current review period and \$18.0 million from prior period investments. The majority of investments were LIHTCs. Fifth Third's level of qualified investments is excellent in the Charlotte-Gastonia-Concord assessment area and good in the remaining four assessment areas.

Fifth Third was considered responsive to the credit and community development needs in the state; therefore, investments without a purpose, mandate, or function of serving Fifth Third's assessment areas in North Carolina were considered to positively impact state performance. Fifth Third made \$1.1 million in qualified investments, typically in the form of LIHTCs that benefited counties within the state, but were outside Fifth Third's delineated assessment areas within North Carolina.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test within the assessment areas located in North Carolina is rated "Outstanding." The Fifth Third's performance is excellent in the Charlotte-Gastonia-Concord assessment area, adequate in Raleigh-Cary assessment area, and good in the remaining three assessment areas.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in Fifth Third's assessment areas. Retail service distribution is good in the Charlotte-Gastonia-Concord, non-metropolitan Western North Carolina, and Raleigh-Cary assessment areas and adequate in the remaining two assessment areas.

Fifth Third has 58 banking centers in North Carolina, which represents 4.5% of Fifth Third's total branches. Fifth Third's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. One branch closed in a moderate-income tract during the evaluation period in the Charlotte-Gastonia-Concord assessment area.

Banking services and business hours do not vary in a way that inconveniences any portions of the Fifth Third's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third is a leader in providing community development services in North Carolina. Fifth Third's performance is excellent in the Charlotte-Gastonia-Concord, Asheville, and Hickory-Lenoir-Morganton assessment areas. The level of community development services is good in the non-metropolitan Western North Carolina and poor in the Raleigh-Cary assessment areas.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
CHARLOTTE-GASTONIA-CONCORD NC-SC MSA #16740**

The Charlotte-Concord-Gastonia NC-SC MSA consists of Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, and Union counties in North Carolina. Fifth Third's assessment area excludes Chester, Lancaster, and York counties in South Carolina. Since there are no branches in the South Carolina portion of the multi-state MSA and Fifth Third only takes the counties in North Carolina that are part of this multi-state MSA, the Charlotte NC-SC MSA is evaluated under North Carolina and not as a separate multi-state MSA. The assessment area is comprised of 42 low-, 109 moderate-, 165 middle-, and 148 upper-income tracts. There are also four tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked fourth out of 36 institutions with 1.2% of the deposit market share. Bank of America had the majority of the market share 75.5% of deposits. The next two largest institutions, Wells Fargo Bank and BB&T, had 15.1% and 2.8% of the market share, respectively. Deposits in this assessment area accounted for 2.2% of Fifth Third's total deposits. This was 73.9% of deposits within the state and the 12th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 3,201 HMDA loans and 1,520 CRA loans, which represented 3.1% and 3.9% of the total loans originated during the evaluation period, respectively. This was the ninth-largest HMDA market and seventh largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 12th among 649 HMDA reporters in the assessment area and Fifth Third ranked 65th. Wells Fargo Bank, Movement Mortgage, Quicken Loans, and Bank of America were the top four HMDA lenders in the assessment area. Fifth Third ranked 16th of 135 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, Wells Fargo Bank, Bank of America, and BB&T. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Two community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a nonprofit housing development corporation, stated the organization is currently participating in a mixed-use development project that will help to revitalize the central city corridor. The mixed-use facility will include market-rate apartments, condominiums, single-family homes and townhomes, and commercial properties. This project offers local financial institutions opportunities to fund community development and small business projects. The contact mentioned strong relationships with most of the local financial institutions, including Bank of America, Fifth Third, Wells Fargo, BB&T, and PNC.

The second contact, representing a small business development center, believed that even in the growing economy, small business owners can still experience difficulties obtaining financing from local banks due to strict underwriting criteria. Therefore, there are opportunities for financial institutions to provide small-dollar loans and financial education for small business owners.

Population Characteristics

According to the 2010 U.S. Census data, the population in the assessment area was 1.9 million. About 29.0% of the population lived in low- and moderate-income tracts. In addition, 74.3% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Charlotte MSA is the 22nd largest in terms of population in the nation.²²⁶ Mecklenburg County is the largest county in the assessment area and in North Carolina.²²⁷ Charlotte is the largest city in Mecklenburg County and North Carolina and the 17th largest city in the nation with 827,097 residents; its population increased by 45.1% between 2000 and 2015. Concord is the largest city in Cabarrus County with 87,696 residents; its population increased by 54.8% between 2000 and 2015. Gastonia is the largest city in Gaston County with 74,543 residents; its population increased by 10.2% between 2000 and 2015.²²⁸

According to Carolina Population Center University of North Carolina,²²⁹ North Carolina's population is projected to increase by nearly 11.0% and gain more than 1 million new residents and reach a population of nearly 10.6 million by 2020. Virtually all of North Carolina's growth is projected to occur in counties within metropolitan areas; 33.0% of the state's growth is projected to occur in the greater Charlotte region. Growth rates of more than 20.0% are projected by 2020 in Mecklenburg, Union, and Cabarrus counties.

The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase.²³⁰ The population within the assessment area experienced positive growth between 2010 and 2015, with Mecklenburg County experiencing the greatest growth and Rowan County experiencing the least growth in population during this time period.

²²⁶ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²²⁷ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

²²⁸ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

²²⁹ UNC Carolina Population Center: <http://demography.cpc.unc.edu/2015/12/08/population-growth-in-the-carolinas-projected-vs-observed-trends/>

²³⁰ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Cabarrus	178,011	196,762	10.5%
Gaston	206,086	213,442	3.6%
Iredell	159,437	169,866	6.5%
Lincoln	78,265	81,035	3.5%
Mecklenburg	919,628	1,034,070	12.4%
Rowan	138,428	139,142	0.5%
Union	201,292	222,742	10.7%
Total	1,881,147	2,057,059	9.4%

Income Characteristics

In 2010, the assessment area median family income was \$62,777, which exceeded both the MSA median family income at \$61,974 and North Carolina's at \$56,153. The MSA's median family income substantially increased between 2010 and 2014. The median family income increased again in 2015 and declined to some extent in 2016.

Borrower Income Levels Charlotte-Concord-Gastonia, NC-SC MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2014	\$65,500	0 - \$32,749	\$32,750 - \$52,399	\$52,400 - \$78,599	\$78,600 - & above
2015	\$66,000	0 - \$32,999	\$33,000 - \$52,799	\$52,800 - \$79,199	\$79,200 - & above
2016	\$64,100	0 - \$32,049	\$32,050 - \$51,279	\$51,280 - \$76,919	\$76,920 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.²³¹ Cabarrus County had the lowest poverty rate in 1999 and Union County had the lowest poverty rate in 2015. Gaston and Rowan counties had highest poverty rates in 1999 and 2015. In 2015, Gaston and Rowan counties' poverty rates were higher than North Carolina's poverty rate and in 2015, North Carolina's poverty rate exceeded that of the nation. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²³² The following table shows the poverty rates for 1999²³³ and 2015.

²³¹ United States Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

²³² 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²³³ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

County	1999 Poverty Rate	2015 Poverty Rate	Change
Cabarrus	7.1%	10.8%	52.1%
Gaston	10.9%	17.3%	58.7%
Iredell	8.2%	14.2%	73.2%
Lincoln	9.2%	13.4%	45.7%
Mecklenburg	9.2%	14.3%	55.4%
Rowan	10.6%	17.3%	63.2%
Union	8.1%	9.7%	19.8%
North Carolina	12.3%	16.4%	33.3%
United States	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 697,360 housing units and 470,872 families in the assessment area. From an income perspective, 30.6% of housing units, 21.8% of owner-occupied units, and 27.6% of families are located in low- or moderate-income tracts. About 71.6% of the housing units in the low-income census tracts are either rental or vacant and 28.3% are owner-occupied. In the moderate-income census tracts, over half of the housing units are either rental or vacant (51.2%) and 48.8% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in the assessment area.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was only 24 years old, with 9.0% of the stock built before 1950. The oldest housing stock was in Gaston County with a median age of 33 years. Within the assessment area, the median age of housing stock was 42 years in low-income tracts and 34 years in moderate-income tracts. Therefore, there appears to be opportunity for Fifth Third to provide home improvement and rehabilitation loans in these lower-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$166,768, with an affordability ratio of 31.47. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. Overall, median housing values increased between 2010 and 2011-2015 and housing affordability became slightly less affordable across the assessment area, primarily due increased demand. During this review period, the most affordable housing was in Gaston County, with the least affordable in Mecklenburg County. According to Moody's Analytics, rising wages and a growing population support strong home price appreciation. Home prices in the metropolitan area are climbing faster than in the rest of the state and nation and year-over-year growth is the strongest since 2012.

Developers are also quickly adding supply, which will alleviate upward pressure on prices in 2017 and beyond. Median gross rents increased at a fairly substantial rate across the assessment area, with renters in Cabarrus County and Mecklenburg County experiencing the largest increase in rental rates. In 2010, about 43.8% of renters across the assessment area had rent costs greater than 30.0% of income. Increasing rental rates may make it harder for potential homebuyers to save enough for a down payment for a home. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and North Carolina.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Cabarrus	\$164,100	32.86	\$167,100	32.75	\$727	\$823	13.2%
Gaston	\$120,800	35.81	\$125,100	33.92	\$678	\$731	7.8%
Iredell	\$164,300	29.80	\$166,300	31.45	\$712	\$796	11.8%
Lincoln	\$146,700	32.34	\$153,200	32.12	\$631	\$671	6.3%
Mecklenburg	\$185,100	29.87	\$184,800	30.77	\$829	\$938	13.1%
Rowan	\$125,100	34.85	\$128,300	33.57	\$666	\$722	8.4%
Union	\$194,900	32.52	\$197,400	33.39	\$787	\$868	10.3%
North Carolina	\$149,100	30.56	\$154,900	30.26	\$718	\$797	11.0%

According to Bankrate.com,²³⁴ North Carolina ranked 31st for foreclosure filings in November 2016. The national average for foreclosure filings was 1 in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:²³⁵

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Cabarrus	1:2,368
Gaston	1:1,032
Iredell	1:1,848
Lincoln	1:8,112
Mecklenburg	1:1,270
Rowan	1:1,022
Union	1:3,321
North Carolina	1:2,179
United States	1:1,533

²³⁴ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²³⁵ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

In November 2016, Rowan County had the highest and Lincoln County had the lowest rate of foreclosure in the assessment area. Rowan and Gaston were two of the top five counties with highest foreclosure rates in the state in November 2016. The rate of foreclosure in North Carolina was below the national rate.

Building permits for this MSA, North Carolina, and the nation are included in the following table for 2014, 2015, and 2016.²³⁶

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Charlotte-Concord-Gastonia MSA	18,537	19,543	5.4%	20,574	5.3%
North Carolina	49,913	54,754	9.7%	60,550	10.6%
United States	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The MSA experienced a consistent increase in the number of housing permits issued between 2014 and 2015 and 2015 and 2016. The increase in the number of permits indicates there is a growing demand for home purchase loans in the MSA and in North Carolina during the evaluation period. According to Moody’s Analytics, residential housing permits jumped the most on record in the 3Q16 and are now back to where they were in the mid-2000s. Construction will add workers at an above-average rate through the end of the decade.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Charlotte metropolitan area economy is growing at a rapid pace. The area is experiencing rapid growth in high-wage areas such as financial activities, logistics, healthcare, and other professional services. The area is favorable to businesses, with low business costs and a highly skilled workforce that draws firms to the area. Competitive living costs support strong in-migration trends. Average hourly earnings in the Charlotte metropolitan area have surged and exceed those nationally by the most since 2012. Accelerating wage growth and an expanding pool of wage earners will drive healthy gains in consumer consumption and job additions in retail and leisure/hospitality will continue to be above average in 2017.

According to the *Charlotte Business Journal*,²³⁷ the Charlotte metropolitan area is home to seven Fortune 500 headquarters. In the past year, Sonic Automotive moved up 18 places on the list, while Nucor Corporation fell 31 places from the previous year.

²³⁶ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

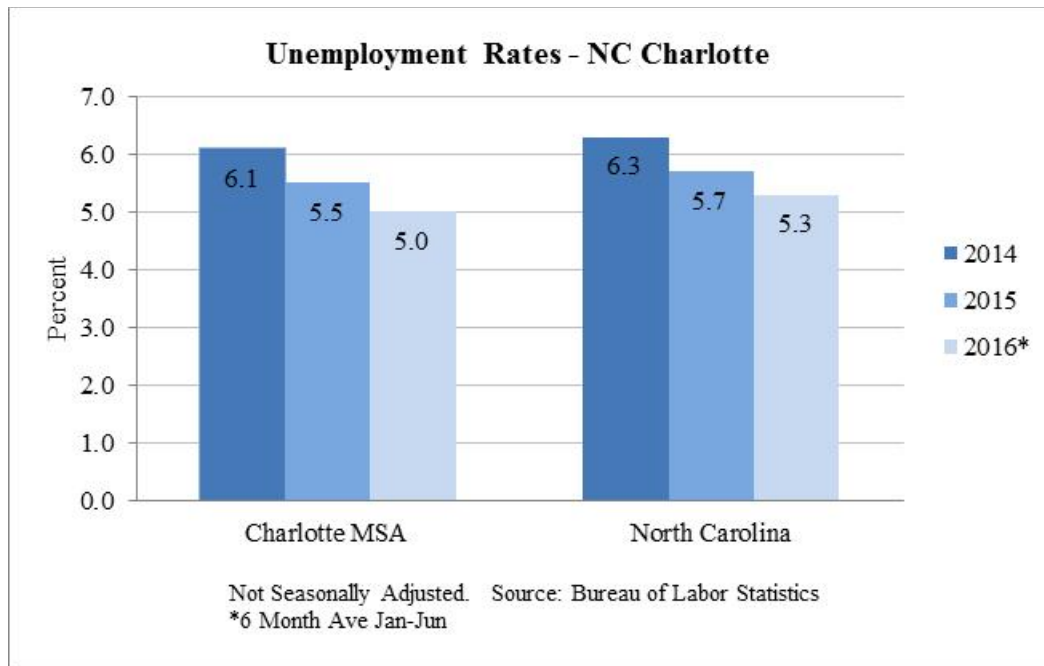
²³⁷ Charlotte Business Journal: <http://www.bizjournals.com/charlotte/news/2016/06/07/the-carolinas-lose-two-fortune-500-companies-this.html>

Charlotte Metropolitan area Fortune 500 Companies (2016)		
Rank	Company	Revenue
26	Bank of America	\$93.1 billion
47	Lowe's Companies	\$59.1 billion
115	Duke Energy Corporation	\$24.0 billion
170	Nucor Corporation	\$16.4 billion
297	Sonic Automotive	\$9.6 billion
375	Sealed Air Corporation	\$7.0 billion
489	Domtar Corporation	\$5.3 billion

According to Moody's Analytics, the top ten employers in the Charlotte MSA in 2015 were:

Company	Number of Employees
Carolinas HealthCare System	35,000
Wells Fargo	22,100
Wal-Mart Stores, Inc.	16,100
Bank of America	15,000
Lowe's Companies	12,960
Novant Health, Inc.	11,000
Presbyterian Regional Healthcare	10,676
American Airlines	9,900
Ruddick/Harris Teeter Inc.	8,239
The Timken Co.	8,000

The following table illustrates the average unemployment rates for 2014, 2015, and 2016 for the MSA and North Carolina.



The unemployment rates declined each year in MSA and were lower than North Carolina's each year. No major layoffs were noted in this assessment area during the evaluation period.

Combined Demographics Report

Assessment Area: NC Charlotte

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	42	9	28,967	6.2	8,913	30.8	98,667	21
Moderate-income	109	23.3	100,931	21.4	16,534	16.4	81,387	17.3
Middle-income	165	35.3	179,339	38.1	14,466	8.1	95,885	20.4
Upper-income	148	31.6	161,635	34.3	5,162	3.2	194,933	41.4
Unknown-income	4	0.9	0	0	0	0	0	0
Total Assessment Area	468	100.0	470,872	100.0	45,075	9.6	470,872	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	56,840	16,090	3.4	28.3	32,082	56.4	8,668	15.2
Moderate-income	179,702	87,692	18.4	48.8	69,291	38.6	22,719	12.6
Middle-income	282,373	190,373	39.9	67.4	67,945	24.1	24,055	8.5
Upper-income	253,168	182,888	38.3	72.2	50,672	20	19,608	7.7
Unknown-income	327	49	0	15	278	85	0	0
Total Assessment Area	772,410	477,092	100.0	61.8	220,268	28.5	75,050	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	7,286	7.4	6,283	6.9	982	13.5	21	6.3
Moderate-income	17,342	17.6	15,838	17.5	1,413	19.5	91	27.5
Middle-income	32,874	33.4	30,420	33.5	2,308	31.8	146	44.1
Upper-income	39,995	40.7	37,576	41.4	2,353	32.5	66	19.9
Unknown-income	792	0.8	592	0.7	193	2.7	7	2.1
Total Assessment Area	98,289	100.0	90,709	100.0	7,249	100.0	331	100.0
	Percentage of Total Businesses:			92.3		7.4		.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	19	1.6	17	1.4	2	11.1	0	0
Moderate-income	221	18.2	219	18.3	2	11.1	0	0
Middle-income	701	57.8	690	57.7	11	61.1	0	0
Upper-income	269	22.2	266	22.3	3	16.7	0	0
Unknown-income	3	0.2	3	0.3	0	0	0	0
Total Assessment Area	1,213	100.0	1,195	100.0	18	100.0	0	.0
	Percentage of Total Farms:			98.5		1.5		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
CHARLOTTE-GASTONIA-CONCORD NC-SC MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated good. Fifth Third has demonstrated a good responsiveness to the credit needs of the community. In addition, Fifth Third originated 33 community development loans totaling \$170.5 million. Fifth Third has a good geographic distribution of loans and a low level of lending gaps. Fifth Third has an excellent distribution among borrowers of different income levels and to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The good level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of refinance lending based on the overall volume of lending, followed by small business, home purchase, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects a good responsiveness to the credit needs within the assessment area. Fifth Third originated 1,536 refinance, 1,494 home purchase, 171 home improvement, 1,520 small business, and 33 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 3.3% is greater than the percentage of total deposits at 2.2% in this area.

Fifth Third made 93.2% of the HMDA lending and 98.3% of the CRA lending within its designated assessment area. While a concentration of lending was noted in York County, South Carolina with 164 HMDA loans, the majority of loans were made within North Carolina. Fifth Third does not have a physical presence in South Carolina.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	4	2.9%	31	22.8%	52	38.2%	49	36.0%
<i>Percentage of Owner Occupied Units</i>		<i>3.4%</i>		<i>18.4%</i>		<i>39.9%</i>		<i>38.3%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	40	29.4%	32	23.5%	31	22.8%	32	23.5%
<i>Percentage of Families by Family Income</i>		21.0%		17.3%		20.4%		41.4%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications for a meaningful analysis. The percentage of other modifications in low-income tracts was slightly below the percentage of owner occupied units in these geographies and the percentage of other modifications in moderate-income tracts exceeded proxy. Therefore, modifications helped to expand lending activities in these areas. The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. Refinance lending, which was the largest loan category, is good. Home improvement lending is also good, and home purchase lending is excellent. Small business lending is good. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	42	5	88.1%
Moderate	109	4	96.3%
Middle	165	2	98.8%
Upper	148	2	98.7%
Unknown	4	1	75.0%
Total	468	14	97.0%

Lending gaps are considered minimal due to the low number of lending gaps in moderate-, middle-, and upper-income tracts. The gaps in low-income tracts can be attributed to the low level of owner-occupied units (28.3%) and small businesses (7.4%) located in these census tracts.

Refinance Loans

Fifth Third made 45 refinance loans totaling \$5.5 million in low-income tracts. This represents 2.9% of refinance loans by volume and 2.2% by dollar amount, which is below the percentage of owner-occupied units at 3.4%. The percentage of loans by volume was below the 2014 aggregate at 2.6% and exceeded the 2015 aggregate at 1.8%. As Fifth Third’s performance exceeded the aggregate of all lenders, but was below proxy, the geographic distribution of refinance loans in low-income tracts is good.

Fifth Third made 256 refinance loans totaling \$27.5 million in moderate-income tracts. This represents 16.7% of refinance loans by volume, which is below the owner-occupied units in these tracts at 18.4%. The percentage of loans by dollar amount at 11.0% is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate at 13.5% and exceeded the 2015 aggregate at 11.6%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 570 refinance loans totaling \$71.8 million in middle-income tracts. This represents 37.1% of refinance loans by volume, which is below the owner-occupied units in these tracts at 39.9%, and 28.7% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 37.5% and the 2015 aggregate at 33.8%.

Fifth Third made 663 refinance loans totaling \$144.6 million in upper-income tracts. This represents 43.2% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 38.3%, and 57.9% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate at 46.3% and was below the 2015 aggregate at 52.8%.

Overall, the geographic distribution of refinance loans is good.

Home Purchase Loans

Fifth Third made 69 home purchase loans totaling \$9.2 million in low-income tracts. This represents 4.6% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 3.4%, and 3.3% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate at 2.1% and significantly exceeded the 2015 aggregate at 2.8%. As Fifth Third's performance significantly exceeded the aggregate of all lenders and exceeded proxy, the geographic distribution in low-income tracts is excellent.

Fifth Third made 267 home purchase loans totaling \$31.0 million in moderate-income tracts. This represents 17.9% of home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 18.4%, and 11.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 12.8% and exceeded the 2015 aggregate at 13.4%. As Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 547 home purchase loans totaling \$78.5 million in middle-income tracts. This represents 36.6% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 39.9%, and 28.4% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 34.4% and was comparable to the 2015 aggregate of 35.2%.

Fifth Third made 610 home purchase loans totaling \$156.9 million in upper-income tracts. This represents 40.8% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 38.3%, and 56.9% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 50.5% and the 2015 aggregate of 48.6%.

Overall, the geographic distribution of home purchase loans is excellent.

Home Improvement Loans

Fifth Third made four home improvement loans totaling \$203,000 in low-income tracts. This represents 2.3% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 3.4%, and 1.4% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 3.6% and was comparable to the 2015 aggregate of 2.4%. Given the high median age of housing in low-income areas at 42 years, which may indicate the need for home improvement lending and Fifth Third's lending performance in these tracts, the geographic distribution of home improvement loans in low-income tracts is good.

Fifth Third made 31 home improvement loans totaling \$2.0 million in moderate-income tracts. This represents 18.1% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 18.4%, and 14.5% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 17.2% and exceeded the 2015 aggregate of 16.5%. As Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is good.

Fifth Third made 79 home improvement loans totaling \$5.5 million in middle-income tracts. This represents 46.2% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 39.9%, and 38.7% by dollar amount and is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 36.7% and exceeded the 2015 aggregate of 35.9%.

Fifth Third made 57 home improvement loans totaling \$6.4 million in upper-income tracts. This represents 33.3% of home improvements loans by volume, which is below the percentage of owner-occupied units in these tracts at 38.3%, and 45.4% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 42.5% and was below the 2015 aggregate of 45.2%.

Overall, the geographic distribution of home improvement loans is good.

Small Business Loans

Fifth Third made 100 small business loans totaling \$15.6 million in low-income tracts. This represents 6.6% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 6.9%, and 10.8% by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 8.2% and was below the 2015 aggregate of 8.4%. Given that Fifth Third's performance was comparable to proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is good.

Fifth Third made 238 small business loans totaling \$27.5 million in moderate-income tracts. This represents 15.7% of small business loans by volume, which is below the percentage of businesses in these tracts at 17.5%. Small business loans by dollar amount at 19.1% exceed proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 14.6% and exceeded the 2015 aggregate of 14.8%. Given that Fifth Third's performance exceeded the aggregate of all lenders, but was below proxy, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 530 small business loans totaling \$46.3 million in middle-income tracts. This represents 34.9% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 33.5%, and 32.2% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 31.6% and exceeded the 2015 aggregate of 31.7%.

Fifth Third made 637 small business loans totaling \$50.8 million in upper-income tracts. This represents 41.9% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 41.4%, and 35.2% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 42.7% and was comparable to the 2015 aggregate of 42.6%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

Overall, the distribution of loans is excellent based on borrower income and for businesses of different revenue sizes. Borrower distribution is excellent for refinance, home purchase, and home improvement loans.

Refinance Loans

Fifth Third made 189 loans totaling \$17.1 million to low-income borrowers. This represents 12.3% of refinance loans by volume, which is below the percentage of low-income families at 21.0%. Also, the percentage of loans by dollar amount in these geographies at 6.8% is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 6.7% and the 2015 aggregate of 5.0%. Given Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 303 loans totaling \$31.2 million to moderate-income borrowers. This represents 19.7% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.3%, and 12.5% by dollar volume, which is below proxy. The percentage of loans by volume substantially exceeded the 2014 aggregate of 13.9% and 5 substantially exceeded the 2015 aggregate of 11.9%. As Fifth Third's performance exceeded proxy and substantially exceeded the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 314 loans totaling \$39.0 million to middle-income borrowers. This represents 20.4% of refinance loans by volume, which is comparable to the percentage of middle-income families at 20.4%, and 15.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.0% and exceeded the 2015 aggregate of 16.5%.

Fifth Third made 581 loans totaling \$131.8 million to upper-income borrowers. This represents 37.8% of refinance loans by volume, which is below the percentage of upper-income families at 41.4%, and 52.8% by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 37.7% and was below the 2015 aggregate of 41.0%.

Overall, the borrower distribution of refinance loans is excellent.

Home Purchase Loans

Fifth Third made 307 loans totaling \$28.6 million to low-income borrowers. This represents 20.5% of home purchase loans by volume, which is comparable to the percentage of low-income families at 21.0%, and 10.4% by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 6.3% and significantly exceeded the 2015 aggregate of 6.1%. As Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 348 loans totaling \$42.9 million to moderate-income borrowers. This represents 23.3% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.3%, and 15.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.6% and the 2015 aggregate of 18.5%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 223 loans totaling \$35.8 million to middle-income borrowers. This represents 14.9% of home purchase loans by volume, which is below the percentage of middle-income families at 20.4%, and 13.0% by dollar amount, which is also below proxy. The percentage of loans by volume was below the 2014 aggregate of 17.7% and the 2015 aggregate of 18.8%.

Fifth Third made 494 loans totaling \$132.3 million to upper-income borrowers. This represents 33.1% of home purchase loans by volume, which is below the percentage of upper-income families at 41.4%, and 49.8% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 38.5% and was below the 2015 aggregate of 38.7%.

Overall, the borrower distribution of home purchase loans is excellent.

Home Improvement Loans

Fifth Third made 37 loans totaling \$1.7 million to low-income borrowers. This represents 21.6% of home improvement loans by volume, which is comparable to the percentage of low-income families at 21.0%, and 12.4% by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 9.7% and the 2015 aggregate of 7.6%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 42 loans totaling \$2.4 million to moderate-income borrowers. This represents 24.6% of its home improvement loans by volume, which exceeds the percentage of moderate-income families at 17.3%, and 16.8% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.1% and exceeded the 2015 aggregate of 16.3%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 42 loans totaling \$3.6 million to middle-income borrowers. This represents 24.6% of home improvement loans by volume, which exceeds the percentage of middle-income families at 20.4%, and 25.7% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.3% and exceeded the 2015 aggregate of 19.9%.

Fifth Third made 50 loans totaling \$6.4 million to upper-income borrowers. This represents 29.2% of home improvement loans by volume, which is significantly below the percentage of upper-income families at 41.4%, and 45.1% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 43.8% and the 2015 aggregate of 47.8%.

Given Fifth Third's strong performance to low- and moderate-income borrowers, the overall borrower distribution of home improvement loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 62.8% of small business loans to businesses with revenues of \$1 million or less. Fifth Third's performance exceeded the 2014 aggregate of 47.0% and the 2015 aggregate of 52.3%, but was significantly below the percentage of small businesses in the assessment area at 92.3%.

Also, during the evaluation period, Fifth Third was able to make a relatively high percentage of small-dollar loans (81.1%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, a community contact indicated the need for small-dollar loans to small businesses.

Community Development Loans

Fifth Third originated 33 community development loans totaling \$170.5 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
2	14,285,000	9	52,282,258	17	89,200,000	5	14,708,253

Community development lending in the assessment area represents 2.8% of the total dollar volume of community development loans originated during the evaluation period. This ranks as Fifth Third’s 11th highest percentage of community development lending during the evaluation period. Fifth Third’s performance is notable because of the high competition for community development loans and a number of large national banks in the area. Fifth Third only has 1.2% of the deposit market share. As such, Fifth Third is considered to have a relatively high level of community development lending.

Examples of community development lending include, but are not limited to:

- Construction loans to a development corporation that supports affordable housing in a HUD Choice Neighborhood that helped to build new, affordable housing. Families pay 30.0% of their income toward the rent in these Section 8 housing developments.
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies
- Loan to support a solar energy financing in a low- and moderate-income area

Flexible Lending Programs

Fifth Third had 701 flexible lending loans in this assessment area: 503 government loans, 66 down payment assistance loans, and 132 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	2.4%	2.2%	3.4%	25.6%	20.4%	18.4%	51.1%	49.0%	39.9%	20.9%	28.5%	38.3%
Down Payment Assistance Programs	7.6%	6.9%	3.4%	30.3%	27.8%	18.4%	53.0%	54.6%	39.9%	9.1%	10.8%	38.3%
Other Flexible Lending Programs	5.3%	3.1%	3.4%	13.6%	10.5%	18.4%	34.8%	30.9%	39.9%	46.2%	55.5%	38.3%
Total	3.4%	2.7%	3.4%	23.8%	18.7%	18.4%	48.2%	45.4%	39.9%	24.5%	33.1%	38.3%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	28.2%	19.9%	21.0%	35.2%	31.4%	17.3%	18.7%	21.2%	20.4%	17.1%	26.0%	41.4%
Down Payment Assistance Programs	47.0%	37.3%	21.0%	42.4%	47.3%	17.3%	4.5%	7.9%	20.4%	0.0%	0.0%	41.4%
Other Flexible Lending Programs	12.1%	9.6%	21.0%	22.0%	16.5%	17.3%	20.5%	18.9%	20.4%	43.2%	52.9%	41.4%
Total	27.0%	18.9%	21.0%	33.4%	29.3%	17.3%	17.7%	19.7%	20.4%	20.4%	30.0%	41.4%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number was comparable to the percentage of owner-occupied units in these tracts and slightly below proxy by dollar amount. The percentage of lending by volume and dollar amount in moderate-income tracts exceeded the percentage of owner-occupied units in these geographies.

Fifth Third’s lending by volume to low-income borrowers exceeded the percentage of low-income families, especially for down payment assistance programs, but was below proxy by dollar amount. The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, especially for down payment assistance and government loan programs.

Fifth Third made extensive use of flexible lending practices in serving the assessment area’s credit needs, as lending through flexible loan programs in low-income tracts was good and flexible lending in the lending in moderate-income tracts and to low- and moderate-income borrowers was excellent.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent.

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 150 qualified investments totaling \$51.5 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
23	18,716,709	2	550	3	20,651,233	113	531,808

Also included in the total number of qualified investments are nine prior period investments totaling \$11.6 million. Overall, Fifth Third made 3.2% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 2.2% and equal to the percentage of branch offices at 3.1%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area through investments in several affordable housing projects and community services throughout the assessment area. These were identified as important needs in the assessment area based on increasing housing prices and accelerating rent costs and higher-than-average poverty rates in multiple counties within the assessment area. Fifth Third made 125 donations totaling \$578,858 that supported local schools, churches, small businesses, and social and charitable organizations. The majority of Fifth Third’s donations (92.0%) supported services to low- and moderate-income individuals.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated excellent. Retail services are accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, no banking centers were opened. One banking center closed was located in a low- and moderate-income tract. Delivery services are accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains 40 banking centers within this assessment area, including two in low-, 10 in moderate-, eight in middle-, and 20 in upper-income census tracts. Fifth Third’s banking centers in this assessment area represent 1.2% of all of its banking centers.

Fifth Third has a total of 51 full-service ATMs within this assessment area, including two in low-, 12 in moderate-, 13 in middle-, and 24 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: NC Charlotte

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	2	5.0%	0	0	Total	9	13.0%	2	3.9%	7	38.9%	42	9.0%	6.9%	7.5%
Moderate	10	25.0%	0	1	Total	15	21.7%	12	23.5%	3	16.7%	109	23.3%	22.5%	17.4%
Middle	8	20.0%	0	0	Total	14	20.3%	13	25.5%	1	5.6%	165	35.3%	37.0%	33.1%
Upper	20	50.0%	0	0	Total	28	40.6%	24	47.1%	4	22.2%	148	31.6%	33.5%	41.1%
Unknown	0	0.0%	0	0	Total	3	4.3%	0	0.0%	3	16.7%	4	0.9%	0.0%	0.9%
Total	40	100.0%	0	1	Total	69	100.0%	51	100.0%	18	100.0%	468	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered adequate, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 4,817 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 4.1% of all community development services provided and equates to 2.32 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
357	45	140	4,275

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization. Community development services include 3,302 hours of providing financial literacy through local nonprofits and school programs, 1,032 hours serving on boards and committees, 429 hours providing technical assistance to non-profits and local business, and 54 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy based on the need to elevate low- and moderate-income individuals out of poverty and help them to acquire skills to alleviate debt and save money. A community contact noted the need for financial education for small business owners, which is reflected in the hours providing technical assistance to non-profits and local business and serving on various boards and committees.

METROPOLITAN and NON-METROPOLITAN AREAS
(Limited-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
THE STATE OF NORTH CAROLINA**

- **Asheville MSA**
 - As of June 30, 2016, Fifth Third operated one branches in the assessment area, representing 1.7% of its branches in North Carolina.
 - As of June 30, 2016, Fifth Third had \$26,719 in deposits in this assessment area, representing a market share of 0.6% and 0.8% of its statewide deposits.
- **Hickory-Lenoir-Morganton MSA**
 - As of June 30, 2016, Fifth Third operated one branches in the assessment area, representing 1.7% of its branches in North Carolina.
 - As of June 30, 2016, Fifth Third had \$40,082 in deposits in this assessment area, representing a market share of 1.2% and 1.3% of it statewide deposits.
- **Raleigh-Cary MSA**
 - As of June 30, 2016, Fifth Third operated five branches in the assessment area, representing 8.6% of its branches in North Carolina.
 - As of June 30, 2016, Fifth Third had \$484,585 in deposits in this assessment area, representing a market share of 1.9% and 15.4% of it statewide deposits.
- **Non-metropolitan Western North Carolina**
 - As of June 30, 2016, Fifth Third operated 11 branches in the assessment area, representing 19.0% of its branches in North Carolina.
 - As of June 30, 2016, Fifth Third had \$271,303 in deposits in this assessment area, representing a market share of 6.2% and 8.6% of it statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE STATE OF NORTH CAROLINA**

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with Fifth Third's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Asheville MSA	Below	Below	Below
Hickory-Lenoir-Morganton MSA	Below	Below	Below
Raleigh-Cary MSA	Below	Below	Below
Non-metropolitan Western North Carolina	Below	Below	Below

For the lending test, Fifth Third received a “High Satisfactory” rating in North Carolina. Lending performance was below Fifth Third’s performance for the state in all four assessment areas. Although below the state performance, the geographic distribution of loans was adequate and the borrower distribution of loans was either adequate or good. There were good levels of community development loans in the Asheville, Hickory-Lenoir-Morganton, and Raleigh-Cary assessment areas and an adequate level of community development loans in non-metropolitan Western North Carolina. A low level of lending gaps was identified in non-metropolitan Western North Carolina and a moderate level of lending gaps was noted in the remaining three assessment areas.

For the investment test, Fifth Third received an “Outstanding” rating in North Carolina. Performance in all five of the limited-scope assessment areas was below Fifth Third’s performance for the state. The weaker performance was primarily due to a lower level of qualified investments and contributions relative to Fifth Third’s operational presence in the assessment area.

For the service test, Fifth Third received an “Outstanding” rating in North Carolina. Performance was below Fifth Third’s performance for the state in all five limited-scope assessment areas. Although below the state’s performance, overall community development services were adequate in the Raleigh-Cary assessment area and good in the remaining three assessment areas. Retail services were good in non-metropolitan Western North Carolina and in the Raleigh-Cary assessment area and adequate in the Asheville and Hickory-Lenoir-Morganton assessment areas. The weaker retail services performance was primarily due to less accessibility of delivery systems in lower-income geographies. Qualified community development services were excellent in two limited-scope assessment areas and good in non-metropolitan Western North Carolina. The Raleigh-Cary assessment area had a poor level of qualified community development services. The weaker community development services performance was primarily due to a lower level of hours dedicated to providing qualified services relative to Fifth Third’s operational presence in these assessment areas.

The performance in the limited-scope assessment areas did not change the overall state rating.

STATE OF OHIO

CRA RATING for State of Ohio:²³⁸ Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors supporting this rating include:

- An excellent responsiveness to credit needs;
- An excellent geographic distribution of loans throughout the assessment area;
- An excellent distribution of loans among borrowers of different income levels and good to businesses of different revenue sizes;
- Exhibits an excellent record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of community development loans;
- Extensive use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are reasonably accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in Ohio: the Cleveland-Akron-Canton CSA and the Columbus MSA. Limited-scope reviews were performed on the remaining five assessment areas: the Dayton-Springfield-Sidney CSA, Lima MSA, non-metropolitan Northwest Ohio, non-metropolitan Southwest Ohio, and Toledo MSA. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the "Institution" section of this report.

²³⁸ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The Cleveland-Akron-Canton and Columbus assessment areas received greater weight in determining the CRA rating for the state. These areas had the largest lending volumes and number of banking centers and ranked first and second, respectively, in the state's share of deposits during the evaluation period. Lastly, these areas represented 56.7% of the banking centers, 58.7% of deposits, and 59.8% of lending in Ohio.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF OHIO

Lending activity accounted for 20.5% of the Fifth Third's total lending activity, while deposits accounted for 16.6% of the Fifth Third's total deposits. HMDA-reportable lending in Ohio represented 21.7% of the Fifth Third's total HMDA lending, while CRA-reportable lending represented 17.3% of the Fifth Third's total CRA lending. As of June 30, 2016, Fifth Third ranked second among 232 insured institutions and has a deposit market share of 14.1% and 335 banking center locations within Ohio.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OHIO

Lending Test

Fifth Third's performance under the lending test within the assessment areas located in Ohio is rated "Outstanding." Fifth Third's lending reflects an excellent responsiveness to the credit needs in the Cleveland-Akron-Canton and Columbus assessment areas. Lending reflects a good responsiveness to credit needs in the remaining five assessment areas: Dayton-Springfield-Sidney, Lima, non-metropolitan Northwest Ohio, non-metropolitan Southwest Ohio, and Toledo.

Lending Activity

In Ohio, Fifth Third originated 22,684 HMDA loans totaling \$3.0 billion and 6,790 small business loans totaling \$975.2 million during the evaluation period.

Lending activity in Ohio is excellent. The Cleveland-Akron-Canton, Columbus, and Dayton-Springfield-Sidney assessment areas have excellent lending activity. Lending activity is good in the remaining four assessment areas.

Geographic and Borrower Distribution

The distribution of loans among geographies is excellent in the assessment areas located in Ohio. The geographic distribution is excellent in the Cleveland-Akron-Canton, Columbus, and Dayton-Springfield-Sidney assessment areas. The geographic distribution is good in the remaining four assessment areas.

A low level of lending gaps was identified in six of the seven assessment areas. Of particular note, there were no gaps in lending in the Cleveland-Akron-Canton assessment area.

The distribution of loans among borrowers of different income levels is excellent and good to businesses of different revenue sizes in the assessment areas located in Ohio. The borrower

distribution is excellent in the Cleveland-Akron-Canton, Columbus, Dayton-Springfield-Sidney, and Toledo assessment areas. The borrower distribution is good in the remaining three assessment areas. The distribution to businesses of different revenue sizes is excellent in the Columbus assessment area and good in the Cleveland-Akron-Canton and Toledo assessment areas and in non-metropolitan Northwest Ohio and non-metropolitan Southwest Ohio. The distribution to businesses of different revenue sizes was adequate in the remaining two assessment areas.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Ohio, Fifth Third originated 188 community development loans totaling \$823.9 million, which represents 13.8% of the Fifth Third's community development lending by dollar volume. This is a relatively high level of community development lending in Ohio. Fifth Third was a leader in providing community development loans in the Columbus assessment area and made a relatively high level of community development loans in the Cleveland-Akron-Canton, Dayton-Springfield-Sidney, and Toledo assessment areas and an adequate level of community development loans in the remaining three assessment areas.

Flexible Lending

Overall, Fifth Third consistently makes extensive use of flexible lending practices within assessment areas located in Ohio.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Ohio is rated "Outstanding." Fifth Third funded \$260.6 in qualified community development investments in Ohio during the evaluation period, consisting of \$117.5 million obtained from new investments made during the current review period and \$143.1 million from prior period investments. The majority of investments were LIHTCs. Fifth Third's level of qualified investments is excellent in the Columbus assessment area and in non-metropolitan Southwest Ohio. The level of qualified investments is adequate in the Toledo assessment area and good in the remaining three assessment areas.

Fifth Third was considered responsive to the credit and community development needs in the state; therefore, investments without a purpose, mandate, or function of serving Fifth Third's assessment areas in Ohio was considered to positively impact state performance. Fifth Third made \$3.3 million in qualified investments, typically in the form of LIHTCs that benefited counties within the state, but were outside Fifth Third's delineated assessment areas within Ohio.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test within the assessment areas located in Ohio is rated "High Satisfactory." Fifth Third's performance is adequate in the Dayton-Springfield-Sidney assessment area and good in the remaining six assessment areas.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are reasonably accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in Fifth Third's assessment areas. Retail service distribution is good in four assessment areas and adequate in the Cleveland-Akron-Canton, Dayton-Springfield-Sidney, and Lima assessment areas.

Fifth Third has 245 banking centers in Ohio which represents 18.9% of Fifth Third's total branches. Fifth Third's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. One branch opened and one branch closed in a moderate-income tract during the evaluation period in the Dayton assessment area during the evaluation period.

Banking services and business hours do not vary in a way that inconveniences any portions of the Fifth Third's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third is a leader in providing community development services in Ohio. Fifth Third's performance is excellent in the Cleveland-Akron-Canton, non-metropolitan Northwest Ohio, non-metropolitan Southwest Ohio, and Toledo assessment areas. The level of community development services is good in the remaining three assessment areas.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
CLEVELAND-AKRON-CANTON OH CSA #184**

The Cleveland-Akron-Canton OH CSA consists of the following three MSAs:

- Akron OH MSA #10420, consisting of Portage and Summit counties
- Canton-Massillon OH MSA #15940, consisting of Stark County, but excluding Carroll County
- Cleveland-Elyria OH MSA #17460, consisting of Cuyahoga, Geauga, Lake, Lorain, and Medina counties

The assessment area is comprised of 136 low-, 185 moderate-, 341 middle-, and 225 upper-income tracts. There are also seven tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked eighth out of 47 institutions with 5.6% of the deposit share. KeyBank had the majority of the market share with 19.7% of deposits, followed by PNC Bank, FirstMerit Bank, Citizens Bank, and Huntington Bank with 12.7%, 11.9%, 10.4%, and 8.9% of the market share, respectively. Deposits in this assessment area accounted for 4.6% of the institution's total deposits. This was 27.5% of deposits within the state and the fifth-highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 8,332 HMDA loans and 2,296 CRA loans, which represented 8.0% and 5.9% of the total loans originated during the evaluation period, respectively. This was the fourth-largest HMDA market and fifth-largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked seventh among 522 HMDA reporters in the assessment area, while Fifth Third ranked 33rd. The top four HMDA lenders in the assessment area were Quicken Loans, Wells Fargo Bank, Huntington Bank, and Third Federal Savings & Loan. Fifth Third ranked 12th of 125 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, PNC Bank, Chase Bank USA, and Capital One. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Three community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an organization that works to empower low-income individuals, stated that portions of the Akron metropolitan area are doing well, while other parts are not. There are significant areas of blight that have had an immense negative economic impact on the city. The contact believed while Akron has done a good job of building and marketing itself as a great place to work and play, it has done less to boost itself as a good place to live. The contact stated the city needs more quality, affordable housing to attract middle-class families and others to live in the city center.

Because employment has grown more steadily in the areas surrounding the city than in the city center, workers who live downtown and rely on public transit are very limited in terms of employment. The city is hoping to extend transit lines throughout the greater Akron region and encourage more economic development in the city center. The contact stated this organization receives its funding from private contributors; thus, they are not familiar with the degree of involvement of the local financial industry in the community. However, the contact stated they have a strong relationship with their own bank, whose employees occasionally provide needed financial literacy training to their clients.

The second contact, representing an organization that works to strengthen neighborhoods in Northeast Ohio, stated home prices have increased across most of Cleveland. Single-family home prices have been increasing slowly, but steadily since 2015; however, prices vary among neighborhoods. Several neighborhoods have median prices that exceed \$100,000. The contact believed the reason for the higher prices is due to newer homes returning to the market after going through foreclosure and increasing employment opportunities. However, across most of the city, home prices are still lower than they were in 2007 before the area's housing market experienced sharp declines. The contact noted there are opportunities for financial institutions to originate small-dollar loans for home improvements/revitalization of older housing stock within the city limits. The contact also mentioned the need for homeownership and foreclosure prevention counseling for first-time homebuyers and lower-income individuals.

The third contact, representing an organization that provides services to help connect people to jobs in the Northeast Ohio area, stated that since 2015, economic growth has been improving at a moderate pace. The contact stated the gradually improving economy has meant consumers are able to buy more goods, particularly automobiles. As a result, the region's assembly plants have experienced an increase in production and employment. The contact stated that fewer Clevelanders are living in poverty than at any time since 2008, perhaps due to individuals with higher-incomes moving into pockets of the city; however, poverty has spread into surrounding communities. The contact stated the need is not gone in the central city; there is just more need in surrounding communities for food banks and other basic kinds of assistance. The contact specifically mentioned KeyBank and Fifth Third as being actively involved with this organization and in the community.

Population Characteristics

According to the 2010 U.S. Census data, the population in the assessment area was 3.2 million. Over one-quarter (27.0%) of the population lived in low- and moderate-income tracts. In addition, 77.0% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Cleveland MSA is the 32nd largest in terms of population in the nation, while the Akron MSA and Canton-Massillon MSA are the 80th and 134th largest, respectively.²³⁹ On the list of Ohio's most populous counties, Cuyahoga County is the most, while Summit County is fourth, Stark County is seventh, Lorain County is ninth, Lake County is 11th, Medina County is 16th, Portage County is 19th, and Geauga County is 29th.²⁴⁰

As of July 1, 2016, Franklin County surpassed Cuyahoga County as Ohio's most populous county. Cuyahoga County has been losing population for more than four decades. Some of Cuyahoga County's loss has been a boon for surrounding counties, such as Lorain and Medina. Lorain County's population has grown by a rate of 1.7% between 2010 and 2016, which is higher than the 0.7% growth rate for the state. Medina County's population has grown by a rate of 2.8%, which makes it the 11th fastest-growing county in the state. Regardless of these growth rates, Lorain County and Medina County remain the ninth- and 16th most populous counties in Ohio, respectively. Cuyahoga County is not the only urban county in Ohio losing residents, as Summit County's population declined by a rate of 0.3% between 2010 and 2016. Ohio's modest population growth is due to immigrants coming from other countries, which explains Ohio's 0.7% population growth since 2010.²⁴¹

According to 2015 U.S. Census data;²⁴² Cleveland is the second-largest city in Ohio with 388,072 residents and is the 51st largest city in the nation. Akron is the fifth-largest city in the state with 197,542 residents, and Canton is the eighth-largest city in Ohio with 71,885 residents. Between 2010 and 2015, Cleveland, Akron, and Canton experienced declines in population of 18.5%, 8.9%, and 11.1%, respectively.²⁴³ The following table shows the population in the assessment area by county for 2010 and 2015 with the percentage of the population increase or decrease.²⁴⁴ For the most part, the population within the assessment area remained stable between 2010 and 2015, with Medina and Lorain counties experiencing the greatest growth and Cuyahoga County experiencing the greatest decline in population.

²³⁹ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²⁴⁰ US-Places: <http://us-places.com/Ohio/population-by-County.htm>

²⁴¹ Dicken, Brad and Knox, David. "Franklin moves past Cuyahoga in population..." *The Medina-Gazette*. March 22, 2017. - <http://www.medina-gazette.com/Medina-County/2017/03/22/Franklin-moves-past-Cuyahoga-in-population-Medina-County-continues-growth.html>

²⁴² US Census Bureau: <http://www.census.gov/quickfacts/table/PST045216/00> (main page – must enter state, county, city, town or zip code)

²⁴³ City Population -Ohio: <https://www.citypopulation.de/USA-Ohio.html>

²⁴⁴ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):
<http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Cuyahoga	1,280,122	1,255,921	-1.9%
Geauga	93,389	94,102	0.8%
Lake	230,041	229,245	-0.3%
Lorain	301,356	305,147	1.3%
Medina	172,332	176,395	2.4%
Portage	161,419	162,275	0.5%
Stark	375,586	375,165	-0.1%
Summit	541,781	541,968	0.0%
Total	3,156,026	3,140,218	-0.5%

Income Characteristics

The 2010 assessment area median family income was higher (\$61,630) than Ohio’s at \$59,680. As shown in the table below, the median family income increased between 6.0-9.0% across the assessment area since 2010.

**Borrower Income Levels
Cleveland-Akron-Canton OH CSA**

FFIEC Estimated Median Family Income	2010	2014	2015	2016
Akron OH MSA	\$62,882	\$62,100	\$66,700	\$66,900
Canton-Massillon OH MSA	\$55,645	\$56,000	\$58,900	\$61,100
Cleveland-Elyria OH MSA	\$62,627	\$62,600	\$66,100	\$66,600

Poverty rates increased in each county in the assessment area from 1999 to 2015.²⁴⁵ Cuyahoga County had the highest poverty rates in 1999 and 2015. Geauga and Medina counties had the lowest poverty rates in 1999 and 2015. In 2015, only Cuyahoga County had a poverty rate higher than Ohio. Cuyahoga, Summit, and Portage counties had poverty rates that exceeded the national rate. However, Lake County experienced the largest increase in poverty rate during this period. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²⁴⁶ The following table shows the poverty rates for 1999²⁴⁷ and 2015.

²⁴⁵ United States Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

²⁴⁶ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²⁴⁷ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

County	1999 Poverty Rate	2015 Poverty Rate	Change
Cuyahoga	13.1%	18.2%	38.9%
Geauga	4.6%	6.7%	45.7%
Lake	5.1%	8.3%	62.7%
Lorain	9.0%	13.5%	50.0%
Medina	4.6%	7.0%	52.2%
Portage	9.3%	13.6%	46.2%
Stark	9.2%	13.4%	45.7%
Summit	9.9%	14.4%	45.5%
Ohio	10.6%	14.8%	39.6%
United States	11.8%	13.5%	14.4%

While a community contact indicated that fewer Clevelanders are living in poverty than at any time since 2008, as shown above, Cuyahoga County still had the highest poverty rate within the assessment area. The contact also stated there is an increasing need for assistance to lower-income individuals in the surrounding communities, as illustrated above by Summit and Portage counties having poverty rates that exceeded the national rate in 2015 and Lake County experiencing the greatest change in poverty rates in the assessment area in the last 16 years.

Housing Characteristics

According to 2010 U.S. Census data, there are 1.4 million housing units and 820,144 families in the assessment area. From an income perspective, 30.7% of housing units, 19.6% of owner-occupied units, and 24.8% of families are located in low- or moderate-income tracts. Nearly three-quarters of the housing units in the low-income census tracts are either rental or vacant (71.8%), and only 28.2% are owner-occupied. In the moderate-income census tracts, over half (54.1%) of the housing units are either rental or vacant, and 45.9% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be more credit-related opportunities for Fifth Third to provide various aspects of affordable housing in moderate-income tracts compared to low-income tracts.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 52 years old, with 32.3% of the stock built before 1950. The oldest housing stock was in Cuyahoga County with a median age of 56 years, while the newest was 31 years in Medina County. However, within the assessment area, the median age of housing stock was 61 years in low-income tracts and 60 years in moderate-income tracts, which indicates that there is ample opportunity to make home improvement loans. In addition, a community contact stated there is a need for small-dollar loans for home improvements/revitalization of older housing stock within the city limits, in addition to the need for homeownership and foreclosure prevention counseling for first-time homebuyers and lower-income individuals.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$145,758, with an affordability ratio of 32.93. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The median housing value decreased and household incomes increased between 2010 and 2011-2015; as a result, housing became more affordable across the assessment area. During the review period, the most affordable housing was in Lake, Stark, Lorain, and Summit counties and the least affordable in Geauga County. Median gross rents increased across the assessment area, with renters in Stark County experiencing the largest increase in rental rates and renters in Summit County experiencing the smallest increase. In 2010, about 46.9% of renters across the assessment area had rent costs greater than 30.0% of income. Rising rental rates could make it more difficult for lower-income individuals to find affordable housing, as increasing rental rates may make it more difficult for potential homebuyers to save for a down payment for a home. According to Moody’s Analytics, low population growth is hurting consumer industries and housing and continues to put constraints on the long-term potential of basic service industries. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Ohio.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Cuyahoga	\$137,200	31.78	\$121,800	36.28	\$698	\$730	4.6%
Gauga	\$230,900	28.44	\$218,800	33.10	\$751	\$800	6.5%
Lake	\$158,100	34.72	\$147,900	39.24	\$757	\$814	7.5%
Lorain	\$147,400	35.32	\$137,400	38.18	\$681	\$741	8.8%
Medina	\$184,900	35.80	\$179,500	37.30	\$784	\$824	5.1%
Portage	\$157,100	32.11	\$150,900	34.83	\$748	\$802	7.2%
Stark	\$128,000	35.11	\$122,900	38.35	\$622	\$680	9.3%
Summit	\$141,200	33.94	\$133,500	38.03	\$719	\$744	3.5%
Ohio	\$136,400	34.72	\$129,900	38.05	\$678	\$730	7.7%

According to Bankrate.com,²⁴⁸ Ohio ranked eighth for foreclosure filings in November 2016. The national average for foreclosure filings was 1 in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:²⁴⁹

²⁴⁸ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²⁴⁹ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Cuyahoga	1:1,053
Geauga	1:915
Lake	1:687
Lorain	1:782
Medina	1:914
Portage	1:1,203
Stark	1:926
Summit	1:887
Ohio	1:1,055
United States	1:1,533

In November 2016, Lake County had the highest rate of foreclosure (fifth highest foreclosure rate in Ohio) and Portage County had the lowest foreclosure rate within the assessment area. According to Moody's Analytics, the above-average foreclosure inventory in the Cleveland metropolitan area has a major impact on home prices. Foreclosures have a tendency to add to the supply of homes that are on the market and may translate into lower prices, longer wait times for pending sales, and diminished desirability of surrounding homes.

Building permits in the MSAs, Ohio, and the nation are included in the following table for 2014, 2015, and 2016.²⁵⁰

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Akron MSA	764	967	26.6%	909	-6.0%
Canton-Massillon MSA	551	558	1.3%	554	-0.7%
Cleveland-Elyria MSA	2,926	2,938	0.4%	3,053	3.9%
Ohio	19,965	20,047	0.4%	22,816	13.8%
United States	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The Akron MSA experienced the greatest increase of housing permits between 2014 and 2015 and the greatest decrease of housing permits between 2015 and 2016. The Canton MSA experienced an increase in housing permits between 2014 and 2015 and a slight decrease between 2015 and 2016. On the other hand, the Cleveland MSA experienced a slight increase in housing permits between 2014 and 2015 and a larger increase between 2015 and 2016. Based on the overall demand for permits and performance context indicating a moderately improving housing market, this could indicate an increased demand for home purchase loans across the assessment area during the evaluation period, particularly in the greater Cleveland and Canton areas.

²⁵⁰ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Cleveland and Akron area economies are in recovery due to growing healthcare and professional services; however, the factory sector is the lowest it has been since early 2011. In the long-term, the contracting population is hurting consumer industries and housing. On the other hand, Canton’s economic prospects will depend on its ability to capitalize on the shale gas industry. Nonetheless, the Canton metropolitan area will remain a below-average performer because of its weak population growth and dearth of high-tech jobs.

According to the *Columbus Business Journal*,²⁵¹ the Cleveland metropolitan area is home to seven Fortune 500 headquarters. In the past year, the Progressive Corporation (insurance) climbed 16 places on the list, while TravelCenters of America (full-service travel center/truck stop centers) fell 74 places.

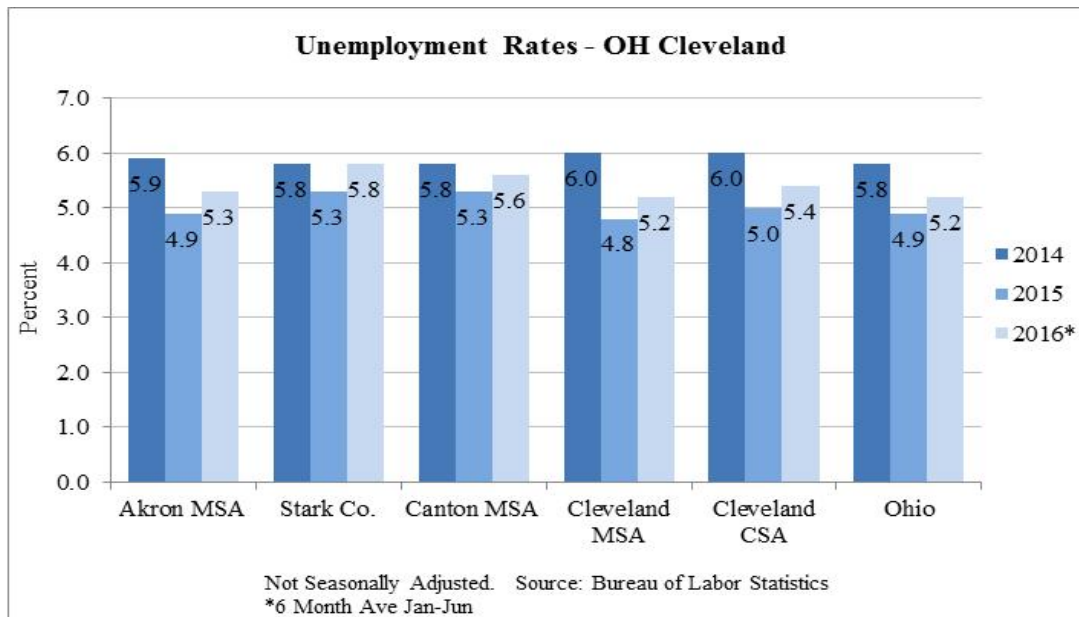
Northeast Ohio Fortune 500 Companies (2016)		
Rank	Company	Revenue
137	Progressive Corporation	\$19.4 billion
169	Goodyear Tire & Rubber Company	\$18.1 billion
188	FirstEnergy Corp.	\$15.1 billion
224	Parker-Hannifin Corporation	\$13.2 billion
253	Sherwin-Williams Company	\$11.1 billion
439	TravelCenters of America	\$7.8 billion
452	J.M. Smucker Company	\$5.6 billion

According to Moody’s Analytics, the top 12 employers in the CSA in 2015/2016 were:

Company	Number of Employees
Cleveland Clinic Foundation	35,291
University Hospitals	19,907
Progressive Corporation	9,330
Giant Eagle, Inc.	9,016
Group Management Services	6,506
Summa Health System	5,526
Kent State University	5,372
FirstEnergy Corp.	5,167
Aultman Hospital	4,288
The Timken Co.	4,112
Mercy Medical Center	2,013
Diebold Inc.	1,700

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the CSA and Ohio.

²⁵¹ Columbus Business First: <http://www.bizjournals.com/columbus/news/2016/06/06/fortune-500-includes-24-ohio-companies-and-big.html>



Overall, unemployment rates declined in 2015 and slightly increased in 2016, but to levels below 2014 unemployment rates. The slight increases in unemployment rates were comparable across the assessment area.

According to *Cleveland.com*, the University of Akron eliminated 213 full-time positions in order to resolve a \$60 million deficit.²⁵² According to the *Cleveland Plain Dealer*, defense contractor Lockheed Martin consolidated and closed most of its Akron, Ohio operations in 2015. As a result, Akron lost about 500 jobs. The company employed about 600 people in the Akron area and the cutback leaves only the Akron Airdock in operation, which only employs 60 individuals. Lockheed Martin also closed or reduced operations not only in Akron, but also in Pennsylvania, Arizona, and Texas as part of a corporate-wide consolidation.²⁵³ According to *Fox8 News*, workers at U.S. Steel Tubular Operations received layoff notices in March 2015. The layoff affects all operations and units at the plant and affects 614 jobs. According to a company spokesperson, the layoffs were a result of a decline in market demand for tubular steel in the gas, oil, and petrochemical industries. While the layoffs are expected to be temporary, there was no indication as to the length of these layoffs.²⁵⁴

²⁵² Farkas, Karen. "University of Akron layoffs." *Cleveland.com*. July 30, 2015. - http://www.cleveland.com/metro/index.ssf/2015/07/university_of_akron_layoffs_include_career_center_set_up_to_help.html

²⁵³ Funk, John. "Lockheed Martin to close most Akron operations b 2015." *The Plain Dealer*. November 14, 2013. - http://www.cleveland.com/business/index.ssf/2013/11/lockheed_martin_to_close_most.html

²⁵⁴ Maglio, Lou. "Major layoffs planned at U.S. Steel Tubular Operations." *Fox8 News*. January 5, 2015. - <http://fox8.com/2015/01/05/major-layoffs-planned-at-u-s-steel-tubular-operations/>

Combined Demographics Report

Assessment Area: OH Cleveland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	136	15.2	67,745	8.3	25,766	38	173,968	21.2
Moderate-income	185	20.7	135,250	16.5	24,417	18.1	144,210	17.6
Middle-income	341	38.1	339,037	41.3	23,880	7	172,912	21.1
Upper-income	225	25.2	278,101	33.9	8,277	3	329,054	40.1
Unknown-income	7	0.8	11	0	0	0	0	0
Total Assessment Area	894	100.0	820,144	100.0	82,340	10.0	820,144	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	160,700	45,371	5.2	28.2	77,223	48.1	38,106	23.7
Moderate-income	277,221	127,173	14.4	45.9	109,846	39.6	40,202	14.5
Middle-income	578,583	387,217	44	66.9	147,657	25.5	43,709	7.6
Upper-income	411,992	321,045	36.4	77.9	66,349	16.1	24,598	6
Unknown-income	102	44	0	43.1	58	56.9	0	0
Total Assessment Area	1,428,598	880,850	100.0	61.7	401,133	28.1	146,615	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	10,688	7.3	9,155	6.9	1,481	11.2	52	8.9
Moderate-income	18,963	12.9	16,833	12.6	2,064	15.7	66	11.2
Middle-income	58,195	39.6	53,072	39.8	4,865	36.9	258	44
Upper-income	58,913	40.1	53,998	40.5	4,706	35.7	209	35.6
Unknown-income	266	0.2	196	0.1	68	0.5	2	0.3
Total Assessment Area	147,025	100.0	133,254	100.0	13,184	100.0	587	100.0
	Percentage of Total Businesses:		90.6		9.0		.4	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	18	1	17	1	1	3.6	0	0
Moderate-income	84	4.8	81	4.7	3	10.7	0	0
Middle-income	1,009	58	995	58.2	14	50	0	0
Upper-income	628	36.1	618	36.1	10	35.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,739	100.0	1,711	100.0	28	100.0	0	.0
	Percentage of Total Farms:		98.4		1.6		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
CLEVELAND-AKRON-CANTON OH CSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. In addition, Fifth Third originated 49 community development loans totaling \$199.1 million. Fifth Third has an excellent overall geographic distribution of loans and there were no gaps in lending. Fifth Third has an excellent distribution among borrowers of different income levels and a good distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The good level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending, based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 5,008 home purchase, 2,953 refinance, 366 home improvement, 2,296 small business, and 49 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 7.4% is greater than the percentage of total deposits at 4.6% in this area.

Fifth Third made 99.7% of the HMDA and 99.8% of the CRA lending within its designated assessment area. Therefore, no concentration of lending was identified in Carroll County, the only excluded county in this assessment area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
HAMP Modifications	4	10.0%	6	15.0%	19	47.5%	11	27.5%
Other Real Estate Secured Modifications	19	5.8%	56	17.2%	167	51.2%	84	25.8%
Percentage of Owner Occupied Units		5.2%		14.4%		44.0%		36.4%

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	93	28.5%	110	33.7%	88	27.0%	34	10.4%
<i>Percentage of Families by Family Income</i>		<i>21.2%</i>		<i>17.6%</i>		<i>21.1%</i>		<i>40.1%</i>

The percentage of HAMP and other modifications in low- and moderate-income tracts exceeded the percentage of owner-occupied units in these geographies. Therefore, modifications helped to expand lending activities in these areas. Most of the borrower incomes for HAMP modifications were unknown; therefore, it would not be meaningful to review the income distribution for these modifications. The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers. Also, several community contacts mentioned the need to help homeowners avoid foreclosure.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Home purchase lending, which was the largest loan category, is good. Refinance lending is excellent, and home improvement lending is adequate. Small business lending is good. Additionally, there are no gaps in lending as shown in the table below:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	62	0	100.0%
Moderate	97	0	100.0%
Middle	131	0	100.0%
Upper	121	0	100.0%
Unknown	3	0	100.0%
Total	414	0	100.0%

There are no lending gaps which is particularly noteworthy due to competition from several other large financial institutions with a significant presence in this market.

Home Purchase Loans

Fifth Third made 136 home purchase loans totaling \$10.6 million in low-income tracts. This represents 2.7% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 5.2%, and 1.5% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate at 1.6% and exceeded the 2015 aggregate at 2.0%. As Fifth Third’s performance exceeded the aggregate of all lenders, but was below proxy, the geographic distribution in low-income tracts is good.

Fifth Third made 703 home purchase loans totaling \$57.2 million in moderate-income tracts. This represents 14.0% of its home purchase loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 14.4%, and 8.1% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 9.5% and exceeded the 2015 aggregate at 10.2%. As Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 2,072 home purchase loans totaling \$231.1 million in middle-income tracts. This represents 41.4% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 44.0%, and 32.6% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 44.4% and was below the 2015 aggregate of 44.0%.

Fifth Third made 2,097 home purchase loans totaling \$410.8 million in upper-income tracts. This represents 41.9% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 36.4%, and 57.9% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 44.5% and was below the 2015 aggregate of 43.9%.

Overall, the geographic distribution of home purchase loans is good.

Refinance Loans

Fifth Third made 89 refinance loans totaling \$6.1 million in low-income tracts. This represents 3.0% of refinance loans by volume and 1.6% by dollar amount, which is below the percentage of owner-occupied units at 5.2%. The percentage of loans by volume was below the 2014 aggregate at 2.1% and exceeded the 2015 aggregate at 1.8%. Given that the owner-occupancy rate in low-income tracts is only 28.2%, which likely impacts the demand for refinance loans and Fifth Third's performance exceeding the aggregate of lenders, the geographic distribution in low-income tracts is excellent.

Fifth Third made 394 refinance loans totaling \$28.4 million in moderate-income tracts. This represents 13.3% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 14.4%. The percentage of loans by dollar amount at 7.6% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 10.1% and substantially exceeded the 2015 aggregate at 8.9%. Given the relatively low owner-occupancy rate at 45.9% and Fifth Third's performance exceeding the aggregate of all lenders; the geographic distribution in moderate-income tracts is excellent.

Fifth Third made 1,228 refinance loans totaling \$124.8 million in middle-income tracts. This represents 41.6% of refinance loans by volume, which is below the owner-occupied units in these tracts at 44.0%. The percentage of loans by dollar amount at 33.4% is below proxy. The percentage of loans by volume was below the 2014 aggregate at 44.8% and was comparable to the 2015 aggregate at 42.4%.

Fifth Third made 1,242 refinance loans totaling \$214.7 million in upper-income tracts. This represents 42.1% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 36.4%, and 57.4% by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 43.0% and was below the 2015 aggregate at 46.9%.

Overall, the geographic distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made five home improvement loans totaling \$420,000 in low-income tracts. This represents 1.4% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 5.2%, and 1.6% by dollar amount, which is also below proxy. The percentage of loans by volume was below the 2014 aggregate of 5.6% and was below the 2015 aggregate of 4.4%. Given the median age of housing stock at 61 years in low-income tracts, which typically indicates the need for home improvement loans, and Fifth Third's performance, which was significantly below proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is poor.

Fifth Third made 42 home improvement loans totaling \$1.9 million in moderate-income tracts. This represents 11.5% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 14.4%, and 7.0% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 14.7% and was comparable to the 2015 aggregate of 14.3%. Given that Fifth Third's performance was below proxy and comparable to the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is good.

Fifth Third made 166 home improvement loans totaling \$9.7 million in middle-income tracts. This represents 45.4% of home improvement loans by volume, which slightly exceeds the percentage of owner-occupied units in these tracts at 44.0%, and 36.5% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 43.3% and exceeded the 2015 aggregate of 42.2%.

Fifth Third made 153 home improvement loans totaling \$14.6 million in upper-income tracts. This represents 41.8% of home improvements loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 36.4%, and 54.9% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 36.4% and was comparable to the 2015 aggregate of 39.1%.

Overall, the geographic distribution of home improvement loans is adequate.

Small Business Loans

Fifth Third made 163 small business loans totaling \$32.0 million in low-income tracts. This represents 7.1% of small business loans by volume, which exceeds the percentage of small businesses in these tracts at 6.9%, and 9.2% by dollar amount, which exceeds proxy.

The percentage of loans by volume was below the 2014 aggregate of 6.0% and exceeded the 2015 aggregate of 6.4%. As Fifth Third's performance exceeded the proxy and aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 217 small business loans totaling \$45.0 million in moderate-income tracts. This represents 9.5% of small business loans by volume, which is below the percentage of businesses in these tracts at 12.6%, and 12.9% by dollar amount, which is comparable to proxy. The percentage of loans by volume was slightly below the 2014 aggregate of 11.7% and was slightly below the 2015 aggregate of 11.7%. Given that Fifth Third's performance was slightly below the aggregate of all lenders and proxy, the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 856 small business loans totaling \$138.0 million in middle-income tracts. This represents 37.3% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 39.8%, and 39.6% by dollar amount, which is comparable to the percentage of businesses in these tracts. The percentage of loans by volume was below the 2014 aggregate of 38.0% and was comparable the 2015 aggregate of 37.9%.

Fifth Third made 1,058 small business loans totaling \$133.5 million in upper-income tracts. This represents 46.1% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 40.5%, and 38.3% by dollar amount, which is comparable to the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 43.1% and exceeded the 2015 aggregate of 43.0%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is excellent based on borrower income and good for businesses of different revenue sizes. Borrower distribution is excellent for home purchase and refinance lending, and good for home improvement lending.

Home Purchase Loans

Fifth Third made 908 loans totaling \$65.7 million to low-income borrowers. This represents 18.1% of home purchase loans by volume, which is below the percentage of low-income families at 21.2%, and 9.3% by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 7.6% and significantly exceeded the 2015 aggregate of 9.2%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 1,209 loans totaling \$119.3 million to moderate-income borrowers. This represents 24.1% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.6%, and 16.8% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.0% and exceeded the 2015 aggregate of 20.8%. As Fifth Third's performance exceeded the aggregate of all lenders and proxy, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 1,152 loans totaling \$150.6 million to middle-income borrowers. This represents 23.0% of home purchase loans by volume, which exceeds the percentage of middle-income families at 21.1%, and 21.2% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.3% and exceeded the 2015 aggregate of 21.5%.

Fifth Third made 1,665 loans totaling \$361.3 million to upper-income borrowers. This represents 33.2% of home purchase loans by volume, which is below the percentage of upper-income families at 40.1%, and 50.9% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 35.3% and was below the 2015 aggregate of 32.1%.

Overall, the borrower distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 428 loans totaling \$31.8 million to low-income borrowers. This represents 14.5% of refinance loans by volume, which is below the percentage of low-income families in tracts at 21.2%, and 8.5% by dollar amount, which is significantly below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 7.0% and significantly exceeded the 2015 aggregate of 6.6%. Given Fifth Third's performance significantly exceeded the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is excellent.

Fifth Third made 560 loans totaling \$49.2 million to moderate-income borrowers. This represents 19.0% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.6%, and 13.1% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.4% and exceeded the 2015 aggregate of 14.3%. As Fifth Third's performance exceeded proxy and the aggregate of other lenders, the borrower distribution for refinance loans to moderate-income borrowers is excellent.

Fifth Third made 772 loans totaling \$82.3 million to middle-income borrowers. This represents 26.1% of refinance loans by volume, which exceeds the percentage of middle-income families at 21.1%, and 22.0% by dollar amount, which slightly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 21.5% and the 2015 aggregate of 20.3%.

Fifth Third made 1,077 loans totaling \$193.7 million to upper-income borrowers. This represents 36.5% of refinance loans by volume, which is below the percentage of upper-income families at 40.1%, and 51.8% by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 41.3% and was below the 2015 aggregate of 38.4%.

Overall, the borrower distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made 50 loans totaling \$2.6 million to low-income borrowers. This represents 13.7% of home improvement loans by volume, which is below the percentage of low-income families at 21.2%, and 9.8% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 10.1% and exceeded the 2015 aggregate of 11.2%. Given that Fifth Third's performance exceeded the aggregate of all lenders but was below proxy, the borrower distribution of home improvement loans to low-income borrowers is good.

Fifth Third made 74 loans totaling \$3.7 million to moderate-income borrowers. This represents 20.2% of its home improvement loans by volume, which exceeds the percentage of moderate-income families at 17.6%, and 14.0% by dollar amount, which also exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 20.4% and was below the 2015 aggregate of 19.7%. Given that Fifth Third's performance was comparable to the aggregate of all lenders and exceeded proxy, the borrower distribution of home improvement loans to moderate-income borrowers is good.

Fifth Third made 102 loans totaling \$5.4 million to middle-income borrowers. This represents 27.9% of home improvement loans by volume, which exceeds the percentage of middle-income families at 21.1%, and 20.3% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 23.3% and exceeded the 2015 aggregate of 22.8%.

Fifth Third made 138 loans totaling \$14.6 million to upper-income borrowers. This represents 37.7% of home improvement loans by volume, which is below the percentage of upper-income families at 40.1%, and 54.6% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 41.1% and was below the 2015 aggregate of 42.4%.

The overall borrower distribution of home improvement loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 52.4% of small business loans to businesses with revenues of \$1 million or less.

Fifth Third’s performance exceeded the 2014 aggregate of 41.5% and exceeded the 2015 aggregate of 45.5%, but was significantly below the percentage of small businesses in the assessment area at 90.6%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (67.7%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated 49 community development loans totaling \$199.1 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
5	24,750,000	16	79,269,935	18	66,144,000	10	28,955,446

Community development lending in the assessment represents 3.3% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s ninth-highest percentage of community development lending during the evaluation period. Given that there is high competition for community development loans with a number of large national banks in the area and that Fifth Third only has 5.6% of the deposit market share, Fifth Third has a relatively high level of community development lending.

Examples of community development lending include, but are not limited to:

- Working capital loan to a retirement living community for seniors that provides a multitude of services including, but not limited to, affordable housing to low- and moderate-income senior citizens and other in-need individuals
- A renewal of a revolving line of credit to a nonprofit that advocates for decent, affordable housing for the homeless and low- and moderate-income individuals with disabilities and special needs. The nonprofit owns multiple affordable housing facilities and administers multiple affordable housing programs; however, this loan supports a permanent supportive housing facility that will provide housing to 500 chronically homeless individuals.
- A working capital loan that supports a nonprofit that helps repair and rehabilitate homes for low- and moderate-income senior citizens, veterans, and the disabled
- A working capital loan that supports a nonprofit that provides pregnancy care to low- and moderate-income women facing unexpected pregnancies
- A working capital loan to a nonprofit that provides a multitude of services to ex-offenders to promote successful reintegration into the community
- Multiple working capital loans to promote economic development by financing a small business to support retention of low- and moderate-income workers (six companies retained about 35 workers)
- Multiple working capital loans to help retain and expand seven businesses located in areas specifically designated by the city to promote revitalization and economic development

The affordable housing loans and loans providing services to low- and moderate-income areas were deemed to be responsive, as community contacts specifically mentioned the need for these types of loans.

Flexible Lending Programs

Fifth Third had 2,003 flexible lending loans in this assessment area: 1,407 government loans, 98 down payment assistance loans, and 498 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.8%	1.0%	5.2%	12.6%	7.9%	14.4%	55.2%	50.4%	44.0%	30.4%	40.7%	36.4%
Down Payment Assistance Programs	29.6%	28.9%	5.2%	22.4%	18.8%	14.4%	33.7%	33.1%	44.0%	14.3%	19.2%	36.4%
Other Flexible Lending Programs	3.0%	1.8%	5.2%	17.7%	11.6%	14.4%	48.6%	45.4%	44.0%	30.7%	41.2%	36.4%
Total	3.4%	2.0%	5.2%	14.3%	9.0%	14.4%	52.5%	48.8%	44.0%	29.7%	40.2%	36.4%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	14.3%	8.5%	21.2%	33.3%	28.2%	17.6%	25.9%	28.0%	21.1%	21.3%	29.8%	40.1%
Down Payment Assistance Programs	66.3%	64.9%	21.2%	17.3%	18.4%	17.6%	11.2%	10.3%	21.1%	4.1%	5.5%	40.1%
Other Flexible Lending Programs	15.8%	12.2%	21.2%	27.1%	23.5%	17.6%	24.0%	22.2%	21.1%	26.5%	35.7%	40.1%
Total	17.2%	11.0%	21.2%	30.9%	26.8%	17.6%	24.7%	26.1%	21.1%	21.7%	30.4%	40.1%

*Unknown tract data is not included in the above table.

Overall, Fifth Third’s lending in low-income tracts, by number and dollar amount, was below the percentage of owner-occupied units in these tracts. However, the percentage of lending in the down payment assistance programs significantly exceeded the percentage of owner-occupied units in low-income tracts. The percentage of lending in moderate-income tracts by volume and dollar amount exceeded the percentage of owner-occupied units in these geographies.

Fifth Third’s lending to low-income borrowers by number and dollar amount was below the percentage of low-income families. The percentage of lending to moderate-income borrowers by volume and dollar amount exceeded the percentage of moderate-income families, especially for government loan programs.

Despite the high foreclosure rates in this assessment area, Fifth Third was able to assist low- and moderate-income borrowers or borrowers purchasing properties in a low- or moderate-income area to purchase homes through the use of several down payment assistance programs. Fifth Third made extensive use of flexible lending practices in serving assessment area credit needs, as lending through flexible loan programs in low- and moderate-income tracts and to low-income borrowers was good, while flexible lending to moderate-income borrowers was excellent.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent.

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 389 qualified investments totaling \$124 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Community Services	
#	\$	#	\$	#	\$
232	50,680,057	10	936,086	85	451,047

Also included in the total number of qualified investments are 62 prior period investments totaling \$72.0 million. Fifth Third made 7.6% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 4.6% and greater than the percentage of branch offices at 6.4%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in affordable housing and community services to combat poverty throughout the assessment area, which were important needs expressed by community contacts. Fifth Third made 98 donations totaling \$1.4 million that supported local schools, small businesses, social and charitable organizations. The majority of Fifth Third’s donations supported economic development, 57.1% of which went to MWV Pinnacle Capital Fund, an economic development organization that invests in high-growth businesses that are owned, controlled, or managed by minorities. Activities that help retain and create jobs were an important need expressed by a community contact.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated good. Retail services are reasonably accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, one banking center was opened and three were closed, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are reasonably accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 83 banking centers within this assessment area, including six in low-, eight in moderate-, 40 in middle-, and 29 in upper-income census tracts. Fifth Third's banking centers in this assessment area represent 6.4% of all of its banking centers.

Fifth Third has a total of 114 full-service ATMs within this assessment area, including 11 in low-, 12 in moderate-, 57 in middle-, and 34 in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: OH Cleveland

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	6	7.2%	0	0	Total	11	8.7%	11	9.6%	0	0.0%	136	15.2%	9.6%	7.3%
Moderate	8	9.6%	0	0	Total	14	11.1%	12	10.5%	2	16.7%	185	20.7%	18.5%	12.8%
Middle	40	48.2%	0	1	Total	61	48.4%	57	50.0%	4	33.3%	341	38.1%	41.7%	39.4%
Upper	29	34.9%	1	2	Total	39	31.0%	34	29.8%	5	41.7%	225	25.2%	30.2%	40.3%
Unknown	0	0.0%	0	0	Total	1	0.8%	0	0.0%	1	8.3%	7	0.8%	0.0%	0.2%
Total	83	100.0%	1	3	Total	126	100.0%	114	100.0%	12	100.0%	894	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered adequate, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered poor.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 6,825 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 5.7% of all community development services provided and equates to 3.28 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
384	1,964	276	4,201

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization.

Community development services include 5,525 hours serving on boards and committees, 909 hours of providing financial literacy through local nonprofits and school programs, 198 hours participating in foreclosure prevention outreach, and 193 hours providing technical assistance to non-profits and local businesses.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy and foreclosure outreach prevention activities. Several community contacts mentioned the need for financial literacy training to provide debt counseling and assist first-time homebuyers. Also, the rates of foreclosure remain significantly higher in seven of eight counties throughout this assessment area compared to the foreclosure rates in Ohio and the nation and Ohio ranked eighth for foreclosure filings in November 2016.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
COLUMBUS OH MSA #18140**

The Columbus OH MSA consists of Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, and Union counties. Fifth Third's assessment area excludes Hocking, Morrow, and Perry counties. The assessment area is comprised of 62 low-, 97 moderate-, 131 middle-, and 121 upper-income tracts. There are also three tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked fourth out of 51 institutions with 8.7% of the deposit share. Huntington Bank had the majority of the market share with 31.4% of deposits, followed by JPMorgan Chase Bank and PNC Bank with 22.5% and 9.7% of the market share, respectively. Deposits in this assessment area accounted for 5.2% of the institution's total deposits. This was 31.2% of deposits within the state and the fourth-highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 5,391 HMDA loans and 1,593 CRA loans, which represented 5.2% and 4.1% of the total loans originated during the evaluation period, respectively. This was the sixth-largest HMDA market and sixth-largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked sixth among 519 HMDA reporters in the assessment area, while Fifth Third ranked 47th. The top four HMDA lenders in the assessment area were Huntington Bank, Wells Fargo Bank, Union Savings Bank, and JPMorgan Chase Bank. Fifth Third ranked 10th of 109 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were PNC Bank, American Express, Chase Bank USA, and U.S. Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Five community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an organization that helps attract and maintain local businesses and generate affordable housing, stated that economic conditions in the Columbus area are strong and home prices have returned to pre-economic crisis values. While financial institutions are actively involved in the community, the contact believed there are opportunities for banks to do a better job promoting affordable housing assistance program options. Education on down payments and closing costs, mortgage credit certificates, and homebuyer education are needed, along with other assistance programs that can help qualified lower-income homebuyers achieve successful home ownership.

The second contact, representing an affordable housing agency, stated that while central Ohio's economy is improving, the availability of affordable, decent housing for lower-income residents is not keeping pace. The contact indicated the market-rate rent in central Ohio is \$811 a month, which is likely not affordable for two people earning minimum wages. In addition, homelessness continues to increase in Franklin County. The contact noted several institutions, including local area banks, are involved in developing affordable housing in neighborhoods that have struggled with blight for years. The contact believed that area banks are actively involved in the community and recognize the need for decent affordable housing and specifically mentioned Nationwide and Huntington Bank as being actively involved with this organization.

The third contact, representing a Community Development Corporation (CDC), a nonprofit, community-based organization focused on revitalizing low-income, underserved neighborhoods in the Columbus area, stated that financial institutions in the area are open to making potential investments to the organization. The contact stated there are opportunities for financial institutions to receive CRA credit and provide tax credit financing that helps support various community development initiatives.

The fourth contact, representing an organization that works to create a better quality of life for local residents through housing and economic development, stated business economic development is a main area of focus. There are opportunities for financial institutions to provide assistance in the form of financial literacy training and low-cost small-dollar loans to individuals who would like to start a small business. Affordable housing is another key area of need in the community, as the contact stated that in older parts of Columbus, approximately 44.0% of the housing stock is 40 years or older. Therefore, there is a need for low-cost loans to help rehabilitate dilapidated housing stock within the city.

The last contact, representing an organization focusing on the needs of low- and moderate-income families, stated there is an increasing number of families in the greater Columbus area in need of assistance with paying their utility bills and rent and buying food and clothing. The contact noted there are more people in need of temporary housing through the Emergency Food and Shelter Program. The contact also stated that there are opportunities for banks to participate within the community by providing financial expertise on local boards or supporting community service projects. Overall, the contact believed area banks are doing an excellent job participating in the community.

Population Characteristics

According to the 2010 U.S. Census data, the population in the assessment area was 1.8 million, of which 30.3% lived in low- and moderate-income tracts. In addition, 75.3% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2016, Franklin County surpassed Cuyahoga County as Ohio's most populous county for the first time. According to the *Columbus Underground*, the data indicates that Franklin County has an estimated population of 1,264,518, with Cuyahoga County at 1,249,352.

Since 2011, Franklin County has steadily grown at an average rate of almost 17,000 persons per year, while Cuyahoga County has declined by an average of 4,000 persons per year. In 2015, the Columbus MSA surpassed the two-million population mark and is expected to surpass the Cleveland MSA population when the next set of population estimates becomes available.²⁵⁵

According to 2016 U.S. Census estimates,²⁵⁶ the Columbus MSA remains the third largest MSA in Ohio behind the Cincinnati and the Cleveland MSAs, respectively. The Columbus MSA is the 33rd largest MSA in the country. From 2010 to 2016, the Columbus MSA experienced a 7.3% increase in population. The Cincinnati MSA also experienced an increase in population of 2.4%, while the Cleveland MSA experienced a 1.0% drop in population during this timeframe.

According to 2015 U.S. Census data,²⁵⁷ Columbus (located in Franklin County) is the largest city in Ohio with 850,106 residents and the 15th largest city in the nation. From 2010 to 2015, Columbus experienced an 18.7% increase in population. The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase.²⁵⁸ The population within the assessment area increased between 2010 and 2015, with Delaware and Franklin counties experiencing the greatest growth and Licking, Madison, and Pickaway counties’ population remaining stable. According to Moody’s Analytics, robust population growth will continue to bolster private services and enable Columbus to continue to perform better than other parts of Ohio and the nation.

County	2010 Population	2015 Population	Population Percent Change
Delaware	174,214	193,013	10.8%
Fairfield	146,156	151,408	3.6%
Franklin	1,163,414	1,251,722	7.6%
Licking	166,492	166,492	0.0%
Madison	43,435	43,435	0.0%
Pickaway	55,698	55,698	0.0%
Union	52,300	54,277	3.8%
Total	1,801,709	1,916,045	6.3%

Income Characteristics

The 2010 assessment area median family income was higher (\$65,998) than Ohio at \$59,680. As shown in the table below, the median family income increased between 4.0-7.0% across the assessment area since 2010.

²⁵⁵ Evans, Walter. “Franklin County Now Largest in Ohio.” *Columbus Underground*. March 23, 2017. - <http://www.columbusunderground.com/franklin-county-now-largest-in-ohio-we1>

²⁵⁶ US Census Bureau: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²⁵⁷ US Census Bureau: <http://www.census.gov/quickfacts/table/PST045216/00> (main page – must enter state, county, city, town or zip code)

²⁵⁸ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

**Borrower Income Levels
Columbus, OH (MSA)**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$69,400	0 - \$34,699	\$34,700 - \$55,519	\$55,520 - \$83,279	\$83,280 - & above
2015	\$71,000	0 - \$35,499	\$35,500 - \$56,799	\$56,800 - \$85,199	\$85,200 - & above
2016	\$69,100	0 - \$34,549	\$34,550 - \$55,279	\$55,280 - \$82,919	\$82,920 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.²⁵⁹ Franklin County had the highest poverty rate in 1999 and 2015. Delaware County had the lowest poverty rate in 1999 and 2015. In 2015, only Franklin County had a poverty rate higher than Ohio and Franklin County and Ohio had poverty rates that exceeded the national rate. However, Licking and Union counties experienced the largest increase in poverty rates during this period. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²⁶⁰ The following table shows the poverty rates for 1999²⁶¹ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Delaware	3.8%	4.4%	15.8%
Fairfield	5.9%	9.1%	54.2%
Franklin	11.6%	17.1%	47.4%
Licking	7.5%	12.6%	68.0%
Madison	7.8%	9.3%	19.2%
Pickaway	9.5%	12.4%	30.5%
Union	4.6%	7.6%	65.2%
Ohio	10.6%	14.8%	39.6%
United States	11.8%	13.5%	14.4%

Two community contacts stated that homelessness is increasing and more families are in need of assistance in the Columbus area. As shown above, Franklin County has the highest poverty rate within the assessment area. Also, the surrounding more rural counties (Licking, Union, and Fairfield) experienced the greatest change in poverty rates in the assessment area in the last 16 years.

²⁵⁹ United States Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

²⁶⁰ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²⁶¹ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 770,131 housing units and 439,901 families in the assessment area. From an income perspective, 33.8% of housing units, 22.2% of owner-occupied units, and 27.7% of families are located in low- or moderate-income tracts. Over three-quarters of the housing units in the low-income census tracts are either rental or vacant (76.7%), and only 23.3% are owner-occupied. In the moderate-income census tracts, over half (54.5%) of the housing units are either rental or vacant, and 45.5% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be more credit-related opportunities for Fifth Third to provide various aspects of affordable housing in moderate-income tracts compared to low-income tracts.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 36 years old, with 18.3% of the stock built before 1950. The oldest housing stock was in Franklin County with a median age of 38 years, while the newest was 15 years in Delaware County. However, within the assessment area, the median age of housing stock was 54 years in low-income tracts and 46 years in moderate-income tracts, which indicates that there is ample opportunity to make home improvement loans. In addition, a community contact stated there is a need for small-dollar loans for home improvements/revitalization of older housing stock within the city limits, in addition to the need for homeownership and foreclosure prevention counseling for first-time homebuyers and lower-income individuals.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$163,938, with an affordability ratio of 32.23. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The median housing values decreased in four counties and increased in three counties between 2010 and 2011-2015, while household incomes increased. As a result, housing became more affordable across the assessment area. During the review period, the most affordable housing was in Union, Pickaway, and Madison counties and the least affordable in Franklin County. Median gross rents substantially increased across most of the assessment area, with renters in Delaware County experiencing the largest increase in rental rates and renters in Union County experiencing the smallest increase. In 2010, about 45.2% of renters across the assessment area had rent costs greater than 30.0% of income. Rising rental rates could make it more difficult for lower income individuals to find affordable housing, as increasing rental rates may make it more difficult for potential homebuyers to save enough for a down payment for a home. In addition, a community contact indicated that the market –rate rent (\$811) is likely not affordable for two people earning minimum wages. Several community contacts stated the level of decent, affordable housing for lower-income residents is not keeping pace with the area's growing needs. Contacts also specifically mentioned the need for banks to do more to promote affordable housing assistance program options to assist qualified lower-income homebuyers achieve successful homeownership and provide low-cost loans to help rehabilitate aged, dilapidated housing stock in the older parts of the city. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Ohio.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Delaware	\$252,700	34.79	\$256,800	35.81	\$781	\$953	22.0%
Fairfield	\$167,200	33.97	\$163,100	37.13	\$733	\$799	9.0%
Franklin	\$155,300	31.61	\$150,600	34.75	\$764	\$845	10.6%
Licking	\$152,600	34.92	\$152,200	37.15	\$682	\$760	11.4%
Madison	\$146,800	34.42	\$149,200	38.48	\$660	\$734	11.2%
Pickaway	\$144,800	34.02	\$147,700	38.89	\$702	\$747	6.4%
Union	\$174,800	39.16	\$171,200	39.36	\$762	\$805	5.6%
Ohio	\$136,400	34.72	\$129,900	38.05	\$678	\$730	7.7%

According to Bankrate.com,²⁶² Ohio ranked eighth for foreclosure filings in November 2016. The national average for foreclosure filings was 1 in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:²⁶³

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Delaware	1:1,769
Fairfield	1:1,900
Franklin	1:1,032
Licking	1:943
Madison	1:1,206
Pickaway	1:975
Union	1:1,283
Ohio	1:1,055
United States	1:1,533

In November 2016, Pickaway County had the highest rate of foreclosure and Fairfield County had the lowest foreclosure rate within the assessment area.

Building permits in the MSA, Ohio, and the nation are included in the following table for 2014, 2015, and 2016.²⁶⁴

²⁶² Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²⁶³ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

²⁶⁴ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Columbus MSA	7,052	7,555	7.1%	8,637	14.3%
Ohio	19,965	20,047	0.4%	22,816	13.8%
United States	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The MSA experienced an increase in housing permits between 2014 and 2015 and a larger increase between 2015 and 2016. Based on the overall demand for permits and performance context indicating an improving housing market, this could indicate an increased demand for home purchase loans across the assessment area during the evaluation period. According to Moody's Analytics, housing starts in Columbus grew much faster than those in the rest of Ohio and the U.S in 2016.

Labor, Employment, and Economic Characteristics

According to Moody's Analytics, the Columbus area economy is in expansion and its economy is performing better than nearly all of its state peers and the nation. Professional services, healthcare, and the public sector continue to drive above-average gains in employment and income. Due to the stable presence of The Ohio State University (top area employer), Columbus' workforce is the most educated of any Ohio metropolitan area and one of the most educated in the Midwest. The Ohio State University also serves as a magnet for out-of-area businesses and an incubator for startups due to its extensive research facilities. Additionally, low business costs in addition to a highly educated workforce also help Columbus to attract more out-of-area companies.

According to *Columbus Business First*,²⁶⁵ the Columbus metropolitan area is home to four Fortune 500 headquarters. In the past year, L Brands climbed 28 places, American Electric Company 19 places, followed by Nationwide climbing 15 places, and Cardinal Health climbing five places on the list.

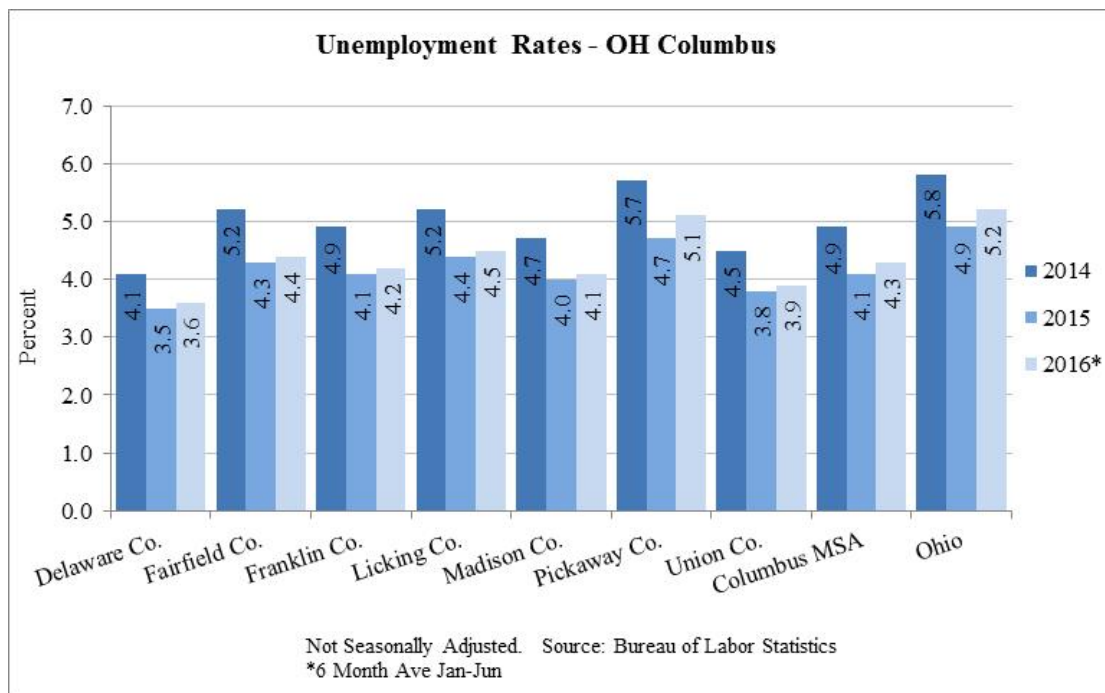
Central Ohio Fortune 500 Companies (2016)		
Rank	Company	Revenue
21	Cardinal Health	\$102.1 billion
69	Nationwide Mutual Insurance Co.	\$40.1 billion
165	American Electric Power Company	\$16.4 billion
234	L Brands Inc.	\$12.5 billion

²⁶⁵ Columbus Business First: <http://www.bizjournals.com/columbus/news/2017/06/07/25-ohio-companies-make-new-fortune-500-list-with.html>

According to Moody’s Analytics, top employers in the assessment area in 2015/2016 were:

Company	Number of Employees
The Ohio State University	27,656
JPMorgan Chase & Co.	20,475
OhioHealth	19,182
The Kroger Co.	17,397
Nationwide	12,433
Honda of America Manufacturing Inc.	10,701
Mount Carmel Health System	8,410
Nationwide Children’s Hospital	7,822
McDonald’s Corp.	7,622
L Brands Inc.	7,100
Huntington Bancshares Inc.	5,500
Giant Eagle Inc.	4,600
Cardinal Health Inc.	4,318
American Electric Power Company	3,578

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the assessment area, MSA, and Ohio.



Overall, unemployment rates declined in 2015 and slightly increased in 2016, but to levels below 2014 unemployment rates across the assessment area. The assessment area had overall lower unemployment rates than Ohio during this period.

According to *The Toledo Blade*, The Andersons Inc. (Lucas County-based agribusiness) filed its official notice with the state of Ohio that it will close its two Toledo area and two Columbus area general stores. The company's closings will affect 1,050 retail workers; 363 jobs will end at the company's Brice and Sawmill general stores in Columbus. The company announced that its retail business lost \$20 million in the past eight years and it would shutter the (retail) stores no later than early June.²⁶⁶

²⁶⁶ Blade Staff. "Andersons files official notice of store layoffs." *The Toledo Blade*. February 11, 2017. - <https://www.toledoblade.com/Retail/2017/02/11/Andersons-files-official-notice-of-store-layoffs.html>

Combined Demographics Report

Assessment Area: OH Columbus

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	62	15	36,180	8.2	13,168	36.4	92,194	21
Moderate-income	97	23.4	85,755	19.5	14,189	16.5	74,503	16.9
Middle-income	131	31.6	157,827	35.9	12,184	7.7	89,933	20.4
Upper-income	121	29.2	160,139	36.4	4,407	2.8	183,271	41.7
Unknown-income	3	0.7	0	0	0	0	0	0
Total Assessment Area	414	100.0	439,901	100.0	43,948	10.0	439,901	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	95,255	22,231	5.1	23.3	51,114	53.7	21,910	23
Moderate-income	165,382	75,202	17.1	45.5	66,998	40.5	23,182	14
Middle-income	270,649	163,263	37.2	60.3	84,671	31.3	22,715	8.4
Upper-income	238,772	178,656	40.7	74.8	44,890	18.8	15,226	6.4
Unknown-income	73	0	0	0	73	100	0	0
Total Assessment Area	770,131	439,352	100.0	57.0	247,746	32.2	83,033	10.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	6,822	7.8	6,050	7.6	745	11.3	27	5.4
Moderate-income	15,754	18.1	14,303	17.9	1,310	19.9	141	28
Middle-income	28,032	32.2	25,868	32.3	1,987	30.2	177	35.1
Upper-income	36,347	41.7	33,721	42.1	2,469	37.6	157	31.2
Unknown-income	232	0.3	170	0.2	60	0.9	2	0.4
Total Assessment Area	87,187	100.0	80,112	100.0	6,571	100.0	504	100.0
	Percentage of Total Businesses:			91.9		7.5		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	24	1.2	23	1.2	1	4.3	0	0
Moderate-income	170	8.8	165	8.6	5	21.7	0	0
Middle-income	1,141	58.8	1,131	59	10	43.5	0	0
Upper-income	605	31.2	598	31.2	7	30.4	0	0
Unknown-income	1	0.1	1	0.1	0	0	0	0
Total Assessment Area	1,941	100.0	1,918	100.0	23	100.0	0	.0
	Percentage of Total Farms:			98.8		1.2		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE COLUMBUS OH MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated excellent. Fifth Third has demonstrated an excellent responsiveness to the credit needs of the community. Additionally, Fifth Third originated 61 community development loans totaling \$313.5 million. Fifth Third has an excellent geographic distribution of loans and minimal lending gaps. Fifth Third has an excellent distribution among borrowers of different income levels and to businesses of different revenue sizes. Fifth Third exhibits an excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The excellent level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an excellent responsiveness to the credit needs within the assessment area. Fifth Third originated 2,853 home purchase, 2,339 refinance, 195 home improvement, 1,593 small business, and 61 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 4.9% is less than the percentage of total deposits at 5.2% in this area.

Fifth Third made 98.4% of the HMDA and 99.5% of the CRA lending within its designated assessment area. No concentrations of lending were identified in any of the excluded counties within the assessment area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	18	6.3%	72	25.1%	130	45.3%	67	23.3%
<i>Percentage of Owner Occupied Units</i>		<i>5.1%</i>		<i>17.1%</i>		<i>37.2%</i>		<i>40.7%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	75	26.1%	96	33.4%	81	28.2%	33	11.5%
Percentage of Families by Family Income		21.0%		16.9%		20.4%		41.7%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications for a meaningful analysis. The percentage of other modifications in low- and moderate-income tracts exceeded the percentage of owner-occupied units in these geographies. Therefore, modifications helped to expand lending activities in these areas. The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is excellent. Home purchase lending, the largest loan category, is excellent. Refinance and home improvement lending are also excellent. Small business lending is good. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	62	3	95.2%
Moderate	97	0	100.0%
Middle	131	0	100.0%
Upper	121	0	100.0%
Unknown	3	2	33.3%
Total	414	5	98.8%

Lending gaps are considered minimal. The penetration rate in low-income tracts is 95.2% and there are no lending gaps in moderate-, middle-, and upper-income tracts.

Home Purchase Loans

Fifth Third made 171 home purchase loans totaling \$16.9 million in low-income tracts. This represents 6.0% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 5.1%, and 3.4% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 2.6% and significantly exceeded the 2015 aggregate at 2.9%. As Fifth Third’s performance exceeded proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is excellent.

Fifth Third made 539 home purchase loans totaling \$56.5 million in moderate-income tracts. This represents 18.9% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 17.1%, and 11.3% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 12.8% and exceeded the 2015 aggregate at 13.3%. As Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of home purchase loans in moderate-income tracts is excellent.

Fifth Third made 905 home purchase loans totaling \$126.6 million in middle-income tracts. This represents 31.7% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 37.2%, and 25.3% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 35.9% and was below the 2015 aggregate of 35.6%.

Fifth Third made 1,238 home purchase loans totaling \$300.9 million in upper-income tracts. This represents 43.4% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 40.7%, and 60.1% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 48.8% and was below the 2015 aggregate of 48.2%.

Overall, the geographic distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 138 refinance loans totaling \$10.7 million in low-income tracts. This represents 5.9% of refinance loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 5.1%, and 2.9% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 3.5% and exceeded the 2015 aggregate at 2.5%. Since Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of refinance loans in low-income tracts is excellent.

Fifth Third made 381 refinance loans totaling \$35.3 million in moderate-income tracts. This represents 16.3% of refinance loans by volume, which is comparable to the owner-occupied units in these tracts at 17.1%, and 9.6% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 14.2% and exceeded the 2015 aggregate at 11.6%. As Fifth Third's performance exceeded the aggregate of all lenders and was comparable to proxy, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 740 refinance loans totaling \$89.6 million in middle-income tracts. This represents 31.6% of refinance loans by volume, which is below the owner-occupied units in these tracts at 37.2%, and 24.3% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 36.8% and was below the 2015 aggregate at 34.1%.

Fifth Third made 1,080 refinance loans totaling \$232.6 million in upper-income tracts. This represents 46.2% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 40.7%, and 63.2% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate at 45.5% and was below the 2015 aggregate at 51.9%.

Overall, the geographic distribution of refinance loans is excellent.

Home Improvement Loans

Fifth Third made 14 home improvement loans totaling \$458,000 in low-income tracts. This represents 7.2% of home improvement loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 5.1%, and 2.5% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 4.0% and exceeded the 2015 aggregate of 3.6%. Given the median age of housing stock at 54 years in low-income tracts, which typically indicates the need for home improvement loans and Fifth Third's performance, which exceeded proxy and the aggregate of all lenders, the geographic distribution of home improvement loans in low-income tracts is excellent.

Fifth Third made 33 home improvement loans totaling \$1.6 million in moderate-income tracts. This represents 16.9% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 17.1%, and 8.8% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 14.9% and the 2015 aggregate of 15.3%. As Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is excellent.

Fifth Third made 68 home improvement loans totaling \$4.8 million in middle-income tracts. This represents 34.9% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 37.2%, and 26.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 38.5% and exceeded the 2015 aggregate of 37.5%.

Fifth Third made 80 home improvement loans totaling \$11.2 million in upper-income tracts. This represents 41.0% of home improvements loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 40.7%, and 61.8%, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 42.6% and was below the 2015 aggregate of 43.6%.

Overall, the geographic distribution of home improvement loans is excellent.

Small Business Loans

Fifth Third made 117 small business loans totaling \$19.6 million in low-income tracts. This represents 7.3% of small business loans by volume, which is comparable to the percentage of businesses in these tracts at 7.6%, and 12.5% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 6.8% and was below the 2015 aggregate of 7.5%. Given that Fifth Third's performance was comparable to proxy, the geographic distribution of small business loans in low-income tracts is good.

Fifth Third made 196 small business loans totaling \$31.6 million in moderate-income tracts. This represents 12.3% of small business loans by volume, which is below the percentage of businesses in these tracts at 17.9%, and 20.1% by dollar volume, which exceeds proxy. The percentage of loans by volume was significantly below the 2014 aggregate of 21.6% and was significantly below the 2015 aggregate of 22.8%. Given that Fifth Third's performance was significantly below the aggregate of all lenders and below proxy, the geographic distribution of small business loans in moderate-income tracts is adequate.

Fifth Third made 442 small business loans totaling \$45.3 million in middle-income tracts. This represents 27.7% of small business loans by volume, which is below the percentage of businesses in these tracts at 32.3%, and 28.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 28.0% and exceeded the 2015 aggregate of 27.5%.

Fifth Third made 835 small business loans totaling \$60.4 million in upper-income tracts. This represents 52.4% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 42.1%, and 38.5% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 42.4% and exceeded the 2015 aggregate of 41.0%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is excellent based on borrower income and for businesses of different revenue sizes. Borrower distribution is excellent for home purchase and home improvement lending, and borrower distribution is good for refinance lending.

Home Purchase Loans

Fifth Third made 577 loans totaling \$51.1 million to low-income borrowers. This represents 20.2% of home purchase loans by volume, which is comparable to the percentage of low-income families at 21.0%, and 10.2% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.0% and significantly exceeded the 2015 aggregate of 8.2%. Because Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home purchase loans to low-income borrowers is excellent.

Fifth Third made 628 loans totaling \$75.3 million to moderate-income borrowers. This represents 22.0% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 16.9%, and 15.0% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.7% and exceeded the 2015 aggregate of 18.8%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 515 loans totaling \$79.4 million to middle-income borrowers. This represents 18.1% of home purchase loans by volume, which is below the percentage of middle-income families at 20.4%, and 15.9% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.6% and was below the 2015 aggregate of 20.4%.

Fifth Third made 1,024 loans totaling \$276.3 million to upper-income borrowers. This represents 35.9% of home purchase loans by volume, which is below the percentage of upper-income families at 41.7%, and 55.2% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 34.2% and was below the 2015 aggregate of 33.9%.

The overall borrower distribution of home purchase loans is excellent.

Refinance Loans

Fifth Third made 322 loans totaling \$28.4 million to low-income borrowers. This represents 13.8% of refinance loans by volume, which is below percentage of low-income families at 21.0%, and 7.7% by dollar volume, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 7.4% and significantly exceeded the 2015 aggregate of 5.6%. Given Fifth Third's performance significantly exceeded the aggregate of all lenders, but was below proxy, the borrower distribution of refinance loans to low-income borrowers is good.

Fifth Third made 445 loans totaling \$43.9 million to moderate-income borrowers. This represents 19.0% of refinance loans by volume, which exceeds the percentage of moderate-income families at 16.9%, and 11.9% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.1% and exceeded the 2015 aggregate of 12.6%. As Fifth Third's performance exceeded proxy and aggregate lenders, borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 516 loans totaling \$63.7 million to middle-income borrowers. This represents 22.1% of refinance loans by volume, which exceeds the percentage of middle-income families at 20.4%, and 17.3% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 19.3% and exceeded the 2015 aggregate of 18.9%.

Fifth Third made 953 loans totaling \$213.5 million to upper-income borrowers. This represents 40.7% of refinance loans by volume, which is comparable to the percentage of upper-income families at 41.7%, while the percentage of loans by dollar amount at 58.0% significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 38.2% and exceeded the 2015 aggregate of 39.3%.

Overall, the borrower distribution of refinance loans is good.

Home Improvement Loans

Fifth Third made 37 loans totaling \$2.4 million to low-income borrowers. This represents 19.0% of home improvement loans by volume, which is comparable to the percentage of low-income families at 21.0%, and 13.2% by dollar amount, which is below proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 9.9% and significantly exceeded the 2015 aggregate of 8.6%. Given that Fifth Third's performance significantly exceeded the aggregate of all lenders and was comparable to proxy, the borrower distribution of home improvement loans to low-income borrowers is excellent.

Fifth Third made 47 loans totaling \$2.3 million to moderate-income borrowers. This represents 24.1% of its home improvement loans by volume, which substantially exceeds the percentage of moderate-income families at 16.9%, and 12.8% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.8% and exceeded the 2015 aggregate of 18.2%. Given that Fifth Third's performance exceeds the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 43 loans totaling \$3.4 million to middle-income borrowers. This represents 22.1% of home improvement loans by volume, which exceeds the percentage of middle-income families at 20.4%, and 18.7% by dollar amount, which is slightly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 20.5% and exceeded the 2015 aggregate of 20.7%.

Fifth Third made 67 loans totaling \$9.9 million to upper-income borrowers. This represents 34.4% of home improvement loans by volume, which is significantly below the percentage of upper-income families at 41.7%, and 54.6% by dollar amount, which exceeds proxy. The percentage of loans by volume was below 2014 aggregate of 44.2% and was below the 2015 aggregate of 45.0%.

Overall, the borrower distribution of home improvement loans is excellent.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 62.9% of small business loans to businesses with revenues of \$1 million or less.

Fifth Third’s performance exceeded the 2014 aggregate of 36.4% and exceeded the 2015 aggregate of 39.5%, but was significantly below the percentage of small businesses in the assessment area at 91.9%. Also, during the evaluation period, Fifth Third was able to make a relatively high percentage of small-dollar loans (79.0%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses. In addition, a community contact indicated there is a need to assist entrepreneurs in starting businesses.

Community Development Loans

Fifth Third originated 61 community development loans totaling \$313.5 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
8	60,049,891	14	91,250,000	35	160,592,816	4	1,615,066

Community development lending in the assessment area represents 5.2% of the total dollar volume of community development loans originated Fifth Third during the evaluation period. This ranks as Fifth Third’s fourth highest percentage of community development lending during the evaluation period. Fifth Third’s performance is especially strong because of the high competition for community development loans and a number of large national banks in the area. As such, Fifth Third is considered a leader in community development lending.

Examples of community development lending include, but are not limited to:

- A renewal of line of credit for Habitat for Humanity Mid-Ohio
- A renewal of a revolving line of credit to a limited housing partnership that provides 72 units of affordable housing for the elderly earning less than 60.0% of the area median income/Medicaid eligible
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies (20 jobs added and over 50 jobs saved)
- Multiple working capital loans to help retain and expand businesses located in areas specifically designated by the city to promote revitalization and economic development

The affordable housing and revitalization loans and loans that provide services to low- and moderate-income areas were deemed to be responsive, as community contacts specifically mentioned the need for these types of loans. A community contact also mentioned the need to revitalize the blighted areas of Columbus.

Flexible Lending Programs

Fifth Third had 1,155 flexible lending loans in this assessment area: 656 government loans, 72 down payment assistance loans, and 427 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.8%	1.2%	5.1%	18.8%	12.5%	17.1%	47.0%	43.1%	37.2%	32.5%	43.3%	40.7%
Down Payment Assistance Programs	52.8%	45.2%	5.1%	23.6%	24.9%	17.1%	16.7%	21.0%	37.2%	6.9%	8.8%	40.7%
Other Flexible Lending Programs	8.9%	5.3%	5.1%	24.4%	16.9%	17.1%	35.8%	35.2%	37.2%	30.9%	42.5%	40.7%
Total	7.6%	4.2%	5.1%	21.1%	14.4%	17.1%	41.0%	39.7%	37.2%	30.3%	41.7%	40.7%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	15.4%	9.0%	21.0%	33.7%	27.9%	16.9%	21.8%	23.0%	20.4%	23.9%	34.8%	41.7%
Down Payment Assistance Programs	52.8%	52.5%	21.0%	25.0%	23.6%	16.9%	9.7%	10.5%	20.4%	8.3%	8.7%	41.7%
Other Flexible Lending Programs	16.9%	15.8%	21.0%	23.2%	19.5%	16.9%	22.0%	20.5%	20.4%	29.5%	36.4%	41.7%
Total	18.3%	12.9%	21.0%	29.3%	25.1%	16.9%	21.1%	21.7%	20.4%	25.0%	34.3%	41.7%

Fifth Third’s lending in low-income tracts, by number exceeded the percentage of owner-occupied units in these tracts; however, lending by dollar amount was below proxy. The number and dollar amount of down payment assistance programs significantly exceeded the overall percentage of lending in low-income tracts. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units in these geographies, while the percentage of lending by dollar amount was below proxy. The number and dollar amounts of down payment assistance programs exceeded the overall percentage of lending in moderate-income tracts.

Fifth Third’s lending by volume and dollar amount to low-income borrowers was below percentage of low-income families in the assessment area.

The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, especially for government loan programs.

Fifth Third made extensive use of flexible lending practices in serving assessment area credit needs, as lending through flexible loan programs to moderate-income borrowers was good and lending in low- and moderate-income tracts and to low-income borrowers was excellent. In addition, a community contact indicated the need for down payment and closing cost assistance programs to assist qualified lower-income homebuyers achieve successful homeownership.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated good.

Fifth Third made a relatively high level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was occasionally in a leadership position. Fifth Third has 411 qualified investments totaling \$61.5 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
221	25,417,612	9	26,100	3	12,500	122	676,378

Also included in the total number of qualified investments are 56 prior period investments totaling \$35.4 million. Fifth Third made 3.8% of its total community development investments in this assessment area, which is less than the percentage of total deposits at 5.2% and less than the percentage of branch offices at 4.3%.

Fifth Third exhibits a good responsiveness to credit and community development needs in the assessment area, including investments in affordable housing throughout the assessment area, which was an important need expressed by several community contacts. Fifth Third made 148 donations totaling \$830,278 that supported chambers of commerce, small businesses, churches, social and charitable organizations. The majority of Fifth Third’s donations (81.5%) supported services to low- and moderate-income individuals, in particular to the United Way of Central Ohio. A community contact indicated there are an increasing number of families in need of various types of assistance in the Columbus area.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated good. Retail services are accessible and Fifth Third a relatively high level of providing community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, no banking centers were opened and two were closed, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households, and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 56 banking centers within this assessment area, including three in low-, 15 in moderate-, 15 in middle-, and 23 in upper-income census tracts. Fifth Third banking centers in this assessment area represent 4.3% of all its banking centers.

Fifth Third has a total of 90 full-service ATMs within this assessment area, including four in low-, 30 in moderate-, 22 in middle-, and 31 in upper-income census tracts. There are also three full-service ATMs located in unknown income tracts.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: OH Columbus

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	3	5.4%	0	0	Total	5	4.5%	4	4.4%	1	4.8%	62	15.0%	10.7%	7.8%
Moderate	15	26.8%	0	0	Total	33	29.7%	30	33.3%	3	14.3%	97	23.4%	20.7%	18.0%
Middle	15	26.8%	0	0	Total	25	22.5%	22	24.4%	3	14.3%	131	31.6%	36.1%	31.9%
Upper	23	41.1%	0	2	Total	42	37.8%	31	34.4%	11	52.4%	121	29.2%	32.5%	42.0%
Unknown	0	0.0%	0	0	Total	6	5.4%	3	3.3%	3	14.3%	3	0.7%	0.0%	0.3%
Total	56	100.0%	0	2	Total	111	100.0%	90	100.0%	21	100.0%	414	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered adequate, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third has a relatively high level of providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 5,397 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 4.5% of all community development services provided and equates to 2.59 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
294	289	290	4,524

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization. Community development services include 3,213 hours of providing financial literacy through local nonprofits and school programs, 1,813 hours serving on boards and committees, 191 hours providing technical assistance to non-profits, and 180 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy, as several community contacts mentioned the need for financial literacy training to assist first-time homebuyers and support for affordable housing.

METROPOLITAN and NON-METROPOLITAN AREAS
(Limited-scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF OHIO

- **Dayton-Springfield-Sidney CSA**
 - As of June 30, 2016, Fifth Third operated 43 branches in the assessment area, representing 17.6% of its branches in Ohio.
 - As of June 30, 2016, Fifth Third had \$3.1 million in deposits in this assessment area, representing a market share of 24.5% and 17.5% of it statewide deposits.
- **Lima MSA**
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 1.2% of its branches in Ohio.
 - As of June 30, 2016, Fifth Third had \$144,302 in deposits in this assessment area, representing a market share of 8.0% and 0.8% of it statewide deposits.
- **Non-metropolitan Northwest Ohio**
 - As of June 30, 2016, Fifth Third operated 18 branches in the assessment area, representing 7.3% of its branches in Ohio.
 - As of June 30, 2016, Fifth Third had \$1.1 million in deposits in this assessment area, representing a market share of 8.6% and 6.0% of it statewide deposits.
- **Non-metropolitan Southwest Ohio**
 - As of June 30, 2016, Fifth Third operated 15 branches in the assessment area, representing 6.1% of its branches in Ohio.
 - As of June 30, 2016, Fifth Third had \$627,041 in deposits in this assessment area, representing a market share of 9.4% and 3.6% of it statewide deposits.
- **Toledo MSA**
 - As of June 30, 2016, Fifth Third operated 27 branches in the assessment area, representing 11.0% of its branches in Ohio.
 - As of June 30, 2016, Fifth Third had \$2.4 million in deposits in this assessment area, representing a market share of 23.5% and 13.5% of it statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE STATE OF OHIO**

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with Fifth Third's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Dayton-Springfield-Sidney CSA	Below	Below	Below
Lima MSA	Below	Below	Consistent
Non-metropolitan Northwest Ohio	Below	Below	Consistent
Non-metropolitan Southwest Ohio	Below	Consistent	Consistent
Toledo MSA	Below	Below	Consistent

For the lending test, Fifth Third received an “Outstanding” rating in Ohio. Performance in all five limited-scope assessment areas was below Fifth Third’s performance for the state. Although below the state performance, the geographic and borrower distribution of loans was excellent in the Dayton-Springfield-Sidney assessment area and good in the remaining four assessment areas. The level of community development loans was good in the Dayton-Springfield-Sidney and Toledo assessment areas and adequate in the remaining three assessment areas. Overall, a low level of lending gaps was noted in all five limited-scope assessment areas.

For the investment test, Fifth Third received an “Outstanding” rating in Ohio. While the investment activity was below the performance for the state in all five limited-scope assessment areas, investment activity was adequate in the Lima assessment area and good in the remaining four assessment areas. The weaker performance was primarily due to a lower level of qualified investments and contributions relative to Fifth Third’s operational presence in the assessment area.

For the service test, Fifth Third received a “High Satisfactory” rating in Ohio. Performance was consistent with Fifth Third’s performance for the state in four of the five limited-scope assessment areas, while services performance in the Dayton-Springfield-Sidney assessment area was below performance for the state. Retail services were good in the non-metropolitan Northwest Ohio, non-metropolitan Southwest Ohio, and the Toledo assessment areas and adequate in the remaining two assessment areas. The stronger retail services performance in the non-metropolitan areas and in the Toledo assessment areas was primarily due to greater accessibility of delivery systems in lower-income geographies. Qualified community development services were excellent in three limited-scope assessment areas and good in the Dayton-Springfield and non-metropolitan Southwest Ohio assessment areas. The weaker community development services performance was primarily due to a lower level of hours dedicated to providing qualified services relative to Fifth Third’s operational presence in these assessment areas.

The performance in the limited-scope assessment areas did not change the overall state rating.

COMMONWEALTH OF PENNSYLVANIA

CRA RATING for Commonwealth of Pennsylvania: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Low Satisfactory

The major factors supporting this rating include:

- An adequate responsiveness to the credit needs of the community;
- A good geographic distribution of loans throughout the assessment area;
- An adequate distribution among borrowers of different income levels and to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of community development loans;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- An adequate level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Pittsburgh MSA assessment area, which represents Fifth Third's entire banking operations for Pennsylvania. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the Institution section of this report.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
PITTSBURGH PA MSA #38300**

The Pittsburgh PA MSA consists of Allegheny County and portions of Washington and Westmoreland counties. Fifth Third's assessment area excludes Armstrong, Beaver, Butler, and Fayette counties. The assessment area is comprised of 38 low-, 104 moderate-, 174 middle-, and 122 upper-income tracts. There are also 13 tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

Fifth Third exited the Pittsburgh market as of April 22, 2016; therefore, 2015 Summary of Deposit information was used to determine the appropriate deposit market share for this assessment area. Additionally, the branches that were open during this review period were evaluated. As of June 30, 2015, Fifth Third ranked 15th out of 45 institutions with 0.7% of the deposit share. PNC Bank had the majority of the market share 50.9% of deposits, followed by The Bank of New York Mellon, Citizens Bank of Pennsylvania, BNY Mellon (PA), and Dollar Bank FSB with 9.9%, 7.8%, 7.2%, and 3.5% of the market share, respectively. Deposits in this assessment area accounted for 0.7% of the institution's total deposits. This was the 26th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 458 HMDA loans and 140 CRA loans, which represented 0.4% of the total loans originated during the evaluation period, respectively. This was the 35th largest HMDA market and 35th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 47th among 447 HMDA reporters in the assessment area, while Fifth Third ranked 100th. The top four HMDA lenders in the assessment area were Wells Fargo Bank, Dollar Bank FSB, PNC Bank, and Howard Hanna Financial Services. Fifth Third ranked 26th of 102 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were PNC Bank, American Express, Capital One, and Synchrony Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Three community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a small business development corporation, stated that one of the overall challenges facing Westmoreland County is its rapidly aging population. Approximately 28.0% of population is projected to be age 65 or older in 2020. The effects of a larger elderly population are a decline in consumer spending, a shrinking tax base, and an increased demand for services. The contact stated that while there is an active banking community in the area, small businesses are still finding it challenging to obtain loans as a result of the current regulatory environment to which banks are bound. The contact indicated there is a need for businesses to be able to obtain small-dollar loans with minimal fees in order to better meet daily operational needs.

The second contact, representing an organization that provides workforce development, stated there are opportunities for financial institutions to participate in economic development initiatives to help create jobs. More available jobs are being posted online for the Pittsburgh region; openings for heavy and tractor-trailer drivers, sales representatives, and registered nurses topped the list for occupations wanted. Nearly half the available jobs require a bachelor's degree and over a quarter require high school and career training.

The third contact, representing an economic development organization, indicated the Pittsburgh area is well-served by a multitude of community banks and larger financial institutions. Overall, community development initiatives are being supported. The contact believed local banks seem more willing and able to lend and provide services in the community than the larger regional financial institutions.

Population Characteristics

According to the 2010 U.S. Census data, the population in the assessment area was 1.4 million. Less than a quarter (23.4%) of the population lived in low- and moderate-income tracts. In addition, 80.0% of the population was 18 years of age or older, the legal age to enter into a contract. According to Moody's Analytics, the Pittsburgh MSA has an older-than-average population. The share of the population age 65 and older in Pennsylvania is four percentage points higher than the U.S. average. A community contact also mentioned the aging population in Westmoreland County as becoming an increasing concern from an economic perspective.

As of July 1, 2015, the Pittsburgh MSA is the 26th largest in terms of population in the nation.²⁶⁷ Allegheny County is the largest county in the assessment area and the second-largest county in Pennsylvania.²⁶⁸ Pittsburgh is the largest city in this county with 304,391 residents and the second-most populous city in Pennsylvania. Pittsburgh is the 63rd largest city in the United States; its population decreased by 8.7% between 2000 and 2015.²⁶⁹ Washington County is the tenth-largest county in Pennsylvania and Greensburg is the largest city in the county, with 14,495 residents. Westmoreland County is the 18th largest county in Pennsylvania and Washington is the largest city in the county with 13,497 residents. According to Moody's Analytics, the Pittsburgh MSA has struggled to retain population and continues to experience weak and worsening out-migration trends in spite of increasing foreign immigration.

The following table shows the population in the assessment area by county for 2010 and 2015, with the percentage of the population increase or decrease.²⁷⁰ The population within the assessment area remained relatively stable between 2010 and 2015, with Westmoreland County experiencing negative growth in population during this time period.

²⁶⁷ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²⁶⁸ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

²⁶⁹ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

²⁷⁰ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):

<http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Allegheny	1,223,348	1,230,459	0.6%
Washington	207,820	208,261	0.2%
Westmoreland	365,169	357,956	-2.0%
Total	1,796,337	1,796,676	0.0%

Income Characteristics

The 2010 assessment area median family income was higher (\$65,364) than Pennsylvania at \$63,364. As shown in the table below, the median family income increased across the assessment area since 2010.

Borrower Income Levels Pittsburgh, PA MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$65,600	0 - \$32,799	\$32,800 - \$52,479	\$52,480 - \$78,719	\$78,720 - & above
2015	\$69,700	0 - \$34,849	\$34,850 - \$55,759	\$55,760 - \$83,639	\$83,640 - & above
2016	\$70,600	0 - \$35,299	\$35,300 - \$56,479	\$56,480 - \$84,719	\$84,720 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.²⁷¹ Allegheny County had the highest poverty rate in 1999 and 2015. Westmoreland County had the lowest poverty rate in 1999 and Washington County had the lowest poverty rate in 2015. In 2015, the poverty rates of the assessment area and Pennsylvania were lower than the national rate. Westmoreland County experienced the largest increase in poverty rate during this period. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²⁷² The following table shows the poverty rates for 1999²⁷³ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Allegheny	11.2%	12.2%	8.9%
Washington	9.8%	10.1%	3.1%
Westmoreland	8.6%	11.3%	31.4%
Pennsylvania	11.0%	13.1%	19.1%
United States	11.8%	13.5%	14.4%

²⁷¹ United States Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

²⁷² 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²⁷³ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 670,057 housing units and 355,640 families in the assessment area. From an income perspective, 27.1% of housing units, 18.5% of owner-occupied units, and 21.4% of families are located in low- or moderate-income tracts. Nearly three-quarters of the housing units in the low-income census tracts are either rental or vacant (73.0%), and 27.1% are owner-occupied. In the moderate-income census tracts, over half (54.3%) of the housing units are either rental or vacant, and 45.7% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be more credit-related opportunities for Fifth Third to provide various aspects of affordable housing in moderate-income tracts compared to low-income tracts.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 57 years old, with 41.8% of the stock built before 1950. Within the assessment area, the median age of housing stock was 61 years in low- and moderate-income tracts, which indicates that there is ample opportunity to make home improvement loans.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$118,494, with an affordability ratio of 40.84. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

The median housing values increased in all three counties between 2010 and 2011-2015 and household incomes increased; however, housing only became slightly more affordable in Westmoreland County. During the review period, the most affordable housing was in Allegheny County. Median gross rents substantially increased across most of the assessment area, with renters in Washington County experiencing the largest increase in rental rates. In 2010, about 44.3% of renters across the assessment area had rent costs greater than 30.0% of income. Rising rental rates could make it more difficult for lower-income individuals to find affordable housing, as increasing rental rates may make it more difficult for potential homebuyers to save enough for a down payment for a home. According to Moody's Analytics, the growing demand for single-family homes is apparent, as these prices increased by 5.6% in 2015, which is above average for Pennsylvania. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Pennsylvania.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Allegheny	\$115,200	41.63	\$129,600	40.93	\$688	\$780	13.4%
Washington	\$130,300	38.13	\$152,400	37.04	\$563	\$675	19.9%
Westmoreland	\$126,800	37.61	\$138,500	37.72	\$578	\$654	13.1%
Pennsylvania	\$159,300	31.64	\$166,000	32.29	\$739	\$840	13.7%

According to Bankrate.com,²⁷⁴ Pennsylvania ranked tenth for foreclosure filings in November 2016. The national average for foreclosure filings was 1 in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:²⁷⁵

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Allegheny	1:1,178
Washington	1:2,522
Westmoreland	1:1,197
Pennsylvania	1:1,246
United States	1:1,533

In November 2016, Allegheny County had the highest rate of foreclosure and Washington County had the lowest foreclosure rate within the assessment area.

Building permits in the MSA, Pennsylvania, and the nation are included in the following table for 2014, 2015, and 2016.²⁷⁶

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Pittsburgh MSA	4,199	5,264	25.4%	4,403	-16.4%
Pennsylvania	25,108	22,854	-9.0%	23,303	2.0%
United States	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The MSA experienced a significant increase in housing permits between 2014 and 2015 and a major decrease between 2015 and 2016, not reflecting the trends in either Pennsylvania or the nation. The reduced demand for permits could indicate a weakening housing market and a decreased demand for home purchase loans across the assessment area.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Pittsburgh area economy is at risk. Natural resources mining and manufacturing are not experiencing much growth. While gains made from the Marcellus Shale boom have subsided, strong gains in high tech and healthcare have countered the losses and kept the economy on track.

²⁷⁴ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²⁷⁵ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

²⁷⁶ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Renowned higher education and research institutions and the low cost of living relative to other large northeastern metropolitan areas continue to be economic strengths for the metropolitan area. However, Pittsburgh’s weak and worsening demographics and aging infrastructure will cause the Pittsburgh metropolitan area to underperform the nation.

According to *Pittsburgh Business First*,²⁷⁷ the Pittsburgh metropolitan area is home to six Fortune 500 headquarters. In the past year, Kraft Heinz climbed 119 places, due to the merger of H.J Heinz and Kraft Foods Group in 2015, making it the fifth-largest food and beverage company in the world. PNC climbed 21 places, PPG climbed 16 places, and WESCO and Dick’s climbed three and 28 places, respectively. On the other hand, United States Steel dropped 68 places since 2015.

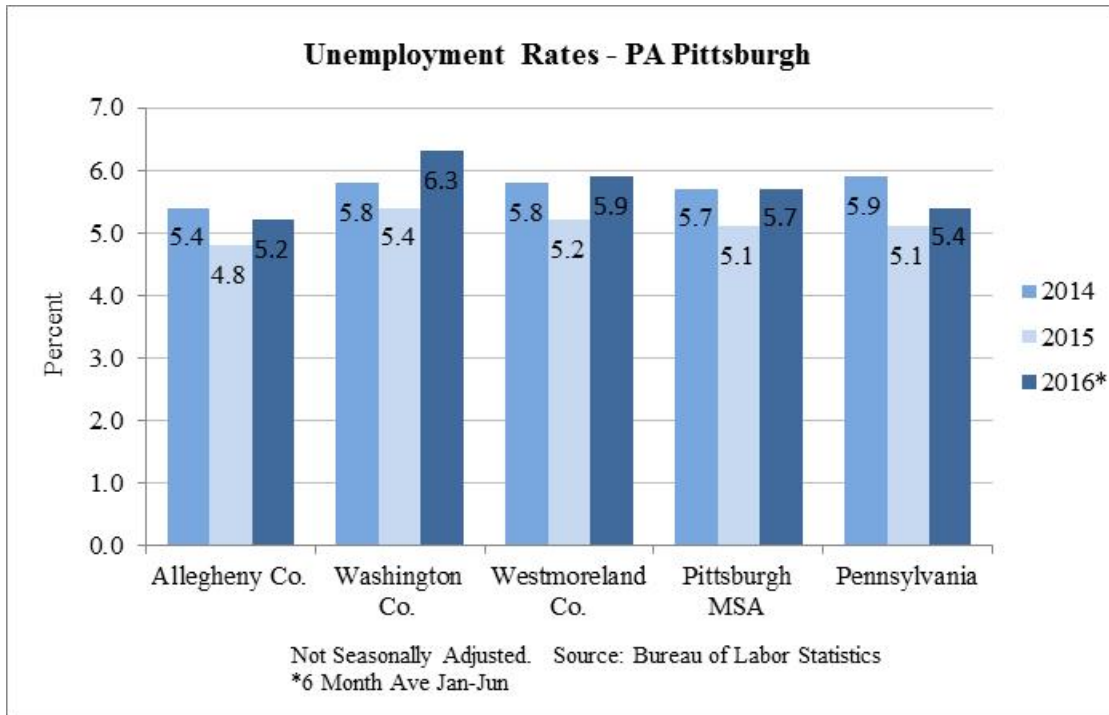
Pittsburgh Fortune 500 Companies (2016)		
Rank	Company	Revenue
153	The Kraft Heinz Company	\$18.2 billion
171	PNC Financial Services Group	\$16.4 billion
182	PPG Industries	\$15.2 billion
244	United States Steel Corporation	\$10.3 billion
357	WESCO International	\$7.3 billion
365	Dick’s Sporting Goods	\$6.2 billion

According to Moody’s Analytics, the top ten employers in the assessment area in 2015/2016 were:

Company	Number of Employees
University of Pittsburgh Medical Center	43,000
University of Pittsburgh	12,116
Giant Eagle Inc.	11,119
PNC Financial Services Group	10,030
West Penn Allegheny Health System	9,998
The Bank of New York Mellon	7,600
Wal-Mart Stores Inc.	6,200
Westinghouse Electric Co.	5,600
Highmark Inc.	6,200
United States Steel Corp.	5,000

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the assessment area, MSA, and Pennsylvania.

²⁷⁷ Pittsburgh Business First: <http://www.bizjournals.com/pittsburgh/news/2016/06/06/here-are-the-pittsburgh-companies-that-are-among.html>



Overall, unemployment rates declined in 2015 and increased in 2016 to levels above 2014 unemployment rates in Washington and Westmoreland counties. Allegheny County had overall lower unemployment rates than Pennsylvania during this period, while the MSA exceeded Pennsylvania’s rate of unemployment in 2016.

According to the *Pittsburgh Post-Gazette*, Macy’s announced it will close several stores in the Pittsburgh region in spring 2017 to cut costs and cope with a shifting retail environment. The three store closures will affect 214 workers. This shutdown is part of the company’s decision to close approximately 100 stores over the next few years and eliminate 3,900 jobs. The company is pleased with the performance of its digital business, with double-digit gains at both *Macy’s.com* and *Bloomingdale.com*; however, store sales continue to be impacted by changing customer behavior. The steps to streamline operations are estimated to generate about \$550 million in savings beginning in 2017.²⁷⁸

²⁷⁸ Ritenbaugh, Stephanie. “Macy’s to close several Pittsburgh-area stores.” *Pittsburgh Post-Gazette*. January 4, 2017. - <http://www.post-gazette.com/business/pittsburgh-company-news/2017/01/04/Macy-s-will-close-78-stores-including-several-in-Western-Pennsylvania-by-spring/stories/201701040226>

Combined Demographics Report

Assessment Area: PA Pittsburgh

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	38	8.4	14,173	4	5,024	35.4	68,254	19.2
Moderate-income	104	23.1	61,895	17.4	10,940	17.7	60,354	17
Middle-income	174	38.6	145,215	40.8	9,099	6.3	74,055	20.8
Upper-income	122	27.1	134,337	37.8	3,864	2.9	152,977	43
Unknown-income	13	2.9	20	0	0	0	0	0
Total Assessment Area	451	100.0	355,640	100.0	28,927	8.1	355,640	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	40,808	11,046	2.7	27.1	19,576	48	10,186	25
Moderate-income	140,498	64,207	15.8	45.7	51,503	36.7	24,788	17.6
Middle-income	277,211	172,690	42.5	62.3	78,252	28.2	26,269	9.5
Upper-income	211,273	158,564	39	75.1	39,803	18.8	12,906	6.1
Unknown-income	267	20	0	7.5	128	47.9	119	44.6
Total Assessment Area	670,057	406,527	100.0	60.7	189,262	28.2	74,268	11.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,636	4.7	3,161	4.5	455	6.5	20	3.4
Moderate-income	10,215	13.1	9,239	13.1	869	12.4	107	18
Middle-income	32,202	41.3	28,863	41	3,046	43.4	293	49.3
Upper-income	31,460	40.3	28,789	40.9	2,501	35.6	170	28.6
Unknown-income	534	0.7	376	0.5	154	2.2	4	0.7
Total Assessment Area	78,047	100.0	70,428	100.0	7,025	100.0	594	100.0
Percentage of Total Businesses:			90.2		9.0		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	1.5	5	1.3	1	16.7	0	0
Moderate-income	27	6.9	26	6.7	1	16.7	0	0
Middle-income	195	49.7	194	50.3	1	16.7	0	0
Upper-income	162	41.3	159	41.2	3	50	0	0
Unknown-income	2	0.5	2	0.5	0	0	0	0
Total Assessment Area	392	100.0	386	100.0	6	100.0	0	.0
Percentage of Total Farms:			98.5		1.5		.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PITTSBURGH PA MSA

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “High Satisfactory.” Fifth Third has demonstrated an adequate responsiveness to the credit needs of the community. In addition, Fifth Third originated ten community development loans totaling \$67.9 million. Fifth Third has a good geographic distribution of loans and a high level of lending gaps and an adequate distribution among borrowers of different income levels and to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance, and small business lending. There were an insufficient number of home improvement loans to analyze performance. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding aggregate lending, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects an adequate responsiveness to the credit needs within the assessment area. Fifth Third originated 289 home purchase, 154 refinance, 14 home improvement, 140 small business, and ten community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 0.4% is less than the percentage of total deposits at 0.7% in this area.

Fifth Third made 77.2% of the HMDA and 71.1% of the CRA lending within its designated assessment area. A concentration of HMDA lending was noted in the excluded tracts in Westmoreland County. Fifth Third made 56 HMDA loans in these excluded tracts. Nonetheless, the majority of the loans were made within the defined assessment area.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. Home purchase lending, which was the largest loan category, is good. Refinance lending is good. Small business lending is excellent. However, there is also a high level of lending gaps. The following gaps in lending were noted in the assessment area:

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Low	30	30	21.0%
Moderate	63	104	39.4%
Middle	75	174	56.9%
Upper	19	122	84.4%
Unknown	12	13	7.7%
Total	199	451	55.9%

Lending gaps are considered significant due to the number of gaps in low-, moderate-, and middle-income tracts. Lending gaps are low in upper-income tracts. The high level of gaps in low- and moderate-income tracts can be somewhat attributed to the low levels of owner-occupied units in 29.5% and 45.7% of these tracts, respectively, and high levels of rentals/vacancies in 73.0% and 54.3% of these tracts. Fifth Third was not able to penetrate at least half of the low- and moderate-income tracts; as a result, Fifth Third's lending penetration is particularly weak in this assessment area.

Home Purchase Loans

Fifth Third made five home purchase loans totaling \$1.3 million in low-income tracts. This represents 1.7% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 2.7%, and 1.8% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 1.4% and the 2015 aggregate at 1.3%. As Fifth Third's performance exceeded the aggregate of all lenders and was below the percentage of owner-occupied units in these geographies, the geographic distribution of home purchase loans in low-income tracts is good.

Fifth Third made 31 home purchase loans totaling \$3.6 million in moderate-income tracts. This represents 10.7% of its home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 15.8%, and 5.0% by dollar amount, which was below the proxy. The percentage of loans by volume was below the 2014 aggregate at 10.1% and was comparable to the 2015 aggregate at 9.9%. As Fifth Third's performance exceeded the aggregate of all lenders and was below proxy, the geographic distribution of home purchase loans in moderate-income tracts is good.

Fifth Third made 94 home purchase loans totaling \$16.0 million in middle-income tracts. This represents 32.5% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 42.5%, and 22.3% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 40.3% and was below the 2015 aggregate of 40.0%.

Fifth Third made 159 home purchase loans totaling \$50.8 million in upper-income tracts. This represents 55.0% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 39.0%, and 70.9% by dollar amount, which exceeds the proxy. The percentage of loans by volume exceeded the 2014 aggregate of 48.2% and exceeded the 2015 aggregate of 48.7%.

Overall, the geographic distribution of home purchase loans is good.

Refinance Loans

Fifth Third made one refinance loan totaling \$43,000 in low-income tracts. This represents 0.6% of refinance loans by volume and 0.2% by dollar amount, which is below the percentage of owner-occupied units at 2.7%. The percentage of loans by volume exceeded the 2014 aggregate at 1.3% and was below the 2015 aggregate at 1.3%. Given that Fifth Third's performance was below proxy and slightly exceeded the aggregate of all lenders and only 27.1% of housing units are owner-occupied, the geographic distribution of refinance loans in low-income tracts is adequate.

Fifth Third made 15 refinance loans totaling \$1.0 million in moderate-income tracts. This represents 9.7% of refinance loans by volume, which is below the owner-occupied units in these tracts at 15.8%. The percentage of loans by dollar amount at 4.3% is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 11.1% and was below the 2015 aggregate at 9.1%. As Fifth Third's performance exceeded the aggregate of all lenders and was below proxy, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 66 refinance loans totaling \$6.8 million in middle-income tracts. This represents 42.9% of refinance loans by volume, which slightly exceeds the owner-occupied units in these tracts at 42.5%. However, refinance loans by dollar amount (29.0%) is below proxy. The percentage of loans by volume was below the 2014 aggregate at 40.9% and exceeded the 2015 aggregate at 38.9%.

Fifth Third made 72 refinance loans totaling \$15.6 million in upper-income tracts. This represents 46.8% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 39.0%, and 66.5% by dollar amount, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 46.6% and was below the 2015 aggregate at 50.7%.

Overall, the geographic distribution of refinance loans is good.

Small Business Loans

Fifth Third made 13 small business loans totaling \$1.5 million in low-income tracts. This represents 9.3% of small business loans by volume, which significantly exceeds the percentage of businesses in these tracts at 4.5% and 4.6% by dollar amount, which slightly exceeds proxy. The percentage of loans by volume slightly exceeded the 2014 aggregate of 4.1% and significantly exceeded the 2015 aggregate of 4.7%. As Fifth Third's performance significantly exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in low-income tracts is excellent.

Fifth Third made 24 small business loans totaling \$7.4 million in moderate-income tracts. This represents 17.1% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 13.1%. This also represents 23.1% small business loans by dollar amount, which exceeds proxy.

The percentage of loans by volume significantly exceeded the 2014 aggregate of 11.8% and exceeded the 2015 aggregate of 13.5%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 49 small business loans totaling \$14.0 million in middle-income tracts. This represents 35.0% of small business loans by volume, which is below the percentage of businesses in these tracts at 41.0%, and 43.7% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 40.2% and was below the 2015 aggregate of 39.1%.

Fifth Third made 53 small business loans totaling \$9.0 million in upper-income tracts. This represents 37.9% of small business loans by volume, which is below the percentage of businesses in these tracts at 40.9%, and 28.1% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 42.8% and was below the 2015 aggregate of 41.6%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is adequate based on borrower income and for businesses of different revenue sizes. Borrower distribution is adequate for home purchase and good for refinance loans.

Home Purchase Loans

Fifth Third made 12 loans totaling \$956,000 to low-income borrowers. This represents 4.2% of home purchase loans by volume, which is significantly below the percentage of low-income families at 19.2%, and 1.3% by dollar amount, which is also significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 6.0% and was below the 2015 aggregate of 7.0%. Because Fifth Third's performance was below the aggregate of all lenders and significantly below proxy, the borrower distribution of home purchase loans to low-income borrowers is adequate.

Fifth Third made 54 loans totaling \$6.6 million to moderate-income borrowers. This represents 18.7% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 17.0%, and 9.1% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 18.8% and was below the 2015 aggregate of 19.5%. As Fifth Third's performance exceeded proxy and was below the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is good.

Fifth Third made 38 loans totaling \$5.3 million to middle-income borrowers. This represents 13.1% of home purchase loans by volume, which is below the percentage of middle-income families at 20.8%, and 7.4% by dollar amount, which is also below proxy. The percentage of loans by volume was below the 2014 aggregate of 20.9% and was below the 2015 aggregate of 20.2%.

Fifth Third made 178 loans totaling \$57.9 million to upper-income borrowers. This represents 61.6% of home purchase loans by volume, which significantly exceeds the percentage of upper-income families at 43.0%, and 80.7% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume significantly exceeded the 2014 aggregate of 40.8% and exceeded the 2015 aggregate of 38.5%.

Overall, the borrower distribution of home purchase loans is adequate.

Refinance Loans

Fifth Third made six loans totaling \$459,000 to low-income borrowers. This represents 3.9% of refinance loans by volume, which is significantly below the percentage of low-income families at 19.2%, and 2.0% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 6.3% and was below the 2015 aggregate of 5.6%. As Fifth Third's performance was significantly below proxy and the aggregate of all lenders, the borrower distribution of refinance loans to low-income borrowers is adequate.

Fifth Third made 35 loans totaling \$2.9 million to moderate-income borrowers. This represents 22.7% of refinance loans by volume, which exceeds the percentage of moderate-income families at 17.0%, and 12.5% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.1% and exceeded the 2015 aggregate of 14.2%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 35 loans totaling \$4.2 million to middle-income borrowers. This represents 22.7% of refinance loans by volume, which exceeds the percentage of middle-income families at 20.8%, and 17.9% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 21.1% and exceeded the 2015 aggregate of 20.3%.

Fifth Third made 67 loans totaling \$14.1 million to upper-income borrowers. This represents 43.5% of refinance loans by volume, which slightly exceeds the percentage of upper-income families at 43.0%, and 60.1% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 46.6% and was below the 2015 aggregate of 45.8%.

Overall, the borrower distribution of refinance loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 33.6% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance was below the 2014 aggregate of 46.4% and was below the 2015 aggregate of 50.5% but was significantly below the percentage of small businesses in the assessment area at 90.2%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (53.6%) up to \$100,000, indicating a willingness to lend in smaller amounts typically requested by small businesses.

Community Development Loans

Fifth Third originated ten community development loans totaling \$67.9 million during the evaluation period as shown in the table below:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
1	50,000	2	8,500,000	3	37,595,573	4	21,802,000

Community development lending in the assessment area represents 1.1% of the total dollar volume of community development loans originated during the evaluation period. This ranks as Fifth Third’s 22nd highest percentage of community development lending during the evaluation period. As such, Fifth Third’s performance is relatively high in community development lending.

Examples of community development lending include, but are not limited to:

- A renewal of a revolving line of credit to a nonprofit housing development coalition that helps to preserve affordable housing in Pittsburgh’s Northside communities and advocates for tenants’ rights
- Working capital loans to several nonprofit organizations that provide a multitude of services to low- and moderate-income individuals and families and individuals with disabilities
- Multiple working capital loans that promote economic development by financing businesses to support job retention, add new jobs, and promote growth to continue operations in low- and moderate-income geographies

Fifth Third was considered responsive to the community credit needs in the state; therefore, two community development loans without a purpose, mandate, or function of serving Fifth Third’s assessment areas in Pennsylvania were considered to positively impact state performance. Fifth Third originated two qualified community development loans totaling \$7.0 million that supported the revitalization of an industrial park that received a grant from Pennsylvania’s redevelopment assistance capital program. These loans were within the Commonwealth, but outside of Fifth Third’s delineated assessment areas within Pennsylvania.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “Outstanding.”

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 49 qualified investments totaling \$18.7 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
18	16,897,760	2	5,350	2	53,300	26	254,174

Also included in the total number of qualified investments is one prior period investment totaling \$1.5 million. Fifth Third made 1.1% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 0.7% and less than the percentage of branch offices at 1.3%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in several affordable housing projects throughout the assessment area, which is a growing need in the area based on increasing housing prices and rent rates. Fifth Third made 33 donations totaling \$397,234 that supported chambers of commerce, small businesses, social and charitable organizations. The majority of Fifth Third’s donations (64.0%) supported services to low- and moderate-income individuals. A community contact highlighted the growing elderly population in the area who have an increased demand for services.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “Low Satisfactory.” Retail services are accessible and Fifth Third provided an adequate level of community development services.

Retail Services

Although Fifth Third exited the Pittsburgh market as of April 22, 2016, the branches that were open during the evaluation period were evaluated. As a result, the following branching information is as of June 30, 2015 and the record of opening and closing branches was not weighed.

Fifth Third maintained 17 banking centers within this assessment area, including two in low-, five in moderate-, two in middle-, and eight in upper-income census tracts. Fifth Third’s banking centers in this assessment area represented 1.2% of all its banking centers.

Fifth Third had 25 ATMs within this assessment area, including two in low-, six in moderate-, six in middle-, and one in upper-income census tracts. The ATMs in this assessment area represented 1.1% of all of Fifth Third’s ATMs.

The following table illustrates the percentage of banking centers in low-, moderate-, middle-, and upper-income census tracts in comparison to the percentage of tracts, and the percentage of households and total businesses in those tracts.

Tract Category	Total Branches		Demographics			
			Census Tracts		Households	Total Businesses
	#	%	#	%	%	%
Low	2	11.8%	38	8.4%	5.1%	4.7%
Moderate	5	29.4%	104	23.1%	19.4%	13.0%
Middle	2	11.8%	174	38.6%	42.1%	41.0%
Upper	8	47.1%	122	27.1%	33.3%	40.6%
Unknown	0	0.0%	13	2.9%	0.0%	0.7%
Total	17	100.0%	451	100.0%	100.0%	100.0%

Branch distribution within low- and moderate-income tracts was considered excellent, as the distribution of branches exceeded the percentage of census tracts and households in these tracts.

Community Development Services

Fifth Third provides an adequate level of community development services in this assessment area. During the evaluation period, Fifth Third employees provided 832 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 0.7% of all community development services provided and equates to 0.4 annualized persons (ANP).

Affordable Housing	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
4	458	370

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing, promote community development, and area revitalization and stabilization. Community development services include 584 hours serving on boards and committees, 162 hours of providing financial literacy through local nonprofits and school programs, 78 hours providing technical assistance to non-profits, and 8 hours participating in foreclosure prevention outreach.

STATE OF TENNESSEE

CRA RATING for State of Tennessee: Outstanding

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and excellent to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- A relatively high level of community development loans;
- Use of flexible lending practices in serving the assessment area's credit needs;
- An excellent level of qualified community development investments and grants;
- Often in a leadership position in providing community development investments and grants;
- Retail delivery systems are accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Nashville-Davidson-Murfreesboro-Franklin MSA. A limited-scope review was performed on the Knoxville MSA. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the Institution section of this report.

The Nashville-Davidson-Murfreesboro-Franklin assessment area received greater weight in determining the CRA rating for the state. This assessment area represented 91.7% of the banking centers, 96.1% of deposits, and 92.6% of lending in Tennessee.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF TENNESSEE

Lending activity accounted for 1.9% of the Fifth Third's total lending activity, while deposits accounted for 1.5% of Fifth Third's total deposits. HMDA-reportable lending in Tennessee represented 1.9% of Fifth Third's total HMDA lending, while CRA-reportable lending represented 2.1% of Fifth Third's total CRA lending. As of June 30, 2016, Fifth Third ranked 13th among 207 insured institutions and has a deposit market share of 1.1% and 36 banking center locations within Tennessee.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF TENNESSEE

Lending Test

Fifth Third's performance under the lending test within the assessment areas located in Tennessee is rated "High Satisfactory." Fifth Third's lending reflects a good responsiveness to the credit needs in the Nashville-Davidson-Murfreesboro-Franklin assessment area and an adequate responsiveness in the Knoxville assessment area.

Lending Activity

In Tennessee, Fifth Third originated 1,964 HMDA loans totaling \$407.1 million and 819 small business loans totaling \$59.2 million during the evaluation period.

Lending activity in Tennessee is good. Lending activity is good in the Nashville-Davidson-Murfreesboro-Franklin assessment area and adequate in the Knoxville assessment area.

Geographic and Borrower Distribution

The geographic distribution is good in the Nashville-Davidson-Murfreesboro-Franklin assessment area and adequate in the Knoxville assessment area.

There was a low level of lending gaps in the Nashville-Davidson-Murfreesboro-Franklin assessment area and a high level of lending gaps in the Knoxville assessment area.

The borrower distribution is good in the Nashville-Davidson-Murfreesboro-Franklin assessment area and adequate in the Knoxville assessment area. The distribution to businesses of different revenue sizes is excellent in the Nashville-Davidson-Murfreesboro-Franklin assessment area and good in the Knoxville assessment area.

A detailed analysis for the geographic distribution and borrower-income distribution is provided with the analysis for each assessment area.

Community Development Loans

In Tennessee, Fifth Third originated 26 community development loans totaling \$265.0 million, which represents 4.2% of the Fifth Third's community development lending by dollar volume. This is a relatively high level of community development lending in Tennessee. Fifth Third made a relatively high level of community development loans in the Nashville-Davidson-Murfreesboro-Franklin and Knoxville assessment areas.

Fifth Third was considered responsive to the community credit needs in the state; therefore, a community development loan without a purpose, mandate, or function of serving Fifth Third's assessment areas in Tennessee was considered to positively impact state performance. Fifth Third originated a qualified community development loan totaling \$1.5 million that supported economic development in a county within the state, but outside Fifth Third's delineated assessment areas within Tennessee.

Additional information regarding community development lending is provided in the respective analyses for each assessment area.

Flexible Lending

Overall, Fifth Third consistently makes use of flexible lending practices within assessment areas located in Tennessee.

Investment Test

Fifth Third's performance under the investment test within the assessment areas located in Tennessee is rated "Outstanding." Fifth Third funded \$32.9 million in qualified community development investments in Tennessee during the evaluation period, consisting of \$18.6 million obtained from new investments made during the current review period and \$14.3 million from prior period investments. The majority of investments were LIHTCs. Fifth Third's level of qualified investments is excellent in the Nashville-Davidson-Murfreesboro-Franklin and Knoxville assessment areas.

Additional information regarding performance under the investment test is provided in the respective analyses for each assessment area.

Service Test

Fifth Third's performance under the service test within the assessment areas located in Tennessee is rated "Outstanding." The Fifth Third's performance is excellent in the Nashville-Davidson-Murfreesboro-Franklin assessment area and good in the Knoxville assessment area.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

Retail Services

Retail delivery systems are accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution is good in the Nashville-Davidson-Murfreesboro-Franklin assessment area and adequate in the Knoxville assessment area.

Fifth Third has 36 banking centers in Tennessee which represents 2.8% of Fifth Third's total branches. Fifth Third's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. No branches opened or closed in Tennessee during the evaluation period.

Banking services and business hours do not vary in a way that inconveniences any portions of Fifth Third's assessment areas and are consistent with the services and hours discussed in the "Institution" assessment.

Community Development Services

Fifth Third is a leader in providing community development services in Tennessee. Fifth Third's performance is excellent in the Nashville-Davidson-Murfreesboro-Franklin and Knoxville assessment areas.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NASHVILLE-
DAVIDSON-MURFREESBORO-FRANKLIN TN MSA #34980**

The Nashville-Davidson-Murfreesboro-Franklin TN MSA consists of Davidson, Rutherford, Sumner, Williamson, and Wilson counties. Fifth Third's assessment area excludes Cannon, Cheatham, Dickson, Hickman, Macon, Maury, Robertson, Smith, and Trousdale counties. The assessment area is comprised of 31 low-, 58 moderate-, 117 middle-, and 100 upper-income tracts. There are also four tracts with no income designation that are primarily composed of correctional institutions, military establishments, education facilities, or medical establishments that do not report income information.

As of June 30, 2016, Fifth Third ranked ninth out of 59 institutions with 3.2% of the deposit share. Bank of America had the majority of the market share 17.8% of deposits, followed by Regions Bank, SunTrust Bank, Pinnacle Bank, and First Tennessee Bank with 14.6%, 12.7%, 10.8%, and 6.8% of the market share, respectively. Deposits in this assessment area accounted for 1.4% of Fifth Third's total deposits. This was 96.1% of deposits within the state and the 15th highest percentage of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 1,836 HMDA loans and 742 CRA loans, which represented 1.8% and 1.9% of the total loans originated during the evaluation period, respectively. This was the 15th largest HMDA market and 15th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 26th among 637 HMDA reporters in the assessment area, while Fifth Third ranked 86th. The top five HMDA lenders in the assessment area were Wells Fargo Bank, Franklin American Mortgage, U.S. Bank, JPMorgan Chase Bank, and Quicken Loans. Fifth Third ranked 17th of 129 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were American Express, U.S. Bank, Chase Bank USA, and Pinnacle Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Two community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing an affordable housing agency, stated that the economy is booming, but the real estate boom is making it unaffordable for lower-income individuals to find and retain housing. The contact stated there is a growing housing crisis in Nashville primarily due to gentrification. The contact indicated there are opportunities for banks to help with the area's most pressing needs, affordable housing and financial education. Overall, the contact believed that local lenders try to work with and help first-time homebuyers by providing assistance and education.

The second contact, representing an organization that provides support to businesses owned by women, stated that their organization has strong partnerships with area banks. The contract mentioned that despite the fact that more women are becoming business owners, women still face challenges when it comes to securing financing; therefore, there are opportunities for banks to increase financing to female entrepreneurs. The contact specifically mentioned Regions, Pinnacle, and INSBANK as leading banks in the area.

Population Characteristics

According to the 2010 U.S. Census data, the population in the assessment area was 1.4 million. Approximately a quarter (26.1%) of the population lived in low- and moderate-income tracts. In addition, 75.7% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Nashville MSA is the 36th largest in terms of population in the nation.²⁷⁹ Davidson County is the largest county.²⁸⁰ Nashville-Davidson is the largest city in this county with 654,610 residents and the second-most populous city in Tennessee. Nashville-Davidson is also the 25th largest city in the United States; its population increased by 19.9% between 2000 and 2015.²⁸¹ Rutherford County is the sixth-largest county in Tennessee. Murfreesboro is the largest city in the county with 126,118 residents; its population increased by 77.9% between 2000 and 2015. Williamson County is the seventh-largest county in Tennessee. Franklin is the largest city in the county with 72,639 residents; its population increased by 56.6% between 2000 and 2015. The following table shows the population in the assessment area by county for 2010 and 2015 and the percentage of the population.²⁸²

According to study by The University of Tennessee, over the next 25 years, Tennessee's demographic profile is expected to follow national trends as the population continues to age and become more racially and ethnically diverse and more urbanized. The Center for Business and Economic Research projects Tennessee's population will reach 8.5 million by 2040, compared to 6.3 million in 2010. The most significant changes in county population will occur primarily in metropolitan areas. Middle Tennessee is expected to lead the state in population growth, as five of the ten counties with the highest projected growth through 2040 are Williamson, Rutherford, Wilson, Robertson, and Sumner. The proportion of senior citizens and elderly is also expected to increase in Tennessee, due to the aging of baby boomers and increased life expectancy. The number of individuals 85 and older in Tennessee is expected to triple to more than 330,000 by 2040.²⁸³

²⁷⁹ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²⁸⁰ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

²⁸¹ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

²⁸² Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015):

<http://www.census.gov/quickfacts/table/PST045216/00>

²⁸³ Study: Tennessee on Track for Steady Population Growth: <http://tntoday.utk.edu/2015/08/27/study-tennessee-track-steady-population-growth/> (August 27, 2015)

The assessment area’s population increased by nearly 11.0% from 2010 to 2015 and Williamson County experienced the greatest increase in population during this time period.

County	2010 Population	2015 Population	Population Percent Change
Davidson	626,681	678,889	8.3%
Rutherford	262,604	298,612	13.7%
Sumner	160,645	175,989	9.6%
Williamson	183,182	211,672	15.6%
Wilson	113,993	128,911	13.1%
Total	1,347,105	1,494,073	10.9%

Income Characteristics

The 2010 assessment area median family income was higher (\$64,894) than Tennessee at \$53,246. As shown in the table below, the median family income increased across the assessment area since 2010, whereas the median family income fell slightly in 2016, but remained above the median family income in 2010.

**Borrower Income Levels
Nashville-Davidson-Murfreesboro-Franklin, TN MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$65,600	0 - \$32,799	\$32,800 - \$52,479	\$52,480 - \$78,719	\$78,720 - & above
2015	\$67,100	0 - \$33,549	\$33,550 - \$53,679	\$53,680 - \$80,519	\$80,520 - & above
2016	\$66,600	0 - \$33,299	\$33,300 - \$53,279	\$53,280 - \$79,919	\$79,920 - & above

Poverty rates increased in each county in the assessment area from 1999 to 2015.²⁸⁴ Davidson County had the highest poverty rate in 1999 and 2015 and Williamson County had the lowest poverty rate in 1999 and 2015. In 2015, Davidson County’s and Tennessee’s poverty rates were above than the national rate. Davidson County experienced the largest increase in poverty rate during this period. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.²⁸⁵ The following table shows the poverty rates for 1999²⁸⁶ and 2015.

²⁸⁴ United States Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

²⁸⁵ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

²⁸⁶ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

County	1999 Poverty Rate	2015 Poverty Rate	Change
Davidson	13.0%	17.1%	31.5%
Rutherford	9.0%	11.1%	23.3%
Sumner	8.1%	10.1%	24.7%
Williamson	4.7%	5.0%	6.4%
Wilson	6.7%	8.4%	25.4%
Tennessee	13.5%	16.7%	23.7%
United States	11.8%	13.5%	14.4%

Housing Characteristics

According to 2010 U.S. Census data, there are 553,503 housing units and 331,085 families in the assessment area. From an income perspective, 28.0% of housing units, 17.7% of owner-occupied units, and 23.2% of families are located in low- or moderate-income tracts. Nearly three-quarters of the housing units in the low-income census tracts are either rental or vacant (72.2%) and 27.8% are owner-occupied. In the moderate-income census tracts, over half (56.6%) of the housing units are either rental or vacant and 43.5% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in low- and moderate-income census tracts, there appear to be more credit-related opportunities for Fifth Third to provide various aspects of affordable housing in moderate-income tracts compared to low-income tracts.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 28 years old, with only 9.1% of the stock built before 1950. Within the assessment area, the median age of housing stock was 43 years in low-income and 36 years old in moderate-income tracts, which indicates that there is opportunity to make home improvement loans in these lower-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$178,409, with an affordability ratio of 29.61. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

The median housing values increased in all five counties between 2010 and 2011-2015 and household incomes increased, making housing only became slightly more affordable in Davidson, Rutherford, and Williamson counties. During the review period, the most affordable housing was in Rutherford County. Median gross rents substantially increased across most of the assessment area, with renters in Sumner County experiencing the largest increase in rental rates. In 2010, about 46.0% of renters across the assessment area had rent costs greater than 30.0% of income. Rising rental rates could make it more difficult for lower-income individuals to find affordable housing, because increasing rental rates may make it more difficult for potential homebuyers to save enough for a down payment for a home.

According to Moody’s Analytics, Nashville has an exceptionally strong housing market. Housing is contributing more to growth as a result of above-average rising incomes. However, a community contact indicated there is a growing affordable housing crisis in Nashville and there are opportunities for banks to help with affordable housing and provide financial education for first-time homebuyers. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and Tennessee.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Davidson	\$164,700	27.73	\$169,600	28.52	\$776	\$874	12.6%
Rutherford	\$157,100	34.23	\$160,700	34.98	\$801	\$890	11.1%
Sumner	\$169,100	32.48	\$178,000	32.24	\$748	\$885	18.3%
Williamson	\$335,800	26.16	\$348,600	27.70	\$1,045	\$1,181	13.0%
Wilson	\$187,500	32.36	\$200,300	30.49	\$750	\$871	16.1%
Tennessee	\$134,000	32.30	\$142,100	31.82	\$678	\$764	12.7%

According to Bankrate.com,²⁸⁷ Tennessee ranked 28th for foreclosure filings in November 2016. The national average for foreclosure filings was 1 in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:²⁸⁸

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Davidson	1:2,593
Rutherford	1:2,225
Sumner	1:2,199
Williamson	1:8,528
Wilson	1:3,362
Tennessee	1:2,136
United States	1:1,533

In November 2016, Sumner County had the highest rate of foreclosure and Williamson County had the lowest foreclosure rate within the assessment area.

Building permits in the MSA, Tennessee, and the nation are included in the following table for 2014, 2015, and 2016.²⁸⁹

²⁸⁷ Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

²⁸⁸ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosuretrends/>

²⁸⁹ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Nashville-Davidson-Murfreesboro-Franklin MSA	15,040	18,291	21.6%	20,182	10.3%
Tennessee	28,263	32,219	14.0%	36,157	12.2%
United States	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The MSA experienced a significant increase in housing permits between 2014 and 2015 and a smaller increase between 2015 and 2016, surpassing the trends in Tennessee and the nation between 2014 and 2015 and more in line with Tennessee between 2015 and 2016. Overall, the MSA and Tennessee surpassed the national demand for building permits. Based on the overall demand for permits, this tends to indicate there is a strong housing market and an ongoing demand for home purchase loans across the assessment area during the evaluation period.

Labor, Employment, and Economic Characteristics

According to Moody’s Analytics, the Nashville area economy is in expansion and the Nashville metropolitan area is outperforming Tennessee’s other metropolitan areas. Hiring is broad-based and incomes are rising at an above-average rate. The housing market is exceptionally strong and demand continues to increase. The area has a favorable business tax-structure and an educated workforce; however, a weak global recovery and strong dollar hamper goods exports.

According to WATE 6,²⁹⁰ the Nashville metropolitan area is home to two Fortune 500 companies. In the past year, Hospital Corporation of America (HCA), the nation’s largest hospital chain climbed 12 places on the list, and Community Health Systems (Franklin, TN) climbed ten places on the list.

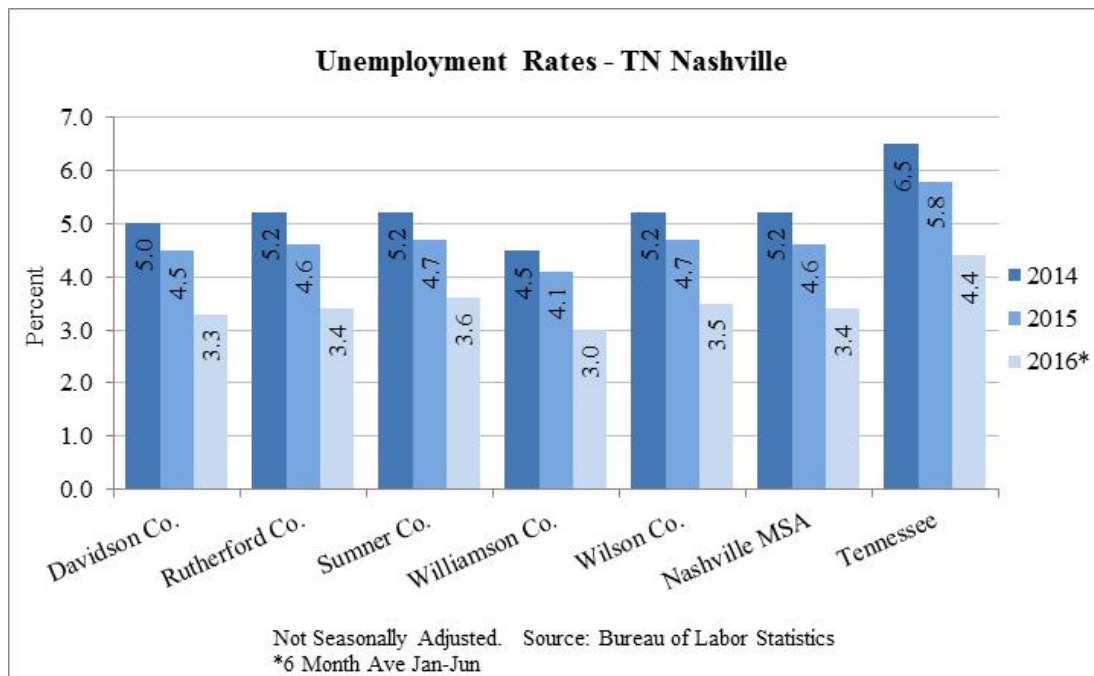
Nashville Fortune 500 Companies (2016)		
Rank	Company	Revenue
63	HCA Holdings	\$41.5 billion
125	Community Health Systems	\$22.4 million

According to Moody’s Analytics, top employers in the assessment area in 2015/2016 were:

²⁹⁰ WATE 6: <http://wate.com/2016/06/06/eight-tennessee-companies-make-2016-fortune-500/>

Company	Number of Employees
Vanderbilt University & Medical Center	22,105
Nissan North America Inc.	10,050
HCA Holdings	7,000
Wal-Mart Stores	4,500
Randstad Work Solutions	3,785
Dell Corporation	3,200
Shoney's Inc.	3,000
Electrolux Home Products North America	2,900
Community Health Systems	2,800
The Tennessean	2,577

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the assessment area, MSA, and Tennessee.



Overall, unemployment rates declined each year across the assessment area. Williamson County had the lowest overall unemployment rate in the assessment area and the assessment area and MSA was lower than Tennessee's rate of unemployment each year.

According to *WKRN-News 2*, the insurance company AIG announced layoffs due to a restructuring of AIG Financial Network. The company is moving financial professionals from the financial network group to the AIG Partners Group; 128 employees were notified their positions would be eliminated immediately. AIG still employs more than 900 people who support life insurance operations for the company.²⁹¹ According to *The Tennessean*, Dell, Inc. closed a customer support unit in Nashville that serves clients with global operations. Dell employs 1,400 people in the Nashville area, but 96 employees in the Murfreesboro and Donelson Pikes customer contact centers were laid off. The layoffs did not affect company employees that provide support for customers across North America. Several years ago, Dell ceased assembling computers in Nashville, outsourcing that work to Ceva Logistics.²⁹²

²⁹¹ WKRN Staff. "AIG announces layoffs that include Middle Tennessee offices." *WKRN-News 2*. January 7, 2016. - <http://wkrn.com/2016/01/07/aig-announces-layoffs-that-include-middle-tennessee-offices/>

²⁹² Ward, Getahn. "Dell closing Nashville unit, laying off 96." *The Tennessean*. March 23, 2015. - <http://www.tennessean.com/story/money/tech/2015/03/23/dell-closing-nashville-unit-idling-employees/70331806/>

Combined Demographics Report

Assessment Area: TN Nashville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	31	10	22,701	6.9	8,369	36.9	65,300	19.7
Moderate-income	58	18.7	54,077	16.3	9,577	17.7	56,020	16.9
Middle-income	117	37.7	129,381	39.1	9,668	7.5	68,305	20.6
Upper-income	100	32.3	124,886	37.7	3,747	3	141,460	42.7
Unknown-income	4	1.3	40	0	0	0	0	0
Total Assessment Area	310	100.0	331,085	100.0	31,361	9.5	331,085	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,194	13,120	3.9	27.8	27,939	59.2	6,135	13
Moderate-income	107,736	46,842	13.8	43.5	48,861	45.4	12,033	11.2
Middle-income	214,084	139,519	41.1	65.2	58,603	27.4	15,962	7.5
Upper-income	184,397	139,838	41.2	75.8	33,238	18	11,321	6.1
Unknown-income	92	0	0	0	92	100	0	0
Total Assessment Area	553,503	339,319	100.0	61.3	168,733	30.5	45,451	8.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,428	7.7	4,813	7.5	596	10.4	19	8.3
Moderate-income	12,166	17.3	10,789	16.8	1,322	23.1	55	23.9
Middle-income	22,240	31.7	20,713	32.3	1,477	25.8	50	21.7
Upper-income	29,757	42.4	27,526	42.9	2,132	37.3	99	43
Unknown-income	542	0.8	345	0.5	190	3.3	7	3
Total Assessment Area	70,133	100.0	64,186	100.0	5,717	100.0	230	100.0
Percentage of Total Businesses:			91.5		8.2		.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	16	2	15	1.9	1	12.5	0	0
Moderate-income	86	10.7	85	10.7	1	12.5	0	0
Middle-income	386	47.9	381	47.7	5	62.5	0	0
Upper-income	317	39.3	316	39.6	1	12.5	0	0
Unknown-income	1	0.1	1	0.1	0	0	0	0
Total Assessment Area	806	100.0	798	100.0	8	100.0	0	.0
Percentage of Total Farms:			99.0		1.0		.0	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NASHVILLE-
DAVIDSON-MURFREESBORO-FRANKLIN TN MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated good. Fifth Third has demonstrated a good responsiveness to the credit needs of the community. In addition, Fifth Third originated 21 community development loans totaling \$203.0 million. Fifth Third has a good geographic distribution of loans and low lending gaps. Fifth Third has a good distribution among borrowers of different income levels and an excellent distribution of loans to businesses of different revenue sizes. Fifth Third exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The good level of community development loans and use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending, based on the overall volume of lending, followed by refinance, small business, and home improvement lending. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding lending by peers, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects a good responsiveness to the credit needs within the assessment area. Fifth Third originated 902 home purchase, 820 refinance, 114 home improvement, 742 small business, and 22 community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 1.8% is greater than the percentage of total deposits at 1.4% in this area.

Fifth Third made 90.3% of the HMDA and 94.3% of the CRA lending within its designated assessment area. A concentration of HMDA loans was noted in the excluded Maury County. There were 80 HMDA loans made in this county during the evaluation period. Nonetheless, the majority of loans were made in the assessment area.

In addition to lending, Fifth Third modified existing loans to borrowers. Refer to the distribution of HAMP and other real-estate secured modifications within the assessment area by census tract income and by borrower income.

	Distribution by Census Tract Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	1	2.3%	10	23.3%	18	41.9%	14	32.6%
<i>Percentage of Owner Occupied Units</i>		<i>3.9%</i>		<i>13.8%</i>		<i>41.1%</i>		<i>41.2%</i>

*Unknown tract data is not included in the above table.

	Distribution by Borrower Income							
	Low		Mod		Middle		Upper	
	#	%	#	%	#	%	#	%
Other Real Estate Secured Modifications	12	27.9%	17	39.5%	5	11.6%	9	20.9%
Percentage of Families by Family Income		19.7%		16.9%		20.6%		42.7%

*Unknown tract data is not included in the above table.

There were not enough HAMP modifications for a meaningful analysis. The percentage of other modifications in low-income tracts was below the percentage of owner-occupied units in these geographies and exceeded the percentage of owner-occupied units in moderate-income tracts. Therefore, modifications helped to expand lending activities in these areas. The percentage of other modifications made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in the assessment area. Therefore, modifications enhanced Fifth Third’s ability to reach low- and moderate-income borrowers.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. Home purchase lending, which was the largest loan category, is good. Refinance lending is good, as is small business lending. Home improvement lending is adequate. There is also an overall low level of lending gaps. The following gaps in lending were noted in the assessment area.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
Low	31	6	80.7%
Moderate	58	3	94.8%
Middle	117	2	98.3%
Upper	100	2	98.0%
Unknown	4	2	50.0%
Total	310	15	95.2%

Lending gaps are considered minimal due to the low number of lending gaps in moderate-, middle-, and upper-income tracts. The lending gaps in the low-income tracts can be attributed to the low-level of owner-occupied units at 27.8% and high level of rentals and vacancies at 72.2% in these census tracts.

Home Purchase Loans

Fifth Third made 37 home purchase loans totaling \$7.1 million in low-income tracts. This represents 4.1% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 3.9%, and 3.5% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 3.7% and was comparable to the 2015 aggregate at 3.8%.

As Fifth Third's performance exceeded the aggregate of all lenders and proxy, the geographic distribution of home purchase loans in low-income tracts is excellent.

Fifth Third made 110 home purchase loans totaling \$18.9 million in moderate-income tracts. This represents 12.2% of its home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 13.8%, and 9.2% by dollar amount, which is significantly below proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 11.9% and was comparable to the 2015 aggregate at 11.8%. As Fifth Third's performance was comparable to the aggregate of all lenders and was below proxy, the geographic distribution of home purchase loans in moderate-income tracts is good.

Fifth Third made 319 home purchase loans totaling \$54.8 million in middle-income tracts. This represents 35.4% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 41.1%, and 26.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 38.2% and was below the 2015 aggregate of 39.0%.

Fifth Third made 436 home purchase loans totaling \$123.5 million in upper-income tracts. This represents 48.3% of home purchase loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 41.2%, and 60.5% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 46.2% and exceeded the 2015 aggregate of 45.5%.

Overall, the geographic distribution of home purchase loans is good.

Refinance Loans

Fifth Third made 30 refinance loans totaling \$3.5 million in low-income tracts. This represents 3.7% of refinance loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 3.9%, and 2.2% by dollar amount, which is below proxy. The percentage of loans by volume was comparable of the 2014 aggregate at 3.7% and slightly exceeded the 2015 aggregate at 3.0%. The owner-occupancy rate in low-income tracts is only 27.8%; thus, the demand for refinance loans is likely to be lower in these areas. Given that Fifth Third's performance was comparable to the aggregate of lenders and proxy, the geographic distribution of refinance loans in low-income tracts is excellent.

Fifth Third made 81 refinance loans totaling \$9.2 million in moderate-income tracts. This represents 9.9% of refinance loans by volume, which is below the percentage of owner-occupied units in these tracts at 13.8%, and 5.7% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 12.3% and exceeded the 2015 aggregate at 10.4%. As Fifth Third's performance was below proxy and exceeded the aggregate of all lenders, the geographic distribution of refinance loans in moderate-income tracts is good.

Fifth Third made 312 refinance loans totaling \$45.2 million in middle-income tracts. This represents 38.0% of refinance loans by volume, which is below the percentage of owner-occupied units in these tracts at 41.1%, and 28.2% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate at 40.0% and exceeded the 2015 aggregate at 37.5%.

Fifth Third made 397 refinance loans totaling \$102.8 million in upper-income tracts. This represents 48.4% of refinance loans by volume, which exceeds the owner-occupied units in these tracts at 41.2%, and 63.9% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate at 44.0% and was below the 2015 aggregate at 49.1%.

Overall, the geographic distribution of refinance loans is good.

Home Improvement Loans

Fifth Third made two home improvement loans totaling \$67,000 in low-income tracts. This represents 1.8% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 3.9%, and 0.5% by dollar amount, which significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 6.3% and was below the 2015 aggregate of 4.7%. Given the median age of housing in low-income tracts at 43 years, which tends to indicate the need for home improvement loans, and Fifth Third's lending performance in these tracts, the geographic distribution of home improvement loans in low-income tracts is considered poor.

Fifth Third made 15 home improvement loans totaling \$1.3 million in moderate-income tracts. This represents 13.2% of home improvement loans by volume, which is comparable to the percentage of owner-occupied units in these tracts at 13.8%, and 10.8% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 15.3% and exceeded the 2015 aggregate of 12.8%. As Fifth Third's performance was comparable to proxy and exceeded the aggregate of all lenders, the geographic distribution of home improvement loans in moderate-income tracts is good.

Fifth Third made 43 home improvement loans totaling \$3.5 million in middle-income tracts. This represents 37.7% of home improvement loans by volume, which is below the percentage of owner-occupied units in these tracts at 41.1%, and 28.2% by dollar amount, which significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 42.0% and exceeded the 2015 aggregate of 41.5%.

Fifth Third made 54 home improvement loans totaling \$7.4 million in upper-income tracts. This represents 47.4% of home improvements loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 41.2%, and 60.5% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 36.4% and exceeded the 2015 aggregate of 42.3%.

Overall, the geographic distribution of home improvement loans is adequate.

Small Business Loans

Fifth Third made 50 small business loans totaling \$1.5 million in low-income tracts. This represents 6.7% of small business loans by volume, which is slightly below the percentage of businesses in these tracts at 7.5%, and 2.8% by dollar amount, which is below proxy. The percentage of loans by volume was slightly below the 2014 aggregate of 8.3% and was slightly below the 2015 aggregate of 7.7%. Given Fifth Third's performance was slightly below the aggregate of all lenders and proxy and the limited number of businesses in these tracts (7.7%), the geographic distribution of small business loans in low-income tracts is good.

Fifth Third made 101 small business loans totaling \$8.5 million in moderate-income tracts. This represents 13.6% of small business loans by volume, which is slightly below the percentage of businesses in these tracts at 16.8%, and 15.8% by dollar amount, which is comparable to proxy. The percentage of loans by volume was below the 2014 aggregate of 17.4% and was below the 2015 aggregate of 17.0%. Given that Fifth Third's performance was slightly below the proxy and below the aggregate of all lenders and the limited number of businesses in these tracts (17.3%), the geographic distribution of small business loans in moderate-income tracts is good.

Fifth Third made 207 small business loans totaling \$16.6 million in middle-income tracts. This represents 27.9% of small business loans by volume, which is below the percentage of businesses in these tracts at 32.3%, and 30.9% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 27.5% and was below the 2015 aggregate of 27.4%.

Fifth Third made 369 small business loans totaling \$19.5 million in upper-income tracts. This represents 49.7% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 42.9%, and 36.2% by dollar amount, which is below the percentage of businesses in these geographies. The percentage of loans by volume exceeded the 2014 aggregate of 44.9% and exceeded the 2015 aggregate of 46.1%.

Overall, the geographic distribution of small business loans is good.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is good based on borrower income and excellent to businesses of different revenue sizes. Borrower distribution is excellent for home purchase lending and good for refinance and home improvement lending.

Home Purchase Loans

Fifth Third made 61 loans totaling \$6.2 million to low-income borrowers. This represents 6.8% of home purchase loans by volume, which is significantly below the percentage of low-income families at 19.7%, and 3.0% by dollar amount, which is significantly below proxy.

The percentage of loans by volume exceeded the 2014 aggregate of 6.3% and was comparable to the 2015 aggregate of 5.8%. Given that Fifth Third's performance exceeded the aggregate of all lenders, but was below proxy, the borrower distribution of home purchase loans to low-income borrowers is good.

Fifth Third made 179 loans totaling \$25.4 million to moderate-income borrowers. This represents 19.8% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 16.9%, and 12.5% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 18.2% and exceeded the 2015 aggregate of 16.9%. Given that Fifth Third's performance exceeded the proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 166 loans totaling \$32.9 million to middle-income borrowers. This represents 18.4% of home purchase loans by volume, which is below the percentage of middle-income families at 20.6%, and 16.1% by dollar amount, which is below proxy. The percentage of loans by volume was comparable to the 2014 aggregate of 18.1% and was comparable to the 2015 aggregate of 19.0%.

Fifth Third made 374 loans totaling \$110.6 million to upper-income borrowers. This represents 41.5% of home purchase loans by volume, which is comparable to the percentage of upper-income families at 42.7%, and 54.1% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 36.6% and was below the 2015 aggregate of 37.2%.

A community contact indicated the lack of employment opportunities for low- and moderate-income individuals is a significant economic factor likely impacting the ability of these individuals to buy homes. Given that Fifth Third's performance lending to low- and moderate-income borrowers exceeded or was comparable to the aggregate of all lenders, the overall borrower distribution for home purchase loans is excellent.

Refinance Loans

Fifth Third made 56 loans totaling \$5.7 million to low-income borrowers. This represents 6.8% of refinance loans by volume, which is significantly below the percentage of low-income families at 19.7%, and 3.5% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 6.3% and exceeded the 2015 aggregate of 4.9%. Given that Fifth Third's performance exceeded the aggregate of all lenders but was significantly below proxy, the borrower distribution of refinance loans to low-income borrowers is good.

Fifth Third made 163 loans totaling \$18.0 million to moderate-income borrowers. This represents 19.9% of refinance loans by volume, which exceeds the percentage of moderate-income families at 16.9%, and 11.2% by dollar volume, which is below proxy.

The percentage of loans by volume exceeded the 2014 aggregate of 14.7% and exceeded the 2015 aggregate of 12.6%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 162 loans totaling \$24.2 million to middle-income borrowers. This represents 19.8% of refinance loans by volume, which is comparable to the percentage of middle-income families at 20.6%, and 15.1% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 16.9% and exceeded the 2015 aggregate of 17.1%.

Fifth Third made 349 loans totaling \$91.1 million to upper-income borrowers. This represents 42.6% of refinance loans by volume, which is comparable to percentage of upper-income families at 42.7%, and 56.7% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 35.7% and was below the 2015 aggregate of 37.0%.

Overall, the borrower distribution of refinance loans is good.

Home Improvement Loans

Fifth Third made three loans totaling \$165,000 to low-income borrowers. This represents 2.6% of home improvement loans by volume, which is significantly below the percentage of low-income families at 19.7%, and 1.3% by dollar amount, which is significantly below proxy. The percentage of loans by volume was significantly below the 2014 aggregate of 8.1% and was significantly below the 2015 aggregate of 8.2%. Given that Fifth Third's performance was significantly below proxy and the aggregate of all lenders, the borrower distribution of home improvement loans to low-income borrowers is poor.

Fifth Third made 29 loans totaling \$2.1 million to moderate-income borrowers. This represents 25.4% of home improvement loans by volume, which exceeds the percentage of moderate-income families at 16.9%, and 17.0% by dollar amount, which is comparable to proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.3% and exceeded the 2015 aggregate of 17.4%. Given that Fifth Third's performance exceeded the aggregate of all lenders and proxy, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Fifth Third made 34 loans totaling \$3.4 million to middle-income borrowers. This represents 29.8% of home improvement loans by volume, which exceeds the percentage of middle-income families at 20.6%, and 27.7% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 20.8% and exceeded the 2015 aggregate of 22.7%.

Fifth Third made 43 loans totaling \$5.7 million to upper-income borrowers. This represents 37.7% of home improvement loans by volume, which is below the percentage of upper-income families at 42.7%, and 46.9% by dollar amount, which exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 39.6% and was below the 2015 aggregate of 44.1%.

The borrower distribution of home improvement loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent, considering Fifth Third’s performance relative to the aggregate of all lenders. Fifth Third was able to make 70.5% of small business loans to businesses with revenues of \$1 million or less. Fifth Third’s performance exceeded the 2014 aggregate of 46.5% and the 2015 aggregate of 51.2%, but was significantly below the percentage of small businesses in the assessment area at 91.5%. Also, during the evaluation period, Fifth Third was able to make a relatively high percentage of small-dollar loans (87.9%) up to \$100,000, indicating a willingness to lend in smaller amounts, which are typically requested by small businesses. In addition, a community contact indicated there are opportunities for banks to increase financing to entrepreneurs and noted that Fifth Third is responsive to this need.

Community Development Loans

Fifth Third originated 21 community development loans totaling \$203.0 million during the evaluation period as shown in the table below:

Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$
3	24,600,000	16	178,350,000	2	60,000

Community development lending in the assessment area represents 3.4% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third’s eighth-highest percentage of community development lending during the evaluation period. Given Fifth Third’s deposit market share of 3.2% and the presence of several large financial institutions in the market and competition for community development loans, Fifth Third has a relatively high level of community development lending in this assessment area.

Examples of community development lending include, but are not limited to:

- Renewal of working capital loans to a nonprofit providing a multitude of services to low- and moderate-income individuals and families
- Working capital loans to promote economic development by financing a small business to support retention of low- and moderate-income workers
- Working capital loans to help retain and expand small businesses located in specific city-designated areas to promote revitalization and economic development

Flexible Lending Programs

Fifth Third had 304 flexible lending loans in this assessment area: 196 government loans, 23 down payment assistance loans, and 85 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
Government Loan Programs	1.5%	2.1%	3.9%	17.9%	13.4%	13.8%	52.0%	47.6%	41.1%	28.6%	36.9%	41.2%
Down Payment Assistance Programs	27.1%	41.7%	3.9%	17.4%	12.4%	13.8%	52.2%	37.1%	41.1%	8.7%	8.8%	41.2%
Other Flexible Lending Programs	5.9%	5.9%	3.9%	16.5%	14.8%	13.8%	47.1%	41.3%	41.1%	30.6%	38.0%	41.2%
Total	4.3%	5.4%	3.9%	17.4%	13.7%	13.8%	50.7%	45.4%	41.1%	27.6%	35.5%	41.2%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
Government Loan Programs	8.2%	4.9%	19.7%	27.0%	20.9%	16.9%	30.6%	29.9%	20.6%	27.6%	37.9%	42.7%
Down Payment Assistance Programs	39.1%	30.1%	19.7%	43.5%	32.1%	16.9%	0.0%	0.0%	20.6%	13.0%	34.1%	42.7%
Other Flexible Lending Programs	16.5%	10.3%	19.7%	38.8%	34.6%	16.9%	22.4%	23.6%	20.6%	20.0%	28.8%	42.7%
Total	12.8%	7.8%	19.7%	31.6%	25.0%	16.9%	26.0%	26.5%	20.6%	24.3%	35.4%	42.7%

*Unknown tract data is not included in the above table.

Fifth Third’s lending in low-income tracts by number and dollar amount exceeded the percentage of owner-occupied units in these tracts, especially for various down payment assistance programs. The percentage of lending by volume in moderate-income tracts exceeded the percentage of owner-occupied units in these geographies, while the percentage of lending by dollar amount was comparable to proxy.

Fifth Third’s lending by volume and dollar amount to low-income borrowers was below the percentage of low-income families the assessment area. The percentage of lending by volume and dollar amount to moderate-income borrowers significantly exceeded the percentage of moderate-income families.

Therefore, Fifth Third made use of flexible lending practices and is serving the assessment area’s credit needs, as lending through flexible loan programs to moderate-income borrowers was good, while the lending in low- and moderate-income tracts and to low-income borrowers was excellent.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated excellent.

Fifth Third made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. As such, Fifth Third was often in a leadership position. Fifth Third has 125 qualified investments totaling \$26.5 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Economic Development		Revitalization and Stabilization		Community Services	
#	\$	#	\$	#	\$	#	\$
20	13,752,061	14	96,190	5	25,000	79	372,732

Also included in the total number of qualified investments are seven prior period investments totaling \$12.3 million. Fifth Third made 1.6% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 1.4% and less than the percentage of branch offices at 2.5%.

Fifth Third exhibits an excellent responsiveness to credit and community development needs in the assessment area, including investments in affordable housing throughout the assessment area, which was an important need expressed by community contacts. Fifth Third made 107 donations totaling \$522,422 that supported small businesses, and social and charitable organizations. The majority of Fifth Third’s donations (71.0%) supported services to low- and moderate-income individuals. Based on the area’s high poverty rates and accelerating elderly population, supporting community services that serve low- and moderate-income individuals is considered to be responsive.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated excellent. Retail services are accessible and Fifth Third is a leader in providing community development services.

Retail Services

Fifth Third's record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, no banking centers were opened and two were closed, resulting in no net change in the number of banking centers in low- and moderate-income tracts. Delivery services are accessible to Fifth Third's geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or households and are consistent with the services and hours discussed in the "Institution" assessment.

Fifth Third maintains 33 banking centers within this assessment area, including two in low-, eight in moderate-, 10 in middle-, and 13 in upper-income census tracts. Fifth Third banking centers in this assessment area represent 2.5% of all its banking centers.

Fifth Third has a total of 38 full-service ATMs within this assessment area, including three in low-, nine in moderate-, eight in middle-, and 17 in upper-income census tracts. There is also one full-service ATM located in an unknown income tract.

The following table illustrates the percentage of banking centers and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts.

Geographic Distribution of Branches & ATMS

Assessment Area: TN Nashville

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	2	6.1%	0	0	Total	15	10.3%	3	7.9%	12	11.2%	31	10.0%	8.1%	7.8%
Moderate	8	24.2%	0	0	Total	35	24.1%	9	23.7%	26	24.3%	58	18.7%	18.8%	17.4%
Middle	10	30.3%	0	0	Total	40	27.6%	8	21.1%	32	29.9%	117	37.7%	39.0%	31.2%
Upper	13	39.4%	0	0	Total	48	33.1%	17	44.7%	31	29.0%	100	32.3%	34.1%	42.8%
Unknown	0	0.0%	0	0	Total	7	4.8%	1	2.6%	6	5.6%	4	1.3%	0.0%	0.9%
Total	33	100.0%	0	0	Total	145	100.0%	38	100.0%	107	100.0%	310	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within low-income tracts was considered adequate, as the distribution of branches was below the percentage of census tracts and households in these tracts. However, the branch distribution within moderate-income tracts was considered excellent.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 2,854 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 2.4% of all community development services provided and equates to 1.37 annualized persons (ANP).

Affordable Housing	Economic Development	Revitalization and Stabilization	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
301	502	134	1,917

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development and area revitalization and stabilization. Community development services include 1,649 hours of providing financial literacy through local nonprofits and school programs, 889 hours serving on boards and committees, 268 hours providing technical assistance to non-profits and local business, and 48 hours participating in foreclosure prevention outreach.

Fifth Third is considered particularly responsive with regard to hours dedicated to financial literacy activities and hours providing technical assistance to small businesses, as community contacts mentioned the need for financial literacy training to help first-time homebuyers and increasing financing for small business entrepreneurs.

METROPOLITAN AREA
(Limited-scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE STATE OF TENNESSEE

- Knoxville MSA
 - As of June 30, 2016, Fifth Third operated three branches in the assessment area, representing 8.3% of its branches in Tennessee.
 - As of June 30, 2016, Fifth Third had \$60,264 in deposits in this assessment area, representing a market share of 0.5% and 3.9% of its statewide deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
THE STATE OF TENNESSEE**

Through the use of available facts and data, including performance and demographic information, the assessment area’s performance was evaluated and compared with Fifth Third’s performance and contributed to weaker performance in the area. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix F for information regarding these areas.

Assessment Area	Lending Test	Investment Test	Service Test
Knoxville MSA	Below	Consistent	Below

For the lending test, Fifth Third received a “High Satisfactory” rating in Tennessee. Performance in the Knoxville assessment area was below Fifth Third’s performance for the state. A lesser geographic and borrower distribution of loans contributed to weaker performance in the Knoxville assessment area. The Knoxville assessment area had a consistent level of community development loans for the state but had a high level of lending gaps.

For the investment test, Fifth Third received an “Outstanding” rating for Tennessee. The investment activity in the Knoxville assessment area was consistent to the performance for the state.

For the service test, Fifth Third received an “Outstanding” rating for Tennessee. Service performance in the Knoxville assessment area was below Fifth Third’s performance for the state. Retail services were adequate. The weaker retail services performance was primarily due to less accessibility of delivery systems in lower-income geographies. Qualified community development services were consistent with performance for the state.

The performance in the limited-scope assessment area did not change the overall state rating.

STATE OF WEST VIRGINIA

CRA RATING for State of West Virginia:²⁹³ Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Outstanding

The major factors supporting this rating include:

- A good responsiveness to credit needs;
- A good geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels and to businesses of different revenue sizes;
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- An adequate level of community development loans;
- An extensive use of flexible lending practices in serving the assessment area's credit needs;
- A significant level of qualified community development investments and grants;
- Occasionally in a leadership position in providing community development investments and grants;
- Retail delivery systems are readily accessible to all geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Charleston MSA, which represents Fifth Third's entire banking operations for West Virginia. The time period, products, and affiliates evaluated for this assessment area are consistent with the scope discussed in the Institution section of this report.

²⁹³ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
CHARLESTON WV MSA #16620**

The Charleston WV MSA consists of Kanawha, Boone, and Clay counties; however, Fifth Third's assessment area comprises Kanawha County only and excludes Boone and Clay counties. The assessment area is comprised of 12 moderate-, 30 middle-, and 11 upper-income tracts. There are no low-income tracts or tracts with no-income designation in this assessment area.

As of June 30, 2016, Fifth Third ranked ninth out of 13 institutions with 1.8% of the deposit share. BB&T had the majority of the market share 32.3% of deposits, followed by United Bank, Huntington National Bank, City National Bank of West Virginia, and JPMorgan Chase Bank with 17.7%, 11.9%, 11.2%, and 10.7% of the market share, respectively. Deposits in this assessment area accounted for 0.1% of Fifth Third's total deposits. This was the 41st highest level of deposits within Fifth Third's CRA footprint.

From January 1, 2014 through June 30, 2016, Fifth Third originated 184 (0.2%) HMDA loans and 62 (0.2%) CRA loans during the evaluation period. This was the 41st largest HMDA market and 40th largest CRA market for loans originated during the evaluation period.

In 2015, Fifth Third Mortgage Company ranked 15th among 149 HMDA reporters in the assessment area, while Fifth Third ranked 32nd. The top five HMDA lenders in the assessment area were City National Bank of West Virginia, Quicken Loans, BB&T, Huntington National Bank, and JPMorgan Chase Bank. Fifth Third ranked 17th of 46 CRA reporters in the assessment area in 2015. The top four CRA lenders in the assessment area were BB&T, American Express Bank, Synchrony Bank, and United Bank. These lenders are mostly issuers of credit cards and their CRA loans primarily consist of commercial credit card accounts.

Two community contact interviews were conducted to provide additional information regarding the assessment area. The first contact, representing a community development organization, stated Charleston's economy is stronger than other economies in West Virginia primarily due to the city being the base of state government. However, in recent years, the city and the state have been negatively impacted by coal companies closing and/or merging. Further, the price of natural gas has dropped, causing energy companies to leave or go out of business. The contact mentioned that there is a huge void with regards to new market tax credits and although downtown Charleston would be eligible for these tax credits, the community lacks the expertise on how to use and leverage them. The contact noted there are opportunities for local financial institutions to provide guidance and technical resources to help businesses and organizations navigate the tax credit process. Lastly, the contact believed financial institutions seem less involved in the community because they are not headquartered in the area; however, the contact specifically mentioned BB&T, JPMorgan Chase, and City National as being active in the community.

The second contact, representing a community action organization, stated that West Virginia must find its “next economy” because while natural gas may be making a small rebound, it will not overhaul West Virginia’s economy. The contact indicated that unemployment is a serious economic concern for the state and this region, as fewer than half of working age adults are employed. Contributing to the decline in workers include West Virginia’s aging population, the overall health of the state’s residents, and mismatched skills among potential employees and available jobs. The contact stated there are opportunities for financial institutions to support job retraining programs and provide financial literacy education to help lower-income people get out of debt and save money. Lastly, the contact indicated that smaller community banks seem more willing to help and appear to have more flexible lending standards.

Population Characteristics

According to the 2010 U.S. Census data, the population in the assessment area was 193,063. About 17.0% of the population lived in moderate-income tracts. In addition, 79.4% of the population was 18 years of age or older, the legal age to enter into a contract.

As of July 1, 2015, the Charleston MSA is the 200th largest in terms of population in the nation.²⁹⁴ Kanawha County is the largest county in the MSA and West Virginia.²⁹⁵ Charleston is the largest city in the county and in West Virginia with 49,736 residents. Charleston is also the 757th largest city in the United States; however, its population decreased by 6.7% between 2000 and 2015.²⁹⁶

According to a study by West Virginia University’s College of Business and Economics, West Virginia’s population is expected to begin a sustained decline around 2016. The state may lose nearly 19,500 people (about 1.05%) between 2010 and 2030. Any future gains from net migration will be likely outweighed by the natural population decline; however, much uncertainty exists around population migration patterns, since public and business policies have the potential to significantly improve migration patterns. Kanawha County’s population is expected to decrease between 2010 and 2030. West Virginia’s population is expected to age at a rate that exceeding that of the nation, as the population group over age 65 is expected to grow by 22.9% by 2030 from 16.0% in 2010. Also, the share of the state’s population that is of prime working age (age 25-44) is expected to decline to 22.3% by 2030, down from 24.7% in 2010.²⁹⁷ Moody’s Analytics noted that the retiree population is supporting the housing and services markets in the state.

The following table shows the population in Kanawha County, which decreased by 2.5% between 2010 and 2015.²⁹⁸

²⁹⁴ MSA population data is derived from the U.S. Census Data 2015 Statistical Abstract:

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

²⁹⁵ U.S. Places: <http://us-places.com> (main page – enter state, choose population by county)

²⁹⁶ U.S. Census QuickFacts: <https://www.census.gov/quickfacts/> (main page – enter state, county, city, town, or zip code)

²⁹⁷ Population Trends in West Virginia through 2030: <https://business.wvu.edu/files/d/fef23e19-5986-42a8-9cfb-299571820a18/bber-2014-04.pdf> (March 2014)

²⁹⁸ Population Estimates derived from U.S. Census Data (April 1, 2010 – July 1, 2015): <http://www.census.gov/quickfacts/table/PST045216/00>

County	2010 Population	2015 Population	Population Percent Change
Kanawha	193,063	188,332	-2.5%
Total	193,063	188,332	-2.5%

Income Characteristics

The 2010 assessment area median family income was substantially higher (\$54,203) than the MSA at \$52,702 and West Virginia at \$38,380. As shown in the table below, the median family income increased in the MSA since 2010. Although it fell in 2016, it remained above the median family income in 2010.

Borrower Income Levels Charleston, WV MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2014	\$57,500	0 - \$28,749	\$28,750 - \$45,999	\$46,000 - \$68,999	\$69,000 - & above
2015	\$59,600	0 - \$29,799	\$29,800 - \$47,679	\$47,680 - \$71,519	\$71,520 - & above
2016	\$57,100	0 - \$28,549	\$28,550 - \$45,679	\$45,680 - \$68,519	\$68,520 - & above

Poverty rates increased in Kanawha County from 1999 to 2015.²⁹⁹ In 2015, Kanawha County's and West Virginia's poverty rates were substantially above than the national rate. According to the U.S. Census Bureau, the national poverty rate in 2015 was 13.5%, down 1.3 percentage points from 14.8% in 2014. For most demographic groups, the 2015 poverty rates and number of people in poverty decreased from 2014.³⁰⁰ The following table shows the poverty rates for 1999³⁰¹ and 2015.

County	1999 Poverty Rate	2015 Poverty Rate	Change
Kanawha	14.4%	16.5%	14.6%
West Virginia	17.9%	18.0%	0.6%
United States	11.8%	13.5%	14.4%

²⁹⁹ United States Department of Agriculture Economic Research Service Poverty Rates (for 1999 and 2015): <https://data.ers.usda.gov/reports.aspx?ID=17826>

³⁰⁰ 2015 National Poverty: <http://www.census.gov/library/publications/2016/demo/p60-256.html>

³⁰¹ 1999 National Poverty Rate: <http://www.census.gov/prod/2000pubs/p60-210.pdf>

Housing Characteristics

According to 2010 U.S. Census data, there are 93,063 housing units and 51,064 families in the assessment area. From an income perspective, 19.0% of housing units, 14.3% of owner-occupied units, and 15.2% of families are located in moderate-income tracts. In the moderate-income census tracts, over half (52.6%) of the housing units are either rental or vacant, and 47.4% are owner-occupied. Therefore, based on the number of housing units compared to the number of families in moderate-income census tracts, there appear to be credit-related opportunities for Fifth Third to provide various aspects of affordable housing in these tracts.

The 2010 U.S. Census data shows the median age of housing stock in the assessment area was 48 years old, with 27.9% of the stock built before 1950. Within the assessment area, the median age of housing stock was 57 years old in moderate-income tracts, which indicates that there is opportunity to make home improvement loans in this assessment area, particularly in moderate-income areas.

According to the 2010 U.S. Census data, the median housing value in the assessment area was \$98,537, with an affordability ratio of 43.31. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

The median housing values and household incomes increased between 2010 and 2011-2015, making housing slightly more affordable overall. Median gross rents substantially decreased in the assessment area between 2010 and 2011-2015. In 2010, about 34.1% of renters across the assessment area had rent costs greater than 30.0% of income. Decreasing rental rates may make it easier for potential homebuyers to save for a down payment for a home. According to Moody's Analytics, there is a very high homeownership rate in the Charleston metropolitan area, which means that many households are benefiting from slowly rising house prices. The table below presents housing characteristics from the U.S. Census data between 2010 and 2015 in the assessment area and West Virginia.

County	2010 Median Housing Value	2010 Affordability Ratio	2011-2015 Median Housing Value	2011-2015 Affordability Ratio	2010 Median Gross Rent	2011-2015 Median Gross Rent	Percent of Change
Kanawha	\$98,500	43.32	\$103,100	44.50	\$698	\$589	-15.6%
West Virginia	\$94,500	40.61	\$103,800	40.22	\$643	\$549	-14.6%

According to Bankrate.com,³⁰² West Virginia ranked 48th for foreclosure filings in November 2016. The national average for foreclosure filings was 1 in every 1,533 housing units. The following table contains information about foreclosure filings in the assessment area, according to Realtytrac:³⁰³

³⁰² Bankrate.com: <http://www.bankrate.com/finance/real-estate/foreclosures-by-state/default.aspx>

³⁰³ Realtytrac: <http://www.realtytrac.com/statsandtrends/foreclosurestrends/>

In November 2016, Kanawha County had a substantially higher rate of foreclosure than West Virginia's, but it was significantly lower than the nation's foreclosure rate.

Geography Name	Ratio of Properties Receiving Foreclosure Filings in November 2016
Kanawha	1:2,506
West Virginia	1:8,311
United States	1:1,533

Building permits in the MSA, West Virginia, and the nation are included in the following table for 2014, 2015, and 2016.³⁰⁴

Geography	2014	2015	Percent of Change 2014-2015	2016	Percent of Change 2015-2016
Charleston MSA	321	283	-11.8%	185	-34.6%
West Virginia	2,686	2,814	4.8%	2,544	-9.6%
United States	1,052,124	1,182,582	12.4%	1,190,191	0.6%

The MSA experienced a decrease in housing permits between 2014 and 2015 and a more significant decrease between 2015 and 2016, which was not representative of the trends in West Virginia or the nation during this timeframe. Additionally, the overall demand for permits tends to indicate a weak housing market and a decreased demand for home purchase loans in the assessment area during the evaluation period. However, according to Moody's Analytics, the demand for residential building permits in September and October 2016 was better than the prior three-month trend.

Labor, Employment, and Economic Characteristics

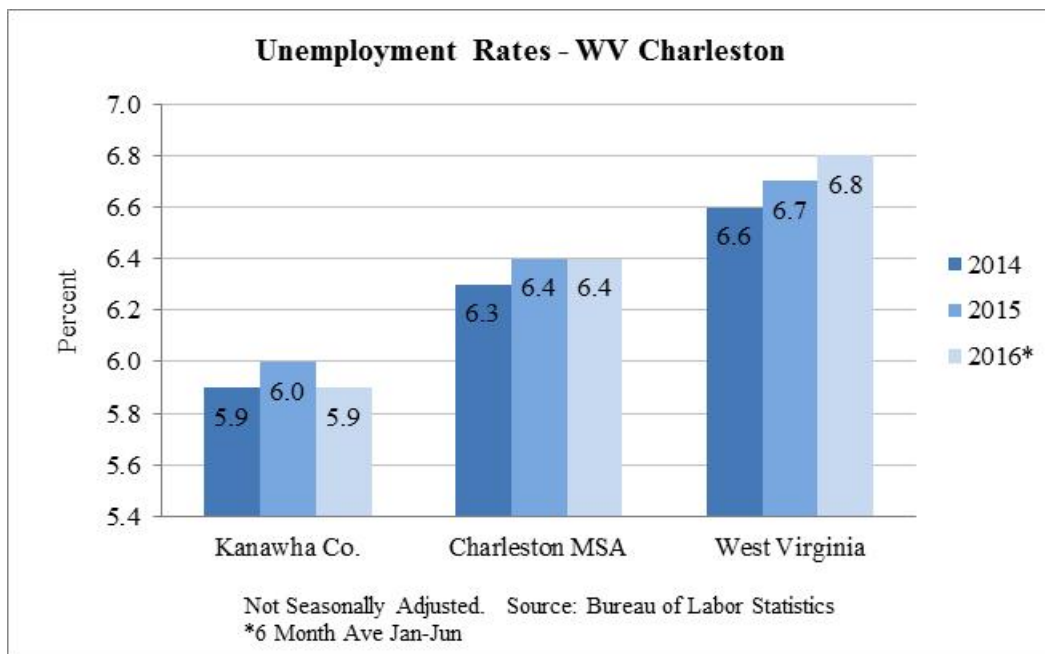
According to Moody's Analytics, the Charleston area economy is in recession, but is beginning to stabilize. While the rollback of environmental regulations may help boost the coal industry, but natural gas prices remain at historical lows, which hurts the demand for coal. As the industrial structure shifts, the lack of retraining and low educational attainment leads to more long-term unemployment. This metropolitan area will remain a below-average performer due to rapidly aging population and weak demographics.

According to Moody's Analytics, top employers in the assessment area in 2015/2016 were:

³⁰⁴ U.S. Census Bureau Building Permits Survey: <http://www.census.gov/construction/bps/>

Company	Number of Employees
Charleston Area Medical Center	6,800
Herbert J. Thomas Memorial Hospital Association	1,300
Frontier Communications	1,250
MC Junking Corp.	>1,000
Wal-Mart Stores	>1,000
WVSR	>1,000
Wells Fargo	750
Walker Machinery Company	700
Capital Area Services	680
Bayer Crop Science	600

The following table illustrates the average unemployment rates for 2014, 2015, and June 2016 for the counties in the assessment area, MSA, and West Virginia.



Overall, unemployment rates remained fairly stable in the assessment area and were significantly lower than West Virginia’s unemployment rates each year.

According to the *Charleston Gazette-Mail*, the Kanawha County Board of Education announced 72 personnel cuts due to lack of state funding and a decline of students. The loss of funding is due to a loss of 731 students in the county, as enrollment numbers from the current school year are used to set funding levels for the following school year. Forty-seven of the eliminated positions are professional (e.g., teachers and administrators) and 25 are service positions (e.g., custodians, cooks, and bus drivers).³⁰⁵

³⁰⁵ Quinn, Ryan. “Kanawha: Schools losing funds for 72 positions.” *Charleston Gazette-Mail*. January 9, 2017. - <http://www.wvgazettemail.com/news-education/20170109/kanawha-schools-losing-funds-for-72-positions>

Additionally, according to the *Associated Press*, Blackhawk Mining announced its plans to idle some coal operations in southern West Virginia and permanently lay off 146 workers. The Panther Creek mine in Kanawha County was part of Blackhawk Mining's purchase through an auction of a substantial amount of bankrupt Patriot Coal's assets last year. Blackhawk indicated that layoffs are expected to take place in March 2016 at Panther Creek's Winchester Underground Mine and Tom's Fork Prep Plant in Eskdale, although other operations at Panther Creek will remain active.³⁰⁶

³⁰⁶ Associated Press. "Blackhawk Mining to idle 146 West Virginia workers." *Marcellus.com*. January 17, 2016. - <https://marcellus.com/news/id/134350/blackhawk-mining-to-idle-146-west-virginia-workers/>

Combined Demographics Report

Assessment Area: WV Charleston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	9,517	18.6
Moderate-income	12	22.6	7,754	15.2	1,417	18.3	9,203	18
Middle-income	30	56.6	31,908	62.5	2,993	9.4	10,819	21.2
Upper-income	11	20.8	11,402	22.3	551	4.8	21,525	42.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	53	100.0	51,064	100.0	4,961	9.7	51,064	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	17,723	8,401	14.3	47.4	6,834	38.6	2,488	14
Middle-income	54,617	36,298	61.7	66.5	11,961	21.9	6,358	11.6
Upper-income	20,723	14,138	24	68.2	4,869	23.5	1,716	8.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	93,063	58,837	100.0	63.2	23,664	25.4	10,562	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2,489	30.7	2,127	29.5	323	41.3	39	28.9
Middle-income	3,634	44.8	3,292	45.7	292	37.3	50	37
Upper-income	1,996	24.6	1,783	24.8	167	21.4	46	34.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	8,119	100.0	7,202	100.0	782	100.0	135	100.0
	Percentage of Total Businesses:			88.7		9.6		1.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6	11.1	6	11.1	0	0	0	0
Middle-income	39	72.2	39	72.2	0	0	0	0
Upper-income	9	16.7	9	16.7	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	54	100.0	54	100.0	0	.0	0	.0
	Percentage of Total Farms:			100.0		.0		.0

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE
CHARLESTON WV MSA**

Lending Test

Fifth Third’s performance under the lending test in this assessment area is rated “High Satisfactory.” Fifth Third has demonstrated a good responsiveness to the credit needs of the community. In addition, Fifth Third originated two community development loans totaling \$4.0 million. Fifth Third has a good geographic distribution of loans and a moderate level of lending gaps. Fifth Third has a good distribution among borrowers of different income levels and to businesses of different revenue sizes. Fifth Third also exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, and businesses with gross annual revenues of \$1 million or less. The adequate level of community development loans and extensive use of flexible lending practices augmented Fifth Third’s performance in this assessment area.

Greatest consideration was given to the evaluation of home purchase lending based on the overall volume of lending, followed by refinance and small business. There were an insufficient number of home improvement loans to analyze performance. Details of Fifth Third’s residential mortgage and small business lending, as well as information regarding aggregate lending, can be found in Appendix E.

Lending Activity

Fifth Third’s lending activity reflects a good responsiveness to the credit needs within the assessment area. Fifth Third originated 93 home purchase, 69 refinance, 22 home improvement, 62 small business, and two community development loans during the evaluation period. The percentage of Fifth Third’s total lending at 0.2% is greater than the percentage of total deposits at 0.1% in this area.

Fifth Third made 93.4% of the HMDA and 100.0% of the CRA lending within its designated assessment area. No concentration was identified in any of the excluded counties within the assessment area.

Geographic Distribution of Loans

Fifth Third’s overall distribution of lending among geographies is good. Home purchase lending is poor. Refinance lending is excellent. Small business lending is excellent. There is also an overall moderate level of lending gaps. The following gaps in lending were noted in the assessment area.

Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
Moderate	12	3	75.0%
Middle	30	2	93.3%
Upper	11	2	81.8%
Total	53	7	86.8%

Lending gaps are considered reasonable. The lower penetration rate in moderate-income tracts is primarily due to an owner-occupancy rate of 47.4% and a high percentage of rentals and vacancies of 52.6% in these areas. Middle-income tracts have a low level of lending gaps and upper-income tracts have a reasonable level of lending gaps.

Home Purchase Loans

Fifth Third made six home purchase loans totaling \$611,000 in moderate-income tracts. This represents 6.5% of its home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 14.3%, and 4.1% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate at 11.3% and was below the 2015 aggregate at 11.2%. As Fifth Third's performance was below proxy and the aggregate of all lenders, the geographic distribution of home purchase loans in low-income tracts is poor.

Fifth Third made 46 home purchase loans totaling \$5.7 million in middle-income tracts. This represents 49.5% of home purchase loans by volume, which is below the percentage of owner-occupied units in these tracts at 61.7%, and 38.4% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 57.9% and was below the 2015 aggregate of 56.3%.

Fifth Third made 41 home purchase loans totaling \$8.5 million in upper-income tracts. This represents 44.1% of home purchase loans by volume, which significantly exceeds the percentage of owner-occupied units in these tracts at 24.0%, and 57.5% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 30.8% and exceeded the 2015 aggregate of 31.2%.

Overall, the geographic distribution of home purchase loans is poor.

Refinance Loans

Fifth Third made eight refinance loans totaling \$1.3 million in moderate-income tracts. This represents 11.6% of refinance loans by volume, which is below the owner-occupied units in these tracts at 14.3%, and 15.2%, which exceeds proxy. The percentage of loans by volume was comparable to the 2014 aggregate at 9.1% and significantly exceeded the 2015 aggregate at 9.0%. Because the owner-occupancy rate in moderate-income tracts is only 47.4% (which likely reduces the demand for refinance loans in these areas) and Fifth Third's performance was comparable in 2014 and significantly exceeded the aggregate of all lenders in 2015, the geographic distribution of refinance loans in moderate-income tracts is excellent.

Fifth Third made 38 refinance loans totaling \$3.7 million in middle-income tracts. This represents 55.1% of refinance loans by volume, which is below the owner-occupied units in these tracts at 61.7%, and 44.1% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate at 60.5% and was below the 2015 aggregate at 59.0%.

Fifth Third made 23 refinance loans totaling \$3.4 million in upper-income tracts. This represents 33.3% of refinance loans by volume, which exceeds the percentage of owner-occupied units in these tracts at 24.0%, and 40.8% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume was below the 2014 aggregate at 30.4% and exceeded the 2015 aggregate at 32.0%.

Overall, the geographic distribution of refinance loans is excellent.

Small Business Loans

Fifth Third made 20 small business loans totaling \$3.7 million in moderate-income tracts. This represents 32.3% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 29.5%, and 34.5% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 26.1% and the 2015 aggregate of 27.6%. Given that Fifth Third's performance exceeded proxy and the aggregate of all lenders, the geographic distribution of small business loans in moderate-income tracts is excellent.

Fifth Third made 26 small business loans totaling \$5.3 million in middle-income tracts. This represents 41.9% of small business loans by volume, which is below the percentage of businesses in these tracts at 45.7%, and 49.3% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 45.6% and was below the 2015 aggregate of 44.1%.

Fifth Third made 16 small business loans totaling \$1.7 million in upper-income tracts. This represents 25.8% of small business loans by volume, which exceeds the percentage of businesses in these tracts at 24.8%, and 16.2% by dollar amount, which is below proxy. The percentage of loans by volume was below the 2014 aggregate of 25.5% and was below the 2015 aggregate of 25.7%.

Overall, the geographic distribution of small business loans is excellent.

Distribution by Borrower Income and Revenue Size of the Business

The distribution of loans is good based on borrower income and for businesses of different revenue sizes. Borrower distribution for home purchase and refinance lending is good.

Home Purchase Loans

Fifth Third made ten loans totaling \$711,000 to low-income borrowers. This represents 10.8% of home purchase loans by volume, which is below the percentage of low-income families at 18.6%, and 4.8% by dollar amount, which is significantly below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 9.2% and was below the 2015 aggregate of 8.1%. Because Fifth Third's performance exceeded the aggregate of all lenders, but was below proxy, the borrower distribution of home purchase loans to low-income borrowers is good.

Fifth Third made 18 loans totaling \$1.7 million to moderate-income borrowers. This represents 19.4% of home purchase loans by volume, which exceeds the percentage of moderate-income families at 18.0%, and 11.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 17.9% and was below the 2015 aggregate of 21.4%. As Fifth Third's performance exceeded proxy and the aggregate of all lenders, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Fifth Third made 23 loans totaling \$3.1 million to middle-income borrowers. This represents 24.7% of home purchase loans by volume, which exceeds the percentage of middle-income families at 21.2%, and 21.1% by dollar amount, which is comparable to proxy. The percentage of loans by volume was below the 2014 aggregate of 21.6% and exceeded the 2015 aggregate of 21.7%.

Fifth Third made 39 loans totaling \$8.8 million to upper-income borrowers. This represents 41.9% of home purchase loans by volume, which is comparable to the percentage of upper-income families at 42.2%, and 59.6% by dollar amount, which exceeds proxy. The percentage of loans by volume exceeded the 2014 aggregate of 35.8% and exceeded the 2015 aggregate of 30.7%.

A community contact indicated that the lack of employment opportunities for low- and moderate-income individuals was a significant economic factor likely impacting the ability of these individuals to buy homes. Since Fifth Third was able to effectively reach these borrowers, the overall borrower distribution of home purchase loans is good.

Refinance Loans

Fifth Third made five loans totaling \$375,000 to low-income borrowers. This represents 7.2% of refinance loans by volume, which is significantly below the percentage of low-income families at 18.6%, and 4.5% by dollar amount, which is significantly below proxy. The percentage of loans by volume was below the 2014 aggregate of 6.2% and exceeded the 2015 aggregate of 6.1%. Given that Fifth Third's performance exceeded the aggregate of all lenders, but was significantly below proxy, the borrower distribution of refinance loans to low-income borrowers is adequate.

Fifth Third made 13 loans totaling \$968,000 to moderate-income borrowers. This represents 18.8% of refinance loans by volume, which exceeds the percentage of moderate-income families at 18.0%, and 11.5% by dollar volume, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 15.6% and exceeded the 2015 aggregate of 15.7%. As Fifth Third's performance exceeded the aggregate of all lenders and proxy, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Fifth Third made 14 loans totaling \$1.2 million to middle-income borrowers. This represents 20.3% of refinance loans by volume, which is comparable to the percentage of middle-income families at 21.2%, and 14.2% by dollar amount, which is below proxy. The percentage of loans by volume exceeded the 2014 aggregate of 24.5% and was below the 2015 aggregate of 21.9%.

Fifth Third made 35 loans totaling \$5.7 million to upper-income borrowers. This represents 50.7% of refinance loans by volume, which exceeds the percentage of upper-income families at 42.2%, and 67.6% by dollar amount, which significantly exceeds proxy. The percentage of loans by volume was below the 2014 aggregate of 41.5% and substantially exceeded the 2015 aggregate of 41.6%.

Overall, the borrower distribution of refinance loans is good.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good, considering Fifth Third's performance relative to the aggregate of all lenders. Fifth Third was able to make 40.3% of small business loans to businesses with revenues of \$1 million or less. Fifth Third's performance was below the 2014 aggregate of 38.0% and exceeded the 2015 aggregate of 44.0%; however, Fifth Third's performance was significantly below the percentage of small businesses in the assessment area at 88.7%. Also, during the evaluation period, Fifth Third was able to make an acceptable percentage of small-dollar loans (59.7%) up to \$100,000, indicating a willingness to lend in smaller amounts that are requested by small businesses.

Community Development Loans

Fifth Third originated two community development loans totaling \$4.0 million supporting economic development during the evaluation period.

Community development lending in the assessment area represents 0.1% of the total dollar volume of community development loans originated by Fifth Third during the evaluation period. This ranks as Fifth Third's 52nd highest percentage of community development lending during the evaluation period. As such, Fifth Third's performance is adequate in community development lending.

The community development loans were renewals of working capital to assist a small business retain employment for 14 low- and moderate-income workers.

Flexible Lending Programs

Fifth Third only originated 184 HMDA loans in this assessment area during the evaluation period, but originated 701 flexible lending loans consisting of 503 government loans, 66 down payment assistance loans, and 132 other flexible lending programs. The following tables show the percentage by volume and by dollar amount of the three types of flexible lending programs made in this assessment area during the evaluation period and the distribution of Fifth Third’s flexible lending programs within the assessment area by census tract income and by borrower income.

Flexible Loan Programs												
	Geographic Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units	% - #	% - \$	% O/O Units
	Government Loan Programs	2.4%	2.2%	3.4%	25.6%	20.4%	18.4%	51.1%	49.0%	39.9%	20.9%	28.5%
Down Payment Assistance Programs	7.6%	6.9%	3.4%	30.3%	27.8%	18.4%	53.0%	54.6%	39.9%	9.1%	10.8%	38.3%
Other Flexible Lending Programs	5.3%	3.1%	3.4%	13.6%	10.5%	18.4%	34.8%	30.9%	39.9%	46.2%	55.5%	38.3%
Total	3.4%	2.7%	3.4%	23.8%	18.7%	18.4%	48.2%	45.4%	39.9%	24.5%	33.1%	38.3%

*Unknown tract data is not included in the above table.

Flexible Loan Programs												
	Borrower Distribution											
	Low			Moderate			Middle			Upper		
	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam	% - #	% - \$	% Fam
	Government Loan Programs	28.2%	19.9%	21.0%	35.2%	31.4%	17.3%	18.7%	21.2%	20.4%	17.1%	26.0%
Down Payment Assistance Programs	47.0%	37.3%	21.0%	42.4%	47.3%	17.3%	4.5%	7.9%	20.4%	0.0%	0.0%	41.4%
Other Flexible Lending Programs	12.1%	9.6%	21.0%	22.0%	16.5%	17.3%	20.5%	18.9%	20.4%	43.2%	52.9%	41.4%
Total	27.0%	18.9%	21.0%	33.4%	29.3%	17.3%	17.7%	19.7%	20.4%	20.4%	30.0%	41.4%

*Unknown tract data is not included in the above table.

Overall, Fifth Third’s lending in low-income tracts by number was comparable to the percentage of owner-occupied units in these tracts, while the dollar amount in the low-income tracts was slightly below proxy. However, down payment assistance loans, by number and dollar amount, exceeded the percentage of owner-occupied units in low-income tracts. The percentage of lending by volume and dollar amount in moderate-income tracts exceeded the percentage of owner-occupied units in these geographies.

Fifth Third’s lending by volume to low-income borrowers exceeded the percentage of low-income families, and lending by dollar amount was below proxy. The percentage of lending by volume and dollar amount to moderate-income borrowers exceeded the percentage of moderate-income families, especially for down payment assistance and government loan programs.

Fifth Third made extensive use of flexible lending practices and is serving the assessment area’s credit needs, as lending through flexible loan programs in low-income tracts was good and excellent in moderate-income tracts and to low- and moderate-income borrowers was excellent.

Investment Test

Fifth Third’s performance relative to the investment test in the assessment area is rated “High Satisfactory.”

Fifth Third made a significant level of qualified community development investments and grants. As such, Fifth Third was occasionally in a leadership position. Fifth Third has 35 qualified investments totaling \$4.0 million during the evaluation period. Shown in the table below are the total current period investments:

Affordable Housing		Community Services	
#	\$	#	\$
11	1,543,486	20	46,471

Also included in the total number of qualified investments are four prior period investments totaling \$2.4 million. Fifth Third made 0.3% of its total community development investments in this assessment area, which is greater than the percentage of total deposits at 0.1% and comparable to the percentage of branch offices at 0.2%.

Fifth Third exhibits a good responsiveness to credit and community development needs in the assessment area. Fifth Third made 25 donations totaling \$51,221 that supported local schools, churches and social and charitable organizations. The majority of Fifth Third’s donations (90.7%) supported services to low- and moderate-income individuals.

Service Test

Fifth Third’s performance under the service test in this assessment area is rated “Outstanding.” Retail services are readily accessible and Fifth Third provides an excellent level of community development services.

Retail Services

Fifth Third’s record of opening and closing offices has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and to low- and moderate-income households. Since the previous evaluation, no banking centers were opened or closed and delivery services are readily accessible to Fifth Third’s geographies and individuals of different income levels.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including moderate-income geographies or households, and are consistent with the services and hours discussed in the “Institution” assessment.

Fifth Third maintains three banking centers within this assessment area, including one in moderate-, two in middle-, and none in upper-income census tracts. Fifth Third banking centers in this assessment area represent 0.2% of all its banking centers.

Fifth Third has a total of three full-service ATMs within this assessment area, including one in moderate-, two in middle-, and none in upper-income census tracts.

The following table illustrates the percentage of banking centers and ATMs in moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts. There are no low-income geographies in this assessment area.

Geographic Distribution of Branches & ATMS

Assessment Area: WV Charleston

Tract Category	Branches				Stand Alone ATMs						Demographics				
	Total Branches		Open #	Closed #	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts		House holds %	Total Businesses %	
	#	%			#	%	#	%	#	%	#	%			
Low	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Moderate	1	33.3%	0	0	Total	1	33.3%	1	33.3%	0	0.0%	12	22.6%	18.5%	31.4%
Middle	2	66.7%	0	0	Total	2	66.7%	2	66.7%	0	0.0%	30	56.6%	58.5%	44.4%
Upper	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	11	20.8%	23.0%	24.2%
Unknown	0	0.0%	0	0	Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%
Total	3	100.0%	0	0	Total	3	100.0%	3	100.0%	0	0.0%	53	100.0%	100.0%	100.0%

2016 FFIEC Census Data, 2010 ACS Data, and 2015 D&B Information

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Branch distribution within moderate-income tracts was considered excellent, because the distribution of branches exceeded the percentage of census tracts and households and businesses in these tracts.

Community Development Services

Fifth Third is a leader in providing community development services in this assessment area. During the evaluation period, Fifth Third employees provided 625 hours of community development service to local organizations serving low- and moderate-income individuals, which represents 0.5% of all community development services provided and equates to 0.3 annualized persons (ANP).

Affordable Housing	Economic Development	Community Services
<i># of Hours</i>	<i># of Hours</i>	<i># of Hours</i>
103	36	486

Employees provided financial expertise through leadership positions in multiple community organizations that provide affordable housing and promote community and economic development. Community development services include 381 hours of providing financial literacy through local nonprofits and school programs, 224 hours serving on boards and committees, and 20 hours providing technical assistance to non-profits.

Fifth Third was considered particularly responsive with regard to hours dedicated to financial literacy activities, as a community contact mentioned the need for financial literacy education to help lower-income individuals get out of debt and learn to save money. Based on the area’s high poverty rates and accelerating elderly population, supporting community services that serve low- and moderate-income individuals is also considered to be responsive.

APPENDIX A
SCOPE OF EXAMINATION

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION	
ASSESSMENT AREA/TYPE OF EXAMINATION	BANKING CENTERS VISITED³⁰⁷
<p><i>Multi-state – full-scope reviews</i></p> <ul style="list-style-type: none"> • Chicago-Naperville IL-IN-WI CSA • Cincinnati OH-KY-IN MSA • Evansville IN-KY MSA • Huntington-Ashland WV-KY-OH MSA • Louisville-Jefferson County KY-IN MSA • South Bend-Elkhart-Mishawaka IN-MI CSA 	None
<p><i>Florida – full-scope reviews</i></p> <ul style="list-style-type: none"> • Orlando-Deltona-Daytona Beach FL CSA • Tampa-St. Petersburg-Clearwater FL MSA <p><i>Florida – limited-scope reviews</i></p> <ul style="list-style-type: none"> • Cape Coral-Fort Myers FL MSA • Jacksonville FL MSA • Lakeland-Winter Haven FL MSA • Miami-Fort Lauderdale-West Palm Beach FL MSA • Naples-Immokalee-Marco Island FL MSA • North Port-Sarasota FL CSA 	None
<p><i>Georgia – full-scope review</i></p> <ul style="list-style-type: none"> • Atlanta-Sandy Springs-Roswell GA MSA <p><i>Georgia – full-scope review</i></p> <ul style="list-style-type: none"> • Augusta-Richmond County GA-SC MSA 	None
<p><i>Illinois – full-scope reviews</i></p> <ul style="list-style-type: none"> • Non-metropolitan Southern Illinois <p><i>Illinois – limited-scope review</i></p> <ul style="list-style-type: none"> • Carbondale-Marion IL MSA • Non-metropolitan Northern Illinois • Rockford IL MSA 	None

³⁰⁷There is a statutory requirement that the written evaluation of a multi-state institution’s performance must list the individual banking centers examined in each state. Before the Consumer Financial Protection Bureau assumed responsibility over supervision of the majority of the consumer compliance regulation impacting Fifth Third, the institution was supervised under the Federal Reserve’s continuous supervision process. Banking centers and/or the institution’s processes for monitoring banking center performance are periodically evaluated under this continuous supervision process so no additional review of banking centers was necessary as part of this CRA performance evaluation.

<p><i>Indiana – full-scope reviews</i></p> <ul style="list-style-type: none"> • Indianapolis-Carmel-Muncie IN CSA • Non-metropolitan Southern Indiana <p><i>Indiana – limited-scope reviews</i></p> <ul style="list-style-type: none"> • Bloomington IN MSA • Fort Wayne IN MSA • Lafayette-West Lafayette IN MSA • Non-metropolitan Northern Indiana • Terre Haute IN MSA 	<p>None</p>
<p><i>Kentucky – full-scope reviews</i></p> <ul style="list-style-type: none"> • Lexington-Fayette KY MSA <p><i>Kentucky – limited-scope review</i></p> <ul style="list-style-type: none"> • Non-metropolitan Eastern Kentucky • Non-metropolitan Western Kentucky • Owensboro KY MSA 	<p>None</p>
<p><i>Michigan – full-scope reviews</i></p> <ul style="list-style-type: none"> • Detroit-Warren-Ann Arbor MI CSA • Grand Rapids-Wyoming-Muskegon MI CSA <p><i>Michigan – limited-scope reviews</i></p> <ul style="list-style-type: none"> • Battle Creek MI MSA • Jackson MI MSA • Kalamazoo-Portage MI MSA • Lansing-East Lansing MI MSA • Non-metropolitan Northern Michigan • Non-metropolitan Southern Michigan • Saginaw-Midland-Bay City MI CSA 	<p>None</p>
<p><i>Missouri – full-scope review</i></p> <ul style="list-style-type: none"> • St. Louis MO-IL MSA 	<p>None</p>
<p><i>North Carolina – full-scope reviews</i></p> <ul style="list-style-type: none"> • Charlotte-Gastonia-Concord NC-SC MSA <p><i>North Carolina – limited-scope reviews</i></p> <ul style="list-style-type: none"> • Asheville NC MSA • Hickory-Lenoir-Morganton NC MSA • Non-metropolitan Western North Carolina • Raleigh-Cary NC MSA 	<p>None</p>
<p><i>Ohio – full-scope reviews</i></p> <ul style="list-style-type: none"> • Cleveland-Akron-Canton OH CSA • Columbus OH MSA 	<p>None</p>

<p><i>Ohio – limited-scope reviews</i></p> <ul style="list-style-type: none"> • Dayton-Springfield-Sidney OH CSA • Lima OH MSA • Non-metropolitan Northwestern Ohio • Non-metropolitan Southwestern Ohio • Toledo OH MSA 	
<p><i>Pennsylvania – full-scope review</i></p> <ul style="list-style-type: none"> • Pittsburgh PA MSA 	None
<p><i>Tennessee – full-scope review</i></p> <ul style="list-style-type: none"> • Nashville-Davidson-Murfreesboro-Franklin TN MSA <p><i>Tennessee – limited-scope review</i></p> <ul style="list-style-type: none"> • Knoxville TN MSA 	None
<p><i>West Virginia – full-scope review</i></p> <ul style="list-style-type: none"> • Charleston WV MSA 	None

APPENDIX B

SUMMARY OF INSTITUTION, MULTI-STATE, AND STATE RATINGS

Institution Rating	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Institution	Outstanding	Outstanding	High Satisfactory	Outstanding
Multi-state MSA Ratings				
Chicago-Naperville IL-IN-WI CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Cincinnati OH-KY-IN MSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Evansville IN-KY MSA	High Satisfactory	Outstanding	High Satisfactory	Outstanding
Huntington-Ashland WV-KY-OH MSA	Low Satisfactory	Outstanding	Outstanding	Satisfactory
Louisville-Jefferson County KY-IN MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
South Bend-Elkhart-Mishawaka IN-MI CSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State MSA Ratings				
State of Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Georgia	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Illinois	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Commonwealth of Kentucky	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Michigan	Outstanding	Outstanding	Outstanding	Outstanding
State of Missouri	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of North Carolina	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
Commonwealth of Pennsylvania	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Tennessee	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of West Virginia	High Satisfactory	High Satisfactory	Outstanding	Satisfactory

APPENDIX C

SUMMARY OF LIMITED-SCOPE REVIEWS

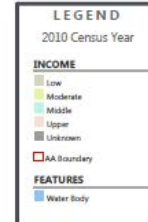
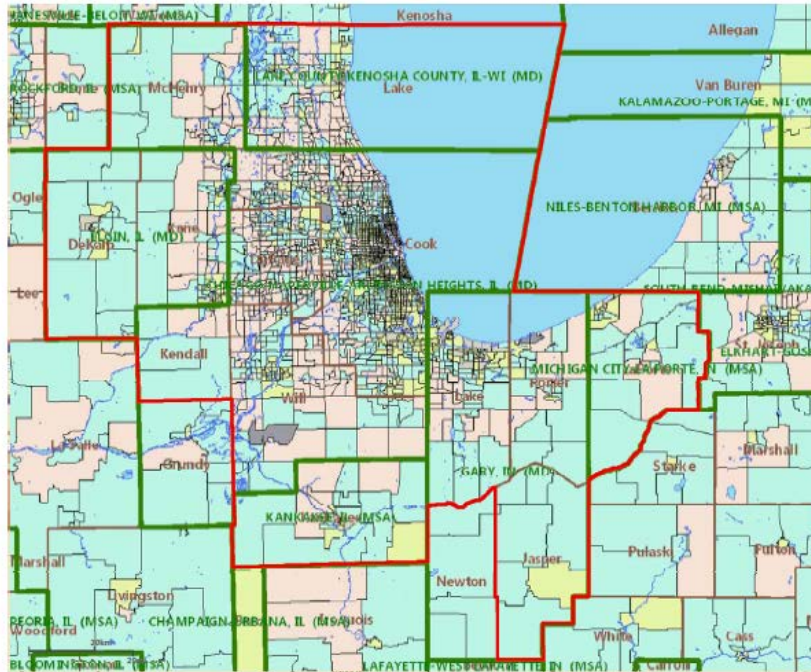
Assessment Area	Lending Test	Investment Test	Service Test
State of Florida			
Cape Coral-Fort Myers FL MSA	Below	Below	Consistent
Jacksonville FL MSA	Below	Consistent	Consistent
Lakeland-Winter Haven FL MSA	Below	Consistent	Consistent
Miami-Fort Lauderdale-West Palm Beach FL MSA	Below	Consistent	Consistent
Naples-Immokalee-Marco Island FL MSA	Below	Below	Below
North Port-Sarasota FL CSA	Below	Below	Consistent
State of Georgia			
Augusta-Richmond County GA-SC MSA	Below	Consistent	Consistent
State of Illinois			
Carbondale-Marion IL MSA	Consistent	Consistent	Consistent
Non-metropolitan Northern Illinois	Consistent	Above	Above
Rockford IL MSA	Consistent	Below	Above
State of Indiana			
Bloomington IN MSA	Below	Consistent	Below
Fort Wayne IN MSA	Below	Consistent	Below
Lafayette-West Lafayette IN MSA	Below	Below	Below
Non-metropolitan Northern Indiana	Below	Below	Below
Terre Haute IN MSA	Below	Below	Below
Commonwealth of Kentucky			
Non-metropolitan Eastern Kentucky	Below	Consistent	Below
Non-metropolitan Western Kentucky	Below	Above	Consistent
Owensboro KY MSA	Below	Below	Below
State of Michigan			
Battle Creek MI MSA	Below	Consistent	Below
Jackson MI MSA	Below	Below	Below
Kalamazoo-Portage MI MSA	Below	Consistent	Below
Lansing-East Lansing MI MSA	Below	Below	Consistent
Non-metropolitan Northern Michigan	Below	Below	Below
Non-metropolitan Southern Michigan	Below	Consistent	Below
Saginaw-Midland-Bay City MI CSA	Below	Consistent	Below

State of North Carolina			
Asheville NC MSA	Below	Below	Below
Hickory-Lenoir-Morganton NC MSA	Below	Below	Below
Non-metropolitan Western North Carolina	Below	Below	Below
Raleigh-Cary NC MSA	Below	Below	Below
State of Ohio			
Dayton-Springfield-Sidney OH CSA	Below	Below	Below
Lima OH MSA	Below	Below	Consistent
Non-metropolitan Northwestern Ohio	Below	Below	Consistent
Non-metropolitan Southwestern Ohio	Below	Consistent	Consistent
Toledo OH MSA	Below	Below	Consistent
State of Tennessee			
Knoxville TN MSA	Below	Consistent	Below

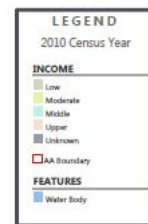
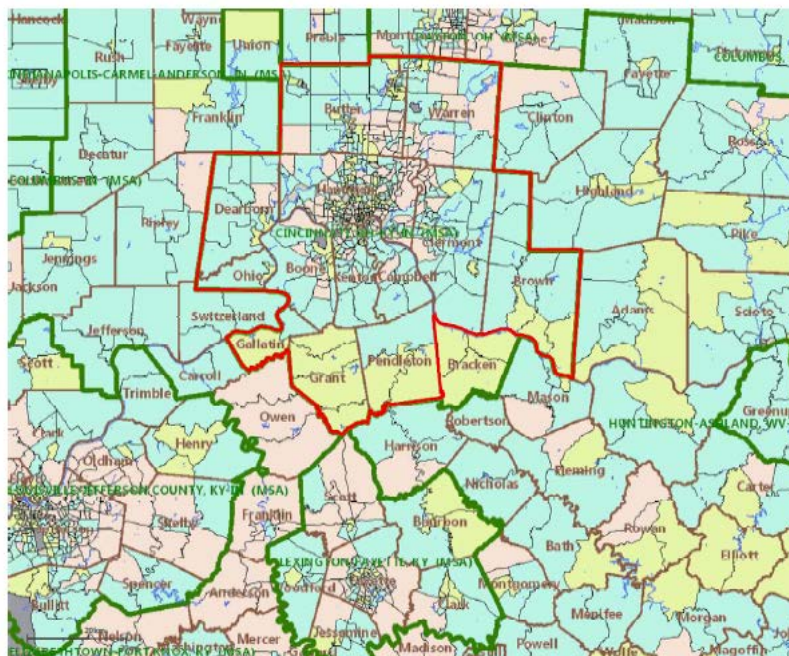
APPENDIX D

ASSESSMENT AREA MAPS

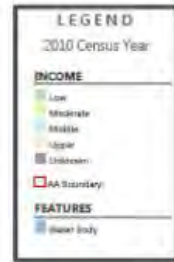
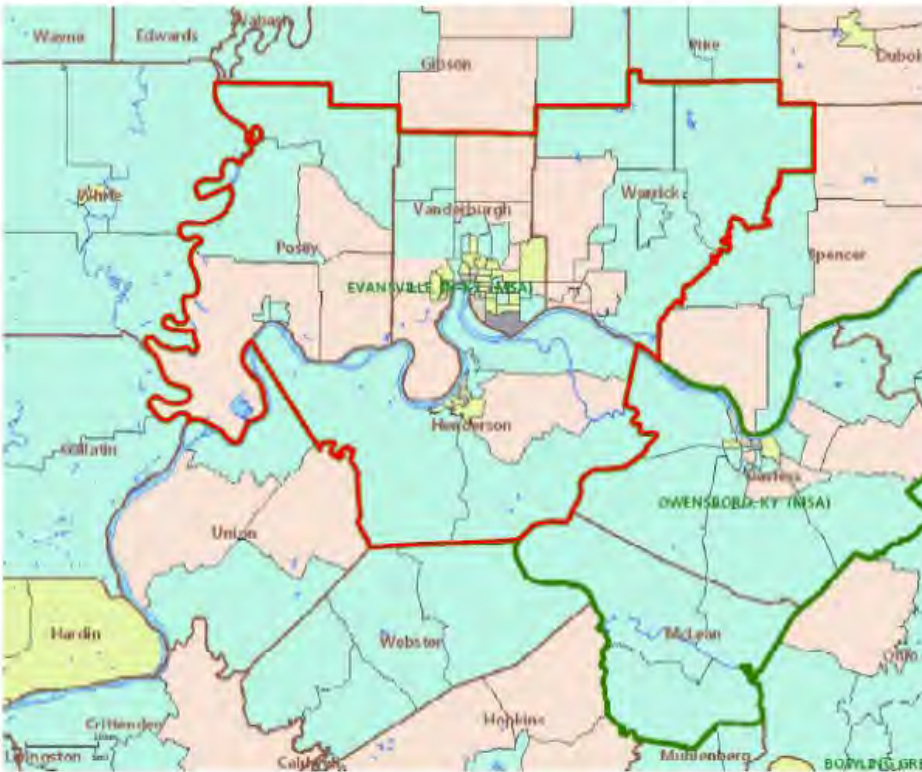
Assessment Area: Multi Chicago-Naperville IL-IN-WI CSA #176



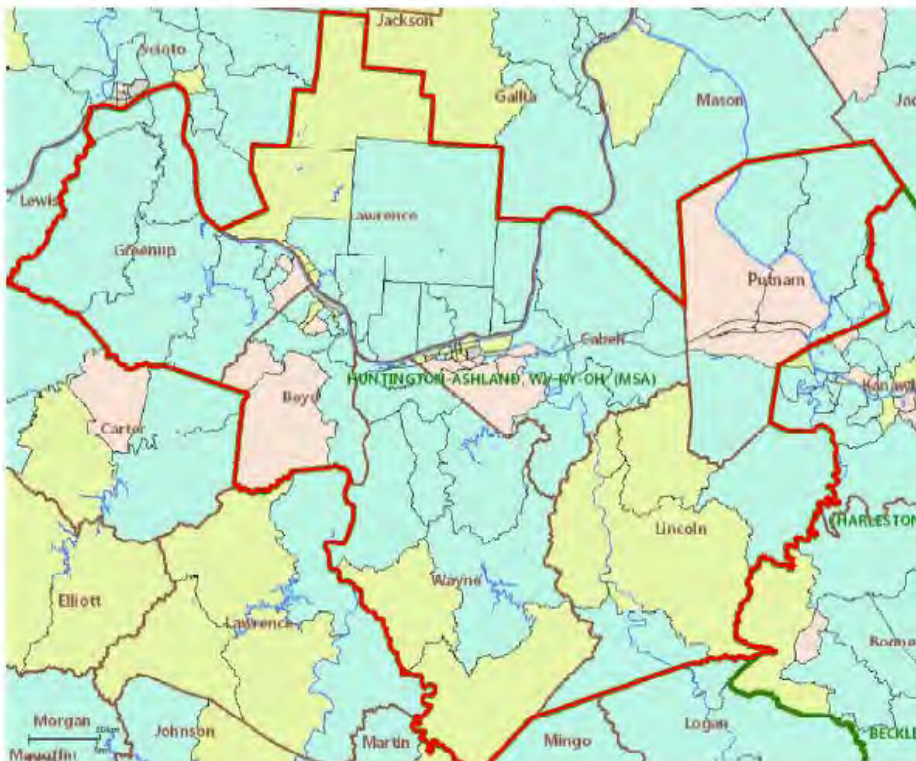
Assessment Area: Multi Cincinnati OH-KY-IN MSA #17140



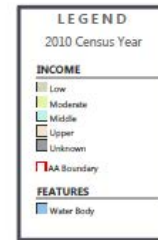
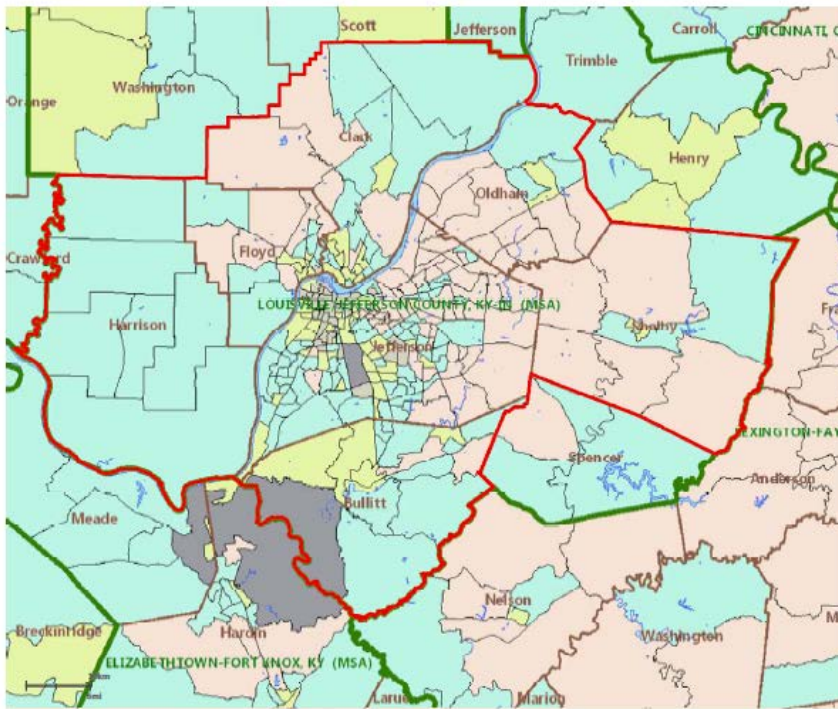
Assessment Area: Multi Evansville IN-KY MSA #21780



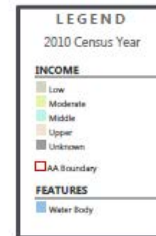
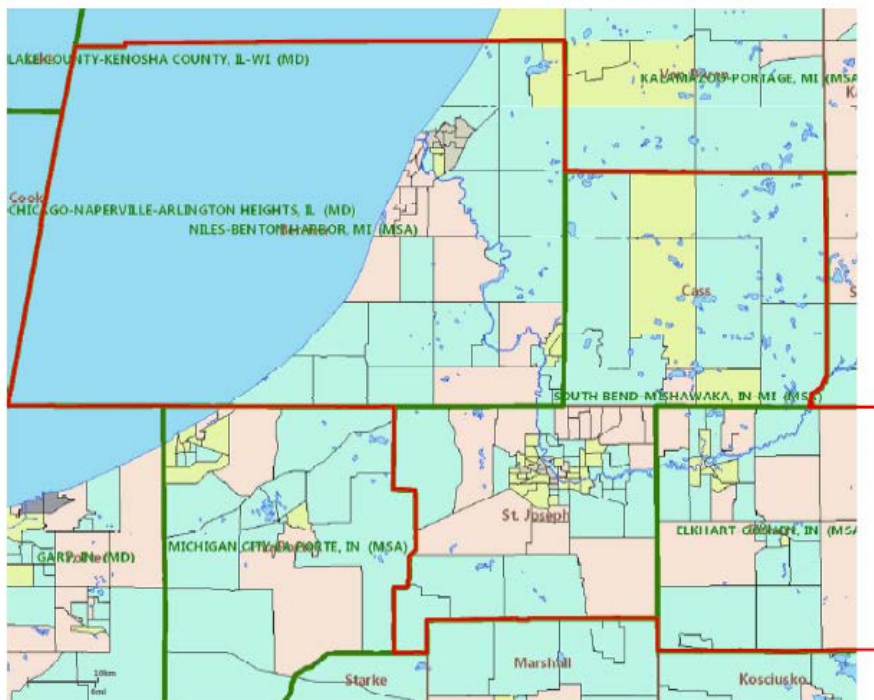
Assessment Area: Multi Huntington-Ashland WV-KY-OH MSA #26580



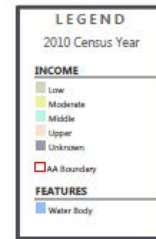
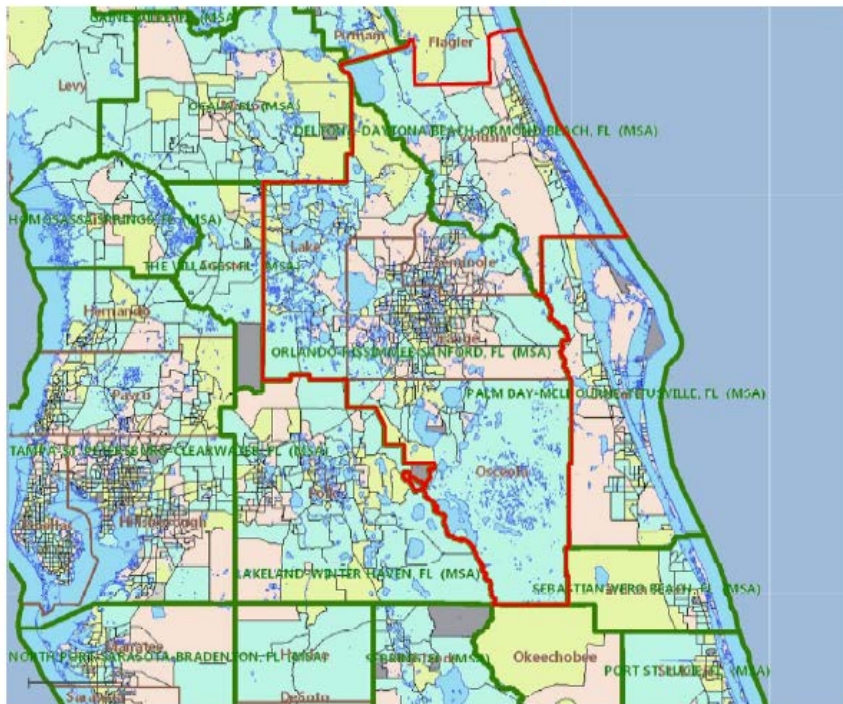
Assessment Area: Multi Louisville/Jefferson County KY-IN MSA #31140



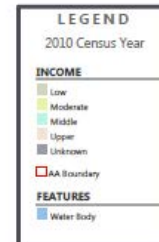
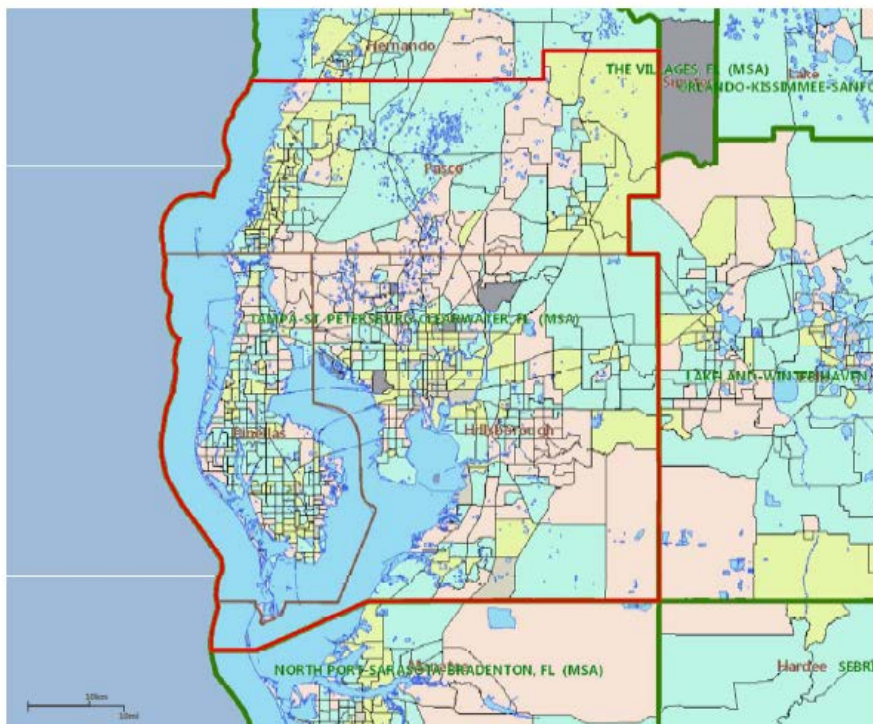
Assessment Area: Multi South Bend Elkhart Mishawaka IN-MI CSA #515



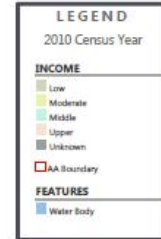
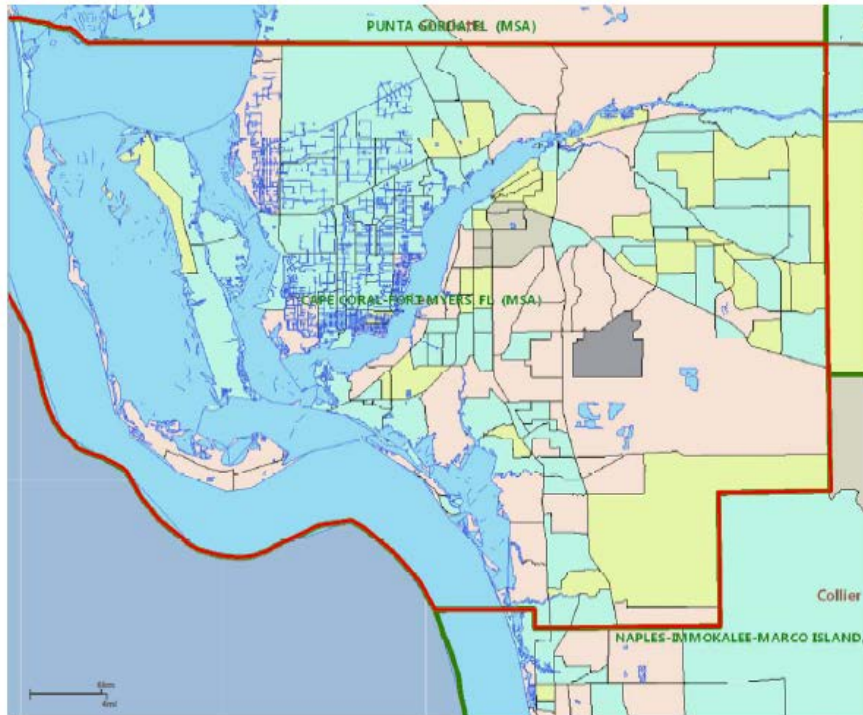
Assessment Area: Orlando-Deltona-Daytona Beach FL CSA #422



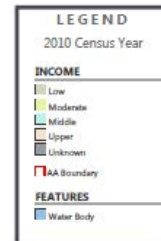
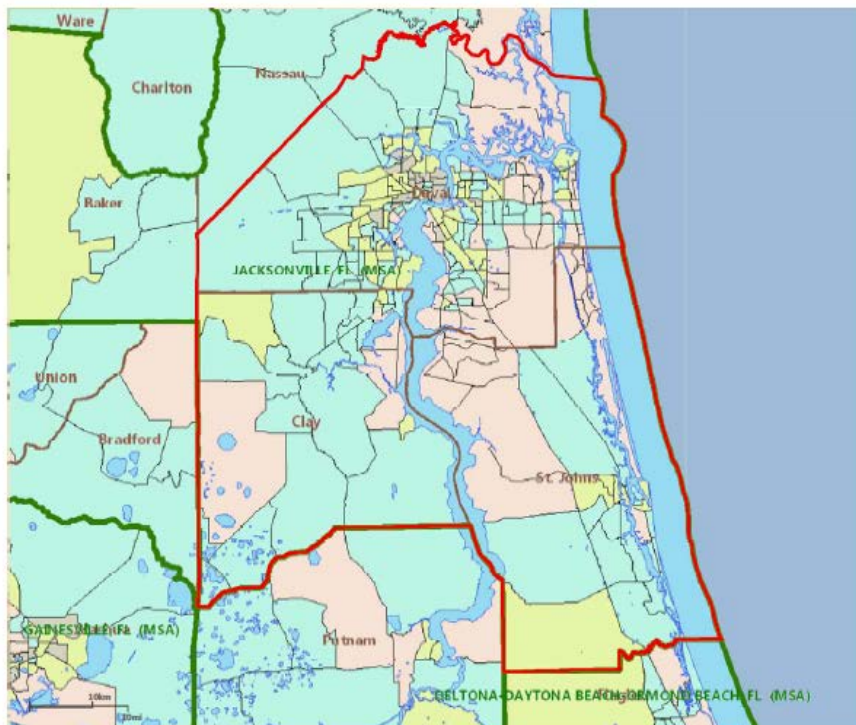
Assessment Area: Tampa-St. Petersburg-Clearwater FL MSA #45300



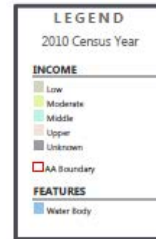
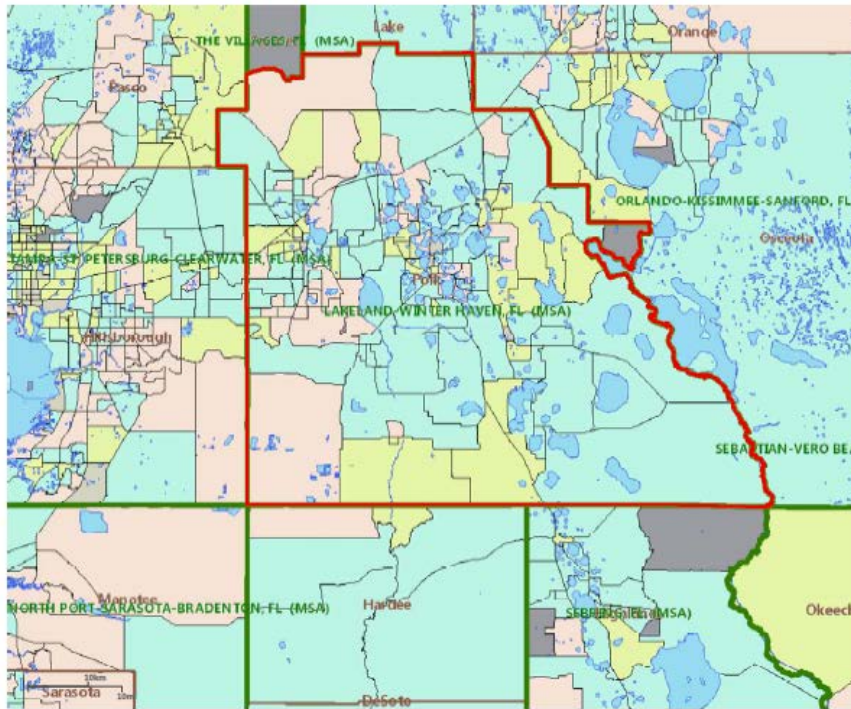
Assessment Area: Cape Coral-Fort Myers FL MSA #15980



Assessment Area: Jacksonville FL MSA #27260



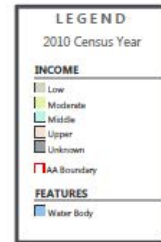
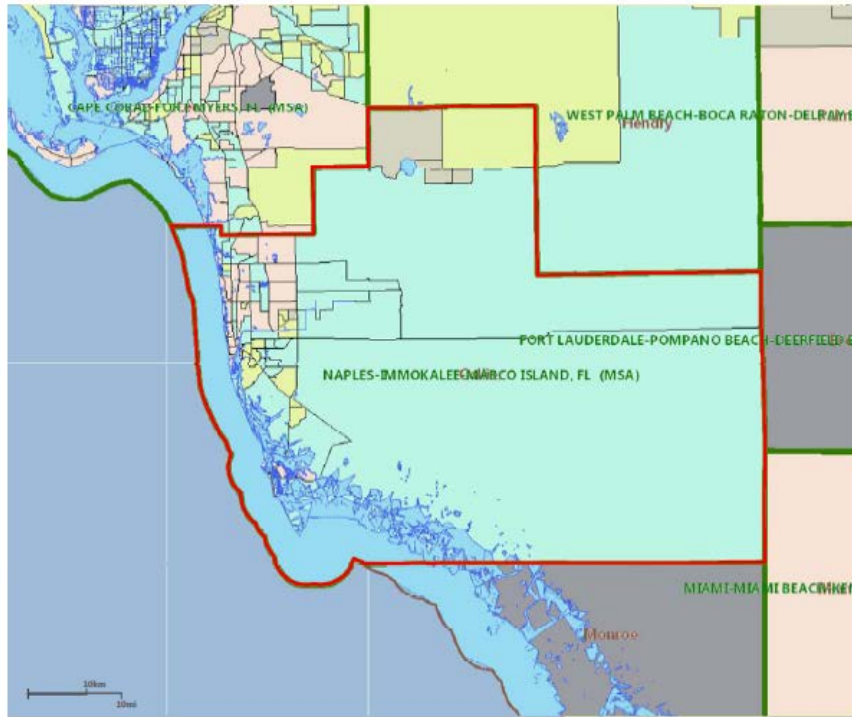
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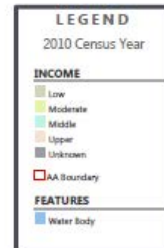
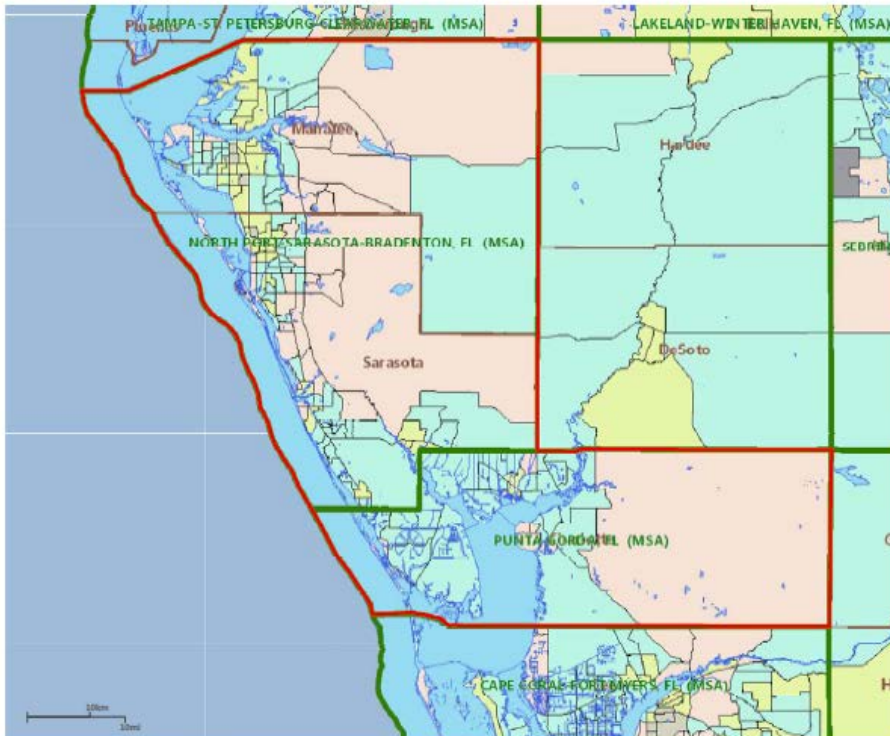
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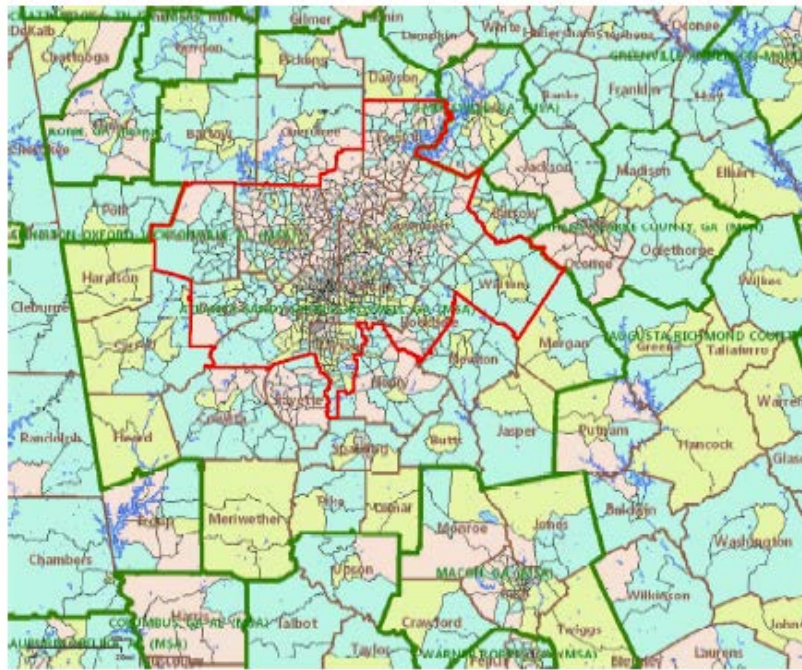
Assessment Area: Naples-Immokalee-Marco Island FL MSA #34940



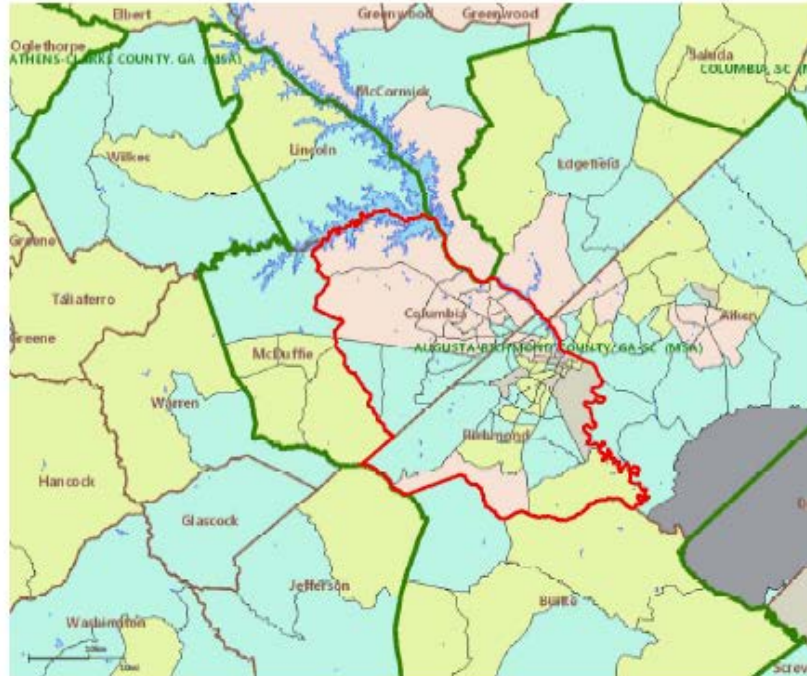
Assessment Area: North Port-Sarasota FL CSA #494



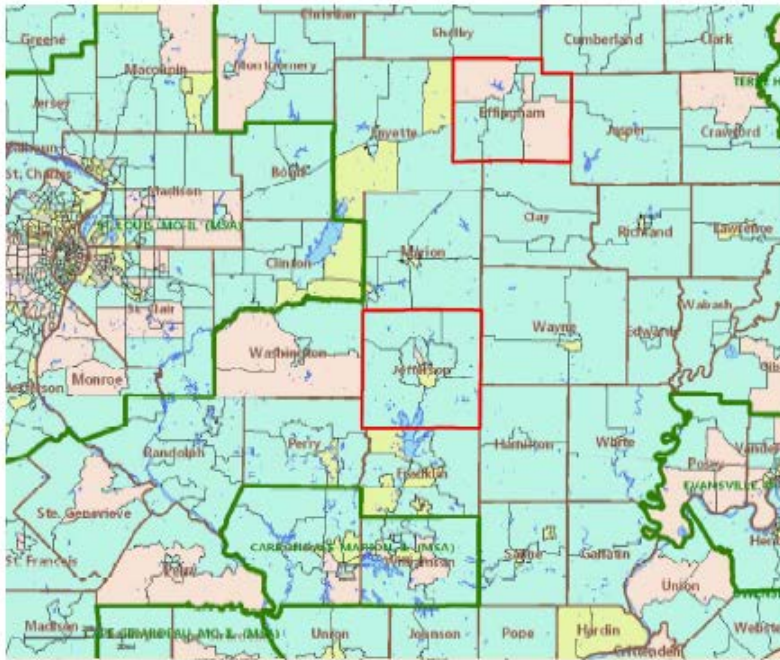
Assessment Area: Atlanta-Sandy Springs-Roswell GA MSA #12060



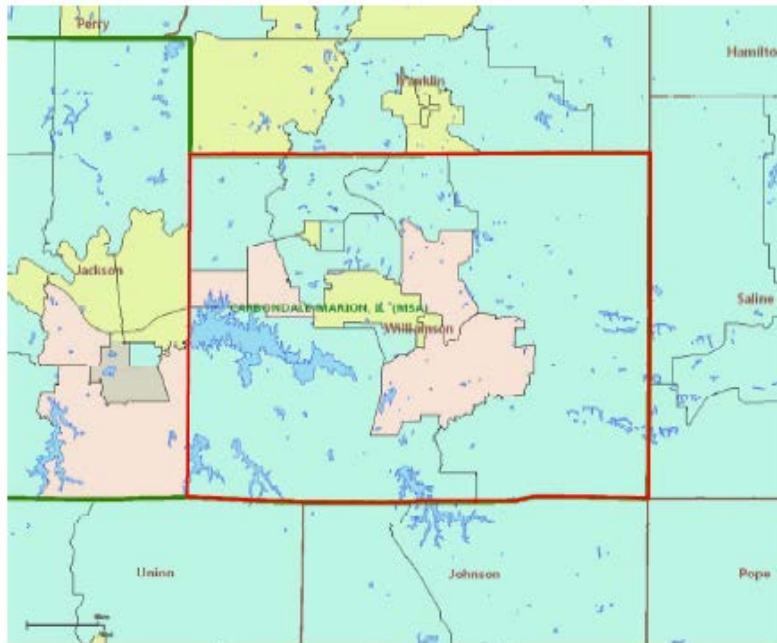
Assessment Area: Augusta-Richmond County GA-SC MSA #12260



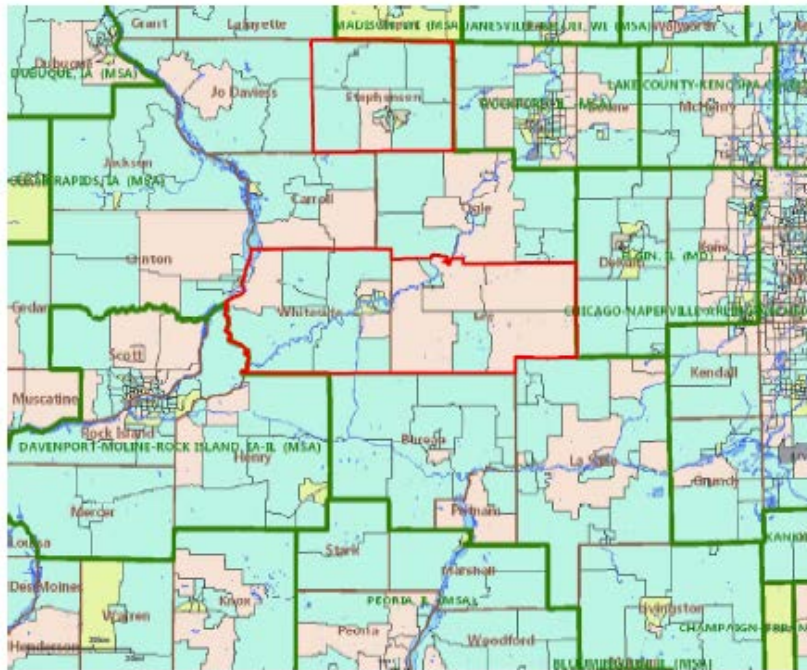
Assessment Area: Illinois State Non-Metro Southern



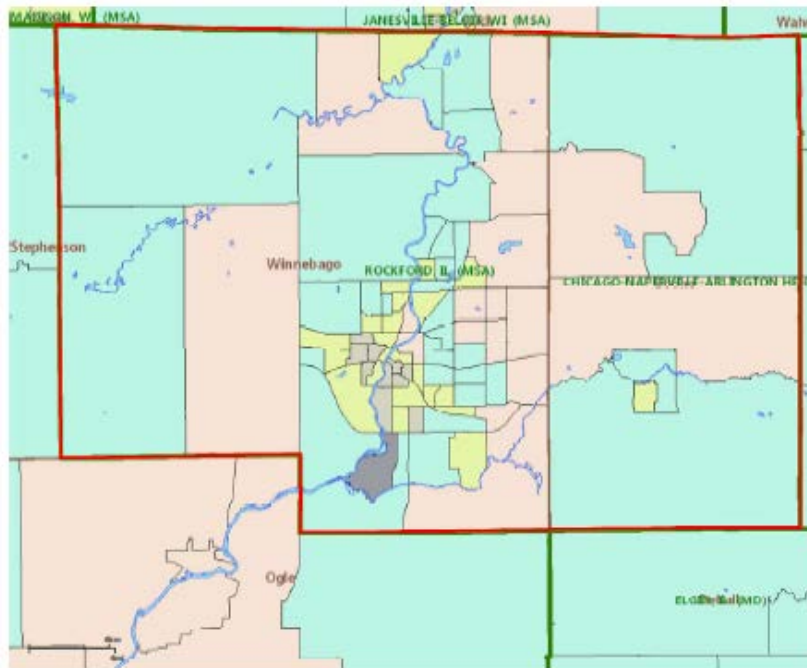
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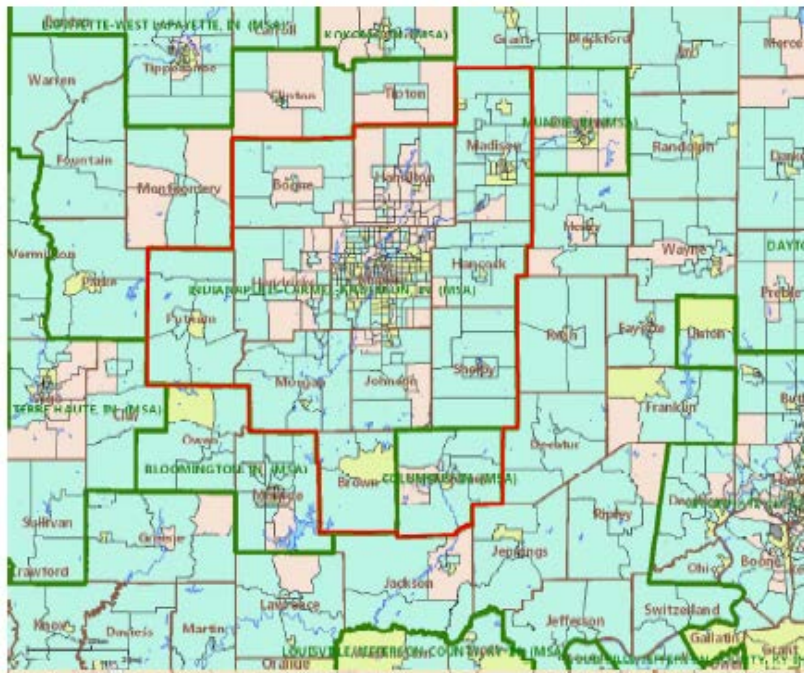
Assessment Area: Illinois State Non-Metro Northern



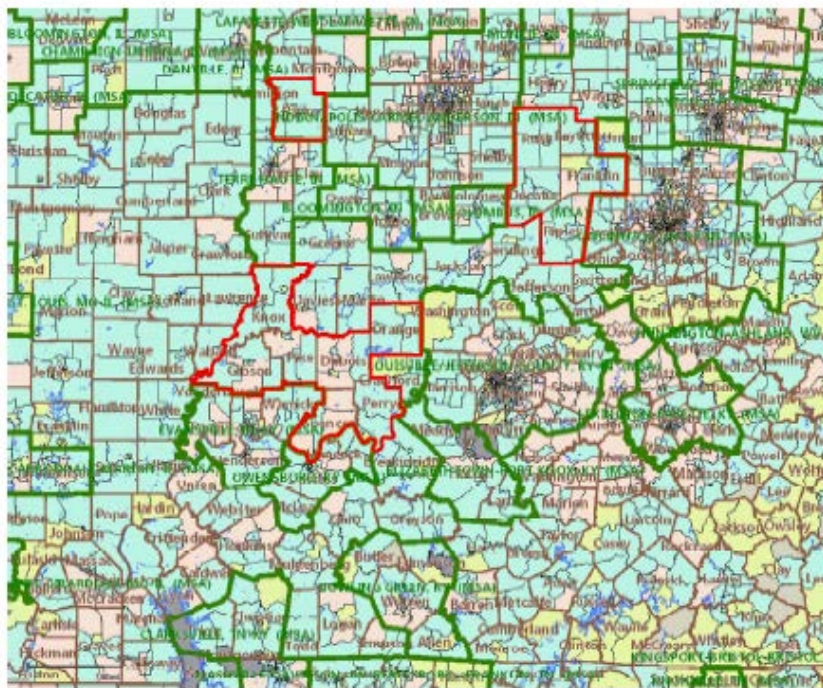
Assessment Area: Rockford IL MSA #40420



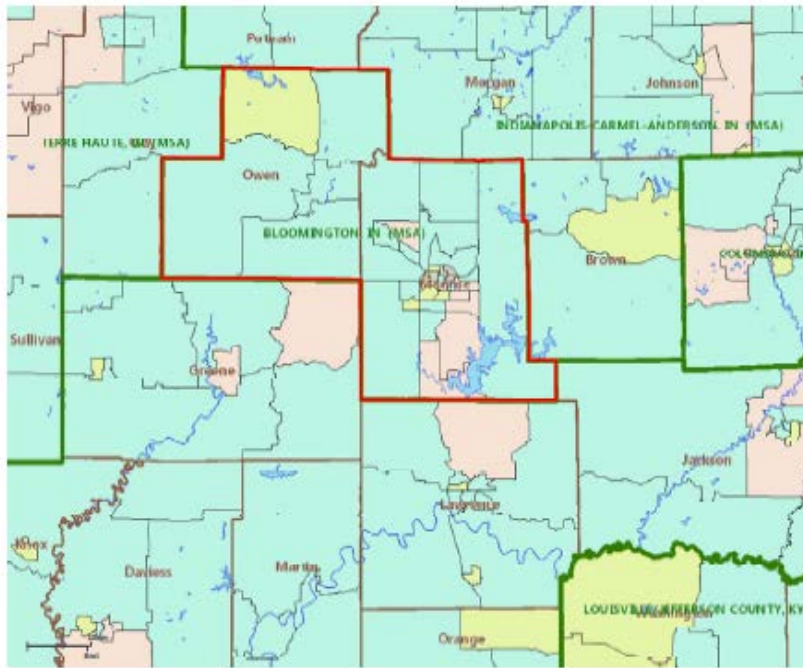
Assessment Area: Indianapolis-Carmel-Muncie IN CSA #294



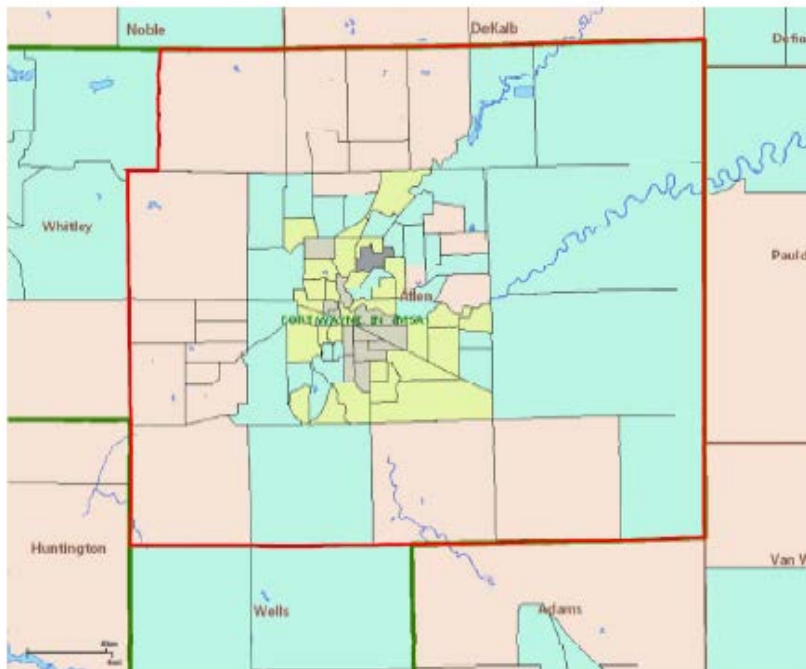
Assessment Area: Indiana State Non-Metro Southern



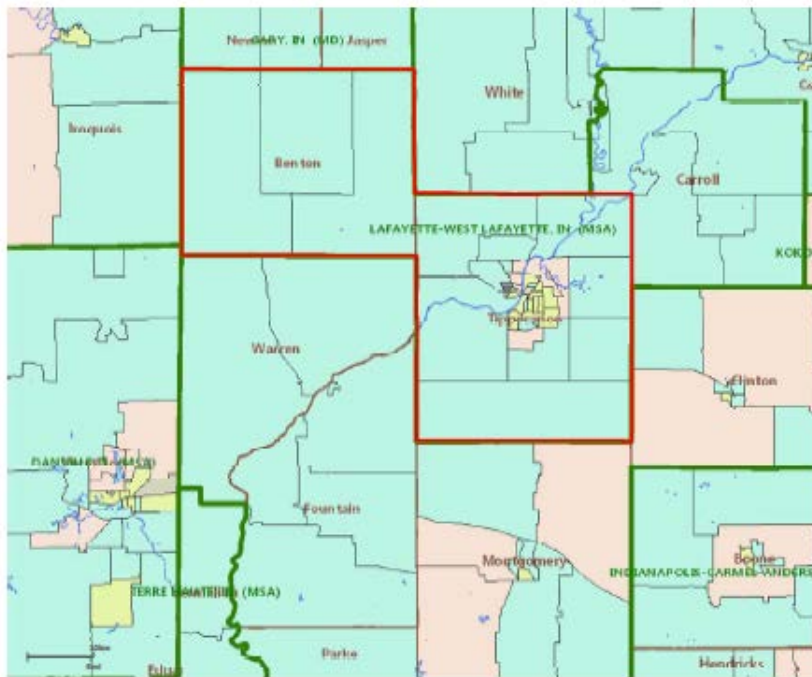
Assessment Area: Bloomington IN MSA #14020



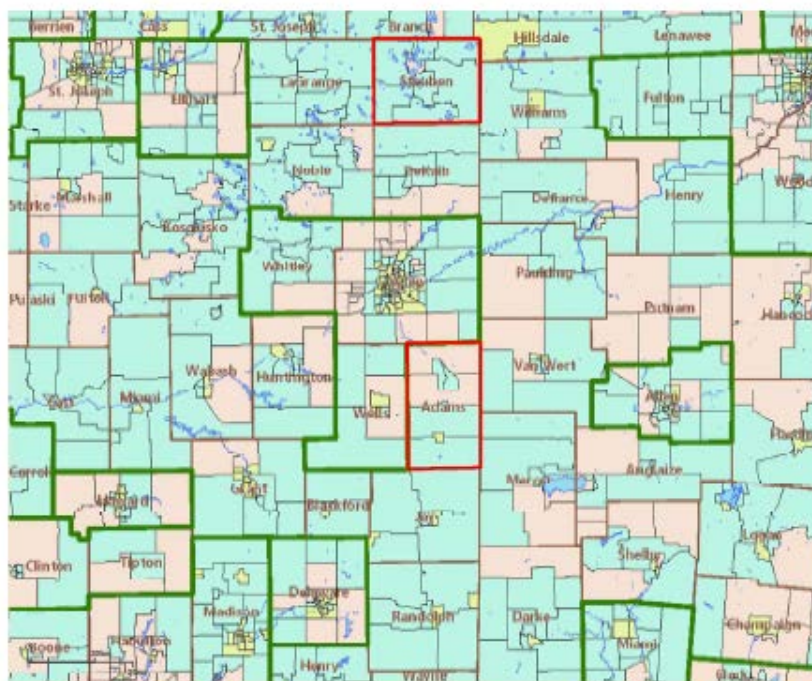
Assessment Area: Fort Wayne IN MSA #23060



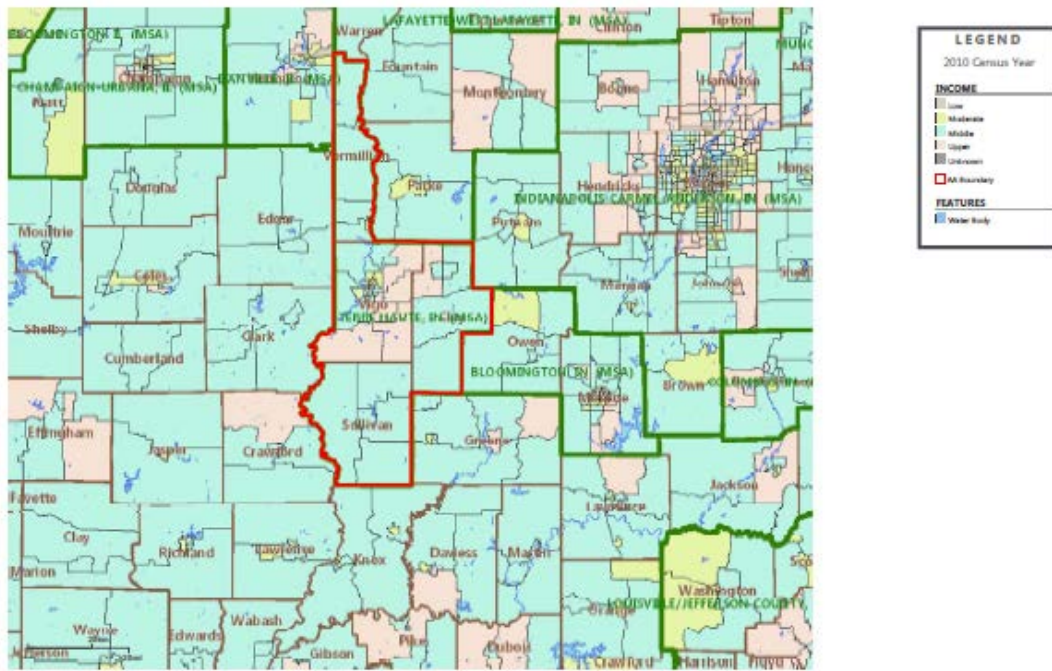
Assessment Area: Lafayette-W Lafayette IN MSA #29140



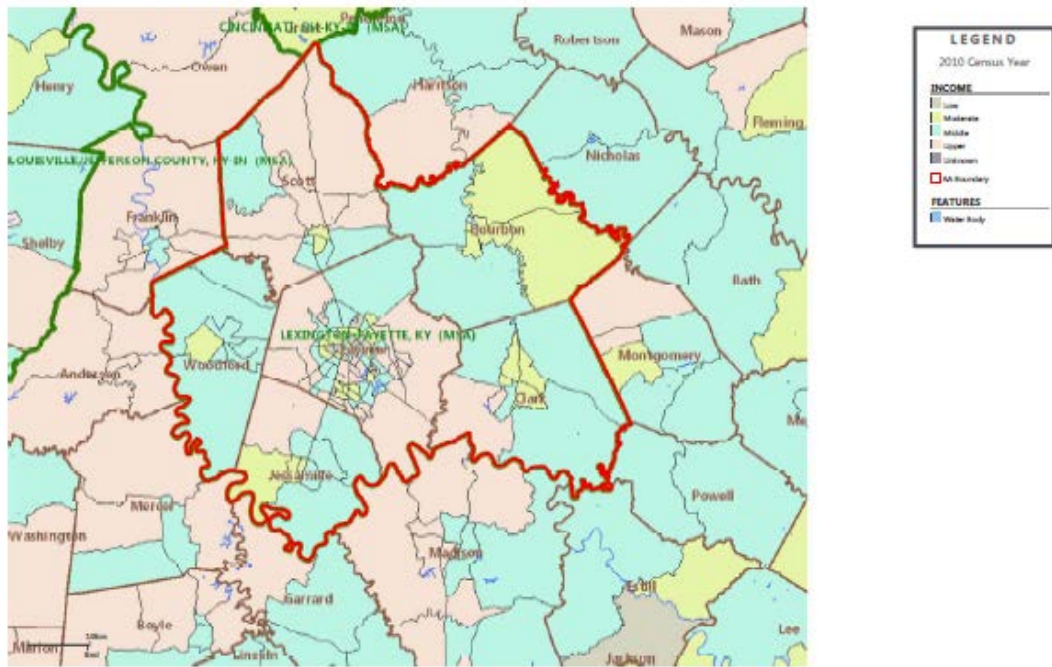
Assessment Area: Indiana State Non-Metro Northern



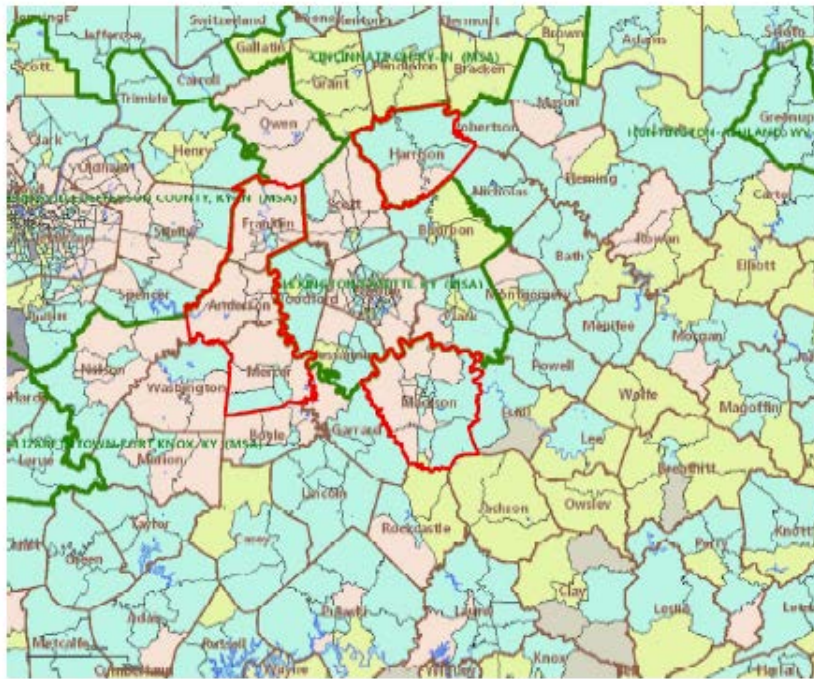
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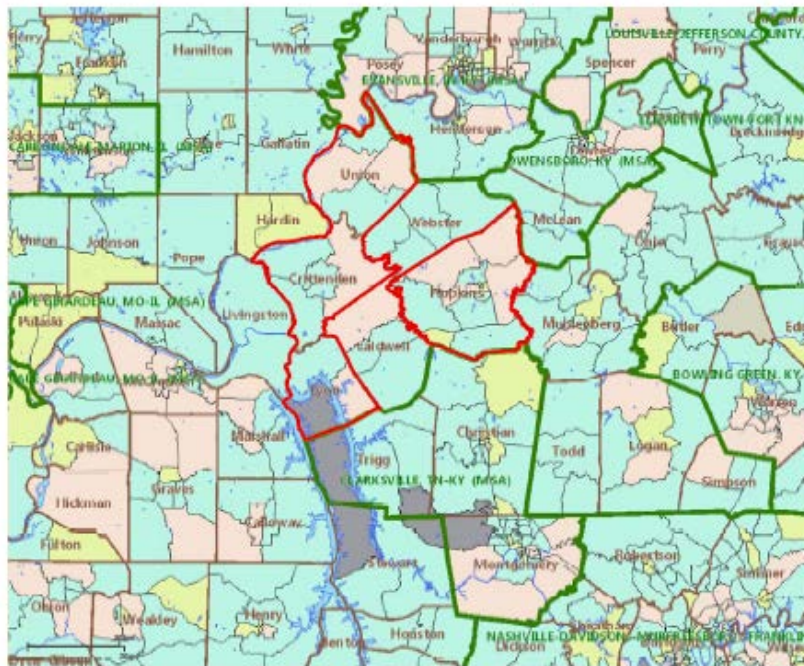
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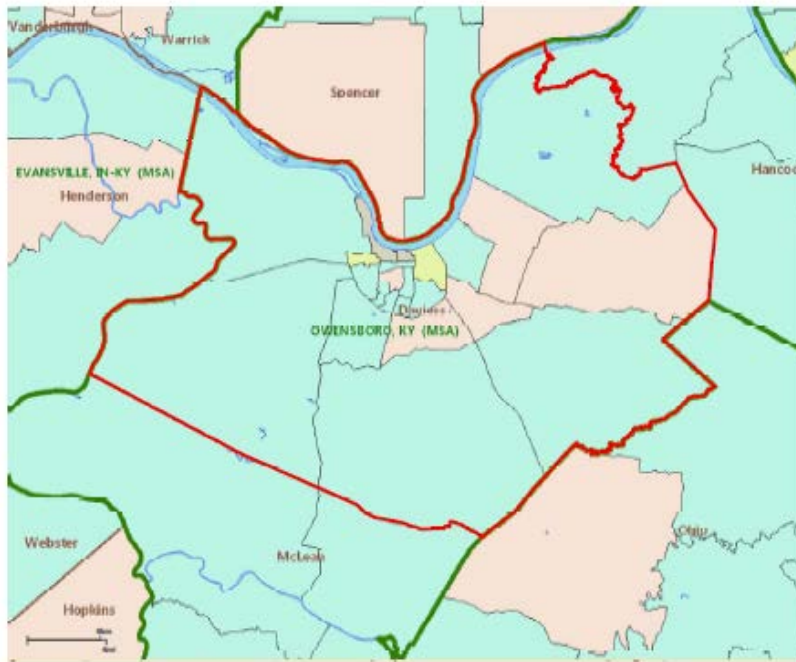
Assessment Area: Kentucky State Non-Metro Eastern



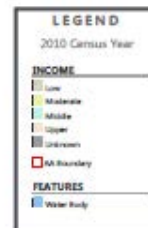
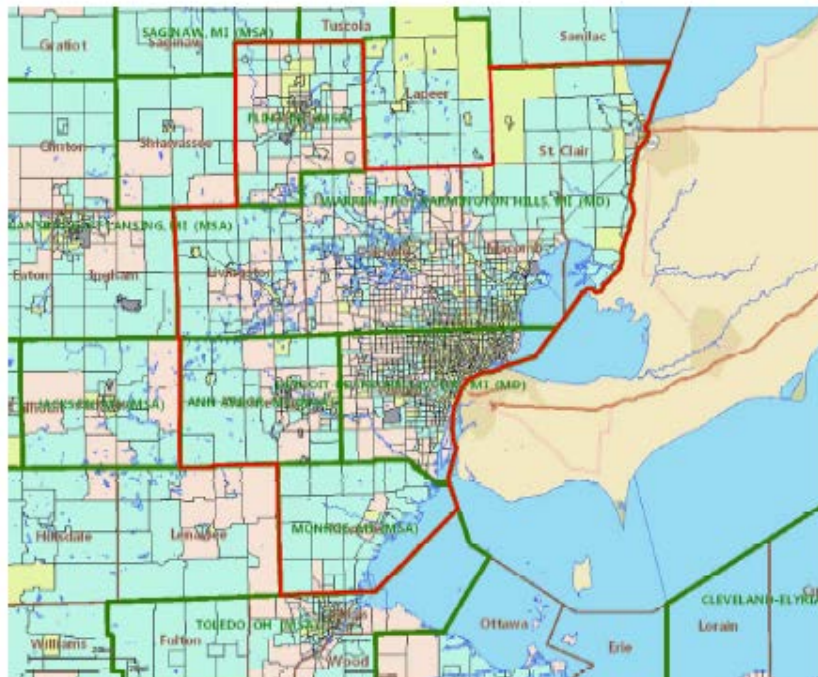
Assessment Area: Kentucky State Non-Metro Western



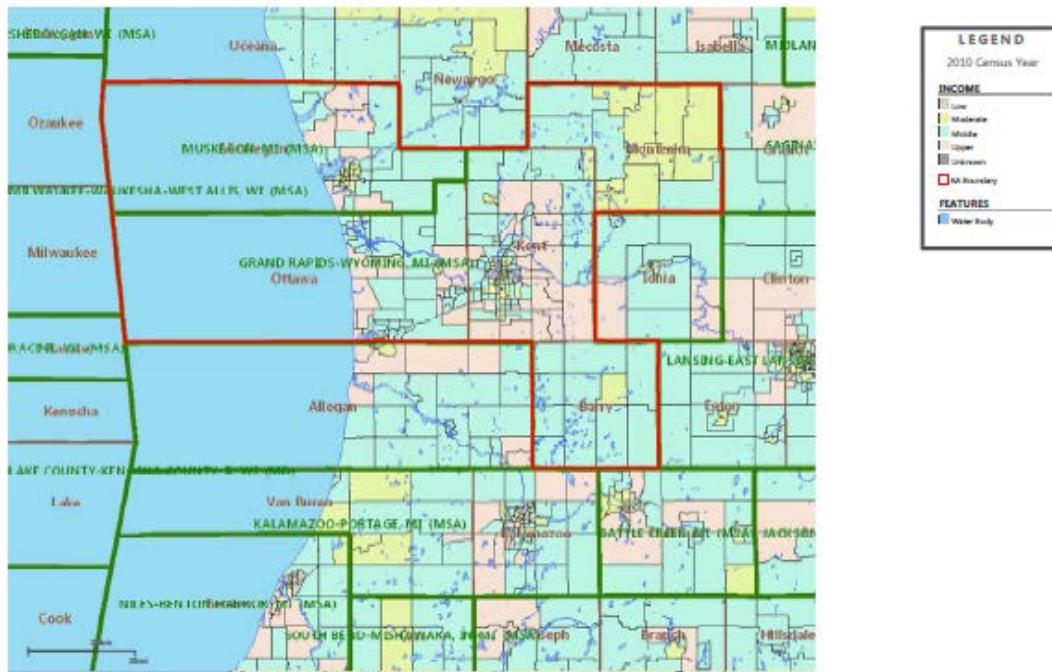
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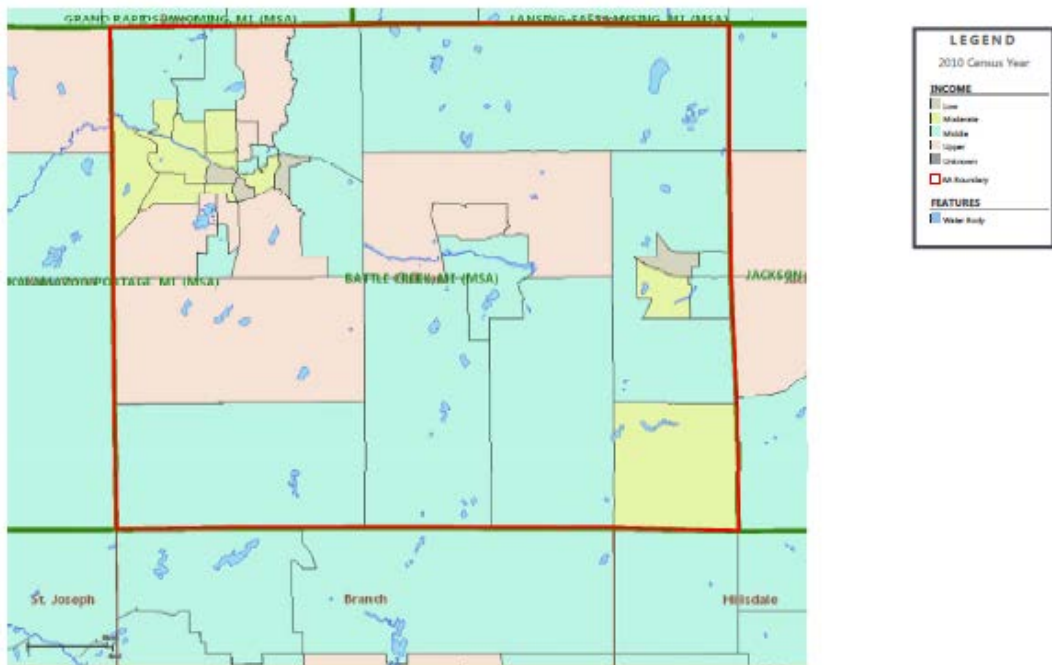
Assessment Area: Detroit-Warren-Ann Arbor MI CSA #220



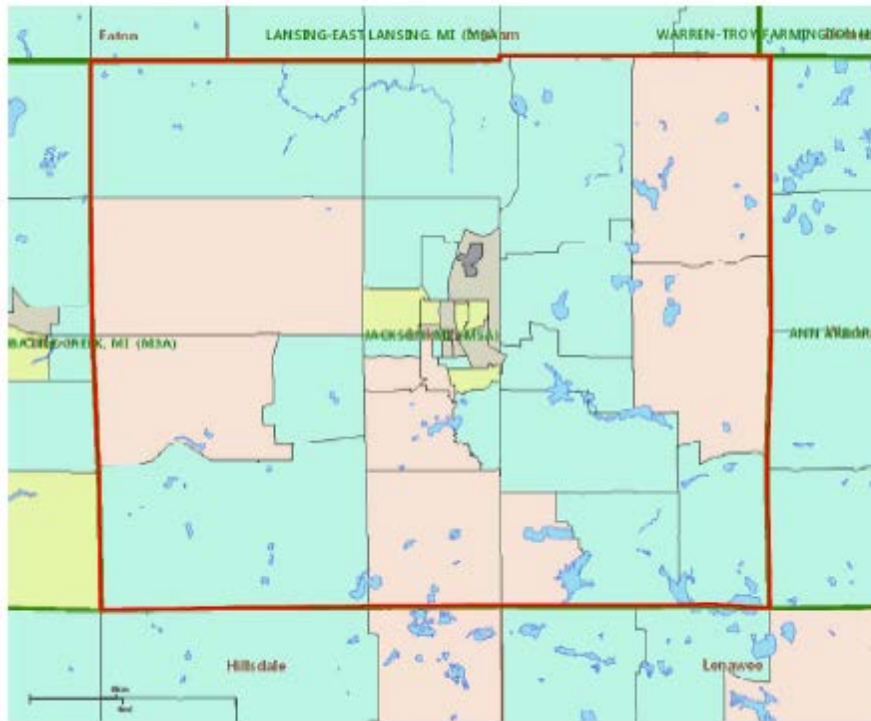
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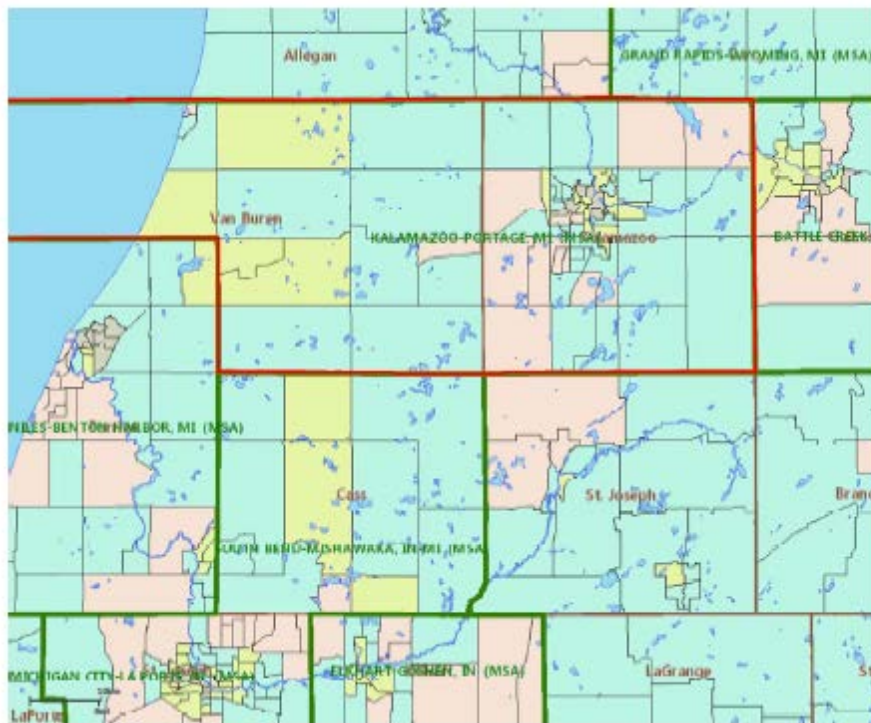
Assessment Area: Battle Creek MI MSA #12980



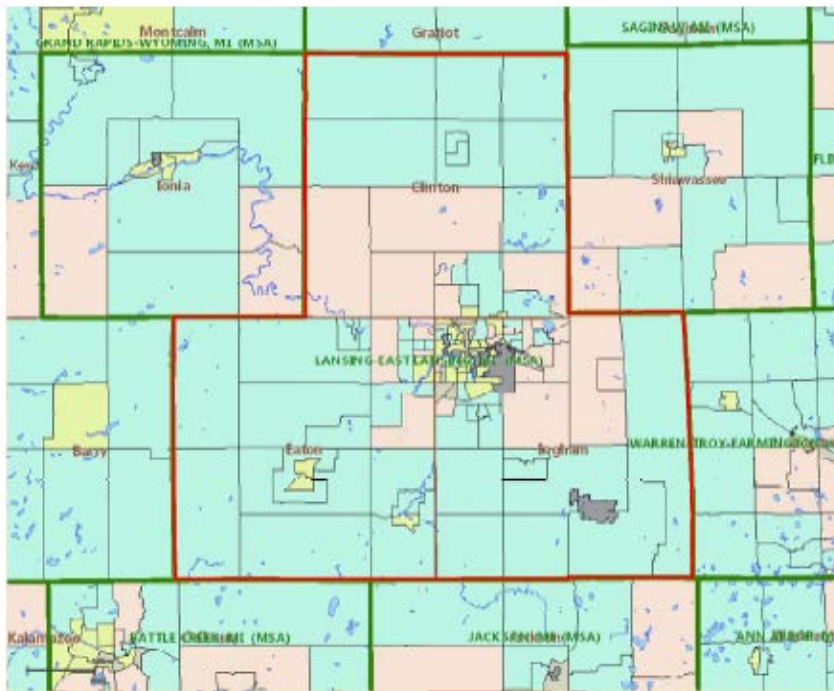
Assessment Area: Jackson MI MSA #27100



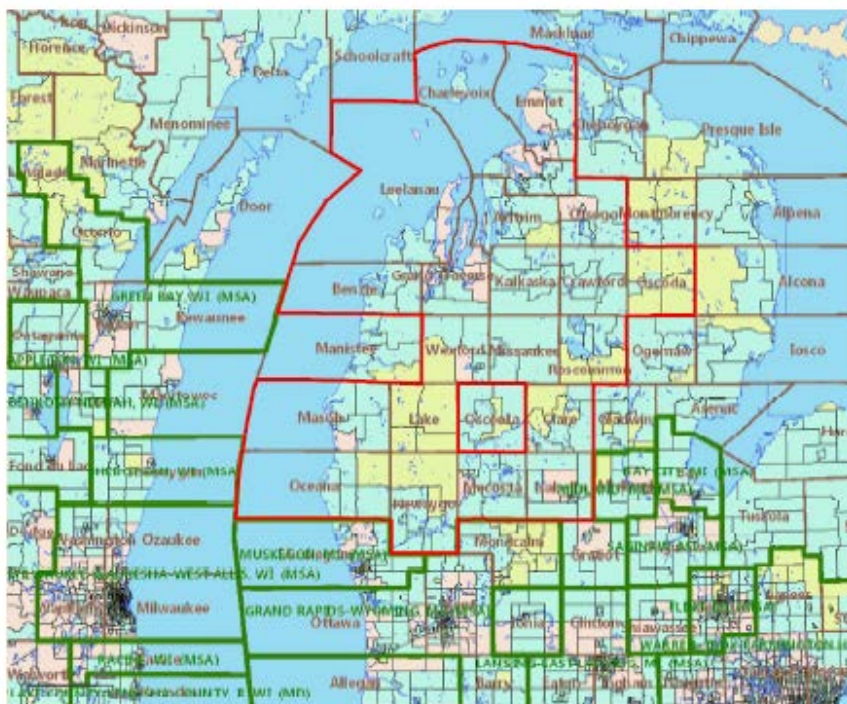
Assessment Area: Kalamazoo-Portage MI MSA #28020



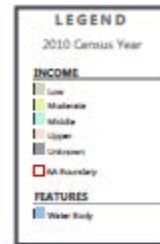
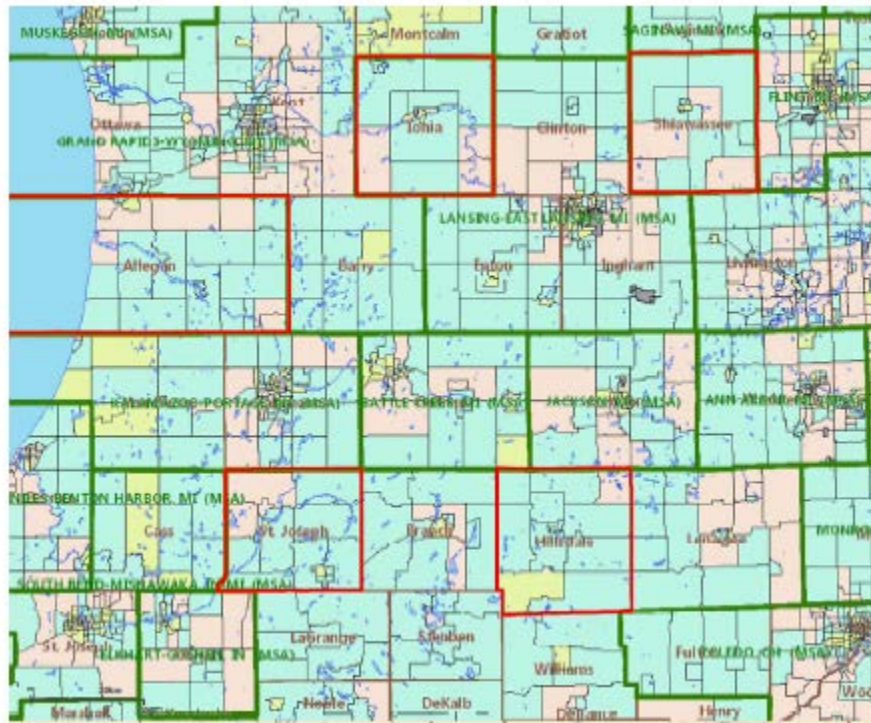
Assessment Area: Lansing-East Lansing MI MSA #29620



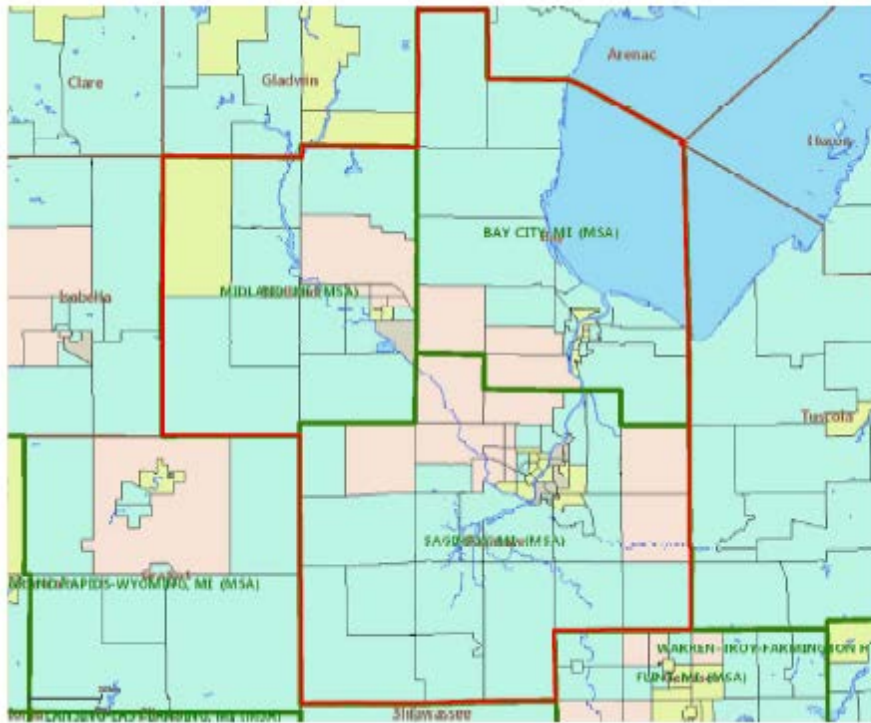
Assessment Area: Michigan State Non-Metro Northern



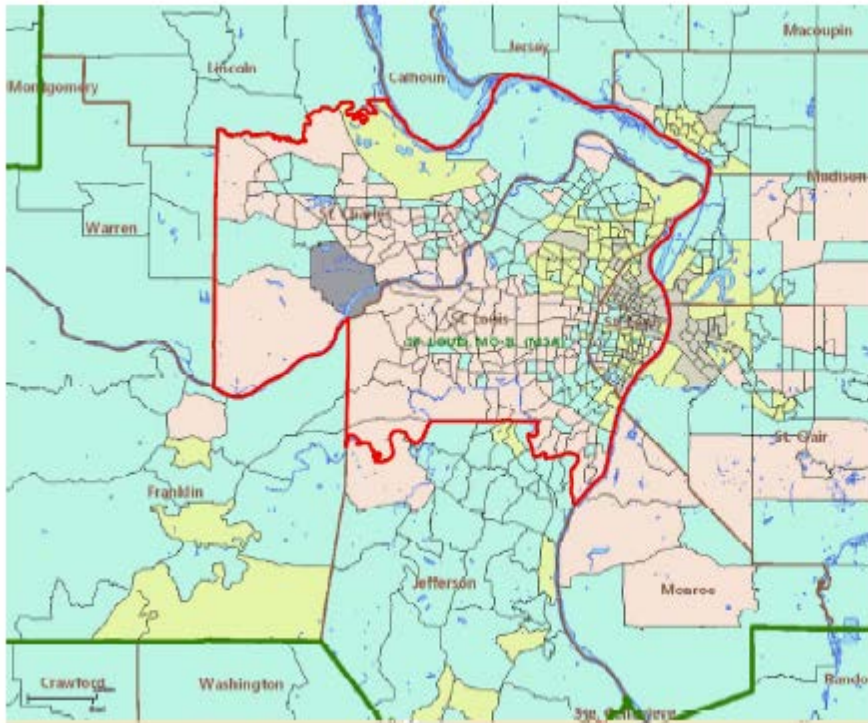
Assessment Area: Michigan State Non-Metro Southern



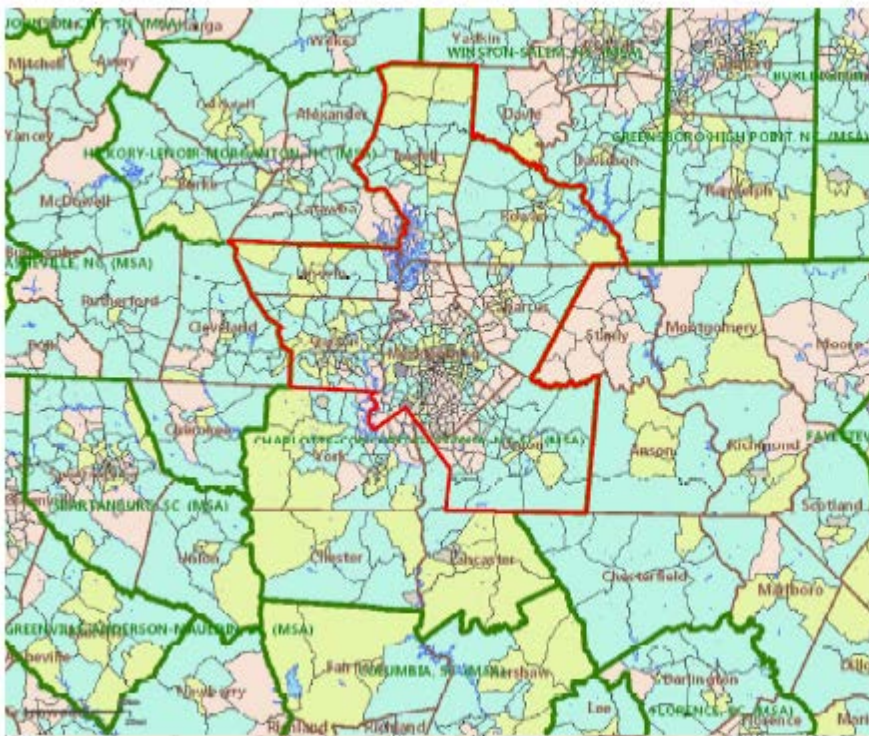
Assessment Area: Saginaw-Midland-Bay City MI CSA #474



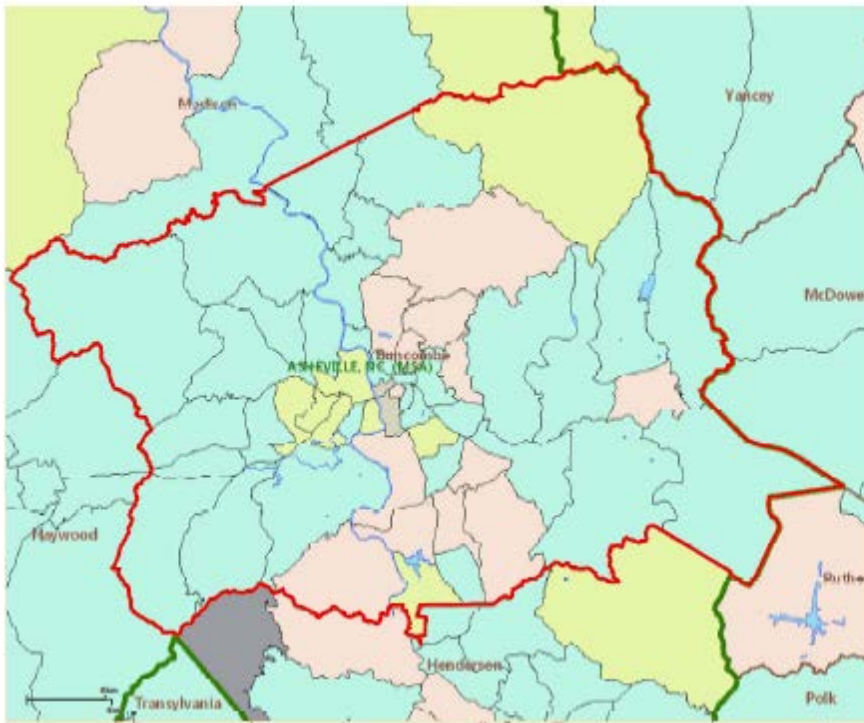
Assessment Area: St. Louis MO-IL MSA #41180



Assessment Area: Charlotte-Gastonia-Concord NC-SC MSA #16740



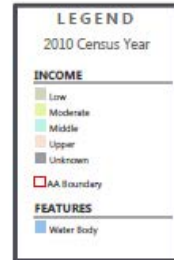
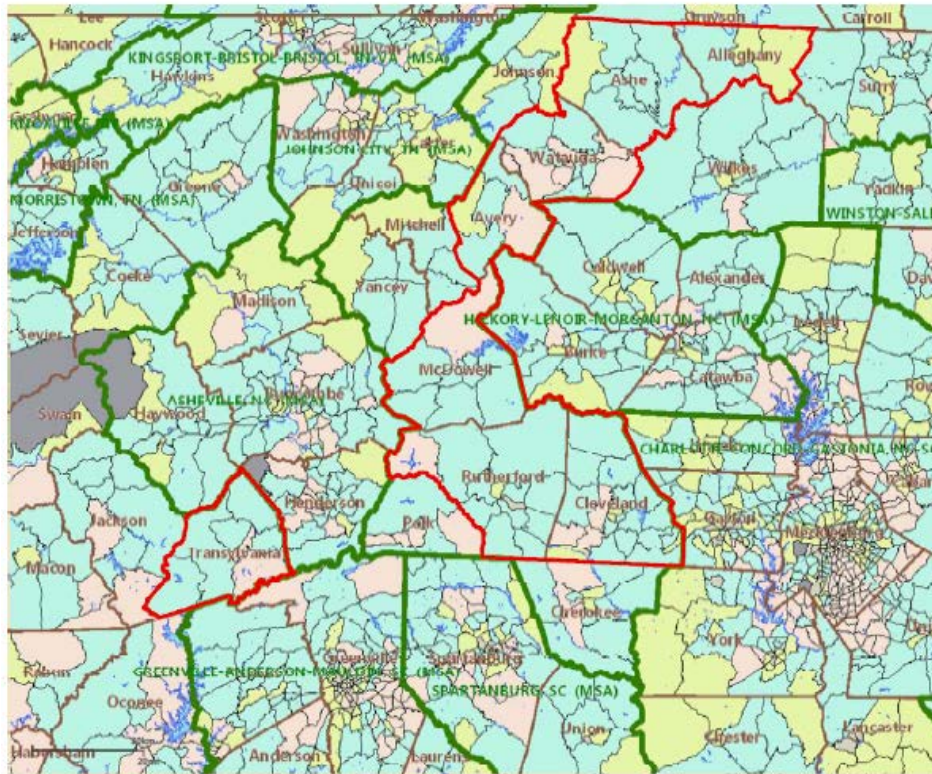
Assessment Area: Asheville NC MSA #11700



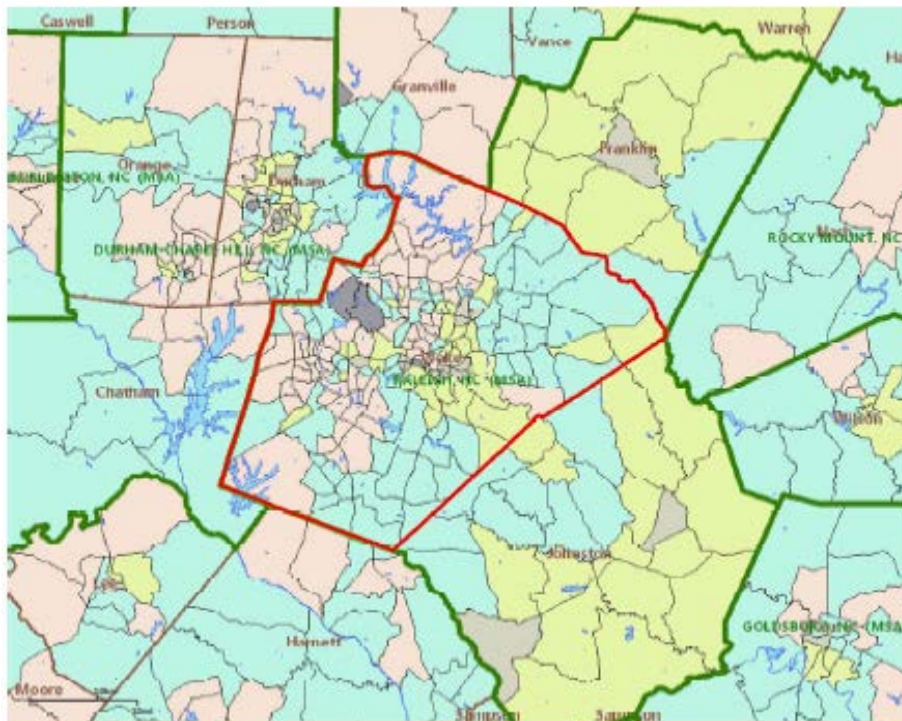
Assessment Area: Hickory-Lenoir-Morganton NC MSA #25860



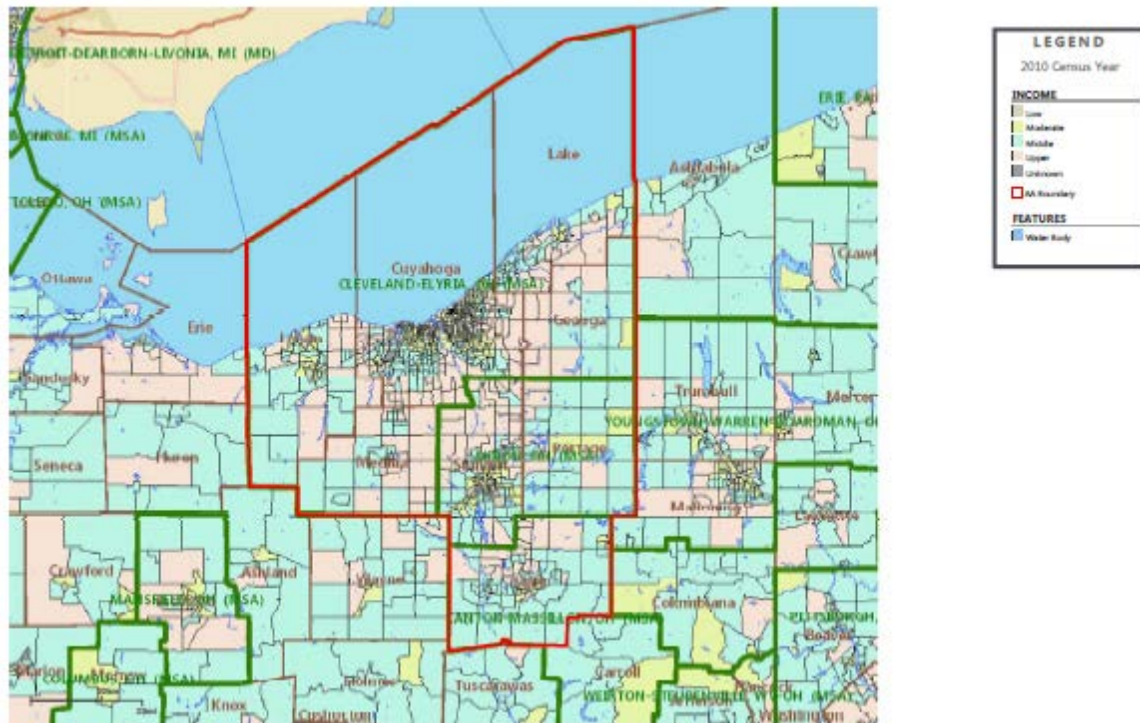
Assessment Area: Non-metropolitan Western North Carolina



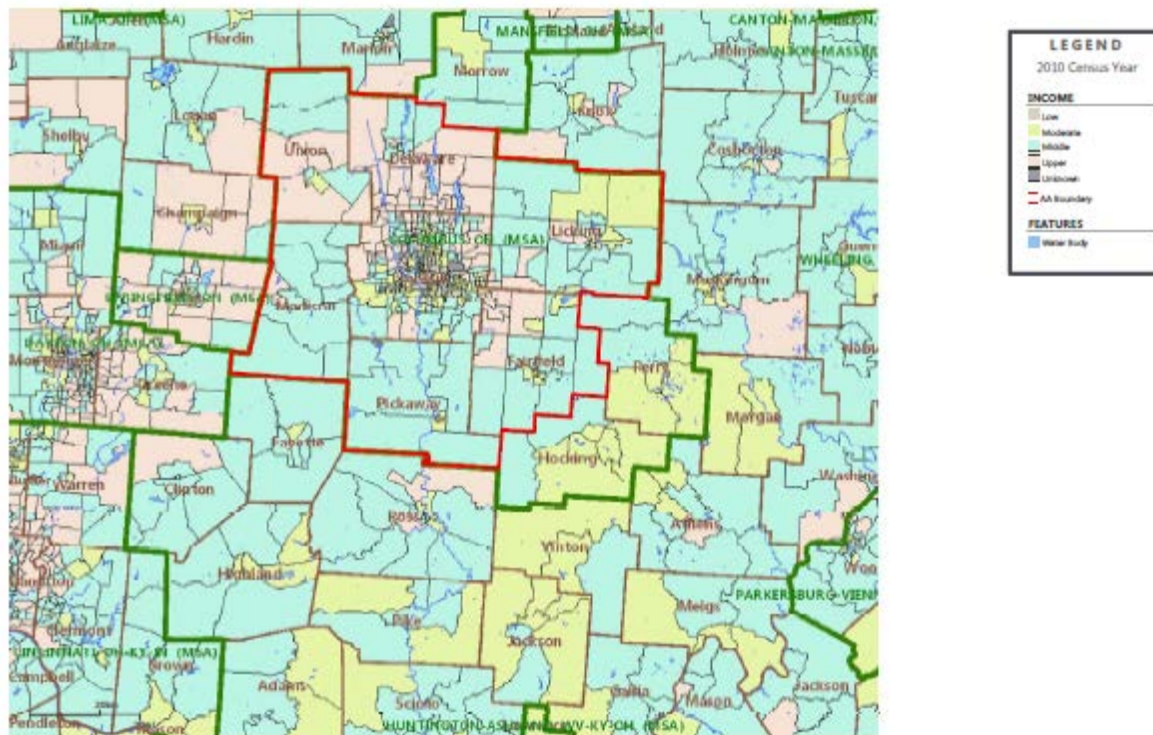
Assessment Area: Raleigh-Cary NC MSA #39580



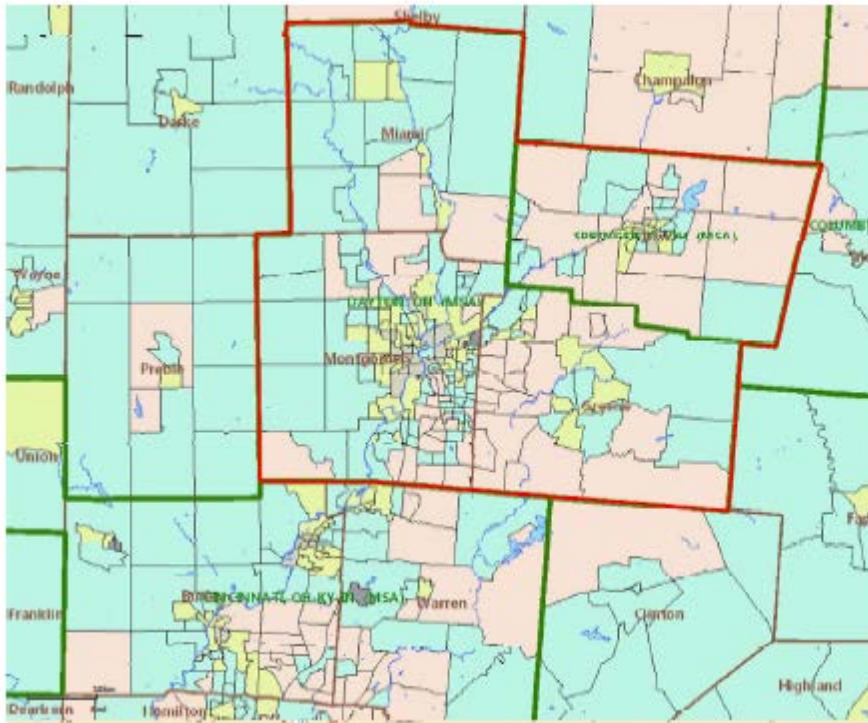
Assessment Area: Cleveland-Akron-Canton OH CSA #184



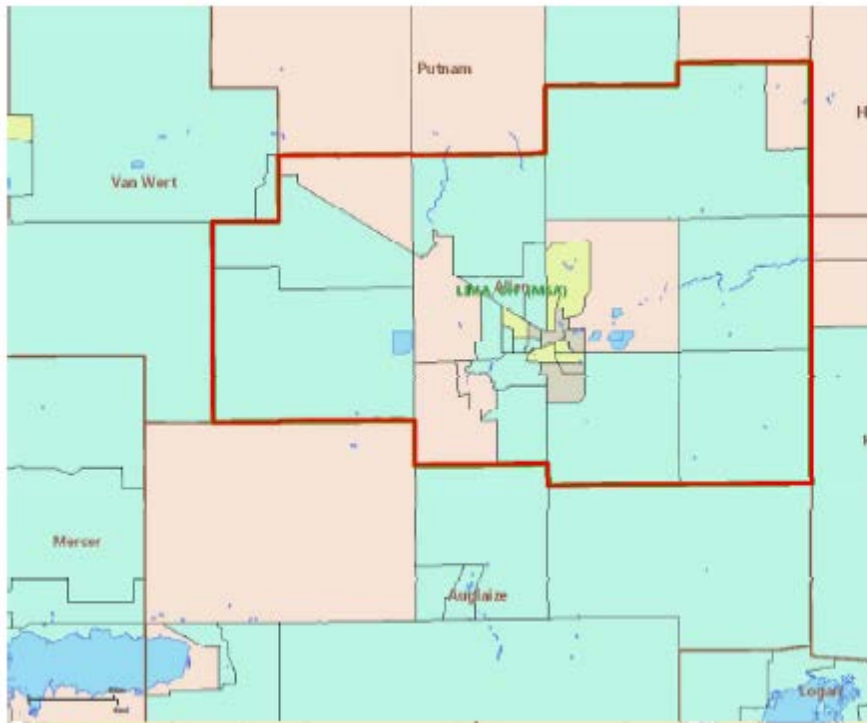
Assessment Area: Columbus OH MSA #18140



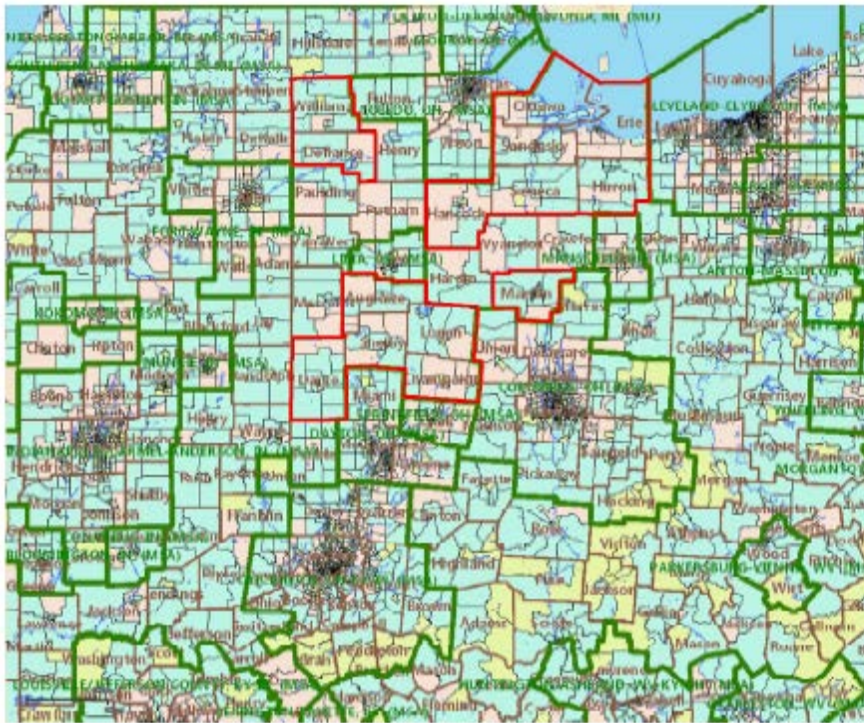
Assessment Area: Dayton-Springfield-Sidney OH CSA #212



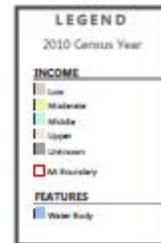
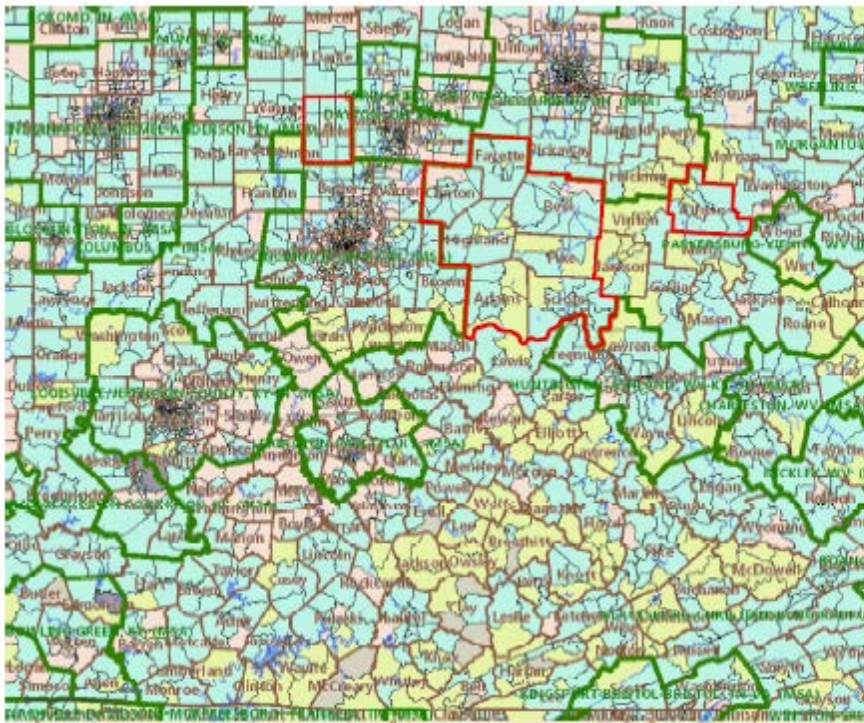
Assessment Area: Lima OH MSA #30620



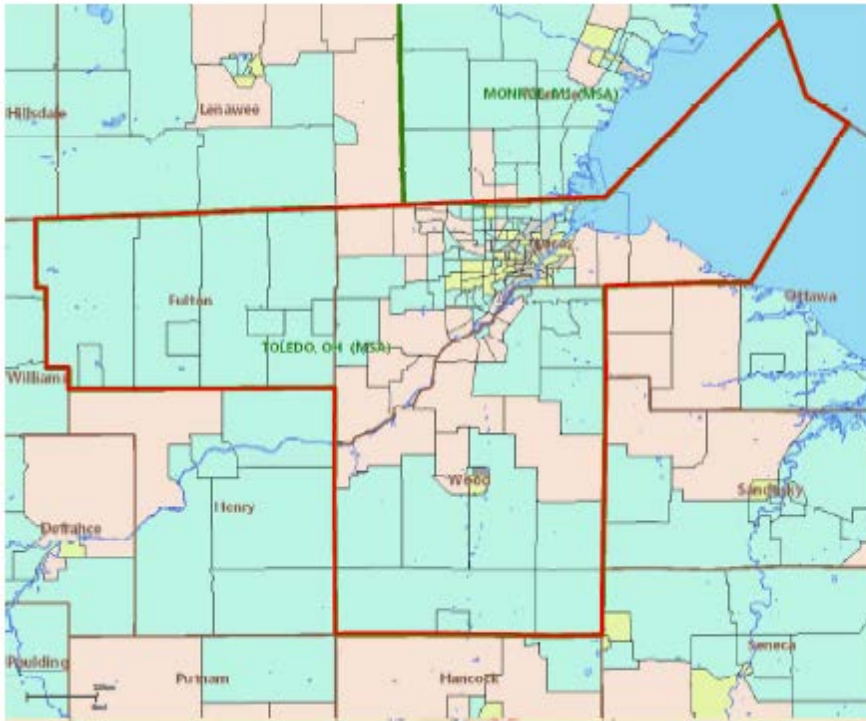
Assessment Area: Ohio State Non-Metro Northwest



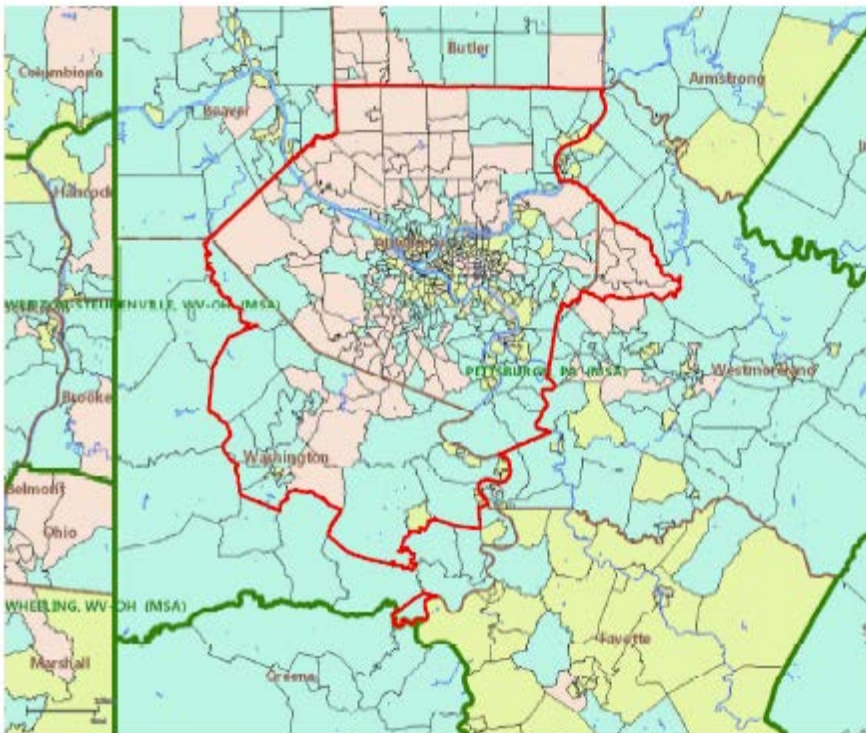
Assessment Area: Ohio State Non-Metro Southwest



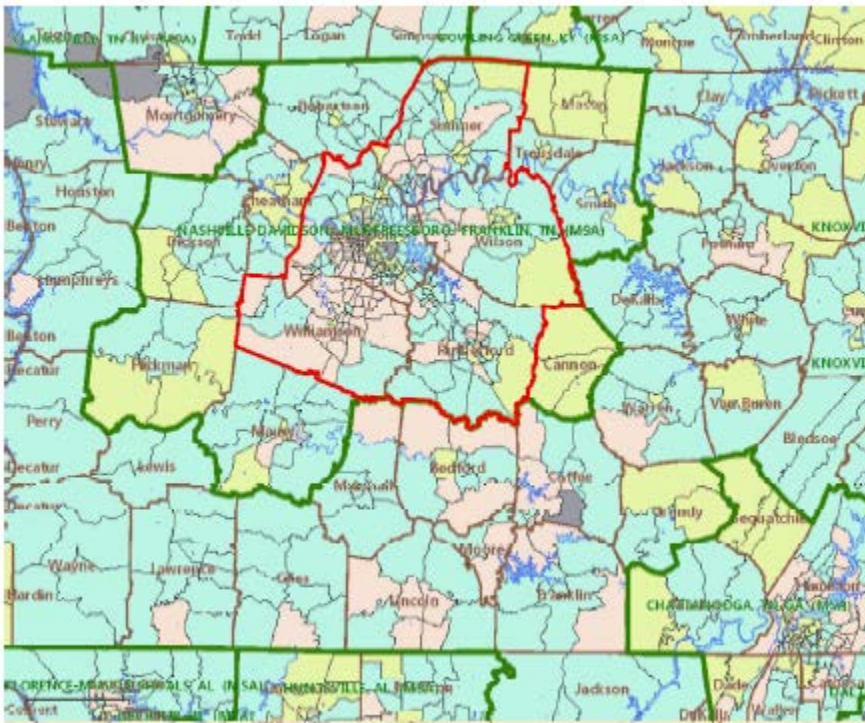
Assessment Area: Toledo OH MSA #45780



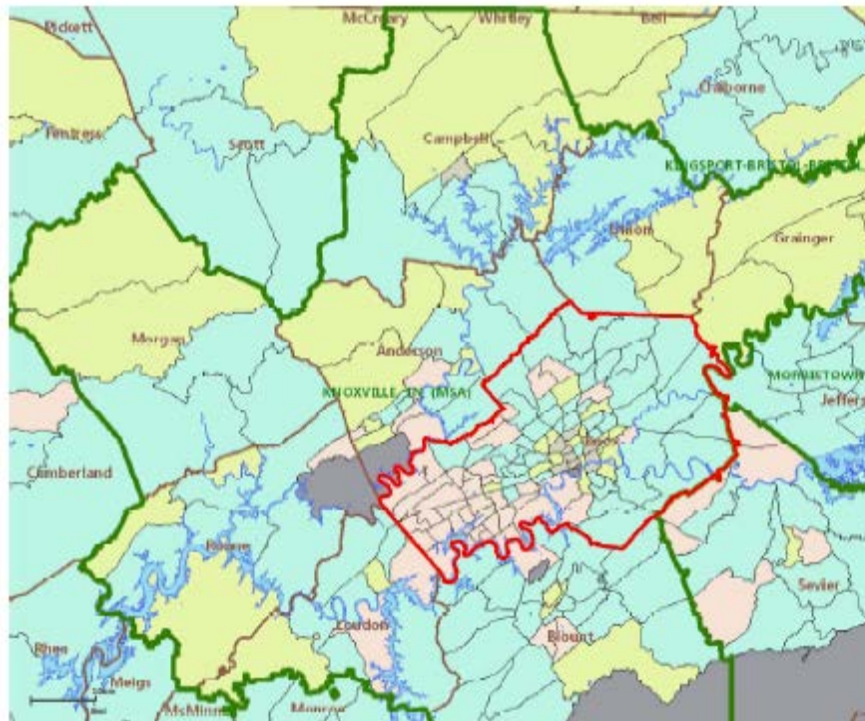
Assessment Area: Pittsburgh PA MSA #45780



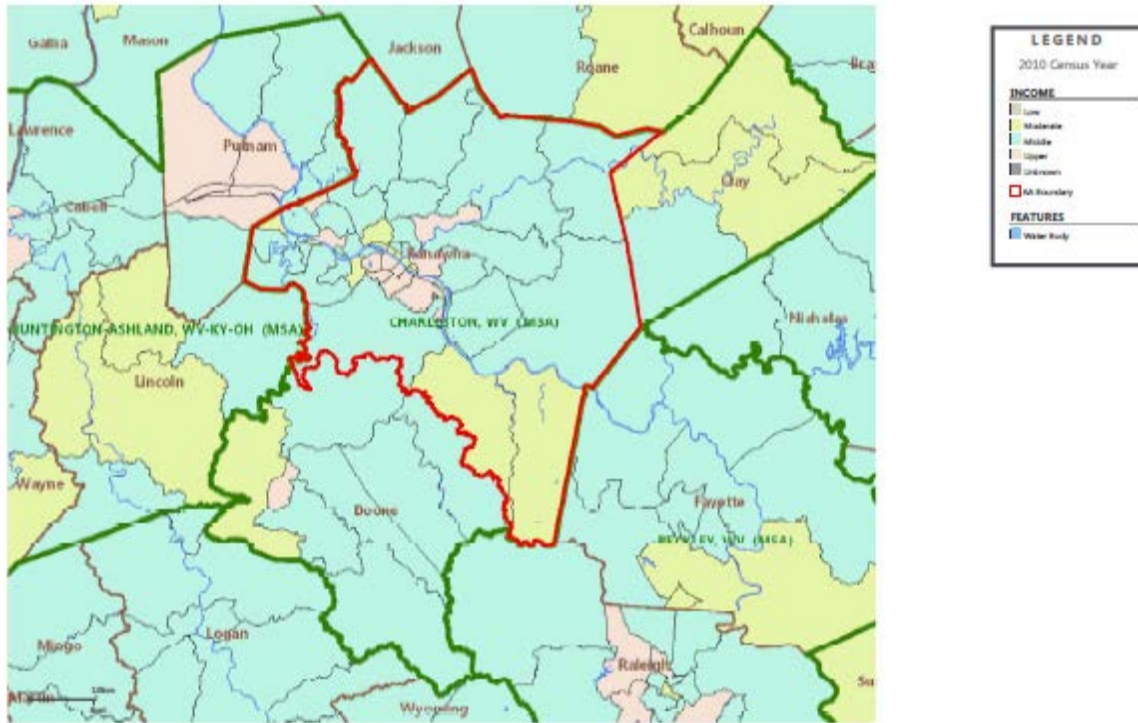
Assessment Area: Nashville TN MSA #34980



Assessment Area: Knoxville TN MSA #28940



Assessment Area: Charleston WV MSA #16620



APPENDIX E
FULL-SCOPE LENDING TABLES

Geographic Distribution of HMDA Loans

Assessment Area: Multi Chicago

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	210	3.6%	\$44,895	3.2%	3.8%	51	2.4%	2.2%	\$10,990	2.1%	1.7%	120	4.6%	2.3%	\$23,243	4.0%	1.9%
	Moderate	1,046	17.9%	\$161,217	11.4%	17.4%	230	11.0%	13.3%	\$35,180	6.6%	8.9%	557	21.5%	13.2%	\$83,043	14.1%	9.1%
	Middle	2,086	35.7%	\$374,364	26.4%	39.5%	788	37.6%	38.7%	\$146,484	27.6%	29.9%	912	35.2%	39.3%	\$153,952	26.2%	30.8%
	Upper	2,493	42.7%	\$839,283	59.1%	39.4%	1,029	49.0%	45.8%	\$337,334	63.6%	59.5%	1,000	38.6%	45.2%	\$327,646	55.7%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>5,835</i>	<i>100.0%</i>	<i>\$1,419,759</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$529,988</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,589</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$587,884</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	181	3.1%	\$32,942	2.3%	3.8%	29	1.6%	2.5%	\$4,098	1.0%	1.8%	86	3.2%	2.0%	\$16,681	2.6%	1.5%
	Moderate	917	15.5%	\$125,143	8.6%	17.4%	205	11.3%	12.3%	\$25,564	6.0%	7.8%	507	18.6%	10.4%	\$72,287	11.2%	6.7%
	Middle	2,031	34.3%	\$335,270	23.1%	39.5%	674	37.1%	36.4%	\$104,828	24.5%	28.2%	905	33.2%	34.9%	\$153,370	23.8%	26.6%
	Upper	2,790	47.1%	\$957,810	66.0%	39.4%	907	50.0%	48.8%	\$292,632	68.5%	62.1%	1,225	45.0%	52.7%	\$402,673	62.4%	65.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>5,919</i>	<i>100.0%</i>	<i>\$1,451,165</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,815</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$427,122</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,723</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$645,011</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	18	5.1%	\$1,809	5.5%	3.8%	4	3.6%	3.6%	\$193	2.5%	2.0%	13	7.6%	3.3%	\$1,606	8.7%	1.8%
	Moderate	62	17.4%	\$5,235	15.9%	17.4%	18	16.2%	15.7%	\$1,056	13.6%	8.7%	30	17.6%	14.4%	\$3,408	18.5%	7.3%
	Middle	166	46.6%	\$11,884	36.1%	39.5%	61	55.0%	41.4%	\$3,929	50.4%	29.1%	67	39.4%	38.7%	\$5,562	30.1%	25.1%
	Upper	110	30.9%	\$14,000	42.5%	39.4%	28	25.2%	39.4%	\$2,615	33.6%	60.2%	60	35.3%	43.6%	\$7,890	42.7%	65.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>356</i>	<i>100.0%</i>	<i>\$32,928</i>	<i>100.0%</i>	<i>100.0%</i>	<i>111</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,793</i>	<i>100.0%</i>	<i>100.0%</i>	<i>170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,466</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	11	44.0%	\$2,545	49.3%	12.6%	0	0.0%	14.1%	\$0	0.0%	12.1%	10	50.0%	13.9%	\$1,930	52.8%	10.5%
	Moderate	13	52.0%	\$2,477	47.9%	22.7%	0	0.0%	29.8%	\$0	0.0%	19.5%	9	45.0%	30.6%	\$1,581	43.2%	16.8%
	Middle	1	4.0%	\$145	2.8%	33.4%	0	0.0%	34.1%	\$0	0.0%	29.3%	1	5.0%	33.1%	\$145	4.0%	24.5%
	Upper	0	0.0%	\$0	0.0%	31.3%	0	0.0%	22.0%	\$0	0.0%	39.0%	0	0.0%	22.4%	\$0	0.0%	48.1%
	<i>Unknown</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$5,167</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,656</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	420	3.5%	\$82,191	2.8%	3.8%	84	2.1%	2.5%	\$15,281	1.6%	2.5%	229	4.2%	2.3%	\$43,460	3.5%	2.3%
	Moderate	2,038	16.8%	\$294,072	10.1%	17.4%	453	11.3%	13.1%	\$61,800	6.4%	9.2%	1,103	20.0%	12.1%	\$160,319	12.8%	8.4%
	Middle	4,284	35.3%	\$721,663	24.8%	39.5%	1,523	37.8%	37.9%	\$255,241	26.5%	29.2%	1,885	34.3%	37.2%	\$313,029	24.9%	28.4%
	Upper	5,393	44.4%	\$1,811,093	62.3%	39.4%	1,964	48.8%	46.5%	\$632,581	65.6%	59.2%	2,285	41.5%	48.5%	\$738,209	58.8%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>#####</i>	<i>100.0%</i>	<i>\$2,909,019</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4,024</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$964,903</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5,502</i>	<i>100.0%</i>	<i>100.0%</i>	<i>#####</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: Multi Chicago

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	1,150	19.7%	\$121,601	8.6%	22.1%	200	9.5%	7.8%	\$19,589	3.7%	3.3%	723	27.9%	7.6%	\$78,591	13.4%	3.4%
	Moderate	1,133	19.4%	\$163,076	11.5%	16.9%	445	21.2%	19.0%	\$62,375	11.8%	11.5%	505	19.5%	18.9%	\$74,824	12.7%	12.0%
	Middle	972	16.7%	\$180,197	12.7%	19.8%	389	18.5%	19.4%	\$71,240	13.4%	16.1%	386	14.9%	19.7%	\$72,945	12.4%	16.8%
	Upper	2,331	39.9%	\$895,900	63.1%	41.2%	941	44.9%	35.2%	\$348,461	65.7%	52.3%	883	34.1%	34.6%	\$339,312	57.7%	50.5%
	Unknown	249	4.3%	\$58,985	4.2%	0.0%	123	5.9%	18.6%	\$28,323	5.3%	16.8%	92	3.6%	19.2%	\$22,212	3.8%	17.3%
	<i>Total</i>	<i>5,835</i>	<i>100.0%</i>	<i>\$1,419,759</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$529,988</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,589</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$587,884</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	790	13.3%	\$80,358	5.5%	22.1%	182	10.0%	7.1%	\$17,247	4.0%	3.3%	388	14.2%	4.6%	\$39,996	6.2%	2.0%
	Moderate	965	16.3%	\$120,799	8.3%	16.9%	277	15.3%	13.1%	\$34,554	8.1%	7.6%	495	18.2%	11.3%	\$63,785	9.9%	6.3%
	Middle	1,169	19.7%	\$182,726	12.6%	19.8%	403	22.2%	18.8%	\$61,345	14.4%	14.0%	545	20.0%	17.9%	\$87,655	13.6%	13.2%
	Upper	2,682	45.3%	\$994,659	68.5%	41.2%	818	45.1%	43.5%	\$284,197	66.5%	57.8%	1,171	43.0%	44.5%	\$421,547	65.4%	58.3%
	Unknown	313	5.3%	\$72,623	5.0%	0.0%	135	7.4%	17.4%	\$29,779	7.0%	17.2%	124	4.6%	21.8%	\$32,028	5.0%	20.1%
	<i>Total</i>	<i>5,919</i>	<i>100.0%</i>	<i>\$1,451,165</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,815</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$427,122</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,723</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$645,011</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	64	18.0%	\$4,207	12.8%	22.1%	18	16.2%	7.7%	\$522	6.7%	2.6%	32	18.8%	7.6%	\$3,000	16.2%	2.3%
	Moderate	95	26.7%	\$6,426	19.5%	16.9%	31	27.9%	15.1%	\$1,857	23.8%	7.5%	47	27.6%	15.6%	\$3,779	20.5%	7.2%
	Middle	78	21.9%	\$6,135	18.6%	19.8%	26	23.4%	19.9%	\$1,699	21.8%	13.1%	36	21.2%	22.9%	\$3,514	19.0%	14.1%
	Upper	117	32.9%	\$15,755	47.8%	41.2%	35	31.5%	38.8%	\$3,450	44.3%	60.3%	54	31.8%	46.4%	\$8,033	43.5%	66.7%
	Unknown	2	0.6%	\$405	1.2%	0.0%	1	0.9%	18.5%	\$265	3.4%	16.5%	1	0.6%	7.5%	\$140	0.8%	9.7%
	<i>Total</i>	<i>356</i>	<i>100.0%</i>	<i>\$32,928</i>	<i>100.0%</i>	<i>100.0%</i>	<i>111</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,793</i>	<i>100.0%</i>	<i>100.0%</i>	<i>170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,466</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	25	100.0%	\$5,167	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	20	100.0%	100.0%	\$3,656	100.0%	100.0%
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$5,167</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,656</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	2,004	16.5%	\$206,166	7.1%	22.1%	400	9.9%	7.4%	\$37,358	3.9%	3.1%	1,143	20.8%	6.1%	\$121,587	9.7%	2.5%
	Moderate	2,193	18.1%	\$290,301	10.0%	16.9%	753	18.7%	16.4%	\$98,786	10.2%	9.2%	1,047	19.0%	15.1%	\$142,388	11.3%	8.6%
	Middle	2,219	18.3%	\$369,058	12.7%	19.8%	818	20.3%	19.0%	\$134,284	13.9%	14.2%	967	17.6%	18.8%	\$164,114	13.1%	14.0%
	Upper	5,130	42.3%	\$1,906,314	65.5%	41.2%	1,794	44.6%	38.3%	\$636,108	65.9%	51.0%	2,108	38.3%	39.3%	\$768,892	61.3%	51.1%
	Unknown	589	4.9%	\$137,180	4.7%	0.0%	259	6.4%	18.9%	\$58,367	6.0%	22.5%	237	4.3%	20.6%	\$58,036	4.6%	23.8%
	<i>Total</i>	<i>#####</i>	<i>100.0%</i>	<i>\$2,909,019</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4,024</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$964,903</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5,502</i>	<i>100.0%</i>	<i>100.0%</i>	<i>#####</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Multi Chicago

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	150	3.0%	\$23,719	4.2%	4.3%	57	3.0%	3.3%	\$10,808	4.7%	3.7%	61	3.0%	3.5%	\$10,264	4.6%	3.5%
	Moderate	767	15.3%	\$87,389	15.4%	14.9%	280	15.0%	14.2%	\$33,312	14.4%	15.7%	319	15.6%	15.0%	\$38,459	17.1%	15.5%
	Middle	1,891	37.8%	\$197,206	34.8%	35.1%	690	36.9%	34.9%	\$81,285	35.2%	35.2%	789	38.7%	35.0%	\$75,141	33.3%	35.0%
	Upper	2,189	43.8%	\$257,896	45.5%	45.6%	843	45.0%	46.5%	\$105,179	45.5%	44.9%	868	42.6%	45.6%	\$101,238	44.9%	45.6%
	Unknown	4	0.1%	\$860	0.2%	0.1%	2	0.1%	0.1%	\$430	0.2%	0.1%	2	0.1%	0.1%	\$430	0.2%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Total	5,001	100.0%	\$567,070	100.0%	100.0%	1,872	100.0%	100.0%	\$231,014	100.0%	100.0%	2,039	100.0%	100.0%	\$225,532	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.2%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.1%
	Moderate	1	2.6%	\$13	0.4%	5.4%	0	0.0%	3.8%	\$0	0.0%	3.5%	1	6.3%	3.5%	\$13	1.3%	3.0%
	Middle	24	61.5%	\$2,261	68.9%	59.8%	8	72.7%	69.1%	\$862	72.9%	77.2%	10	62.5%	69.2%	\$682	68.0%	79.7%
	Upper	14	35.9%	\$1,007	30.7%	33.4%	3	27.3%	25.9%	\$321	27.1%	18.8%	5	31.3%	26.0%	\$308	30.7%	17.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.5%	0	0.0%	0.9%	\$0	0.0%	0.2%
Total	39	100.0%	\$3,281	100.0%	100.0%	11	100.0%	100.0%	\$1,183	100.0%	100.0%	16	100.0%	100.0%	\$1,003	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Multi Chicago

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	2,837	56.7%	\$117,747	20.8%	90.0%	924	49.4%	39.8%	\$37,401	16.2%	28.2%	1,187	58.2%	45.0%	\$51,223	22.7%	27.1%
		Over \$1 Million	1,119	22.4%	\$331,534	58.5%	9.6%	449	24.0%					435	21.3%				
		Total Rev. available	3,956	79.1%	\$449,281	79.3%	99.6%	1,373	73.4%					1,622	79.5%				
		Rev. Not Known	1,045	20.9%	\$117,789	20.8%	0.4%	499	26.7%					417	20.5%				
		Total	5,001	100.0%	\$567,070	100.0%	100.0%	1,872	100.0%					2,039	100.0%				
	Loan Size	\$100,000 or Less	3,809	76.2%	\$112,208	19.8%		1,394	74.5%	91.1%	\$41,781	18.1%	25.4%	1,571	77.0%	92.0%	\$45,884	20.3%	27.6%
		\$100,001 - \$250,000	527	10.5%	\$96,375	17.0%		204	10.9%	3.9%	\$37,688	16.3%	15.1%	208	10.2%	3.5%	\$37,633	16.7%	14.1%
		\$250,001 - \$1 Million	665	13.3%	\$358,487	63.2%		274	14.6%	5.0%	\$151,545	65.6%	59.5%	260	12.8%	4.6%	\$142,015	63.0%	58.2%
		Total	5,001	100.0%	\$567,070	100.0%		1,872	100.0%	100.0%	\$231,014	100.0%	100.0%	2,039	100.0%	100.0%	\$225,532	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2,643	93.2%	\$51,698	43.9%													
		\$100,001 - \$250,000	94	3.3%	\$15,197	12.9%													
		\$250,001 - \$1 Million	100	3.5%	\$50,852	43.2%													
		Total	2,837	100.0%	\$117,747	100.0%													
Small Farm	Revenue	\$1 Million or Less	28	71.8%	\$1,394	42.5%	97.5%	6	54.5%	51.4%	\$370	31.3%	58.8%	11	68.8%	49.3%	\$308	30.7%	58.6%
		Over \$1 Million	3	7.7%	\$729	22.2%	2.4%	0	0.0%				2	12.5%					
		Total Rev. available	31	79.5%	\$2,123	64.7%	99.9%	6	54.5%				13	81.3%					
		Not Known	8	20.5%	\$1,158	35.3%	0.0%	5	45.5%				3	18.8%					
		Total	39	100.0%	\$3,281	100.0%	100.0%	11	100.0%				16	100.0%					
	Loan Size	\$100,000 or Less	26	66.7%	\$805	24.5%		5	45.5%	67.2%	\$137	11.6%	18.6%	12	75.0%	70.2%	\$320	31.9%	19.6%
		\$100,001 - \$250,000	12	30.8%	\$2,097	63.9%		6	54.5%	19.7%	\$1,046	88.4%	33.7%	4	25.0%	17.6%	\$683	68.1%	32.6%
		\$250,001 - \$500,000	1	2.6%	\$379	11.6%		0	0.0%	13.0%	\$0	0.0%	47.7%	0	0.0%	12.1%	\$0	0.0%	47.8%
		Total	39	100.0%	\$3,281	100.0%		11	100.0%	100.0%	\$1,183	100.0%	100.0%	16	100.0%	100.0%	\$1,003	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	23	82.1%	\$515	36.9%													
		\$100,001 - \$250,000	5	17.9%	\$879	63.1%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	28	100.0%	\$1,394	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: Multi Cincinnati

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	131	2.6%	\$14,106	1.7%	2.8%	23	1.3%	1.8%	\$2,401	0.8%	1.4%	72	3.3%	1.8%	\$6,896	2.0%	1.2%
	Moderate	890	17.9%	\$92,073	11.1%	17.4%	217	12.4%	13.6%	\$22,227	7.3%	8.7%	448	20.8%	14.9%	\$46,007	13.5%	9.6%
	Middle	2,078	41.8%	\$277,127	33.5%	46.3%	736	42.2%	45.8%	\$96,644	31.7%	38.8%	888	41.2%	45.8%	\$115,904	34.1%	39.7%
	Upper	1,875	37.7%	\$443,533	53.6%	33.6%	769	44.1%	38.8%	\$183,457	60.2%	51.1%	747	34.7%	37.6%	\$171,370	50.4%	49.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4,974	100.0%	\$826,839	100.0%	100.0%	1,745	100.0%	100.0%	\$304,729	100.0%	100.0%	2,155	100.0%	100.0%	\$340,177	100.0%	100.0%
REFINANCE	Low	135	2.6%	\$10,787	1.5%	2.8%	42	2.4%	1.9%	\$3,193	1.4%	1.6%	65	2.8%	1.5%	\$4,660	1.4%	1.0%
	Moderate	849	16.6%	\$74,176	10.2%	17.4%	274	15.9%	14.5%	\$22,581	9.7%	16.9%	390	16.5%	13.0%	\$35,177	10.4%	8.8%
	Middle	2,189	42.7%	\$250,532	34.6%	46.3%	796	46.2%	45.1%	\$87,044	37.3%	40.8%	949	40.2%	43.8%	\$110,452	32.7%	37.9%
	Upper	1,956	38.1%	\$389,493	53.7%	33.6%	611	35.5%	38.4%	\$120,548	51.7%	40.7%	957	40.5%	41.7%	\$187,864	55.6%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5,129	100.0%	\$724,988	100.0%	100.0%	1,723	100.0%	100.0%	\$233,366	100.0%	100.0%	2,361	100.0%	100.0%	\$338,153	100.0%	100.0%
HOME IMPROVEMENT	Low	10	2.4%	\$373	1.4%	2.8%	3	2.0%	2.2%	\$50	0.6%	2.5%	6	3.3%	1.8%	\$215	1.5%	1.5%
	Moderate	72	17.6%	\$3,191	11.8%	17.4%	21	14.2%	13.5%	\$799	10.3%	7.9%	39	21.4%	15.3%	\$1,920	13.6%	8.6%
	Middle	209	51.0%	\$12,751	47.2%	46.3%	88	59.5%	47.7%	\$4,312	55.5%	37.7%	82	45.1%	44.7%	\$5,937	42.1%	35.0%
	Upper	119	29.0%	\$10,716	39.6%	33.6%	36	24.3%	36.6%	\$2,603	33.5%	51.9%	55	30.2%	38.3%	\$6,039	42.8%	54.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	410	100.0%	\$27,031	100.0%	100.0%	148	100.0%	100.0%	\$7,764	100.0%	100.0%	182	100.0%	100.0%	\$14,111	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	6	42.9%	\$22,341	77.2%	14.5%	1	33.3%	11.1%	\$22,000	85.1%	10.6%	5	50.0%	13.5%	\$341	31.7%	7.2%
	Moderate	4	28.6%	\$2,788	9.6%	29.7%	1	33.3%	37.5%	\$2,358	9.1%	32.7%	3	30.0%	36.3%	\$430	39.9%	28.9%
	Middle	2	14.3%	\$306	1.1%	38.5%	0	0.0%	33.9%	\$0	0.0%	36.6%	2	20.0%	36.7%	\$306	28.4%	39.3%
	Upper	2	14.3%	\$3,500	12.1%	17.3%	1	33.3%	17.5%	\$1,500	5.8%	20.1%	0	0.0%	13.5%	\$0	0.0%	24.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	14	100.0%	\$28,935	100.0%	100.0%	3	100.0%	100.0%	\$25,858	100.0%	100.0%	10	100.0%	100.0%	\$1,077	100.0%	100.0%	
HMDA TOTALS	Low	282	2.7%	\$47,607	3.0%	2.8%	69	1.9%	1.9%	\$27,644	4.8%	2.0%	148	3.1%	1.7%	\$12,112	1.7%	1.5%
	Moderate	1,815	17.2%	\$172,228	10.7%	17.4%	513	14.2%	14.1%	\$47,965	8.4%	13.4%	880	18.7%	14.2%	\$83,534	12.0%	10.3%
	Middle	4,478	42.5%	\$540,716	33.6%	46.3%	1,620	44.8%	45.5%	\$188,000	32.9%	39.5%	1,921	40.8%	44.9%	\$232,599	33.5%	38.9%
	Upper	3,952	37.5%	\$847,242	52.7%	33.6%	1,417	39.2%	38.4%	\$308,108	53.9%	45.2%	1,759	37.4%	39.2%	\$365,273	52.7%	49.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	####	100.0%	\$1,607,793	100.0%	100.0%	3,619	100.0%	100.0%	\$571,717	100.0%	100.0%	4,708	100.0%	100.0%	\$693,518	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: Multi Cincinnati

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	927	18.6%	\$76,793	9.3%	20.8%	240	13.8%	10.3%	\$18,594	6.1%	5.0%	511	23.7%	11.2%	\$43,759	12.9%	5.7%
	Moderate	1,113	22.4%	\$125,327	15.2%	17.2%	364	20.9%	21.1%	\$41,143	13.5%	14.7%	484	22.5%	21.3%	\$54,788	16.1%	15.2%
	Middle	904	18.2%	\$131,300	15.9%	21.1%	348	19.9%	20.3%	\$50,617	16.6%	18.5%	364	16.9%	19.4%	\$53,031	15.6%	18.1%
	Upper	1,450	29.2%	\$376,599	45.5%	40.9%	567	32.5%	32.0%	\$150,369	49.3%	46.7%	561	26.0%	31.4%	\$141,987	41.7%	46.1%
	Unknown	580	11.7%	\$116,820	14.1%	0.0%	226	13.0%	16.3%	\$44,006	14.4%	15.0%	235	10.9%	16.7%	\$46,612	13.7%	15.0%
	Total	4,974	100.0%	\$826,839	100.0%	100.0%	1,745	100.0%	100.0%	\$304,729	100.0%	100.0%	2,155	100.0%	100.0%	\$340,177	100.0%	100.0%
REFINANCE	Low	809	15.8%	\$60,992	8.4%	20.8%	265	15.4%	8.3%	\$19,237	8.2%	3.0%	383	16.2%	7.2%	\$29,299	8.7%	3.7%
	Moderate	1,071	20.9%	\$98,330	13.6%	17.2%	405	23.5%	16.4%	\$35,330	15.1%	7.6%	463	19.6%	14.6%	\$43,719	12.9%	9.5%
	Middle	1,159	22.6%	\$136,433	18.8%	21.1%	396	23.0%	20.8%	\$43,723	18.7%	11.8%	540	22.9%	19.6%	\$67,273	19.9%	16.1%
	Upper	1,697	33.1%	\$360,354	49.7%	40.9%	536	31.1%	35.6%	\$116,298	49.8%	33.1%	772	32.7%	37.6%	\$161,894	47.9%	49.7%
	Unknown	393	7.7%	\$68,879	9.5%	0.0%	121	7.0%	19.0%	\$18,778	8.0%	44.4%	203	8.6%	21.0%	\$35,968	10.6%	21.0%
	Total	5,129	100.0%	\$724,988	100.0%	100.0%	1,723	100.0%	100.0%	\$233,366	100.0%	100.0%	2,361	100.0%	100.0%	\$338,153	100.0%	100.0%
HOME IMPROVEMENT	Low	87	21.2%	\$3,669	13.6%	20.8%	33	22.3%	9.8%	\$1,412	18.2%	4.5%	37	20.3%	10.0%	\$1,722	12.2%	4.1%
	Moderate	119	29.0%	\$5,975	22.1%	17.2%	43	29.1%	18.3%	\$1,538	19.8%	9.5%	58	31.9%	19.0%	\$3,579	25.4%	10.8%
	Middle	81	19.8%	\$5,438	20.1%	21.1%	27	18.2%	23.4%	\$1,513	19.5%	20.0%	36	19.8%	24.0%	\$2,613	18.5%	18.8%
	Upper	112	27.3%	\$10,851	40.1%	40.9%	42	28.4%	41.8%	\$3,136	40.4%	58.1%	44	24.2%	42.0%	\$5,432	38.5%	59.6%
	Unknown	11	2.7%	\$1,098	4.1%	0.0%	3	2.0%	6.6%	\$165	2.1%	7.9%	7	3.8%	5.0%	\$765	5.4%	6.7%
	Total	410	100.0%	\$27,031	100.0%	100.0%	148	100.0%	100.0%	\$7,764	100.0%	100.0%	182	100.0%	100.0%	\$14,111	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	14	100.0%	\$28,935	100.0%	0.0%	3	100.0%	100.0%	\$25,858	100.0%	100.0%	10	100.0%	100.0%	\$1,077	100.0%	100.0%
	Total	14	100.0%	\$28,935	100.0%	100.0%	3	100.0%	100.0%	\$25,858	100.0%	100.0%	10	100.0%	100.0%	\$1,077	100.0%	100.0%
HMDA TOTALS	Low	1,823	17.3%	\$141,454	8.8%	20.8%	538	14.9%	9.4%	\$39,243	6.9%	3.9%	931	19.8%	9.5%	\$74,780	10.8%	4.6%
	Moderate	2,303	21.9%	\$229,632	14.3%	17.2%	812	22.4%	19.1%	\$78,011	13.6%	10.9%	1,005	21.3%	18.3%	\$102,086	14.7%	12.0%
	Middle	2,144	20.4%	\$273,171	17.0%	21.1%	771	21.3%	20.5%	\$95,853	16.8%	14.8%	940	20.0%	19.6%	\$122,917	17.7%	16.3%
	Upper	3,259	31.0%	\$747,804	46.5%	40.9%	1,145	31.6%	33.6%	\$269,803	47.2%	38.8%	1,377	29.2%	34.3%	\$309,313	44.6%	45.2%
	Unknown	998	9.5%	\$215,732	13.4%	0.0%	353	9.8%	17.3%	\$88,807	15.5%	31.6%	455	9.7%	18.3%	\$84,422	12.2%	21.9%
	Total	#####	100.0%	\$1,607,793	100.0%	100.0%	3,619	100.0%	100.0%	\$571,717	100.0%	100.0%	4,708	100.0%	100.0%	\$693,518	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: Multi Cincinnati

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	333	6.5%	\$65,264	9.1%	4.9%	137	6.4%	5.0%	\$25,235	8.8%	6.5%	125	6.5%	5.1%	\$24,995	8.7%	6.3%
	Moderate	889	17.4%	\$164,688	23.0%	20.5%	385	17.9%	19.6%	\$66,041	23.0%	25.0%	341	17.6%	19.7%	\$68,614	23.9%	24.7%
	Middle	1,924	37.6%	\$254,293	35.6%	40.7%	806	37.5%	37.6%	\$103,984	36.2%	34.8%	720	37.2%	37.4%	\$100,323	35.0%	35.1%
	Upper	1,973	38.5%	\$230,565	32.3%	33.8%	818	38.1%	36.8%	\$91,592	31.9%	33.5%	747	38.6%	37.0%	\$92,834	32.4%	33.5%
	Unknown	1	0.0%	\$20	0.0%	0.0%	1	0.0%	0.0%	\$20	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.2%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Total	5,120	100.0%	\$714,830	100.0%	100.0%	2,147	100.0%	100.0%	\$286,872	100.0%	100.0%	1,933	100.0%	100.0%	\$286,766	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	1.2%	\$0	0.0%	0.4%	0	0.0%	1.5%	\$0	0.0%	0.8%
	Moderate	1	4.0%	\$32	3.0%	15.3%	1	16.7%	21.8%	\$32	9.7%	13.3%	0	0.0%	20.1%	\$0	0.0%	19.1%
	Middle	19	76.0%	\$673	62.9%	65.3%	4	66.7%	61.5%	\$148	44.8%	63.3%	9	75.0%	60.9%	\$212	50.2%	59.8%
	Upper	5	20.0%	\$365	34.1%	18.8%	1	16.7%	14.7%	\$150	45.5%	22.8%	3	25.0%	17.5%	\$210	49.8%	20.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	25	100.0%	\$1,070	100.0%	100.0%	6	100.0%	100.0%	\$330	100.0%	100.0%	12	100.0%	100.0%	\$422	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Multi Cincinnati

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison													
	Bank				Total Businesses	2014					2015									
	Count		Dollar			Count		Dollar			Count		Dollar							
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	2,702	52.8%	\$115,942	16.2%	91.0%	1,093	50.9%	45.9%	\$45,210	15.8%	28.3%	977	50.5%	49.2%	\$47,316	16.5%	31.0%	
		Over \$1 Million	1,534	30.0%	\$503,267	70.4%	8.5%	579	27.0%					668	34.6%					
		Total Rev. available	4,236	82.8%	\$619,209	86.6%	99.5%	1,672	77.9%					1,645	85.1%					
		Rev. Not Known	884	17.3%	\$95,621	13.4%	0.5%	475	22.1%					288	14.9%					
		Total	5,120	100.0%	\$714,830	100.0%	100.0%	2,147	100.0%					1,933	100.0%					
	Loan Size	\$100,000 or Less	3,646	71.2%	\$116,023	16.2%		1,552	72.3%	89.9%	\$46,969	16.4%	26.6%	1,331	68.9%	90.4%	\$45,169	15.8%	27.6%	
		\$100,001 - \$250,000	659	12.9%	\$121,951	17.1%		264	12.3%	4.7%	\$48,742	17.0%	15.9%	276	14.3%	4.4%	\$50,540	17.6%	15.4%	
		\$250,001 - \$1 Million	815	15.9%	\$476,856	66.7%		331	15.4%	5.4%	\$191,161	66.6%	57.4%	326	16.9%	5.3%	\$191,057	66.6%	57.1%	
		Total	5,120	100.0%	\$714,830	100.0%		2,147	100.0%	100.0%	\$286,872	100.0%	100.0%	1,933	100.0%	100.0%	\$286,766	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2,523	93.4%	\$54,751	47.2%														
		\$100,001 - \$250,000	102	3.8%	\$17,830	15.4%														
		\$250,001 - \$1 Million	77	2.8%	\$43,361	37.4%														
		Total	2,702	100.0%	\$115,942	100.0%														
	Small Farm	Revenue	\$1 Million or Less	18	72.0%	\$589	55.0%	99.4%	3	50.0%	54.4%	\$107	32.4%	67.8%	8	66.7%	54.0%	\$164	38.9%	69.9%
			Over \$1 Million	1	4.0%	\$45	4.2%	0.6%	0	0.0%				1	8.3%					
			Total Rev. available	19	76.0%	\$634	59.2%	100.0%	3	50.0%				9	75.0%					
Not Known			6	24.0%	\$436	40.7%	0.0%	3	50.0%				3	25.0%						
Total			25	100.0%	\$1,070	100.0%	100.0%	6	100.0%				12	100.0%						
Loan Size		\$100,000 or Less	22	88.0%	\$570	53.3%		5	83.3%	87.3%	\$180	54.5%	36.9%	11	91.7%	89.1%	\$272	64.5%	37.5%	
		\$100,001 - \$250,000	3	12.0%	\$500	46.7%		1	16.7%	8.7%	\$150	45.5%	31.3%	1	8.3%	6.6%	\$150	35.5%	25.7%	
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.0%	\$0	0.0%	31.9%	0	0.0%	4.4%	\$0	0.0%	36.8%	
		Total	25	100.0%	\$1,070	100.0%		6	100.0%	100.0%	\$330	100.0%	100.0%	12	100.0%	100.0%	\$422	100.0%	100.0%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	17	94.4%	\$389	66.0%														
		\$100,001 - \$250,000	1	5.6%	\$200	34.0%														
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%														
	Total	18	100.0%	\$589	100.0%															

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: Multi Evansville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	6	0.8%	\$531	0.5%	4.3%	1	0.3%	1.9%	\$86	0.2%	1.1%	0	0.0%	1.6%	\$0	0.0%	1.0%
	Moderate	142	18.0%	\$11,837	11.1%	18.0%	37	12.9%	15.2%	\$3,253	8.3%	9.4%	64	19.5%	15.8%	\$5,432	12.6%	9.9%
	Middle	257	32.6%	\$30,287	28.5%	40.6%	97	33.9%	36.7%	\$11,369	29.0%	33.9%	105	32.0%	34.7%	\$12,060	28.0%	32.4%
	Upper	384	48.7%	\$63,712	59.9%	37.1%	151	52.8%	46.2%	\$24,544	62.5%	55.6%	159	48.5%	47.9%	\$25,649	59.5%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>789</i>	<i>100.0%</i>	<i>\$106,367</i>	<i>100.0%</i>	<i>100.0%</i>	<i>286</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$39,252</i>	<i>100.0%</i>	<i>100.0%</i>	<i>328</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$43,141</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	15	2.5%	\$587	0.9%	4.3%	4	2.0%	2.6%	\$152	0.8%	1.7%	6	2.2%	2.1%	\$301	1.0%	1.3%
	Moderate	109	18.3%	\$6,172	9.9%	18.0%	37	18.4%	17.8%	\$1,956	9.8%	10.7%	46	16.7%	13.5%	\$2,832	9.6%	7.5%
	Middle	216	36.2%	\$21,467	34.5%	40.6%	76	37.8%	37.5%	\$6,733	33.6%	36.7%	97	35.1%	36.8%	\$9,595	32.5%	36.0%
	Upper	257	43.0%	\$33,924	54.6%	37.1%	84	41.8%	42.2%	\$11,191	55.9%	50.8%	127	46.0%	47.7%	\$16,755	56.8%	55.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>597</i>	<i>100.0%</i>	<i>\$62,150</i>	<i>100.0%</i>	<i>100.0%</i>	<i>201</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,032</i>	<i>100.0%</i>	<i>100.0%</i>	<i>276</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,483</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	4	4.7%	\$99	1.8%	4.3%	2	6.5%	3.9%	\$77	5.1%	7.6%	2	5.0%	2.3%	\$22	0.7%	1.4%
	Moderate	13	15.3%	\$500	8.9%	18.0%	3	9.7%	17.6%	\$139	9.2%	9.5%	6	15.0%	16.6%	\$254	8.0%	10.5%
	Middle	31	36.5%	\$1,231	22.0%	40.6%	18	58.1%	44.8%	\$576	38.0%	42.7%	11	27.5%	37.6%	\$567	17.8%	34.1%
	Upper	37	43.5%	\$3,769	67.3%	37.1%	8	25.8%	33.8%	\$723	47.7%	40.1%	21	52.5%	43.6%	\$2,348	73.6%	53.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>85</i>	<i>100.0%</i>	<i>\$5,599</i>	<i>100.0%</i>	<i>100.0%</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,515</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,191</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	1	100.0%	\$87	100.0%	8.6%	0	0.0%	7.0%	\$0	0.0%	0.5%	0	0.0%	10.5%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	37.8%	0	0.0%	41.9%	\$0	0.0%	37.2%	0	0.0%	31.6%	\$0	0.0%	33.2%
	Middle	0	0.0%	\$0	0.0%	34.3%	0	0.0%	39.5%	\$0	0.0%	31.8%	0	0.0%	36.8%	\$0	0.0%	38.5%
	Upper	0	0.0%	\$0	0.0%	19.3%	0	0.0%	11.6%	\$0	0.0%	30.5%	0	0.0%	21.1%	\$0	0.0%	26.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$87</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	26	1.8%	\$1,304	0.7%	4.3%	7	1.4%	2.4%	\$315	0.5%	1.4%	8	1.2%	1.9%	\$323	0.4%	1.2%
	Moderate	264	17.9%	\$18,509	10.6%	18.0%	77	14.9%	16.4%	\$5,348	8.8%	11.5%	116	18.0%	15.1%	\$8,518	11.2%	10.3%
	Middle	504	34.2%	\$52,985	30.4%	40.6%	191	36.9%	37.8%	\$18,678	30.7%	34.8%	213	33.1%	35.8%	\$22,222	29.3%	34.1%
	Upper	678	46.1%	\$101,405	58.2%	37.1%	243	46.9%	43.5%	\$36,458	60.0%	52.3%	307	47.7%	47.3%	\$44,752	59.0%	54.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,472</i>	<i>100.0%</i>	<i>\$174,203</i>	<i>100.0%</i>	<i>100.0%</i>	<i>518</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$60,799</i>	<i>100.0%</i>	<i>100.0%</i>	<i>644</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$75,815</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: Multi Evansville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	121	15.3%	\$9,078	8.5%	21.4%	29	10.1%	9.1%	\$2,152	5.5%	4.7%	59	18.0%	10.1%	\$4,286	9.9%	5.7%
	Moderate	216	27.4%	\$21,807	20.5%	17.2%	82	28.7%	21.2%	\$8,240	21.0%	15.9%	94	28.7%	21.7%	\$9,615	22.3%	16.5%
	Middle	183	23.2%	\$24,076	22.6%	21.6%	71	24.8%	18.5%	\$9,549	24.3%	17.5%	74	22.6%	20.4%	\$9,990	23.2%	20.1%
	Upper	247	31.3%	\$48,643	45.7%	39.7%	94	32.9%	25.8%	\$17,895	45.6%	37.9%	95	29.0%	26.0%	\$18,685	43.3%	37.4%
	Unknown	22	2.8%	\$2,763	2.6%	0.0%	10	3.5%	25.4%	\$1,416	3.6%	23.9%	6	1.8%	21.8%	\$565	1.3%	20.3%
	<i>Total</i>	<i>789</i>	<i>100.0%</i>	<i>\$106,367</i>	<i>100.0%</i>	<i>100.0%</i>	<i>286</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$39,252</i>	<i>100.0%</i>	<i>100.0%</i>	<i>328</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$43,141</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	101	16.9%	\$6,453	10.4%	21.4%	33	16.4%	9.8%	\$2,123	10.6%	5.5%	50	18.1%	8.1%	\$3,343	11.3%	4.2%
	Moderate	139	23.3%	\$10,059	16.2%	17.2%	44	21.9%	18.4%	\$3,029	15.1%	12.3%	67	24.3%	17.7%	\$5,005	17.0%	11.5%
	Middle	161	27.0%	\$16,178	26.0%	21.6%	53	26.4%	21.0%	\$5,282	26.4%	19.1%	74	26.8%	20.4%	\$7,811	26.5%	17.4%
	Upper	170	28.5%	\$26,251	42.2%	39.7%	61	30.3%	30.9%	\$8,353	41.7%	40.1%	73	26.4%	30.6%	\$11,911	40.4%	39.3%
	Unknown	26	4.4%	\$3,209	5.2%	0.0%	10	5.0%	19.8%	\$1,245	6.2%	23.1%	12	4.3%	23.2%	\$1,413	4.8%	27.6%
	<i>Total</i>	<i>597</i>	<i>100.0%</i>	<i>\$62,150</i>	<i>100.0%</i>	<i>100.0%</i>	<i>201</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,032</i>	<i>100.0%</i>	<i>100.0%</i>	<i>276</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,483</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	17	20.0%	\$616	11.0%	21.4%	8	25.8%	13.4%	\$318	21.0%	7.2%	7	17.5%	12.0%	\$206	6.5%	6.4%
	Moderate	18	21.2%	\$957	17.1%	17.2%	6	19.4%	20.8%	\$210	13.9%	15.4%	8	20.0%	21.4%	\$504	15.8%	15.2%
	Middle	23	27.1%	\$1,425	25.5%	21.6%	8	25.8%	25.9%	\$290	19.1%	18.6%	9	22.5%	28.9%	\$790	24.8%	22.9%
	Upper	27	31.8%	\$2,601	46.5%	39.7%	9	29.0%	34.5%	\$697	46.0%	45.5%	16	40.0%	34.5%	\$1,691	53.0%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.5%	\$0	0.0%	13.4%	0	0.0%	3.1%	\$0	0.0%	5.2%
	<i>Total</i>	<i>85</i>	<i>100.0%</i>	<i>\$5,599</i>	<i>100.0%</i>	<i>100.0%</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,515</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,191</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$87	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$87</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	239	16.2%	\$16,147	9.3%	21.4%	70	13.5%	9.7%	\$4,593	7.6%	4.7%	116	18.0%	9.5%	\$7,835	10.3%	4.9%
	Moderate	373	25.3%	\$32,823	18.8%	17.2%	132	25.5%	20.2%	\$11,479	18.9%	13.8%	169	26.2%	20.1%	\$15,124	19.9%	13.8%
	Middle	367	24.9%	\$41,679	23.9%	21.6%	132	25.5%	19.9%	\$15,121	24.9%	16.9%	157	24.4%	21.2%	\$18,591	24.5%	18.1%
	Upper	444	30.2%	\$77,495	44.5%	39.7%	164	31.7%	28.2%	\$26,945	44.3%	36.4%	184	28.6%	28.4%	\$32,287	42.6%	36.5%
	Unknown	49	3.3%	\$6,059	3.5%	0.0%	20	3.9%	22.0%	\$2,661	4.4%	28.2%	18	2.8%	20.8%	\$1,978	2.6%	26.7%
	<i>Total</i>	<i>1,472</i>	<i>100.0%</i>	<i>\$174,203</i>	<i>100.0%</i>	<i>100.0%</i>	<i>518</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$60,799</i>	<i>100.0%</i>	<i>100.0%</i>	<i>644</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$75,815</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Multi Evansville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	33	7.9%	\$4,141	8.2%	6.8%	9	4.9%	7.1%	\$1,440	6.3%	7.5%	17	11.3%	7.5%	\$1,650	7.6%	9.7%
	Moderate	106	25.3%	\$13,504	26.7%	22.0%	49	26.8%	24.2%	\$6,580	28.6%	27.8%	32	21.2%	24.2%	\$4,883	22.6%	25.9%
	Middle	156	37.2%	\$18,014	35.6%	38.8%	68	37.2%	35.8%	\$8,813	38.3%	34.5%	59	39.1%	34.5%	\$7,364	34.1%	32.9%
	Upper	124	29.6%	\$14,994	29.6%	32.5%	57	31.1%	31.3%	\$6,160	26.8%	29.9%	43	28.5%	32.3%	\$7,701	35.7%	31.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	0.2%	0	0.0%	1.4%	\$0	0.0%	0.3%
	Total	419	100.0%	\$50,653	100.0%	100.0%	183	100.0%	100.0%	\$22,993	100.0%	100.0%	151	100.0%	100.0%	\$21,598	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	1.3%	0	0.0%	1.2%	\$0	0.0%	0.1%
	Moderate	1	11.1%	\$52	10.3%	4.4%	1	16.7%	4.2%	\$52	20.2%	2.5%	0	0.0%	6.2%	\$0	0.0%	4.4%
	Middle	4	44.4%	\$96	19.1%	58.1%	4	66.7%	56.3%	\$96	37.2%	45.3%	0	0.0%	56.9%	\$0	0.0%	53.4%
	Upper	4	44.4%	\$355	70.6%	37.1%	1	16.7%	38.7%	\$110	42.6%	50.9%	2	100.0%	35.0%	\$135	100.0%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.0%
Total	9	100.0%	\$503	100.0%	100.0%	6	100.0%	100.0%	\$258	100.0%	100.0%	2	100.0%	100.0%	\$135	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Multi Evansville

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	212	50.6%	\$8,669	17.1%	89.7%	89	48.6%	37.5%	\$3,925	17.1%	27.5%	70	46.4%	41.2%	\$3,586	16.6%	30.7%
		Over \$1 Million	121	28.9%	\$33,281	65.7%	9.6%	52	28.4%				51	33.8%					
		Total Rev. available	333	79.5%	\$41,950	82.8%	99.3%	141	77.0%				121	80.2%					
		Rev. Not Known	86	20.5%	\$8,703	17.2%	0.6%	42	23.0%				30	19.9%					
		Total	419	100.0%	\$50,653	100.0%	100.0%	183	100.0%				151	100.0%					
	Loan Size	\$100,000 or Less	322	76.8%	\$9,737	19.2%		138	75.4%	85.4%	\$4,002	17.4%	21.2%	111	73.5%	84.4%	\$3,655	16.9%	21.7%
		\$100,001 - \$250,000	31	7.4%	\$5,905	11.7%		14	7.7%	7.1%	\$2,596	11.3%	19.9%	12	7.9%	7.6%	\$2,342	10.8%	19.5%
		\$250,001 - \$1 Million	66	15.8%	\$35,011	69.1%		31	16.9%	7.4%	\$16,395	71.3%	58.9%	28	18.5%	8.0%	\$15,601	72.2%	58.8%
		Total	419	100.0%	\$50,653	100.0%		183	100.0%	100.0%	\$22,993	100.0%	100.0%	151	100.0%	100.0%	\$21,598	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	201	94.8%	\$4,036	46.6%													
		\$100,001 - \$250,000	5	2.4%	\$799	9.2%													
		\$250,001 - \$1 Million	6	2.8%	\$3,834	44.2%													
Total		212	100.0%	\$8,669	100.0%														
Small Farm	Revenue	\$1 Million or Less	6	66.7%	\$330	65.6%	99.5%	4	66.7%	65.1%	\$195	75.6%	70.8%	2	100.0%	59.2%	\$135	100.0%	64.9%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.5%	0	0.0%				0	0.0%					
		Total Rev. available	6	66.7%	\$330	65.6%	100.0%	4	66.7%				2	100.0%					
		Not Known	3	33.3%	\$173	34.4%	0.0%	2	33.3%				0	0.0%					
		Total	9	100.0%	\$503	100.0%	100.0%	6	100.0%				2	100.0%					
	Loan Size	\$100,000 or Less	6	66.7%	\$173	34.4%		5	83.3%	71.4%	\$148	57.4%	24.3%	1	50.0%	66.5%	\$25	18.5%	19.7%
		\$100,001 - \$250,000	3	33.3%	\$330	65.6%		1	16.7%	15.5%	\$110	42.6%	26.3%	1	50.0%	21.2%	\$110	81.5%	35.4%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	13.0%	\$0	0.0%	49.4%	0	0.0%	12.3%	\$0	0.0%	44.9%
		Total	9	100.0%	\$503	100.0%		6	100.0%	100.0%	\$258	100.0%	100.0%	2	100.0%	100.0%	\$135	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	4	66.7%	\$110	33.3%													
		\$100,001 - \$250,000	2	33.3%	\$220	66.7%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
Total		6	100.0%	\$330	100.0%														

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: Multi Huntington

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	3	1.0%	\$228	0.4%	1.2%	1	0.7%	0.8%	\$56	0.2%	0.4%	2	1.6%	0.9%	\$172	0.8%	0.5%
	Moderate	16	5.2%	\$1,493	2.9%	14.9%	7	4.8%	9.4%	\$752	3.1%	6.4%	9	7.2%	9.4%	\$741	3.5%	6.2%
	Middle	134	43.8%	\$20,921	41.1%	59.9%	70	48.3%	55.4%	\$10,724	44.9%	50.9%	45	36.0%	55.5%	\$7,382	34.7%	51.5%
	Upper	153	50.0%	\$28,264	55.5%	24.0%	67	46.2%	34.5%	\$12,347	51.7%	42.3%	69	55.2%	34.3%	\$13,007	61.1%	41.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>306</i>	<i>100.0%</i>	<i>\$50,906</i>	<i>100.0%</i>	<i>100.0%</i>	<i>145</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,879</i>	<i>100.0%</i>	<i>100.0%</i>	<i>125</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,302</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	0.4%	\$58	0.2%	1.2%	1	1.1%	0.8%	\$58	0.6%	0.6%	0	0.0%	1.1%	\$0	0.0%	0.9%
	Moderate	23	8.4%	\$2,156	6.9%	14.9%	8	8.9%	10.2%	\$786	7.9%	7.6%	9	6.9%	8.9%	\$973	6.3%	6.5%
	Middle	159	57.8%	\$16,934	54.1%	59.9%	57	63.3%	59.5%	\$6,101	61.0%	55.7%	74	56.9%	58.4%	\$8,260	53.1%	55.5%
	Upper	92	33.5%	\$12,135	38.8%	24.0%	24	26.7%	29.6%	\$3,051	30.5%	36.1%	47	36.2%	31.6%	\$6,314	40.6%	37.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%
	<i>Total</i>	<i>275</i>	<i>100.0%</i>	<i>\$31,283</i>	<i>100.0%</i>	<i>100.0%</i>	<i>90</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,996</i>	<i>100.0%</i>	<i>100.0%</i>	<i>130</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15,547</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	0.9%	\$0	0.0%	0.5%
	Moderate	6	8.8%	\$272	6.0%	14.9%	1	6.7%	14.0%	\$6	0.8%	11.0%	4	11.1%	12.1%	\$236	10.1%	12.2%
	Middle	46	67.6%	\$3,293	72.3%	59.9%	10	66.7%	57.6%	\$575	72.5%	52.2%	26	72.2%	60.1%	\$1,823	78.0%	56.8%
	Upper	16	23.5%	\$987	21.7%	24.0%	4	26.7%	27.6%	\$212	26.7%	36.3%	6	16.7%	26.8%	\$277	11.9%	30.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	<i>Total</i>	<i>68</i>	<i>100.0%</i>	<i>\$4,552</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$793</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,336</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	21.6%	\$0	0.0%	21.7%	0	0.0%	12.8%	\$0	0.0%	4.4%
	Moderate	0	0.0%	\$0	0.0%	30.3%	0	0.0%	13.5%	\$0	0.0%	19.2%	0	0.0%	21.3%	\$0	0.0%	14.2%
	Middle	0	0.0%	\$0	0.0%	33.1%	0	0.0%	43.2%	\$0	0.0%	34.1%	0	0.0%	40.4%	\$0	0.0%	49.4%
	Upper	0	0.0%	\$0	0.0%	19.8%	0	0.0%	21.6%	\$0	0.0%	25.0%	0	0.0%	25.5%	\$0	0.0%	32.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	4	0.6%	\$286	0.3%	1.2%	2	0.8%	0.9%	\$114	0.3%	1.1%	2	0.7%	1.0%	\$172	0.4%	0.9%
	Moderate	45	6.9%	\$3,921	4.5%	14.9%	16	6.4%	10.2%	\$1,544	4.5%	7.4%	22	7.6%	9.6%	\$1,950	5.0%	7.1%
	Middle	339	52.2%	\$41,148	47.4%	59.9%	137	54.8%	57.1%	\$17,400	50.2%	52.2%	145	49.8%	57.0%	\$17,465	44.6%	53.0%
	Upper	261	40.2%	\$41,386	47.7%	24.0%	95	38.0%	31.8%	\$15,610	45.0%	39.3%	122	41.9%	32.4%	\$19,598	50.0%	39.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>649</i>	<i>100.0%</i>	<i>\$86,741</i>	<i>100.0%</i>	<i>100.0%</i>	<i>250</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34,668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>291</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$39,185</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: Multi Huntington

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	7	2.3%	\$472	0.9%	22.1%	3	2.1%	5.6%	\$200	0.8%	2.5%	3	2.4%	6.1%	\$186	0.9%	2.8%
	Moderate	58	19.0%	\$6,059	11.9%	17.6%	26	17.9%	17.7%	\$2,672	11.2%	11.6%	25	20.0%	17.7%	\$2,743	12.9%	11.5%
	Middle	80	26.1%	\$10,689	21.0%	20.4%	41	28.3%	24.0%	\$5,342	22.4%	20.7%	29	23.2%	23.2%	\$3,991	18.7%	20.7%
	Upper	158	51.6%	\$33,090	65.0%	39.9%	73	50.3%	39.9%	\$15,404	64.5%	52.9%	67	53.6%	38.2%	\$14,047	65.9%	51.2%
	Unknown	3	1.0%	\$596	1.2%	0.0%	2	1.4%	12.9%	\$261	1.1%	12.3%	1	0.8%	14.8%	\$335	1.6%	13.8%
	<i>Total</i>	<i>306</i>	<i>100.0%</i>	<i>\$50,906</i>	<i>100.0%</i>	<i>100.0%</i>	<i>145</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,879</i>	<i>100.0%</i>	<i>100.0%</i>	<i>125</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,302</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	10	3.6%	\$800	2.6%	22.1%	3	3.3%	6.8%	\$278	2.8%	3.8%	5	3.8%	6.7%	\$409	2.6%	3.2%
	Moderate	56	20.4%	\$3,996	12.8%	17.6%	14	15.6%	15.4%	\$1,138	11.4%	10.1%	27	20.8%	13.4%	\$2,042	13.1%	8.7%
	Middle	66	24.0%	\$6,077	19.4%	20.4%	23	25.6%	22.3%	\$2,133	21.3%	18.0%	29	22.3%	20.1%	\$2,653	17.1%	16.9%
	Upper	137	49.8%	\$19,657	62.8%	39.9%	48	53.3%	45.2%	\$6,151	61.5%	55.2%	65	50.0%	43.6%	\$9,986	64.2%	53.9%
	Unknown	6	2.2%	\$753	2.4%	0.0%	2	2.2%	10.4%	\$296	3.0%	12.9%	4	3.1%	16.2%	\$457	2.9%	17.3%
	<i>Total</i>	<i>275</i>	<i>100.0%</i>	<i>\$31,283</i>	<i>100.0%</i>	<i>100.0%</i>	<i>90</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,996</i>	<i>100.0%</i>	<i>100.0%</i>	<i>130</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15,547</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	4	5.9%	\$70	1.5%	22.1%	1	6.7%	10.4%	\$8	1.0%	5.5%	3	8.3%	6.7%	\$62	2.7%	2.7%
	Moderate	13	19.1%	\$675	14.8%	17.6%	1	6.7%	19.1%	\$6	0.8%	11.9%	8	22.2%	19.4%	\$415	17.8%	9.3%
	Middle	18	26.5%	\$1,128	24.8%	20.4%	6	40.0%	21.0%	\$298	37.6%	17.7%	4	11.1%	22.7%	\$286	12.2%	19.6%
	Upper	33	48.5%	\$2,679	58.9%	39.9%	7	46.7%	43.9%	\$481	60.7%	59.4%	21	58.3%	48.9%	\$1,573	67.3%	62.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.5%	\$0	0.0%	5.4%	0	0.0%	2.3%	\$0	0.0%	5.7%
	<i>Total</i>	<i>68</i>	<i>100.0%</i>	<i>\$4,552</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$793</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,336</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	21	3.2%	\$1,342	1.5%	22.1%	7	2.8%	6.5%	\$486	1.4%	3.1%	11	3.8%	6.4%	\$657	1.7%	2.8%
	Moderate	127	19.6%	\$10,730	12.4%	17.6%	41	16.4%	16.9%	\$3,816	11.0%	10.7%	60	20.6%	16.2%	\$5,200	13.3%	9.7%
	Middle	164	25.3%	\$17,894	20.6%	20.4%	70	28.0%	22.9%	\$7,773	22.4%	19.0%	62	21.3%	21.9%	\$6,930	17.7%	18.1%
	Upper	328	50.5%	\$55,426	63.9%	39.9%	128	51.2%	42.1%	\$22,036	63.6%	52.5%	153	52.6%	41.2%	\$25,606	65.3%	49.8%
	Unknown	9	1.4%	\$1,349	1.6%	0.0%	4	1.6%	11.6%	\$557	1.6%	14.8%	5	1.7%	14.4%	\$792	2.0%	19.6%
	<i>Total</i>	<i>649</i>	<i>100.0%</i>	<i>\$86,741</i>	<i>100.0%</i>	<i>100.0%</i>	<i>250</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34,668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>291</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$39,185</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Multi Huntington

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Bank %	Agg %	\$ 000s	\$ %	\$ %	#	%	Bank %	Agg %	\$ 000s
SMALL BUSINESSES	Low	5	6.7%	\$1,619	12.5%	6.3%	2	6.9%	6.3%	\$754	13.2%	6.6%	2	6.5%	5.9%	\$850	13.7%	6.1%
	Moderate	16	21.3%	\$3,057	23.5%	19.5%	8	27.6%	14.6%	\$1,273	22.3%	17.3%	4	12.9%	16.0%	\$1,103	17.8%	19.2%
	Middle	31	41.3%	\$2,954	22.7%	47.1%	10	34.5%	43.4%	\$1,303	22.9%	38.7%	16	51.6%	42.7%	\$1,477	23.8%	39.9%
	Upper	23	30.7%	\$5,361	41.3%	27.1%	9	31.0%	29.9%	\$2,372	41.6%	34.8%	9	29.0%	31.0%	\$2,772	44.7%	33.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.8%	\$0	0.0%	2.7%	0	0.0%	4.3%	\$0	0.0%	1.6%
	Total	75	100.0%	\$12,991	100.0%	100.0%	29	100.0%	100.0%	\$5,702	100.0%	100.0%	31	100.0%	100.0%	\$6,202	100.0%	100.0%
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	10.7%	0	0.0%	6.5%	\$0	0.0%	8.6%	0	0.0%	7.9%	\$0	0.0%	1.6%
	Middle	2	100.0%	\$30	100.0%	70.9%	2	100.0%	60.9%	\$30	100.0%	70.4%	0	0.0%	63.2%	\$0	0.0%	41.1%
	Upper	0	0.0%	\$0	0.0%	18.4%	0	0.0%	23.9%	\$0	0.0%	18.5%	0	0.0%	18.4%	\$0	0.0%	53.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.7%	\$0	0.0%	2.4%	0	0.0%	10.5%	\$0	0.0%	4.2%
Total	2	100.0%	\$30	100.0%	100.0%	2	100.0%	100.0%	\$30	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Multi Huntington

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2014			2015										
	Count		Dollar			Count		Dollar			Count		Dollar						
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	35	46.7%	\$2,149	16.5%	90.5%	11	37.9%	40.9%	\$763	13.4%	34.9%	13	41.9%	44.6%	\$534	8.6%	40.1%
		Over \$1 Million	26	34.7%	\$9,495	73.1%	8.2%	10	34.5%				13	41.9%					
		Total Rev. available	61	81.4%	\$11,644	89.6%	98.7%	21	72.4%				26	83.8%					
		Rev. Not Known	14	18.7%	\$1,347	10.4%	1.3%	8	27.6%				5	16.1%					
		Total	75	100.0%	\$12,991	100.0%	100.0%	29	100.0%				31	100.0%					
	Loan Size	\$100,000 or Less	51	68.0%	\$1,730	13.3%		20	69.0%	88.9%	\$674	11.8%	27.4%	19	61.3%	90.4%	\$594	9.6%	31.0%
		\$100,001 - \$250,000	8	10.7%	\$1,334	10.3%		2	6.9%	5.5%	\$440	7.7%	18.1%	4	12.9%	5.1%	\$658	10.6%	18.6%
		\$250,001 - \$1 Million	16	21.3%	\$9,927	76.4%		7	24.1%	5.5%	\$4,588	80.5%	54.5%	8	25.8%	4.5%	\$4,950	79.8%	50.4%
		Total	75	100.0%	\$12,991	100.0%		29	100.0%	100.0%	\$5,702	100.0%	100.0%	31	100.0%	100.0%	\$6,202	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	31	88.6%	\$629	29.3%													
		\$100,001 - \$250,000	1	2.9%	\$131	6.1%													
		\$250,001 - \$1 Million	3	8.6%	\$1,389	64.6%													
		Total	35	100.0%	\$2,149	100.0%													
Small Farm	Revenue	\$1 Million or Less	2	100.0%	\$30	100.0%	99.4%	2	100.0%	47.8%	\$30	100.0%	34.5%	0	0.0%	44.7%	\$0	0.0%	81.0%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.6%	0	0.0%				0	0.0%					
		Total Rev. available	2	100.0%	\$30	100.0%	100.0%	2	100.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	2	100.0%	\$30	100.0%	100.0%	2	100.0%				0	0.0%					
	Loan Size	\$100,000 or Less	2	100.0%	\$30	100.0%		2	100.0%	95.7%	\$30	100.0%	54.6%	0	0.0%	97.4%	\$0	0.0%	53.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.2%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.2%	\$0	0.0%	24.7%	0	0.0%	2.6%	\$0	0.0%	46.3%
		Total	2	100.0%	\$30	100.0%		2	100.0%	100.0%	\$30	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	\$30	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	2	100.0%	\$30	100.0%													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: Multi Louisville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	48	2.6%	\$4,755	1.5%	4.7%	11	1.6%	2.1%	\$1,106	0.9%	1.2%	21	2.5%	2.0%	\$1,645	1.2%	1.2%
	Moderate	254	13.8%	\$26,247	8.5%	13.8%	88	12.8%	12.2%	\$8,371	7.0%	8.1%	118	14.2%	11.6%	\$12,915	9.4%	7.8%
	Middle	702	38.2%	\$87,351	28.4%	45.0%	260	37.7%	43.7%	\$32,743	27.5%	35.3%	322	38.7%	44.4%	\$41,009	30.0%	35.6%
	Upper	832	45.3%	\$189,185	61.5%	36.6%	331	48.0%	42.0%	\$76,973	64.6%	55.5%	371	44.6%	42.0%	\$81,272	59.4%	55.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,836</i>	<i>100.0%</i>	<i>\$307,538</i>	<i>100.0%</i>	<i>100.0%</i>	<i>690</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$119,193</i>	<i>100.0%</i>	<i>100.0%</i>	<i>832</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$136,841</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	71	4.1%	\$4,099	1.7%	4.7%	39	7.5%	3.7%	\$1,989	2.9%	2.1%	22	2.6%	2.4%	\$1,545	1.3%	1.4%
	Moderate	235	13.7%	\$20,455	8.6%	13.8%	61	11.8%	12.1%	\$4,988	7.2%	8.1%	119	14.3%	10.6%	\$9,688	8.2%	6.7%
	Middle	730	42.5%	\$76,816	32.3%	45.0%	213	41.0%	44.8%	\$22,511	32.3%	36.4%	351	42.1%	42.9%	\$38,496	32.7%	34.2%
	Upper	681	39.7%	\$136,200	57.3%	36.6%	206	39.7%	39.5%	\$40,202	57.7%	53.5%	342	41.0%	44.1%	\$67,919	57.7%	57.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,717</i>	<i>100.0%</i>	<i>\$237,570</i>	<i>100.0%</i>	<i>100.0%</i>	<i>519</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$69,690</i>	<i>100.0%</i>	<i>100.0%</i>	<i>834</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$117,648</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	3	1.9%	\$183	1.4%	4.7%	2	4.3%	3.2%	\$109	3.3%	1.9%	1	1.3%	4.5%	\$74	1.2%	2.6%
	Moderate	29	18.4%	\$1,624	12.4%	13.8%	5	10.6%	15.4%	\$184	5.5%	9.1%	18	23.4%	13.1%	\$1,108	18.4%	8.5%
	Middle	64	40.5%	\$3,964	30.3%	45.0%	20	42.6%	44.6%	\$991	29.6%	37.2%	30	39.0%	43.0%	\$1,844	30.6%	32.8%
	Upper	62	39.2%	\$7,325	55.9%	36.6%	20	42.6%	36.8%	\$2,065	61.7%	51.8%	28	36.4%	39.4%	\$3,000	49.8%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>\$13,096</i>	<i>100.0%</i>	<i>100.0%</i>	<i>47</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,349</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,026</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.2%	0	0.0%	12.5%	\$0	0.0%	4.1%	0	0.0%	14.7%	\$0	0.0%	4.3%
	Moderate	0	0.0%	\$0	0.0%	23.1%	0	0.0%	30.5%	\$0	0.0%	31.1%	0	0.0%	30.0%	\$0	0.0%	35.7%
	Middle	0	0.0%	\$0	0.0%	36.0%	0	0.0%	36.7%	\$0	0.0%	23.8%	0	0.0%	40.0%	\$0	0.0%	32.8%
	Upper	0	0.0%	\$0	0.0%	21.7%	0	0.0%	20.3%	\$0	0.0%	41.0%	0	0.0%	15.3%	\$0	0.0%	27.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	122	3.3%	\$9,037	1.6%	4.7%	52	4.1%	2.7%	\$3,204	1.7%	1.6%	44	2.5%	2.3%	\$3,264	1.3%	1.5%
	Moderate	518	14.0%	\$48,326	8.7%	13.8%	154	12.3%	12.4%	\$13,543	7.0%	9.3%	255	14.6%	11.3%	\$23,711	9.1%	9.3%
	Middle	1,496	40.3%	\$168,131	30.1%	45.0%	493	39.3%	44.1%	\$56,245	29.3%	35.1%	703	40.3%	43.7%	\$81,349	31.2%	34.9%
	Upper	1,575	42.4%	\$332,710	59.6%	36.6%	557	44.3%	40.8%	\$119,240	62.0%	54.0%	741	42.5%	42.6%	\$152,191	58.4%	54.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>3,711</i>	<i>100.0%</i>	<i>\$558,204</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,256</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$192,232</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,743</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$260,515</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: Multi Louisville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	338	18.4%	\$30,733	10.0%	21.0%	80	11.6%	10.5%	\$6,686	5.6%	5.7%	172	20.7%	10.4%	\$16,092	11.8%	5.5%
	Moderate	450	24.5%	\$51,485	16.7%	17.4%	183	26.5%	22.2%	\$20,706	17.4%	16.0%	197	23.7%	22.7%	\$22,848	16.7%	16.2%
	Middle	347	18.9%	\$52,022	16.9%	20.7%	141	20.4%	20.6%	\$21,187	17.8%	19.4%	157	18.9%	20.1%	\$23,370	17.1%	19.0%
	Upper	639	34.8%	\$160,885	52.3%	40.8%	270	39.1%	30.7%	\$67,265	56.4%	44.4%	276	33.2%	30.9%	\$68,370	50.0%	44.7%
	Unknown	62	3.4%	\$12,413	4.0%	0.0%	16	2.3%	16.1%	\$3,349	2.8%	14.5%	30	3.6%	15.9%	\$6,161	4.5%	14.6%
	<i>Total</i>	<i>1,836</i>	<i>100.0%</i>	<i>\$307,538</i>	<i>100.0%</i>	<i>100.0%</i>	<i>690</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$119,193</i>	<i>100.0%</i>	<i>100.0%</i>	<i>832</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$136,841</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	260	15.1%	\$20,359	8.6%	21.0%	65	12.5%	9.4%	\$4,572	6.6%	5.1%	115	13.8%	7.0%	\$9,912	8.4%	3.6%
	Moderate	389	22.7%	\$37,679	15.9%	17.4%	112	21.6%	16.6%	\$10,703	15.4%	11.4%	206	24.7%	15.7%	\$20,161	17.1%	10.4%
	Middle	436	25.4%	\$48,100	20.2%	20.7%	152	29.3%	20.3%	\$15,853	22.7%	16.8%	191	22.9%	18.8%	\$22,464	19.1%	15.9%
	Upper	576	33.5%	\$122,407	51.5%	40.8%	175	33.7%	32.0%	\$36,987	53.1%	44.2%	287	34.4%	34.0%	\$58,442	49.7%	45.4%
	Unknown	56	3.3%	\$9,025	3.8%	0.0%	15	2.9%	21.7%	\$1,575	2.3%	22.4%	35	4.2%	24.5%	\$6,669	5.7%	24.7%
	<i>Total</i>	<i>1,717</i>	<i>100.0%</i>	<i>\$237,570</i>	<i>100.0%</i>	<i>100.0%</i>	<i>519</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$69,690</i>	<i>100.0%</i>	<i>100.0%</i>	<i>834</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$117,648</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	29	18.4%	\$1,604	12.2%	21.0%	9	19.1%	11.7%	\$290	8.7%	11.1%	15	19.5%	10.6%	\$1,059	17.6%	4.7%
	Moderate	43	27.2%	\$2,615	20.0%	17.4%	14	29.8%	19.2%	\$875	26.1%	13.3%	22	28.6%	21.1%	\$1,199	19.9%	13.3%
	Middle	36	22.8%	\$2,883	22.0%	20.7%	15	31.9%	21.7%	\$1,134	33.9%	17.2%	15	19.5%	21.7%	\$1,205	20.0%	18.1%
	Upper	50	31.6%	\$5,994	45.8%	40.8%	9	19.1%	37.1%	\$1,050	31.4%	46.6%	25	32.5%	40.9%	\$2,563	42.5%	55.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.4%	\$0	0.0%	11.9%	0	0.0%	5.7%	\$0	0.0%	8.2%
	<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>\$13,096</i>	<i>100.0%</i>	<i>100.0%</i>	<i>47</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,349</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,026</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	627	16.9%	\$52,696	9.4%	21.0%	154	12.3%	10.1%	\$11,548	6.0%	5.3%	302	17.3%	9.0%	\$27,063	10.4%	4.4%
	Moderate	882	23.8%	\$91,779	16.4%	17.4%	309	24.6%	20.0%	\$32,284	16.8%	13.6%	425	24.4%	19.8%	\$44,208	17.0%	13.0%
	Middle	819	22.1%	\$103,005	18.5%	20.7%	308	24.5%	20.5%	\$38,174	19.9%	17.5%	363	20.8%	19.5%	\$47,039	18.1%	16.6%
	Upper	1,265	34.1%	\$289,286	51.8%	40.8%	454	36.1%	31.3%	\$105,302	54.8%	42.0%	588	33.7%	32.4%	\$129,375	49.7%	42.1%
	Unknown	118	3.2%	\$21,438	3.8%	0.0%	31	2.5%	18.2%	\$4,924	2.6%	21.5%	65	3.7%	19.2%	\$12,830	4.9%	23.9%
	<i>Total</i>	<i>3,711</i>	<i>100.0%</i>	<i>\$558,204</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,256</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$192,232</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,743</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$260,515</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: Multi Louisville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	%	Agg %	Bank \$ 000s	\$ %	Agg \$ %	
SMALL BUSINESSES	Low	123	12.5%	\$21,309	17.0%	9.3%	53	13.1%	8.7%	\$9,776	17.8%	13.3%	44	11.6%	10.2%	\$7,723	15.6%	13.1%
	Moderate	140	14.3%	\$19,280	15.4%	14.7%	55	13.6%	15.8%	\$8,689	15.8%	18.6%	57	15.0%	15.4%	\$6,874	13.9%	17.8%
	Middle	273	27.8%	\$37,926	30.3%	34.6%	110	27.2%	31.5%	\$16,163	29.4%	29.4%	104	27.4%	31.0%	\$16,155	32.7%	30.5%
	Upper	446	45.4%	\$46,730	37.3%	41.3%	186	46.0%	42.4%	\$20,406	37.1%	37.5%	175	46.1%	42.0%	\$18,701	37.8%	37.7%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	1.0%	0	0.0%	0.4%	\$0	0.0%	0.7%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.3%	0	0.0%	1.0%	\$0	0.0%	0.2%
	Total	982	100.0%	\$125,245	100.0%	100.0%	404	100.0%	100.0%	\$55,034	100.0%	100.0%	380	100.0%	100.0%	\$49,453	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.3%	0	0.0%	2.4%	\$0	0.0%	2.7%	0	0.0%	1.4%	\$0	0.0%	3.5%
	Middle	1	16.7%	\$80	25.8%	47.6%	0	0.0%	49.2%	\$0	0.0%	51.9%	1	25.0%	49.0%	\$80	38.3%	59.9%
	Upper	5	83.3%	\$230	74.2%	45.4%	0	0.0%	47.6%	\$0	0.0%	45.3%	3	75.0%	49.0%	\$129	61.7%	36.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	0.2%	0	0.0%	0.7%	\$0	0.0%	0.0%
Total	6	100.0%	\$310	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	4	100.0%	100.0%	\$209	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Multi Louisville

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2014			2015										
	Count		Dollar			Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	526	53.6%	\$20,627	16.5%	91.5%	198	49.0%	42.9%	\$10,621	19.3%	31.3%	204	53.7%	47.4%	\$6,438	13.0%	31.8%
		Over \$1 Million	255	26.0%	\$79,015	63.1%	8.1%	108	26.7%				100	26.3%					
		Total Rev. available	781	79.6%	\$99,642	79.6%	99.6%	306	75.7%				304	80.0%					
		Rev. Not Known	201	20.5%	\$25,603	20.4%	0.4%	98	24.3%				76	20.0%					
		Total	982	100.0%	\$125,245	100.0%	100.0%	404	100.0%				380	100.0%					
	Loan Size	\$100,000 or Less	719	73.2%	\$22,432	17.9%		285	70.5%	90.2%	\$8,953	16.3%	30.9%	282	74.2%	90.7%	\$8,892	18.0%	31.1%
		\$100,001 - \$250,000	108	11.0%	\$18,075	14.4%		51	12.6%	4.9%	\$8,421	15.3%	16.8%	38	10.0%	4.5%	\$6,490	13.1%	15.9%
		\$250,001 - \$1 Million	155	15.8%	\$84,738	67.7%		68	16.8%	4.9%	\$37,660	68.4%	52.3%	60	15.8%	4.9%	\$34,071	68.9%	53.0%
		Total	982	100.0%	\$125,245	100.0%		404	100.0%	100.0%	\$55,034	100.0%	100.0%	380	100.0%	100.0%	\$49,453	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	497	94.5%	\$10,210	49.5%													
		\$100,001 - \$250,000	14	2.7%	\$2,180	10.6%													
		\$250,001 - \$1 Million	15	2.9%	\$8,237	39.9%													
		Total	526	100.0%	\$20,627	100.0%													
Small Farm	Revenue	\$1 Million or Less	6	100.0%	\$310	100.0%	99.4%	0	0.0%	23.8%	\$0	0.0%	41.6%	4	100.0%	29.3%	\$209	100.0%	35.2%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.6%	0	0.0%				0	0.0%					
		Total Rev. available	6	100.0%	\$310	100.0%	100.0%	0	0.0%				4	100.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	6	100.0%	\$310	100.0%	100.0%	0	0.0%				4	100.0%					
	Loan Size	\$100,000 or Less	5	83.3%	\$209	67.4%		0	0.0%	88.1%	\$0	0.0%	31.9%	3	75.0%	89.1%	\$108	51.7%	37.6%
		\$100,001 - \$250,000	1	16.7%	\$101	32.6%		0	0.0%	7.1%	\$0	0.0%	29.8%	1	25.0%	6.8%	\$101	48.3%	29.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	38.3%	0	0.0%	4.1%	\$0	0.0%	33.4%
		Total	6	100.0%	\$310	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	4	100.0%	100.0%	\$209	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	83.3%	\$209	67.4%													
		\$100,001 - \$250,000	1	16.7%	\$101	32.6%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	6	100.0%	\$310	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: Multi South Bend

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014					2015							
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar				
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	2	0.7%	\$244	0.6%	1.9%	2	1.4%	0.7%	\$244	1.2%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.4%	
	Moderate	52	18.1%	\$4,993	12.1%	17.1%	25	17.6%	13.7%	\$2,590	13.2%	8.9%	21	20.0%	13.6%	\$2,028	12.8%	8.4%	
	Middle	123	42.9%	\$15,651	38.0%	47.9%	58	40.8%	46.1%	\$6,971	35.5%	43.7%	47	44.8%	46.2%	\$6,911	43.5%	44.4%	
	Upper	110	38.3%	\$20,290	49.3%	33.0%	57	40.1%	39.4%	\$9,835	50.1%	46.9%	37	35.2%	39.6%	\$6,949	43.7%	46.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	287	100.0%	\$41,178	100.0%	100.0%	142	100.0%	100.0%	\$19,640	100.0%	100.0%	105	100.0%	100.0%	\$15,888	100.0%	100.0%	
REFINANCE	Low	4	0.9%	\$188	0.4%	1.9%	2	1.1%	0.6%	\$123	0.6%	0.3%	2	1.2%	0.5%	\$65	0.3%	0.2%	
	Moderate	60	14.0%	\$4,827	9.4%	17.1%	23	12.9%	13.6%	\$1,986	9.5%	8.8%	19	11.5%	11.3%	\$1,500	7.0%	6.9%	
	Middle	237	55.4%	\$28,929	56.6%	47.9%	106	59.6%	47.7%	\$13,282	63.7%	46.7%	88	53.3%	47.7%	\$11,343	52.7%	47.9%	
	Upper	127	29.7%	\$17,142	33.6%	33.0%	47	26.4%	38.2%	\$5,465	26.2%	44.2%	56	33.9%	40.5%	\$8,624	40.1%	45.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	428	100.0%	\$51,086	100.0%	100.0%	178	100.0%	100.0%	\$20,856	100.0%	100.0%	165	100.0%	100.0%	\$21,532	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.3%	\$0	0.0%	0.9%	0	0.0%	1.4%	\$0	0.0%	0.7%	
	Moderate	8	12.9%	\$394	10.8%	17.1%	2	7.7%	13.2%	\$77	5.7%	7.9%	5	20.8%	15.9%	\$220	15.9%	8.3%	
	Middle	40	64.5%	\$2,061	56.4%	47.9%	20	76.9%	45.1%	\$1,121	83.0%	40.7%	13	54.2%	45.5%	\$640	46.4%	45.5%	
	Upper	14	22.6%	\$1,201	32.9%	33.0%	4	15.4%	40.4%	\$152	11.3%	50.5%	6	25.0%	37.2%	\$520	37.7%	45.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	62	100.0%	\$3,656	100.0%	100.0%	26	100.0%	100.0%	\$1,350	100.0%	100.0%	24	100.0%	100.0%	\$1,380	100.0%	100.0%	
MULTI FAMILY		Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	8.1%	0	0.0%	2.3%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	35.6%	0	0.0%	41.9%	\$0	0.0%	59.6%	0	0.0%	34.8%	\$0	0.0%	34.1%	
	Middle	0	0.0%	\$0	0.0%	43.3%	0	0.0%	41.9%	\$0	0.0%	22.0%	0	0.0%	30.4%	\$0	0.0%	12.8%	
	Upper	0	0.0%	\$0	0.0%	13.0%	0	0.0%	14.0%	\$0	0.0%	17.8%	0	0.0%	34.8%	\$0	0.0%	53.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	0.8%	\$432	0.5%	1.9%	4	1.2%	0.7%	\$367	0.9%	0.4%	2	0.7%	0.6%	\$65	0.2%	0.3%	
	Moderate	120	15.4%	\$10,214	10.6%	17.1%	50	14.5%	13.7%	\$4,653	11.1%	11.6%	45	15.3%	12.9%	\$3,748	9.7%	9.4%	
	Middle	400	51.5%	\$46,641	48.6%	47.9%	184	53.2%	46.6%	\$21,374	51.1%	43.5%	148	50.3%	46.7%	\$18,894	48.7%	43.8%	
	Upper	251	32.3%	\$38,633	40.3%	33.0%	108	31.2%	39.0%	\$15,452	36.9%	44.5%	99	33.7%	39.8%	\$16,093	41.5%	46.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	777	100.0%	\$95,920	100.0%	100.0%	346	100.0%	100.0%	\$41,846	100.0%	100.0%	294	100.0%	100.0%	\$38,800	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: Multi South Bend

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	39	13.6%	\$2,510	6.1%	20.0%	16	11.3%	7.8%	\$1,027	5.2%	3.9%	16	15.2%	7.4%	\$1,135	7.1%	3.6%
	Moderate	62	21.6%	\$5,478	13.3%	18.6%	34	23.9%	22.3%	\$2,879	14.7%	15.2%	21	20.0%	21.7%	\$2,034	12.8%	14.4%
	Middle	61	21.3%	\$7,697	18.7%	21.2%	28	19.7%	21.1%	\$3,183	16.2%	19.1%	25	23.8%	22.8%	\$3,601	22.7%	19.7%
	Upper	110	38.3%	\$22,341	54.3%	40.2%	53	37.3%	32.9%	\$10,431	53.1%	48.7%	40	38.1%	33.6%	\$8,158	51.3%	49.6%
	Unknown	15	5.2%	\$3,152	7.7%	0.0%	11	7.7%	15.9%	\$2,120	10.8%	13.1%	3	2.9%	14.5%	\$960	6.0%	12.7%
	<i>Total</i>	<i>287</i>	<i>100.0%</i>	<i>\$41,178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>142</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$19,640</i>	<i>100.0%</i>	<i>100.0%</i>	<i>105</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15,888</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	50	11.7%	\$3,326	6.5%	20.0%	20	11.2%	7.4%	\$1,353	6.5%	3.9%	15	9.1%	5.8%	\$877	4.1%	2.8%
	Moderate	86	20.1%	\$7,729	15.1%	18.6%	35	19.7%	15.9%	\$3,103	14.9%	10.3%	35	21.2%	15.1%	\$3,414	15.9%	9.1%
	Middle	109	25.5%	\$10,183	19.9%	21.2%	48	27.0%	20.7%	\$4,784	22.9%	16.7%	35	21.2%	20.5%	\$3,202	14.9%	15.7%
	Upper	171	40.0%	\$28,819	56.4%	40.2%	71	39.9%	37.4%	\$11,352	54.4%	49.3%	73	44.2%	39.8%	\$13,415	62.3%	53.9%
	Unknown	12	2.8%	\$1,029	2.0%	0.0%	4	2.2%	18.6%	\$264	1.3%	19.8%	7	4.2%	18.7%	\$624	2.9%	18.4%
	<i>Total</i>	<i>428</i>	<i>100.0%</i>	<i>\$51,086</i>	<i>100.0%</i>	<i>100.0%</i>	<i>178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,856</i>	<i>100.0%</i>	<i>100.0%</i>	<i>165</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,532</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	4	6.5%	\$169	4.6%	20.0%	1	3.8%	8.7%	\$3	0.2%	5.0%	1	4.2%	10.8%	\$58	4.2%	4.1%
	Moderate	20	32.3%	\$957	26.2%	18.6%	10	38.5%	18.5%	\$616	45.6%	14.8%	8	33.3%	20.0%	\$332	24.1%	13.5%
	Middle	13	21.0%	\$682	18.7%	21.2%	5	19.2%	24.1%	\$195	14.4%	18.8%	6	25.0%	22.7%	\$312	22.6%	17.8%
	Upper	23	37.1%	\$1,769	48.4%	40.2%	9	34.6%	40.8%	\$531	39.3%	58.6%	8	33.3%	40.4%	\$604	43.8%	58.7%
	Unknown	2	3.2%	\$79	2.2%	0.0%	1	3.8%	7.9%	\$5	0.4%	2.7%	1	4.2%	6.2%	\$74	5.4%	5.9%
	<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>\$3,656</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,350</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,380</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	93	12.0%	\$6,005	6.3%	20.0%	37	10.7%	7.7%	\$2,383	5.7%	3.7%	32	10.9%	6.9%	\$2,070	5.3%	3.1%
	Moderate	168	21.6%	\$14,164	14.8%	18.6%	79	22.8%	19.7%	\$6,598	15.8%	12.7%	64	21.8%	19.1%	\$5,780	14.9%	11.5%
	Middle	183	23.6%	\$18,562	19.4%	21.2%	81	23.4%	21.1%	\$8,162	19.5%	17.3%	66	22.4%	21.9%	\$7,115	18.3%	17.0%
	Upper	304	39.1%	\$52,929	55.2%	40.2%	133	38.4%	35.0%	\$22,314	53.3%	46.5%	121	41.2%	36.3%	\$22,177	57.2%	48.5%
	Unknown	29	3.7%	\$4,260	4.4%	0.0%	16	4.6%	16.5%	\$2,389	5.7%	19.8%	11	3.7%	15.8%	\$1,658	4.3%	19.9%
	<i>Total</i>	<i>777</i>	<i>100.0%</i>	<i>\$95,920</i>	<i>100.0%</i>	<i>100.0%</i>	<i>346</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$41,846</i>	<i>100.0%</i>	<i>100.0%</i>	<i>294</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$38,800</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: Multi South Bend

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Count		Bank Dollar		Small Businesses	Count		Dollar				Count		Dollar			
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %
SMALL BUSINESSES	Low	27	6.5%	\$7,659	12.0%	5.2%	12	6.6%	5.2%	\$2,401	9.3%	6.7%	8	4.8%	5.1%	\$2,063	8.2%	6.5%
	Moderate	64	15.4%	\$10,860	17.0%	17.9%	24	13.1%	16.7%	\$4,228	16.4%	18.2%	29	17.5%	18.0%	\$5,536	21.9%	19.4%
	Middle	213	51.2%	\$27,266	42.8%	44.8%	99	54.1%	44.0%	\$12,953	50.4%	44.8%	84	50.6%	43.5%	\$9,842	39.0%	44.9%
	Upper	112	26.9%	\$17,934	28.1%	32.0%	48	26.2%	32.1%	\$6,124	23.8%	29.4%	45	27.1%	31.6%	\$7,820	31.0%	28.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.8%	0	0.0%	1.8%	\$0	0.0%	0.6%
	Total	416	100.0%	\$63,719	100.0%	100.0%	183	100.0%	100.0%	\$25,706	100.0%	100.0%	166	100.0%	100.0%	\$25,261	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	5.9%	\$434	11.3%	5.7%	0	0.0%	0.8%	\$0	0.0%	0.1%	1	7.7%	3.8%	\$25	2.2%	2.2%
	Middle	28	82.4%	\$3,008	78.1%	57.2%	10	83.3%	56.7%	\$1,070	84.3%	54.9%	10	76.9%	57.0%	\$905	79.4%	55.6%
	Upper	4	11.8%	\$410	10.6%	36.8%	2	16.7%	40.6%	\$200	15.7%	44.5%	2	15.4%	38.5%	\$210	18.4%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.3%
Total	34	100.0%	\$3,852	100.0%	100.0%	12	100.0%	100.0%	\$1,270	100.0%	100.0%	13	100.0%	100.0%	\$1,140	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Multi South Bend

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2014			2015										
	Count		Dollar			Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	191	45.9%	\$9,819	15.4%	90.3%	78	42.6%	42.1%	\$3,536	13.8%	31.7%	83	50.0%	45.1%	\$4,665	18.5%	31.0%
		Over \$1 Million	121	29.1%	\$44,195	69.4%	9.0%	43	23.5%					52	31.3%				
		Total Rev. available	312	75.0%	\$54,014	84.8%	99.3%	121	66.1%					135	81.3%				
		Rev. Not Known	104	25.0%	\$9,705	15.2%	0.6%	62	33.9%					31	18.7%				
		Total	416	100.0%	\$63,719	100.0%	100.0%	183	100.0%					166	100.0%				
	Loan Size	\$100,000 or Less	285	68.5%	\$8,983	14.1%		129	70.5%	85.9%	\$3,761	14.6%	22.3%	115	69.3%	86.3%	\$3,690	14.6%	23.3%
		\$100,001 - \$250,000	50	12.0%	\$8,855	13.9%		22	12.0%	6.3%	\$3,826	14.9%	16.1%	20	12.0%	6.2%	\$3,529	14.0%	16.2%
		\$250,001 - \$1 Million	81	19.5%	\$45,881	72.0%		32	17.5%	7.8%	\$18,119	70.5%	61.6%	31	18.7%	7.5%	\$18,042	71.4%	60.4%
		Total	416	100.0%	\$63,719	100.0%		183	100.0%	100.0%	\$25,706	100.0%	100.0%	166	100.0%	100.0%	\$25,261	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	170	89.0%	\$3,491	35.6%													
\$100,001 - \$250,000		11	5.8%	\$2,062	21.0%														
\$250,001 - \$1 Million		10	5.2%	\$4,266	43.4%														
Total		191	100.0%	\$9,819	100.0%														
Small Farm	Revenue	\$1 Million or Less	17	50.0%	\$1,003	26.0%	97.7%	5	41.7%	61.3%	\$235	18.5%	68.7%	7	53.8%	60.0%	\$485	42.5%	61.1%
		Over \$1 Million	3	8.8%	\$390	10.1%	2.3%	1	8.3%					2	15.4%				
		Total Rev. available	20	58.8%	\$1,393	36.1%	100.0%	6	50.0%					9	69.2%				
		Not Known	14	41.2%	\$2,459	63.8%	0.0%	6	50.0%					4	30.8%				
		Total	34	100.0%	\$3,852	100.0%	100.0%	12	100.0%					13	100.0%				
	Loan Size	\$100,000 or Less	20	58.8%	\$818	21.2%		7	58.3%	70.5%	\$270	21.3%	22.0%	9	69.2%	68.7%	\$390	34.2%	22.5%
		\$100,001 - \$250,000	12	35.3%	\$2,275	59.1%		5	41.7%	21.1%	\$1,000	78.7%	42.8%	4	30.8%	21.9%	\$750	65.8%	41.5%
		\$250,001 - \$500,000	2	5.9%	\$759	19.7%		0	0.0%	8.4%	\$0	0.0%	35.2%	0	0.0%	9.4%	\$0	0.0%	35.9%
		Total	34	100.0%	\$3,852	100.0%		12	100.0%	100.0%	\$1,270	100.0%	100.0%	13	100.0%	100.0%	\$1,140	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	13	76.5%	\$378	37.7%													
\$100,001 - \$250,000		4	23.5%	\$625	62.3%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		17	100.0%	\$1,003	100.0%														

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: FL Orlando

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	12	1.0%	\$1,707	0.8%	0.7%	1	0.3%	0.3%	\$218	0.4%	0.2%	7	1.3%	0.3%	\$1,003	1.1%	0.2%
	Moderate	268	22.5%	\$34,200	15.9%	18.8%	47	14.6%	13.9%	\$5,892	9.5%	9.7%	148	26.4%	14.4%	\$19,039	20.1%	10.4%
	Middle	511	42.9%	\$80,230	37.2%	46.3%	142	44.0%	46.4%	\$22,939	37.1%	39.6%	229	40.9%	46.0%	\$34,094	36.1%	40.2%
	Upper	399	33.5%	\$99,437	46.1%	34.2%	133	41.2%	39.4%	\$32,755	53.0%	50.6%	176	31.4%	39.3%	\$40,407	42.7%	49.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,190</i>	<i>100.0%</i>	<i>\$215,574</i>	<i>100.0%</i>	<i>100.0%</i>	<i>323</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$61,804</i>	<i>100.0%</i>	<i>100.0%</i>	<i>560</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$94,543</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	5	0.8%	\$654	0.6%	0.7%	1	0.5%	0.4%	\$233	0.7%	0.3%	2	0.6%	0.4%	\$182	0.3%	0.2%
	Moderate	125	18.9%	\$14,447	12.7%	18.8%	17	9.3%	13.7%	\$2,109	6.6%	9.7%	68	21.3%	12.7%	\$6,905	12.9%	8.7%
	Middle	292	44.1%	\$38,565	33.9%	46.3%	96	52.7%	44.1%	\$12,885	40.3%	37.9%	132	41.3%	43.2%	\$18,244	34.1%	37.1%
	Upper	240	36.3%	\$60,155	52.9%	34.2%	68	37.4%	41.8%	\$16,719	52.3%	52.1%	118	36.9%	43.8%	\$28,107	52.6%	54.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>662</i>	<i>100.0%</i>	<i>\$113,821</i>	<i>100.0%</i>	<i>100.0%</i>	<i>182</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$31,946</i>	<i>100.0%</i>	<i>100.0%</i>	<i>320</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$53,438</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	2	2.4%	\$198	2.2%	0.7%	1	3.8%	0.8%	\$60	2.5%	0.2%	1	2.2%	0.8%	\$138	2.5%	0.6%
	Moderate	18	21.4%	\$1,624	18.2%	18.8%	4	15.4%	16.2%	\$250	10.4%	7.7%	13	28.9%	16.6%	\$1,357	24.9%	9.4%
	Middle	40	47.6%	\$3,596	40.2%	46.3%	15	57.7%	46.2%	\$1,236	51.4%	36.4%	19	42.2%	42.9%	\$1,873	34.4%	34.0%
	Upper	24	28.6%	\$3,522	39.4%	34.2%	6	23.1%	36.7%	\$861	35.8%	55.7%	12	26.7%	39.7%	\$2,077	38.1%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>84</i>	<i>100.0%</i>	<i>\$8,940</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,407</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,445</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	6.3%	\$0	0.0%	7.6%	0	0.0%	5.0%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	39.1%	0	0.0%	42.0%	\$0	0.0%	36.5%	0	0.0%	46.0%	\$0	0.0%	39.1%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	34.8%	\$0	0.0%	38.8%	0	0.0%	27.3%	\$0	0.0%	33.9%
	Upper	0	0.0%	\$0	0.0%	19.2%	0	0.0%	17.0%	\$0	0.0%	17.1%	0	0.0%	21.6%	\$0	0.0%	24.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	19	1.0%	\$2,559	0.8%	0.7%	3	0.6%	0.3%	\$511	0.5%	0.9%	10	1.1%	0.3%	\$1,323	0.9%	0.5%
	Moderate	411	21.2%	\$50,271	14.9%	18.8%	68	12.8%	14.0%	\$8,251	8.6%	12.2%	229	24.8%	14.0%	\$27,301	17.8%	12.5%
	Middle	843	43.5%	\$122,391	36.2%	46.3%	253	47.6%	45.7%	\$37,060	38.5%	39.1%	380	41.1%	45.0%	\$54,211	35.3%	38.7%
	Upper	663	34.2%	\$163,114	48.2%	34.2%	207	39.0%	40.0%	\$50,335	52.3%	47.8%	306	33.1%	40.7%	\$70,591	46.0%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,936</i>	<i>100.0%</i>	<i>\$338,335</i>	<i>100.0%</i>	<i>100.0%</i>	<i>531</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$96,157</i>	<i>100.0%</i>	<i>100.0%</i>	<i>925</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$153,426</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: FL Orlando

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	195	16.4%	\$18,973	8.8%	20.1%	16	5.0%	3.4%	\$1,350	2.2%	1.5%	119	21.3%	3.9%	\$11,333	12.0%	1.8%
	Moderate	227	19.1%	\$28,057	13.0%	18.5%	44	13.6%	14.1%	\$4,991	8.1%	8.6%	118	21.1%	15.6%	\$14,978	15.8%	10.2%
	Middle	192	16.1%	\$29,134	13.5%	21.0%	61	18.9%	19.5%	\$9,053	14.6%	15.8%	74	13.2%	20.3%	\$11,402	12.1%	17.1%
	Upper	413	34.7%	\$109,016	50.6%	40.5%	149	46.1%	46.1%	\$36,073	58.4%	59.0%	150	26.8%	44.1%	\$38,512	40.7%	56.1%
	Unknown	163	13.7%	\$30,394	14.1%	0.0%	53	16.4%	16.8%	\$10,337	16.7%	15.2%	99	17.7%	16.1%	\$18,318	19.4%	14.8%
	<i>Total</i>	<i>1,190</i>	<i>100.0%</i>	<i>\$215,574</i>	<i>100.0%</i>	<i>100.0%</i>	<i>323</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$61,804</i>	<i>100.0%</i>	<i>100.0%</i>	<i>560</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$94,543</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	111	16.8%	\$9,343	8.2%	20.1%	11	6.0%	6.2%	\$780	2.4%	3.3%	64	20.0%	4.9%	\$5,740	10.7%	2.6%
	Moderate	119	18.0%	\$13,343	11.7%	18.5%	25	13.7%	11.8%	\$2,536	7.9%	7.6%	69	21.6%	11.2%	\$7,908	14.8%	7.1%
	Middle	118	17.8%	\$14,616	12.8%	21.0%	38	20.9%	18.1%	\$4,458	14.0%	14.2%	57	17.8%	16.4%	\$7,130	13.3%	13.0%
	Upper	273	41.2%	\$69,534	61.1%	40.5%	94	51.6%	43.9%	\$21,742	68.1%	53.8%	110	34.4%	42.3%	\$29,094	54.4%	51.9%
	Unknown	41	6.2%	\$6,985	6.1%	0.0%	14	7.7%	20.0%	\$2,430	7.6%	21.2%	20	6.3%	25.1%	\$3,566	6.7%	25.4%
	<i>Total</i>	<i>662</i>	<i>100.0%</i>	<i>\$113,821</i>	<i>100.0%</i>	<i>100.0%</i>	<i>182</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$31,946</i>	<i>100.0%</i>	<i>100.0%</i>	<i>320</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$53,438</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	12	14.3%	\$952	10.6%	20.1%	1	3.8%	8.8%	\$36	1.5%	2.2%	11	24.4%	8.1%	\$916	16.8%	2.3%
	Moderate	20	23.8%	\$1,608	18.0%	18.5%	8	30.8%	16.7%	\$545	22.6%	8.5%	7	15.6%	15.8%	\$766	14.1%	7.9%
	Middle	22	26.2%	\$2,428	27.2%	21.0%	9	34.6%	20.9%	\$897	37.3%	18.3%	9	20.0%	19.2%	\$1,122	20.6%	16.1%
	Upper	29	34.5%	\$3,688	41.3%	40.5%	7	26.9%	46.3%	\$665	27.6%	64.5%	18	40.0%	52.0%	\$2,641	48.5%	65.2%
	Unknown	1	1.2%	\$264	3.0%	0.0%	1	3.8%	7.3%	\$264	11.0%	6.6%	0	0.0%	5.0%	\$0	0.0%	8.6%
	<i>Total</i>	<i>84</i>	<i>100.0%</i>	<i>\$8,940</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,407</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,445</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	318	16.4%	\$29,268	8.7%	20.1%	28	5.3%	4.4%	\$2,166	2.3%	1.8%	194	21.0%	4.4%	\$17,989	11.7%	1.9%
	Moderate	366	18.9%	\$43,008	12.7%	18.5%	77	14.5%	13.5%	\$8,072	8.4%	7.5%	194	21.0%	14.2%	\$23,652	15.4%	8.4%
	Middle	332	17.1%	\$46,178	13.6%	21.0%	108	20.3%	19.1%	\$14,408	15.0%	13.9%	140	15.1%	19.0%	\$19,654	12.8%	14.4%
	Upper	715	36.9%	\$182,238	53.9%	40.5%	250	47.1%	45.4%	\$58,480	60.8%	52.1%	278	30.1%	43.8%	\$70,247	45.8%	50.0%
	Unknown	205	10.6%	\$37,643	11.1%	0.0%	68	12.8%	17.5%	\$13,031	13.6%	24.7%	119	12.9%	18.6%	\$21,884	14.3%	25.4%
	<i>Total</i>	<i>1,936</i>	<i>100.0%</i>	<i>\$338,335</i>	<i>100.0%</i>	<i>100.0%</i>	<i>531</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$96,157</i>	<i>100.0%</i>	<i>100.0%</i>	<i>925</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$153,426</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: FL Orlando

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	23	2.2%	\$2,311	2.0%	1.1%	9	2.4%	1.1%	\$1,046	2.2%	1.6%	10	2.3%	1.2%	\$820	1.8%	1.3%
	Moderate	280	27.0%	\$46,991	40.8%	21.8%	111	29.1%	21.3%	\$18,791	39.0%	25.2%	111	25.9%	20.7%	\$19,373	42.9%	26.0%
	Middle	364	35.1%	\$34,198	29.7%	40.5%	128	33.6%	37.6%	\$12,632	26.2%	36.7%	149	34.7%	37.8%	\$11,776	26.1%	35.5%
	Upper	369	35.6%	\$31,790	27.6%	36.6%	133	34.9%	38.7%	\$15,678	32.6%	35.6%	159	37.1%	39.3%	\$13,159	29.2%	36.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.9%	0	0.0%	1.0%	\$0	0.0%	0.8%
	Total	1,036	100.0%	\$115,290	100.0%	100.0%	381	100.0%	100.0%	\$48,147	100.0%	100.0%	429	100.0%	100.0%	\$45,128	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.7%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	11.5%	0	0.0%	13.1%	\$0	0.0%	6.4%	0	0.0%	8.1%	\$0	0.0%	5.5%
	Middle	2	66.7%	\$10	11.8%	51.3%	0	0.0%	43.4%	\$0	0.0%	45.0%	2	100.0%	50.7%	\$10	100.0%	46.4%
	Upper	1	33.3%	\$75	88.2%	36.7%	1	100.0%	40.2%	\$75	100.0%	45.6%	0	0.0%	37.2%	\$0	0.0%	45.7%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.3%	\$0	0.0%	3.0%	0	0.0%	3.4%	\$0	0.0%	2.3%
Total	3	100.0%	\$85	100.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	2	100.0%	100.0%	\$10	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: FL Orlando

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	%	%	Bank	Agg	%	\$ 000s	%	%	Bank	Agg	%	\$ 000s	%	%	
Small Business	Revenue	\$1 Million or Less	622	60.0%	\$24,744	21.5%	95.1%	203	53.3%	48.8%	\$8,790	18.3%	34.0%	258	60.1%	54.9%	\$10,108	22.4%	37.5%
		Over \$1 Million	226	21.8%	\$70,378	61.0%	4.8%	90	23.6%					89	20.7%				
		Total Rev. available	848	81.8%	\$95,122	82.5%	99.9%	293	76.9%					347	80.8%				
		Rev. Not Known	188	18.1%	\$20,168	17.5%	0.1%	88	23.1%					82	19.1%				
		Total	1,036	100.0%	\$115,290	100.0%	100.0%	381	100.0%					429	100.0%				
	Loan Size	\$100,000 or Less	811	78.3%	\$22,426	19.5%		282	74.0%	95.7%	\$8,161	17.0%	41.5%	344	80.2%	95.9%	\$9,301	20.6%	43.2%
		\$100,001 - \$250,000	91	8.8%	\$17,341	15.0%		37	9.7%	2.1%	\$7,015	14.6%	13.9%	38	8.9%	2.0%	\$7,017	15.5%	12.7%
		\$250,001 - \$1 Million	134	12.9%	\$75,523	65.5%		62	16.3%	2.2%	\$32,971	68.5%	44.6%	47	11.0%	2.2%	\$28,810	63.8%	44.1%
		Total	1,036	100.0%	\$115,290	100.0%		381	100.0%	100.0%	\$48,147	100.0%	100.0%	429	100.0%	100.0%	\$45,128	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	582	93.6%	\$10,519	42.5%													
		\$100,001 - \$250,000	17	2.7%	\$2,843	11.5%													
		\$250,001 - \$1 Million	23	3.7%	\$11,382	46.0%													
		Total	622	100.0%	\$24,744	100.0%													
Small Farm	Revenue	\$1 Million or Less	2	66.7%	\$10	11.8%	94.4%	0	0.0%	50.0%	\$0	0.0%	25.5%	2	100.0%	60.8%	\$10	100.0%	56.3%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.6%	0	0.0%					0	0.0%				
		Total Rev. available	2	66.7%	\$10	11.8%	100.0%	0	0.0%					2	100.0%				
		Not Known	1	33.3%	\$75	88.2%	0.0%	1	100.0%					0	0.0%				
		Total	3	100.0%	\$85	100.0%	100.0%	1	100.0%					2	100.0%				
	Loan Size	\$100,000 or Less	3	100.0%	\$85	100.0%		1	100.0%	87.7%	\$75	100.0%	33.4%	2	100.0%	84.5%	\$10	100.0%	29.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.4%	\$0	0.0%	23.6%	0	0.0%	7.4%	\$0	0.0%	18.6%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.9%	\$0	0.0%	43.0%	0	0.0%	8.1%	\$0	0.0%	51.7%
		Total	3	100.0%	\$85	100.0%		1	100.0%	100.0%	\$75	100.0%	100.0%	2	100.0%	100.0%	\$10	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	\$10	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	2	100.0%	\$10	100.0%													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: FL Tampa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	30	2.2%	\$3,438	1.3%	1.9%	6	1.3%	1.0%	\$820	0.9%	0.6%	18	3.0%	1.2%	\$2,080	1.9%	0.8%
	Moderate	306	22.5%	\$35,886	14.0%	21.4%	61	13.6%	13.5%	\$6,849	7.7%	8.2%	170	28.0%	14.3%	\$19,645	18.4%	9.0%
	Middle	478	35.2%	\$73,530	28.6%	42.1%	153	34.2%	41.3%	\$23,302	26.3%	34.3%	216	35.6%	41.0%	\$31,146	29.1%	34.3%
	Upper	544	40.1%	\$143,913	56.0%	34.6%	227	50.8%	44.2%	\$57,629	65.0%	56.8%	203	33.4%	43.5%	\$54,183	50.6%	55.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,358</i>	<i>100.0%</i>	<i>\$256,767</i>	<i>100.0%</i>	<i>100.0%</i>	<i>447</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$88,600</i>	<i>100.0%</i>	<i>100.0%</i>	<i>607</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,054</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	14	2.3%	\$1,222	1.1%	1.9%	2	1.2%	1.4%	\$111	0.4%	3.1%	6	2.1%	1.1%	\$568	1.2%	0.6%
	Moderate	123	19.8%	\$12,357	11.5%	21.4%	21	13.0%	13.5%	\$1,900	6.5%	11.4%	57	19.7%	12.6%	\$5,283	10.9%	8.1%
	Middle	232	37.4%	\$30,232	28.1%	42.1%	65	40.1%	40.2%	\$8,964	30.6%	32.9%	119	41.2%	39.6%	\$14,977	30.9%	32.5%
	Upper	251	40.5%	\$63,870	59.3%	34.6%	74	45.7%	44.9%	\$18,294	62.5%	52.6%	107	37.0%	46.6%	\$27,613	57.0%	58.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>620</i>	<i>100.0%</i>	<i>\$107,681</i>	<i>100.0%</i>	<i>100.0%</i>	<i>162</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,269</i>	<i>100.0%</i>	<i>100.0%</i>	<i>289</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$48,441</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.7%	0	0.0%	1.9%	\$0	0.0%	0.9%
	Moderate	20	21.1%	\$1,294	16.8%	21.4%	6	15.4%	19.0%	\$235	7.5%	10.2%	11	29.7%	17.7%	\$913	29.5%	8.1%
	Middle	38	40.0%	\$2,869	37.3%	42.1%	17	43.6%	39.9%	\$1,177	37.7%	33.2%	13	35.1%	40.4%	\$1,129	36.5%	34.3%
	Upper	37	38.9%	\$3,537	45.9%	34.6%	16	41.0%	39.8%	\$1,710	54.8%	55.8%	13	35.1%	40.1%	\$1,055	34.1%	56.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>95</i>	<i>100.0%</i>	<i>\$7,700</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,122</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,097</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	4.3%	0	0.0%	9.9%	\$0	0.0%	5.1%	0	0.0%	6.1%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	28.1%	0	0.0%	27.0%	\$0	0.0%	29.6%	0	0.0%	27.2%	\$0	0.0%	21.1%
	Middle	0	0.0%	\$0	0.0%	37.2%	0	0.0%	31.6%	\$0	0.0%	41.7%	0	0.0%	40.8%	\$0	0.0%	37.6%
	Upper	0	0.0%	\$0	0.0%	30.5%	0	0.0%	31.6%	\$0	0.0%	23.6%	0	0.0%	25.8%	\$0	0.0%	38.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	44	2.1%	\$4,660	1.3%	1.9%	8	1.2%	1.1%	\$931	0.8%	1.5%	24	2.6%	1.2%	\$2,648	1.7%	0.9%
	Moderate	449	21.7%	\$49,537	13.3%	21.4%	88	13.6%	13.8%	\$8,984	7.4%	10.3%	238	25.5%	14.0%	\$25,841	16.3%	9.8%
	Middle	748	36.1%	\$106,631	28.7%	42.1%	235	36.3%	40.8%	\$33,443	27.6%	34.3%	348	37.3%	40.5%	\$47,252	29.8%	34.1%
	Upper	832	40.1%	\$211,320	56.8%	34.6%	317	48.9%	44.2%	\$77,633	64.2%	53.9%	323	34.6%	44.3%	\$82,851	52.2%	55.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2,073</i>	<i>100.0%</i>	<i>\$372,148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>648</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$120,991</i>	<i>100.0%</i>	<i>100.0%</i>	<i>933</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$158,592</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: FL Tampa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	219	16.1%	\$18,889	7.4%	20.6%	27	6.0%	4.0%	\$1,940	2.2%	1.6%	136	22.4%	4.1%	\$12,168	11.4%	1.7%
	Moderate	226	16.6%	\$27,462	10.7%	18.2%	58	13.0%	14.5%	\$6,973	7.9%	8.3%	129	21.3%	15.7%	\$15,532	14.5%	9.4%
	Middle	251	18.5%	\$36,502	14.2%	19.6%	93	20.8%	19.7%	\$13,293	15.0%	15.5%	107	17.6%	19.4%	\$15,540	14.5%	15.5%
	Upper	604	44.5%	\$161,770	63.0%	41.6%	246	55.0%	46.4%	\$60,926	68.8%	60.6%	207	34.1%	44.1%	\$58,406	54.6%	58.4%
	Unknown	58	4.3%	\$12,144	4.7%	0.0%	23	5.1%	15.4%	\$5,468	6.2%	14.1%	28	4.6%	16.6%	\$5,408	5.1%	15.0%
	<i>Total</i>	<i>1,358</i>	<i>100.0%</i>	<i>\$256,767</i>	<i>100.0%</i>	<i>100.0%</i>	<i>447</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$88,600</i>	<i>100.0%</i>	<i>100.0%</i>	<i>607</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,054</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	113	18.2%	\$8,996	8.4%	20.6%	15	9.3%	6.0%	\$1,253	4.3%	2.9%	66	22.8%	4.7%	\$5,103	10.5%	2.2%
	Moderate	112	18.1%	\$10,585	9.8%	18.2%	25	15.4%	11.3%	\$2,122	7.2%	6.5%	60	20.8%	10.8%	\$5,848	12.1%	6.4%
	Middle	107	17.3%	\$14,150	13.1%	19.6%	28	17.3%	17.8%	\$3,891	13.3%	12.6%	48	16.6%	16.2%	\$5,817	12.0%	12.1%
	Upper	246	39.7%	\$65,261	60.6%	41.6%	81	50.0%	43.4%	\$19,689	67.3%	49.9%	93	32.2%	42.7%	\$26,486	54.7%	53.2%
	Unknown	42	6.8%	\$8,689	8.1%	0.0%	13	8.0%	21.6%	\$2,314	7.9%	28.1%	22	7.6%	25.5%	\$5,187	10.7%	26.1%
	<i>Total</i>	<i>620</i>	<i>100.0%</i>	<i>\$107,681</i>	<i>100.0%</i>	<i>100.0%</i>	<i>162</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,269</i>	<i>100.0%</i>	<i>100.0%</i>	<i>289</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$48,441</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	18	18.9%	\$1,133	14.7%	20.6%	3	7.7%	8.9%	\$141	4.5%	2.4%	11	29.7%	7.5%	\$815	26.3%	2.7%
	Moderate	20	21.1%	\$1,331	17.3%	18.2%	10	25.6%	16.4%	\$677	21.7%	9.3%	8	21.6%	16.1%	\$571	18.4%	8.7%
	Middle	23	24.2%	\$1,999	26.0%	19.6%	11	28.2%	19.5%	\$1,064	34.1%	16.3%	8	21.6%	19.5%	\$673	21.7%	15.2%
	Upper	33	34.7%	\$3,096	40.2%	41.6%	14	35.9%	50.4%	\$1,099	35.2%	65.2%	10	27.0%	52.1%	\$1,038	33.5%	64.9%
	Unknown	1	1.1%	\$141	1.8%	0.0%	1	2.6%	4.8%	\$141	4.5%	6.7%	0	0.0%	4.8%	\$0	0.0%	8.4%
	<i>Total</i>	<i>95</i>	<i>100.0%</i>	<i>\$7,700</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,122</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,097</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	350	16.9%	\$29,018	7.8%	20.6%	45	6.9%	4.8%	\$3,334	2.8%	1.9%	213	22.8%	4.4%	\$18,086	11.4%	1.7%
	Moderate	358	17.3%	\$39,378	10.6%	18.2%	93	14.4%	13.6%	\$9,772	8.1%	7.4%	197	21.1%	14.2%	\$21,951	13.8%	7.7%
	Middle	381	18.4%	\$52,651	14.1%	19.6%	132	20.4%	19.1%	\$18,248	15.1%	13.9%	163	17.5%	18.3%	\$22,030	13.9%	13.3%
	Upper	883	42.6%	\$230,127	61.8%	41.6%	341	52.6%	45.5%	\$81,714	67.5%	54.4%	310	33.2%	43.9%	\$85,930	54.2%	52.0%
	Unknown	101	4.9%	\$20,974	5.6%	0.0%	37	5.7%	17.0%	\$7,923	6.5%	22.4%	50	5.4%	19.1%	\$10,595	6.7%	25.2%
	<i>Total</i>	<i>2,073</i>	<i>100.0%</i>	<i>\$372,148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>648</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$120,991</i>	<i>100.0%</i>	<i>100.0%</i>	<i>933</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$158,592</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: FL Tampa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ 000s	\$ %	\$ %	Bank #	Agg %	\$ 000s	\$ %	Agg \$ %		
SMALL BUSINESSES	Low	47	3.3%	\$5,265	4.8%	2.7%	26	4.7%	3.2%	\$3,506	8.5%	5.1%	16	2.7%	3.3%	\$1,583	3.4%	4.4%
	Moderate	313	22.3%	\$30,847	28.2%	20.2%	129	23.4%	19.7%	\$10,801	26.3%	22.3%	111	19.1%	19.0%	\$12,235	26.4%	22.1%
	Middle	488	34.8%	\$44,248	40.5%	38.4%	182	33.0%	37.2%	\$15,426	37.6%	39.1%	210	36.1%	37.9%	\$19,978	43.2%	39.1%
	Upper	555	39.6%	\$28,907	26.5%	38.7%	214	38.8%	38.7%	\$11,294	27.5%	32.8%	245	42.1%	38.8%	\$12,493	27.0%	33.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.7%	0	0.0%	1.0%	\$0	0.0%	0.6%
	Total	1,403	100.0%	\$109,267	100.0%	100.0%	551	100.0%	100.0%	\$41,027	100.0%	100.0%	582	100.0%	100.0%	\$46,289	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	1.1%
	Moderate	1	20.0%	\$15	11.3%	20.1%	0	0.0%	17.9%	\$0	0.0%	34.4%	1	50.0%	18.6%	\$15	23.1%	18.7%
	Middle	1	20.0%	\$5	3.8%	41.5%	0	0.0%	40.2%	\$0	0.0%	40.6%	0	0.0%	27.9%	\$0	0.0%	28.2%
	Upper	3	60.0%	\$113	85.0%	36.1%	1	100.0%	38.5%	\$50	100.0%	22.8%	1	50.0%	47.1%	\$50	76.9%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	2.1%	0	0.0%	2.9%	\$0	0.0%	2.4%
Total	5	100.0%	\$133	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	2	100.0%	100.0%	\$65	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: FL Tampa

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2014			2015										
	Count		Dollar			Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	814	58.0%	\$24,648	22.6%	94.6%	291	52.8%	48.2%	\$7,874	19.2%	34.2%	325	55.8%	54.7%	\$9,689	20.9%	36.9%
		Over \$1 Million	243	17.3%	\$54,811	50.2%	5.3%	77	14.0%					131	22.5%				
		Total Rev. available	1,057	75.3%	\$79,459	72.8%	99.9%	368	66.8%					456	78.3%				
		Rev. Not Known	346	24.7%	\$29,808	27.3%	0.1%	183	33.2%					126	21.6%				
		Total	1,403	100.0%	\$109,267	100.0%	100.0%	551	100.0%					582	100.0%				
	Loan Size	\$100,000 or Less	1,183	84.3%	\$31,970	29.3%		472	85.7%	94.3%	\$12,879	31.4%	36.5%	489	84.0%	94.6%	\$12,839	27.7%	37.7%
		\$100,001 - \$250,000	113	8.1%	\$20,932	19.2%		40	7.3%	2.7%	\$7,674	18.7%	14.7%	49	8.4%	2.6%	\$8,994	19.4%	14.3%
		\$250,001 - \$1 Million	107	7.6%	\$56,365	51.6%		39	7.1%	3.0%	\$20,474	49.9%	48.8%	44	7.6%	2.9%	\$24,456	52.8%	48.0%
		Total	1,403	100.0%	\$109,267	100.0%		551	100.0%	100.0%	\$41,027	100.0%	100.0%	582	100.0%	100.0%	\$46,289	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	786	96.6%	\$14,753	59.9%													
		\$100,001 - \$250,000	12	1.5%	\$2,120	8.6%													
		\$250,001 - \$1 Million	16	2.0%	\$7,775	31.5%													
		Total	814	100.0%	\$24,648	100.0%													
Small Farm	Revenue	\$1 Million or Less	3	60.0%	\$33	24.8%	95.1%	0	0.0%	44.4%	\$0	0.0%	42.5%	1	50.0%	50.0%	\$15	23.1%	63.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	4.6%	0	0.0%					0	0.0%				
		Total Rev. available	3	60.0%	\$33	24.8%	99.7%	0	0.0%					1	50.0%				
		Not Known	2	40.0%	\$100	75.2%	0.2%	1	100.0%					1	50.0%				
		Total	5	100.0%	\$133	100.0%	100.0%	1	100.0%					2	100.0%				
	Loan Size	\$100,000 or Less	5	100.0%	\$133	100.0%		1	100.0%	86.3%	\$50	100.0%	31.6%	2	100.0%	87.1%	\$65	100.0%	31.6%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.3%	\$0	0.0%	43.3%	0	0.0%	9.3%	\$0	0.0%	35.9%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	25.1%	0	0.0%	3.6%	\$0	0.0%	32.6%
		Total	5	100.0%	\$133	100.0%		1	100.0%	100.0%	\$50	100.0%	100.0%	2	100.0%	100.0%	\$65	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	3	100.0%	\$33	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	3	100.0%	\$33	100.0%													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: GA Atlanta

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014					2015							
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar				
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%			
HOME PURCHASE	Low	17	1.7%	\$1,868	0.7%	3.4%	4	1.4%	2.0%	\$515	0.6%	1.3%	9	2.3%	2.0%	\$959	0.9%	1.4%	
	Moderate	95	9.8%	\$14,128	5.2%	17.4%	29	10.0%	12.7%	\$4,772	5.7%	8.4%	33	8.5%	13.4%	\$3,900	3.7%	9.0%	
	Middle	301	30.9%	\$64,123	23.5%	37.5%	84	29.0%	35.6%	\$17,128	20.6%	27.4%	120	31.0%	37.0%	\$23,655	22.6%	29.3%	
	Upper	561	57.6%	\$192,216	70.6%	41.7%	173	59.7%	49.7%	\$60,786	73.1%	62.9%	225	58.1%	47.6%	\$75,985	72.7%	60.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>974</i>	<i>100.0%</i>	<i>\$272,335</i>	<i>100.0%</i>	<i>100.0%</i>	<i>290</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$83,201</i>	<i>100.0%</i>	<i>100.0%</i>	<i>387</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$104,499</i>	<i>100.0%</i>	<i>100.0%</i>		
REFINANCE	Low	11	1.5%	\$1,894	0.9%	3.4%	1	0.5%	1.9%	\$208	0.4%	1.3%	9	2.5%	1.8%	\$1,583	1.6%	1.1%	
	Moderate	49	6.8%	\$6,379	3.2%	17.4%	18	8.9%	14.0%	\$2,302	4.5%	9.2%	19	5.4%	11.4%	\$2,574	2.5%	7.0%	
	Middle	204	28.3%	\$38,679	19.3%	37.5%	64	31.7%	35.7%	\$11,707	22.9%	27.3%	94	26.6%	33.7%	\$16,866	16.6%	25.7%	
	Upper	457	63.4%	\$153,477	76.6%	41.7%	119	58.9%	48.4%	\$36,828	72.1%	62.2%	231	65.4%	53.2%	\$80,780	79.3%	66.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>721</i>	<i>100.0%</i>	<i>\$200,429</i>	<i>100.0%</i>	<i>100.0%</i>	<i>202</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$51,045</i>	<i>100.0%</i>	<i>100.0%</i>	<i>353</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$101,803</i>	<i>100.0%</i>	<i>100.0%</i>		
HOME IMPROVEMENT	Low	3	10.0%	\$74	2.5%	3.4%	3	25.0%	3.1%	\$74	8.0%	1.2%	0	0.0%	2.6%	\$0	0.0%	1.2%	
	Moderate	3	10.0%	\$349	11.9%	17.4%	2	16.7%	14.1%	\$245	26.5%	6.7%	1	12.5%	13.2%	\$104	10.8%	6.5%	
	Middle	7	23.3%	\$662	22.6%	37.5%	2	16.7%	34.2%	\$100	10.8%	21.1%	0	0.0%	34.9%	\$0	0.0%	23.6%	
	Upper	17	56.7%	\$1,849	63.0%	41.7%	5	41.7%	48.6%	\$505	54.7%	71.0%	7	87.5%	49.2%	\$859	89.2%	68.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>\$2,934</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$924</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$963</i>	<i>100.0%</i>	<i>100.0%</i>		
MULTI FAMILY	Multi-Family Units						Low	0	0.0%	18.6%	\$0	0.0%	9.2%	0	0.0%	16.3%	\$0	0.0%	9.4%
	Moderate	1	50.0%	\$11,000	63.2%	33.9%	0	0.0%	33.9%	\$0	0.0%	26.9%	1	50.0%	38.5%	\$11,000	63.2%	31.2%	
	Middle	1	50.0%	\$6,400	36.8%	22.9%	0	0.0%	21.5%	\$0	0.0%	30.5%	1	50.0%	20.9%	\$6,400	36.8%	29.5%	
	Upper	0	0.0%	\$0	0.0%	25.2%	0	0.0%	26.0%	\$0	0.0%	33.5%	0	0.0%	24.3%	\$0	0.0%	29.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$17,400</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,400</i>	<i>100.0%</i>	<i>100.0%</i>		
HMDA TOTALS	Low	31	1.8%	\$3,836	0.8%	3.4%	8	1.6%	2.0%	\$797	0.6%	1.9%	18	2.4%	2.0%	\$2,542	1.1%	1.8%	
	Moderate	148	8.6%	\$31,856	6.5%	17.4%	49	9.7%	13.3%	\$7,319	5.4%	10.0%	54	7.2%	12.6%	\$17,578	7.8%	9.7%	
	Middle	513	29.7%	\$109,864	22.3%	37.5%	150	29.8%	35.6%	\$28,935	21.4%	27.6%	215	28.7%	35.6%	\$46,921	20.9%	27.9%	
	Upper	1,035	59.9%	\$347,542	70.5%	41.7%	297	58.9%	49.2%	\$98,119	72.6%	60.5%	463	61.7%	49.8%	\$157,624	70.2%	60.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>1,727</i>	<i>100.0%</i>	<i>\$493,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>504</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$135,170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>750</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$224,665</i>	<i>100.0%</i>	<i>100.0%</i>		

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: GA Atlanta

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg			
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	36	3.7%	\$3,398	1.2%	21.8%	12	4.1%	8.1%	\$1,104	1.3%	3.7%	14	3.6%	7.4%	\$1,343	1.3%	3.5%
	Moderate	78	8.0%	\$10,748	3.9%	16.6%	21	7.2%	16.5%	\$2,733	3.3%	10.5%	31	8.0%	16.9%	\$4,378	4.2%	10.9%
	Middle	97	10.0%	\$18,099	6.6%	18.7%	23	7.9%	17.1%	\$4,436	5.3%	14.6%	25	6.5%	17.3%	\$4,395	4.2%	14.7%
	Upper	475	48.8%	\$177,138	65.0%	42.9%	149	51.4%	38.0%	\$57,327	68.9%	53.6%	121	31.3%	37.6%	\$51,202	49.0%	53.1%
	Unknown	288	29.6%	\$62,952	23.1%	0.0%	85	29.3%	20.3%	\$17,601	21.2%	17.6%	196	50.6%	20.8%	\$43,181	41.3%	17.8%
	<i>Total</i>	<i>974</i>	<i>100.0%</i>	<i>\$272,335</i>	<i>100.0%</i>	<i>100.0%</i>	<i>290</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$83,201</i>	<i>100.0%</i>	<i>100.0%</i>	<i>387</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$104,499</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	31	4.3%	\$3,216	1.6%	21.8%	8	4.0%	6.9%	\$957	1.9%	3.4%	11	3.1%	5.0%	\$1,123	1.1%	2.4%
	Moderate	49	6.8%	\$6,728	3.4%	16.6%	18	8.9%	12.3%	\$2,470	4.8%	7.4%	20	5.7%	10.7%	\$2,806	2.8%	6.5%
	Middle	104	14.4%	\$16,441	8.2%	18.7%	29	14.4%	15.7%	\$4,250	8.3%	11.8%	44	12.5%	15.6%	\$7,203	7.1%	12.1%
	Upper	342	47.4%	\$132,216	66.0%	42.9%	90	44.6%	40.0%	\$32,233	63.1%	50.8%	147	41.6%	42.5%	\$62,486	61.4%	55.7%
	Unknown	195	27.0%	\$41,828	20.9%	0.0%	57	28.2%	25.1%	\$11,135	21.8%	26.6%	131	37.1%	26.2%	\$28,185	27.7%	23.2%
	<i>Total</i>	<i>721</i>	<i>100.0%</i>	<i>\$200,429</i>	<i>100.0%</i>	<i>100.0%</i>	<i>202</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$51,045</i>	<i>100.0%</i>	<i>100.0%</i>	<i>353</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$101,803</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	7	23.3%	\$404	13.8%	21.8%	3	25.0%	8.6%	\$136	14.7%	2.3%	2	25.0%	6.9%	\$117	12.1%	2.0%
	Moderate	8	26.7%	\$581	19.8%	16.6%	3	25.0%	17.9%	\$255	27.6%	8.0%	2	25.0%	16.6%	\$64	6.6%	8.1%
	Middle	7	23.3%	\$739	25.2%	18.7%	3	25.0%	20.0%	\$186	20.1%	13.6%	1	12.5%	19.9%	\$104	10.8%	14.1%
	Upper	7	23.3%	\$980	33.4%	42.9%	2	16.7%	44.6%	\$117	12.7%	66.8%	3	37.5%	50.4%	\$678	70.4%	66.5%
	Unknown	1	3.3%	\$230	7.8%	0.0%	1	8.3%	8.9%	\$230	24.9%	9.3%	0	0.0%	6.2%	\$0	0.0%	9.3%
	<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>\$2,934</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$924</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$963</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$17,400	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$17,400	100.0%	100.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$17,400</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,400</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	74	4.3%	\$7,018	1.4%	21.8%	23	4.6%	7.7%	\$2,197	1.6%	3.3%	27	3.6%	6.4%	\$2,583	1.1%	2.8%
	Moderate	135	7.8%	\$18,057	3.7%	16.6%	42	8.3%	15.1%	\$5,458	4.0%	8.7%	53	7.1%	14.5%	\$7,248	3.2%	8.6%
	Middle	208	12.0%	\$35,279	7.2%	18.7%	55	10.9%	16.7%	\$8,872	6.6%	12.6%	70	9.3%	16.7%	\$11,702	5.2%	12.8%
	Upper	824	47.7%	\$310,334	62.9%	42.9%	241	47.8%	38.8%	\$89,677	66.3%	48.6%	271	36.1%	39.8%	\$114,366	50.9%	50.7%
	Unknown	486	28.1%	\$122,410	24.8%	0.0%	143	28.4%	21.7%	\$28,966	21.4%	26.8%	329	43.9%	22.6%	\$88,766	39.5%	25.0%
	<i>Total</i>	<i>1,727</i>	<i>100.0%</i>	<i>\$493,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>504</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$135,170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>750</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$224,665</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: GA Atlanta

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	23	4.5%	\$2,562	3.9%	5.0%	6	3.1%	4.6%	\$531	1.9%	6.5%	10	4.9%	4.7%	\$1,629	7.3%	6.3%
	Moderate	126	24.9%	\$20,813	32.1%	20.0%	42	22.0%	17.6%	\$9,046	32.3%	20.3%	53	25.7%	18.0%	\$7,310	32.7%	20.0%
	Middle	132	26.0%	\$10,985	16.9%	33.0%	54	28.3%	28.7%	\$4,722	16.9%	28.0%	50	24.3%	28.9%	\$3,597	16.1%	28.1%
	Upper	226	44.6%	\$30,524	47.0%	42.0%	89	46.6%	48.0%	\$13,677	48.9%	44.2%	93	45.1%	47.4%	\$9,841	44.0%	44.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.1%	\$0	0.0%	0.9%	0	0.0%	0.9%	\$0	0.0%	0.7%
	Total	507	100.0%	\$64,884	100.0%	100.0%	191	100.0%	100.0%	\$27,976	100.0%	100.0%	206	100.0%	100.0%	\$22,377	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	3.3%	0	0.0%	1.6%	\$0	0.0%	3.2%	0	0.0%	1.7%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	13.5%	0	0.0%	13.9%	\$0	0.0%	5.0%	0	0.0%	10.7%	\$0	0.0%	15.8%
	Middle	0	0.0%	\$0	0.0%	37.9%	0	0.0%	37.7%	\$0	0.0%	72.6%	0	0.0%	47.9%	\$0	0.0%	64.5%
	Upper	0	0.0%	\$0	0.0%	45.2%	0	0.0%	45.9%	\$0	0.0%	19.1%	0	0.0%	38.8%	\$0	0.0%	17.2%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.1%	0	0.0%	0.8%	\$0	0.0%	0.8%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: GA Atlanta

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	%	%	Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	291	57.4%	\$12,671	19.5%	93.2%	106	55.5%	51.9%	\$6,163	22.0%	34.2%	118	57.3%	56.6%	\$3,937	17.6%	36.6%
		Over \$1 Million	152	30.0%	\$43,126	66.5%	6.6%	56	29.3%					65	31.6%				
		Total Rev. available	443	87.4%	\$55,797	86.0%	99.8%	162	84.8%					183	88.9%				
		Rev. Not Known	64	12.6%	\$9,087	14.0%	0.2%	29	15.2%					23	11.2%				
	Total	507	100.0%	\$64,884	100.0%	100.0%	191	100.0%					206	100.0%					
	Loan Size	\$100,000 or Less	378	74.6%	\$10,808	16.7%		134	70.2%	93.9%	\$3,435	12.3%	35.0%	163	79.1%	94.4%	\$5,065	22.6%	37.1%
		\$100,001 - \$250,000	61	12.0%	\$11,223	17.3%		25	13.1%	2.8%	\$4,891	17.5%	14.1%	23	11.2%	2.6%	\$4,161	18.6%	13.4%
		\$250,001 - \$1 Million	68	13.4%	\$42,853	66.0%		32	16.8%	3.3%	\$19,650	70.2%	50.9%	20	9.7%	3.0%	\$13,151	58.8%	49.5%
		Total	507	100.0%	\$64,884	100.0%		191	100.0%	100.0%	\$27,976	100.0%	100.0%	206	100.0%	100.0%	\$22,377	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	273	93.8%	\$5,286	41.7%													
		\$100,001 - \$250,000	9	3.1%	\$1,658	13.1%													
		\$250,001 - \$1 Million	9	3.1%	\$5,727	45.2%													
		Total	291	100.0%	\$12,671	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.2%	0	0.0%	46.7%	\$0	0.0%	42.1%	0	0.0%	52.9%	\$0	0.0%	42.9%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.8%	0	0.0%					0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	86.9%	\$0	0.0%	37.0%	0	0.0%	88.4%	\$0	0.0%	37.4%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.0%	\$0	0.0%	30.6%	0	0.0%	7.4%	\$0	0.0%	28.5%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.1%	\$0	0.0%	32.4%	0	0.0%	4.1%	\$0	0.0%	34.1%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: IL Southern IL

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Dollar				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	1	1.8%	\$22	0.3%	0.8%	1	3.6%	0.5%	\$22	0.6%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	1	1.8%	\$21	0.3%	6.7%	1	3.6%	4.9%	\$21	0.6%	2.8%	0	0.0%	3.1%	\$0	0.0%	1.4%
	Middle	35	62.5%	\$4,394	63.2%	65.4%	18	64.3%	60.9%	\$2,535	70.0%	59.6%	13	68.4%	63.4%	\$1,520	63.8%	61.3%
	Upper	19	33.9%	\$2,515	36.2%	27.1%	8	28.6%	33.7%	\$1,044	28.8%	37.4%	6	31.6%	33.4%	\$864	36.2%	37.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>\$6,952</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,622</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,384</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.9%	\$0	0.0%	0.4%
	Moderate	4	5.2%	\$173	2.7%	6.7%	1	4.5%	3.9%	\$62	3.0%	2.5%	2	5.1%	2.4%	\$81	2.7%	1.5%
	Middle	47	61.0%	\$3,596	56.1%	65.4%	13	59.1%	67.1%	\$1,181	57.8%	60.3%	23	59.0%	64.8%	\$1,526	50.6%	61.0%
	Upper	26	33.8%	\$2,637	41.2%	27.1%	8	36.4%	29.1%	\$801	39.2%	37.2%	14	35.9%	31.9%	\$1,411	46.8%	37.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>\$6,406</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,044</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,018</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	8.0%	\$87	7.2%	6.7%	0	0.0%	6.9%	\$0	0.0%	4.3%	1	7.1%	5.4%	\$77	12.6%	2.7%
	Middle	15	60.0%	\$638	52.9%	65.4%	3	60.0%	72.2%	\$149	63.4%	64.0%	8	57.1%	75.7%	\$236	38.5%	65.1%
	Upper	8	32.0%	\$480	39.8%	27.1%	2	40.0%	20.8%	\$86	36.6%	31.7%	5	35.7%	18.9%	\$300	48.9%	32.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$1,205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$235</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$613</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	75.6%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	13.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	0.6%	\$22	0.2%	0.8%	1	1.8%	0.3%	\$22	0.4%	0.1%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	7	4.4%	\$281	1.9%	6.7%	2	3.6%	4.6%	\$83	1.4%	2.6%	3	4.2%	3.0%	\$158	2.6%	1.4%
	Middle	97	61.4%	\$8,628	59.2%	65.4%	34	61.8%	63.8%	\$3,865	65.5%	61.4%	44	61.1%	64.8%	\$3,282	54.6%	63.9%
	Upper	53	33.5%	\$5,632	38.7%	27.1%	18	32.7%	31.3%	\$1,931	32.7%	35.9%	25	34.7%	31.8%	\$2,575	42.8%	34.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>\$14,563</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,901</i>	<i>100.0%</i>	<i>100.0%</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,015</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: IL Southern IL

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	8	14.3%	\$538	7.7%	19.4%	3	10.7%	6.9%	\$205	5.7%	3.5%	4	21.1%	8.3%	\$279	11.7%	4.4%
	Moderate	10	17.9%	\$641	9.2%	16.6%	7	25.0%	22.8%	\$454	12.5%	15.7%	2	10.5%	19.3%	\$143	6.0%	14.4%
	Middle	20	35.7%	\$2,374	34.1%	23.0%	10	35.7%	22.2%	\$1,120	30.9%	21.7%	5	26.3%	21.4%	\$652	27.3%	20.1%
	Upper	17	30.4%	\$3,194	45.9%	41.0%	7	25.0%	24.3%	\$1,638	45.2%	38.2%	8	42.1%	28.8%	\$1,310	54.9%	40.7%
	Unknown	1	1.8%	\$205	2.9%	0.0%	1	3.6%	23.8%	\$205	5.7%	20.9%	0	0.0%	22.2%	\$0	0.0%	20.4%
	<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>\$6,952</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,622</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,384</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	9	11.7%	\$445	6.9%	19.4%	3	13.6%	7.0%	\$119	5.8%	3.2%	5	12.8%	7.3%	\$267	8.8%	3.7%
	Moderate	20	26.0%	\$1,235	19.3%	16.6%	4	18.2%	12.8%	\$240	11.7%	8.0%	15	38.5%	17.3%	\$965	32.0%	11.2%
	Middle	19	24.7%	\$1,478	23.1%	23.0%	4	18.2%	24.5%	\$470	23.0%	20.8%	10	25.6%	24.8%	\$726	24.1%	21.6%
	Upper	27	35.1%	\$3,013	47.0%	41.0%	11	50.0%	46.5%	\$1,215	59.4%	60.5%	8	20.5%	39.8%	\$960	31.8%	52.0%
	Unknown	2	2.6%	\$235	3.7%	0.0%	0	0.0%	9.2%	\$0	0.0%	7.5%	1	2.6%	10.8%	\$100	3.3%	11.6%
	<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>\$6,406</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,044</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,018</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	2	8.0%	\$9	0.7%	19.4%	0	0.0%	9.7%	\$0	0.0%	4.4%	2	14.3%	12.2%	\$9	1.5%	5.3%
	Moderate	7	28.0%	\$201	16.7%	16.6%	2	40.0%	15.3%	\$62	26.4%	19.7%	4	28.6%	24.3%	\$129	21.0%	13.4%
	Middle	5	20.0%	\$356	29.5%	23.0%	2	40.0%	34.7%	\$131	55.7%	38.7%	1	7.1%	12.2%	\$15	2.4%	8.7%
	Upper	11	44.0%	\$639	53.0%	41.0%	1	20.0%	31.9%	\$42	17.9%	36.3%	7	50.0%	41.9%	\$460	75.0%	63.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.3%	\$0	0.0%	0.8%	0	0.0%	9.5%	\$0	0.0%	9.0%
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$1,205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$235</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$613</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	19	12.0%	\$992	6.8%	19.4%	6	10.9%	7.1%	\$324	5.5%	3.2%	11	15.3%	8.1%	\$555	9.2%	3.9%
	Moderate	37	23.4%	\$2,077	14.3%	16.6%	13	23.6%	19.0%	\$756	12.8%	12.5%	21	29.2%	18.8%	\$1,237	20.6%	12.2%
	Middle	44	27.8%	\$4,208	28.9%	23.0%	16	29.1%	23.5%	\$1,721	29.2%	20.9%	16	22.2%	22.0%	\$1,393	23.2%	19.0%
	Upper	55	34.8%	\$6,846	47.0%	41.0%	19	34.5%	31.8%	\$2,895	49.1%	44.6%	23	31.9%	33.6%	\$2,730	45.4%	42.7%
	Unknown	3	1.9%	\$440	3.0%	0.0%	1	1.8%	18.6%	\$205	3.5%	18.7%	1	1.4%	17.6%	\$100	1.7%	22.2%
	<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>\$14,563</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,901</i>	<i>100.0%</i>	<i>100.0%</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,015</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: IL Southern IL

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %		
SMALL BUSINESSES	Low	1	1.4%	\$5	0.0%	6.0%	0	0.0%	5.8%	\$0	0.0%	11.1%	0	0.0%	6.1%	\$0	0.0%	4.7%
	Moderate	4	5.5%	\$66	0.5%	5.0%	3	8.8%	6.2%	\$53	1.0%	5.3%	0	0.0%	5.2%	\$0	0.0%	2.6%
	Middle	50	68.5%	\$10,292	83.2%	63.0%	23	67.6%	62.0%	\$4,992	89.6%	63.2%	21	77.8%	63.9%	\$5,095	90.3%	71.0%
	Upper	18	24.7%	\$2,011	16.3%	26.0%	8	23.5%	20.4%	\$526	9.4%	19.4%	6	22.2%	21.2%	\$546	9.7%	20.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	5.6%	\$0	0.0%	1.0%	0	0.0%	3.7%	\$0	0.0%	0.8%
	Total	73	100.0%	\$12,374	100.0%	100.0%	34	100.0%	100.0%	\$5,571	100.0%	100.0%	27	100.0%	100.0%	\$5,641	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	1.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.5%	0	0.0%	3.5%	\$0	0.0%	2.2%	0	0.0%	2.9%	\$0	0.0%	2.3%
	Middle	4	28.6%	\$470	41.4%	70.8%	2	28.6%	74.6%	\$370	59.2%	73.8%	1	20.0%	78.0%	\$75	17.9%	82.5%
	Upper	10	71.4%	\$665	58.6%	28.7%	5	71.4%	21.4%	\$255	40.8%	22.4%	4	80.0%	18.5%	\$345	82.1%	15.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	0.2%
Total	14	100.0%	\$1,135	100.0%	100.0%	7	100.0%	100.0%	\$625	100.0%	100.0%	5	100.0%	100.0%	\$420	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: IL Southern IL

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	20	27.4%	\$1,063	8.6%	89.2%	9	26.5%	35.9%	\$666	12.0%	29.5%	5	18.5%	39.8%	\$319	5.7%	29.7%
		Over \$1 Million	37	50.7%	\$9,515	76.9%	9.4%	16	47.1%					16	59.3%				
		Total Rev. available	57	78.1%	\$10,578	85.5%	98.6%	25	73.6%					21	77.8%				
		Rev. Not Known	16	21.9%	\$1,796	14.5%	1.5%	9	26.5%					6	22.2%				
		Total	73	100.0%	\$12,374	100.0%	100.0%	34	100.0%					27	100.0%				
	Loan Size	\$100,000 or Less	41	56.2%	\$1,210	9.8%		20	58.8%	89.2%	\$690	12.4%	24.6%	11	40.7%	90.9%	\$398	7.1%	28.3%
		\$100,001 - \$250,000	18	24.7%	\$3,353	27.1%		8	23.5%	5.6%	\$1,585	28.5%	17.9%	9	33.3%	4.0%	\$1,618	28.7%	14.5%
		\$250,001 - \$1 Million	14	19.2%	\$7,811	63.1%		6	17.6%	5.2%	\$3,296	59.2%	57.5%	7	25.9%	5.1%	\$3,625	64.3%	57.2%
		Total	73	100.0%	\$12,374	100.0%		34	100.0%	100.0%	\$5,571	100.0%	100.0%	27	100.0%	100.0%	\$5,641	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	18	90.0%	\$404	38.0%													
\$100,001 - \$250,000		1	5.0%	\$188	17.7%														
\$250,001 - \$1 Million		1	5.0%	\$471	44.3%														
Total		20	100.0%	\$1,063	100.0%														
Small Farm	Revenue	\$1 Million or Less	6	42.9%	\$550	48.5%	99.2%	3	42.9%	75.7%	\$385	61.6%	72.6%	1	20.0%	74.0%	\$75	17.9%	80.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.8%	0	0.0%					0	0.0%				
		Total Rev. available	6	42.9%	\$550	48.5%	100.0%	3	42.9%					1	20.0%				
		Not Known	8	57.1%	\$585	51.5%	0.0%	4	57.1%					4	80.0%				
		Total	14	100.0%	\$1,135	100.0%	100.0%	7	100.0%					5	100.0%				
	Loan Size	\$100,000 or Less	11	78.6%	\$465	41.0%		5	71.4%	75.1%	\$175	28.0%	32.4%	4	80.0%	82.7%	\$200	47.6%	42.7%
		\$100,001 - \$250,000	2	14.3%	\$350	30.8%		1	14.3%	17.9%	\$130	20.8%	35.5%	1	20.0%	12.7%	\$220	52.4%	32.8%
		\$250,001 - \$500,000	1	7.1%	\$320	28.2%		1	14.3%	6.9%	\$320	51.2%	32.1%	0	0.0%	4.6%	\$0	0.0%	24.6%
		Total	14	100.0%	\$1,135	100.0%		7	100.0%	100.0%	\$625	100.0%	100.0%	5	100.0%	100.0%	\$420	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	83.3%	\$230	41.8%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		1	16.7%	\$320	58.2%														
Total		6	100.0%	\$550	100.0%														

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: IN Indianapolis

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	106	4.1%	\$9,496	2.2%	4.8%	10	1.3%	1.5%	\$645	0.5%	0.8%	69	5.4%	1.8%	\$6,160	3.1%	1.0%
	Moderate	519	20.3%	\$54,298	12.8%	18.3%	64	8.5%	12.5%	\$6,111	4.4%	7.4%	297	23.4%	13.4%	\$31,312	15.9%	8.2%
	Middle	1,030	40.3%	\$142,890	33.6%	43.7%	348	46.2%	42.7%	\$51,203	36.5%	35.6%	498	39.2%	42.4%	\$64,357	32.7%	36.2%
	Upper	901	35.3%	\$219,057	51.5%	33.3%	331	44.0%	43.3%	\$82,311	58.7%	56.2%	407	32.0%	42.4%	\$94,896	48.2%	54.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2,556</i>	<i>100.0%</i>	<i>\$425,741</i>	<i>100.0%</i>	<i>100.0%</i>	<i>753</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$140,270</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,271</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$196,725</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	76	3.4%	\$5,059	1.6%	4.8%	9	1.4%	2.3%	\$644	0.7%	2.6%	39	3.6%	1.6%	\$2,313	1.5%	0.8%
	Moderate	379	17.1%	\$32,355	10.2%	18.3%	84	13.4%	13.4%	\$6,871	7.4%	17.9%	185	17.1%	11.2%	\$15,497	10.1%	6.6%
	Middle	925	41.7%	\$104,848	33.2%	43.7%	307	49.1%	44.3%	\$33,892	36.5%	41.2%	429	39.5%	41.1%	\$48,998	31.9%	33.9%
	Upper	839	37.8%	\$173,943	55.0%	33.3%	225	36.0%	40.0%	\$51,324	55.3%	38.4%	432	39.8%	46.1%	\$86,834	56.5%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2,219</i>	<i>100.0%</i>	<i>\$316,205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>625</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$92,731</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,085</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$153,642</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	10	6.7%	\$423	4.1%	4.8%	7	12.5%	2.4%	\$317	10.2%	1.0%	3	4.5%	2.4%	\$106	2.2%	1.4%
	Moderate	36	24.2%	\$1,661	16.0%	18.3%	8	14.3%	13.4%	\$273	8.8%	6.7%	19	28.8%	13.4%	\$877	18.1%	6.1%
	Middle	60	40.3%	\$3,637	35.0%	43.7%	27	48.2%	46.9%	\$1,554	50.2%	37.2%	24	36.4%	44.4%	\$1,465	30.2%	35.0%
	Upper	43	28.9%	\$4,672	45.0%	33.3%	14	25.0%	37.2%	\$953	30.8%	55.1%	20	30.3%	39.9%	\$2,397	49.5%	57.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>149</i>	<i>100.0%</i>	<i>\$10,393</i>	<i>100.0%</i>	<i>100.0%</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,097</i>	<i>100.0%</i>	<i>100.0%</i>	<i>66</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,845</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	10.2%	\$0	0.0%	5.4%	0	0.0%	12.3%	\$0	0.0%	8.7%
	Moderate	1	100.0%	\$72	100.0%	41.1%	0	0.0%	37.8%	\$0	0.0%	35.4%	1	100.0%	36.1%	\$72	100.0%	32.8%
	Middle	0	0.0%	\$0	0.0%	30.7%	0	0.0%	38.6%	\$0	0.0%	29.2%	0	0.0%	37.7%	\$0	0.0%	35.7%
	Upper	0	0.0%	\$0	0.0%	16.0%	0	0.0%	13.4%	\$0	0.0%	30.0%	0	0.0%	13.9%	\$0	0.0%	22.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$72</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	192	3.9%	\$14,978	2.0%	4.8%	26	1.8%	1.9%	\$1,606	0.7%	1.8%	111	4.6%	1.8%	\$8,579	2.4%	1.3%
	Moderate	935	19.0%	\$88,386	11.7%	18.3%	156	10.9%	12.9%	\$13,255	5.6%	13.2%	502	20.7%	12.6%	\$47,758	13.4%	9.0%
	Middle	2,015	40.9%	\$251,375	33.4%	43.7%	682	47.6%	43.4%	\$86,649	36.7%	37.3%	951	39.2%	42.0%	\$114,820	32.3%	35.3%
	Upper	1,783	36.2%	\$397,672	52.9%	33.3%	570	39.7%	41.9%	\$134,588	57.0%	47.7%	859	35.5%	43.7%	\$184,127	51.8%	54.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>4,925</i>	<i>100.0%</i>	<i>\$752,411</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,434</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$236,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,423</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$355,284</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: IN Indianapolis

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count		Dollar				Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg			Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	565	22.1%	\$50,799	11.9%	21.0%	73	9.7%	9.3%	\$6,412	4.6%	4.9%	386	30.4%	10.5%	\$34,849	17.7%	5.7%
	Moderate	538	21.0%	\$61,304	14.4%	17.5%	155	20.6%	21.5%	\$18,334	13.1%	15.3%	247	19.4%	21.4%	\$28,332	14.4%	15.5%
	Middle	451	17.6%	\$66,857	15.7%	20.9%	152	20.2%	19.5%	\$22,755	16.2%	18.2%	202	15.9%	19.6%	\$30,565	15.5%	18.1%
	Upper	802	31.4%	\$212,945	50.0%	40.6%	313	41.6%	32.0%	\$82,680	58.9%	46.6%	313	24.6%	31.6%	\$82,270	41.8%	45.7%
	Unknown	200	7.8%	\$33,836	7.9%	0.0%	60	8.0%	17.7%	\$10,089	7.2%	15.0%	123	9.7%	16.9%	\$20,709	10.5%	15.0%
	<i>Total</i>	<i>2,556</i>	<i>100.0%</i>	<i>\$425,741</i>	<i>100.0%</i>	<i>100.0%</i>	<i>753</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$140,270</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,271</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$196,725</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	397	17.9%	\$31,215	9.9%	21.0%	90	14.4%	8.8%	\$6,407	6.9%	3.2%	189	17.4%	6.8%	\$14,962	9.7%	3.4%
	Moderate	462	20.8%	\$42,480	13.4%	17.5%	130	20.8%	17.2%	\$11,688	12.6%	7.9%	233	21.5%	14.7%	\$21,917	14.3%	9.4%
	Middle	466	21.0%	\$55,665	17.6%	20.9%	139	22.2%	19.5%	\$16,966	18.3%	11.1%	222	20.5%	17.7%	\$26,439	17.2%	14.7%
	Upper	758	34.2%	\$166,718	52.7%	40.6%	224	35.8%	32.8%	\$51,305	55.3%	30.3%	354	32.6%	35.4%	\$77,398	50.4%	49.0%
	Unknown	136	6.1%	\$20,127	6.4%	0.0%	42	6.7%	21.7%	\$6,365	6.9%	47.5%	87	8.0%	25.3%	\$12,926	8.4%	23.4%
	<i>Total</i>	<i>2,219</i>	<i>100.0%</i>	<i>\$316,205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>625</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$92,731</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,085</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$153,642</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	33	22.1%	\$1,576	15.2%	21.0%	6	10.7%	8.7%	\$239	7.7%	3.5%	22	33.3%	9.6%	\$1,101	22.7%	4.2%
	Moderate	29	19.5%	\$1,574	15.1%	17.5%	14	25.0%	19.5%	\$576	18.6%	12.2%	11	16.7%	18.5%	\$690	14.2%	10.0%
	Middle	37	24.8%	\$2,297	22.1%	20.9%	14	25.0%	23.9%	\$928	30.0%	18.9%	13	19.7%	23.7%	\$711	14.7%	19.0%
	Upper	49	32.9%	\$4,885	47.0%	40.6%	22	39.3%	43.3%	\$1,354	43.7%	62.5%	19	28.8%	45.5%	\$2,282	47.1%	64.0%
	Unknown	1	0.7%	\$61	0.6%	0.0%	0	0.0%	4.5%	\$0	0.0%	2.9%	1	1.5%	2.7%	\$61	1.3%	2.9%
	<i>Total</i>	<i>149</i>	<i>100.0%</i>	<i>\$10,393</i>	<i>100.0%</i>	<i>100.0%</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,097</i>	<i>100.0%</i>	<i>100.0%</i>	<i>66</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,845</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$72	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$72	100.0%	100.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$72</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	995	20.2%	\$83,590	11.1%	21.0%	169	11.8%	9.1%	\$13,058	5.5%	3.9%	597	24.6%	9.1%	\$50,912	14.3%	4.5%
	Moderate	1,029	20.9%	\$105,358	14.0%	17.5%	299	20.9%	19.9%	\$30,598	13.0%	11.4%	491	20.3%	18.7%	\$50,939	14.3%	12.3%
	Middle	954	19.4%	\$124,819	16.6%	20.9%	305	21.3%	19.7%	\$40,649	17.2%	14.4%	437	18.0%	19.0%	\$57,715	16.2%	15.9%
	Upper	1,609	32.7%	\$384,548	51.1%	40.6%	559	39.0%	32.7%	\$135,339	57.3%	37.7%	686	28.3%	33.6%	\$161,950	45.6%	44.7%
	Unknown	338	6.9%	\$54,096	7.2%	0.0%	102	7.1%	18.6%	\$16,454	7.0%	32.7%	212	8.7%	19.7%	\$33,768	9.5%	22.5%
	<i>Total</i>	<i>4,925</i>	<i>100.0%</i>	<i>\$752,411</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,434</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$236,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,423</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$355,284</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: IN Indianapolis

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Count		Bank Dollar		Small Businesses	Count		Dollar				Count		Dollar			
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %
SMALL BUSINESSES	Low	57	4.2%	\$9,026	4.8%	4.7%	17	3.0%	4.5%	\$1,866	2.4%	5.6%	28	5.7%	5.1%	\$5,768	8.0%	6.2%
	Moderate	224	16.5%	\$37,795	20.1%	18.7%	100	17.5%	16.6%	\$17,144	22.1%	19.4%	74	15.1%	16.9%	\$12,863	17.7%	18.5%
	Middle	588	43.3%	\$80,382	42.6%	41.2%	248	43.4%	39.9%	\$33,631	43.3%	41.7%	211	43.1%	39.3%	\$31,133	42.9%	39.4%
	Upper	489	36.0%	\$61,258	32.5%	35.3%	205	35.9%	37.5%	\$25,088	32.3%	32.5%	177	36.1%	37.6%	\$22,745	31.4%	35.5%
	Unknown	1	0.1%	\$20	0.0%	0.0%	1	0.2%	0.1%	\$20	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	1.0%	\$0	0.0%	0.2%
	Total	1,359	100.0%	\$188,481	100.0%	100.0%	571	100.0%	100.0%	\$77,749	100.0%	100.0%	490	100.0%	100.0%	\$72,509	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.6%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.6%
	Moderate	2	11.1%	\$200	10.8%	4.8%	1	16.7%	3.2%	\$100	20.4%	2.8%	1	11.1%	2.8%	\$100	13.5%	3.3%
	Middle	11	61.1%	\$1,086	58.6%	74.4%	4	66.7%	79.1%	\$322	65.7%	77.2%	4	44.4%	78.3%	\$139	18.8%	77.0%
	Upper	5	27.8%	\$568	30.6%	19.9%	1	16.7%	16.3%	\$68	13.9%	19.3%	4	44.4%	17.4%	\$500	67.7%	19.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	0.1%	0	0.0%	0.8%	\$0	0.0%	0.0%
Total	18	100.0%	\$1,854	100.0%	100.0%	6	100.0%	100.0%	\$490	100.0%	100.0%	9	100.0%	100.0%	\$739	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: IN Indianapolis

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2014			2015										
	Count		Dollar			Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	704	51.8%	\$33,811	17.9%	91.3%	284	49.7%	40.3%	\$14,875	19.1%	33.7%	245	50.0%	41.9%	\$11,842	16.3%	28.6%
		Over \$1 Million	398	29.3%	\$125,870	66.8%	8.2%	149	26.1%					162	33.1%				
		Total Rev. available	1,102	81.1%	\$159,681	84.7%	99.5%	433	75.8%					407	83.1%				
		Rev. Not Known	257	18.9%	\$28,800	15.3%	0.6%	138	24.2%					83	16.9%				
		Total	1,359	100.0%	\$188,481	100.0%	100.0%	571	100.0%					490	100.0%				
	Loan Size	\$100,000 or Less	964	70.9%	\$34,583	18.3%		403	70.6%	89.1%	\$14,069	18.1%	26.7%	344	70.2%	89.2%	\$12,598	17.4%	26.7%
		\$100,001 - \$250,000	180	13.2%	\$32,889	17.4%		78	13.7%	5.2%	\$14,549	18.7%	16.7%	61	12.4%	5.0%	\$10,790	14.9%	15.9%
		\$250,001 - \$1 Million	215	15.8%	\$121,009	64.2%		90	15.8%	5.7%	\$49,131	63.2%	56.6%	85	17.3%	5.8%	\$49,121	67.7%	57.4%
		Total	1,359	100.0%	\$188,481	100.0%		571	100.0%	100.0%	\$77,749	100.0%	100.0%	490	100.0%	100.0%	\$72,509	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	639	90.8%	\$15,395	45.5%													
\$100,001 - \$250,000		41	5.8%	\$7,009	20.7%														
\$250,001 - \$1 Million		24	3.4%	\$11,407	33.7%														
Total		704	100.0%	\$33,811	100.0%														
Small Farm	Revenue	\$1 Million or Less	8	44.4%	\$350	18.9%	98.9%	2	33.3%	53.4%	\$143	29.2%	56.4%	4	44.4%	50.6%	\$82	11.1%	60.4%
		Over \$1 Million	1	5.6%	\$10	0.5%	1.1%	1	16.7%				0	0.0%					
		Total Rev. available	9	50.0%	\$360	19.4%	100.0%	3	50.0%				4	44.4%					
		Not Known	9	50.0%	\$1,494	80.6%	0.0%	3	50.0%				5	55.6%					
		Total	18	100.0%	\$1,854	100.0%	100.0%	6	100.0%				9	100.0%					
	Loan Size	\$100,000 or Less	15	83.3%	\$817	44.1%		5	83.3%	69.9%	\$303	61.8%	21.7%	8	88.9%	66.6%	\$389	52.6%	18.6%
		\$100,001 - \$250,000	1	5.6%	\$187	10.1%		1	16.7%	17.7%	\$187	38.2%	32.3%	0	0.0%	18.5%	\$0	0.0%	29.3%
		\$250,001 - \$500,000	2	11.1%	\$850	45.8%		0	0.0%	12.4%	\$0	0.0%	46.0%	1	11.1%	14.9%	\$350	47.4%	52.0%
		Total	18	100.0%	\$1,854	100.0%		6	100.0%	100.0%	\$490	100.0%	100.0%	9	100.0%	100.0%	\$739	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	8	100.0%	\$350	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		8	100.0%	\$350	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: IN Southern IN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	53	10.3%	\$4,611	7.8%	11.5%	29	11.9%	10.3%	\$2,131	7.7%	7.2%	17	8.9%	10.8%	\$1,689	7.6%	7.9%
	Middle	284	55.4%	\$30,116	51.1%	66.5%	132	54.3%	65.8%	\$13,969	50.6%	63.6%	113	59.2%	66.0%	\$12,206	55.2%	64.7%
	Upper	176	34.3%	\$24,202	41.1%	22.0%	82	33.7%	23.6%	\$11,499	41.7%	28.7%	61	31.9%	23.1%	\$8,227	37.2%	27.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.5%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>513</i>	<i>100.0%</i>	<i>\$58,929</i>	<i>100.0%</i>	<i>100.0%</i>	<i>243</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$27,599</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$22,122</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	61	11.9%	\$4,120	8.2%	11.5%	27	14.4%	11.9%	\$1,577	9.5%	8.4%	24	9.9%	10.0%	\$1,745	6.9%	6.7%
	Middle	328	63.9%	\$30,885	61.2%	66.5%	117	62.6%	68.7%	\$10,195	61.7%	68.1%	158	65.3%	67.3%	\$15,546	61.2%	66.6%
	Upper	124	24.2%	\$15,430	30.6%	22.0%	43	23.0%	19.0%	\$4,755	28.8%	22.6%	60	24.8%	22.6%	\$8,121	32.0%	26.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.9%	0	0.0%	0.1%	\$0	0.0%	0.0%
	<i>Total</i>	<i>513</i>	<i>100.0%</i>	<i>\$50,435</i>	<i>100.0%</i>	<i>100.0%</i>	<i>187</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,527</i>	<i>100.0%</i>	<i>100.0%</i>	<i>242</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$25,412</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	18	18.0%	\$593	13.8%	11.5%	6	16.2%	10.1%	\$243	14.5%	8.0%	10	21.3%	12.9%	\$312	16.3%	8.0%
	Middle	66	66.0%	\$2,518	58.7%	66.5%	26	70.3%	73.3%	\$1,100	65.6%	70.6%	30	63.8%	70.3%	\$1,014	52.8%	66.8%
	Upper	16	16.0%	\$1,178	27.5%	22.0%	5	13.5%	16.5%	\$335	20.0%	20.0%	7	14.9%	16.7%	\$593	30.9%	25.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	1.4%	0	0.0%	0.1%	\$0	0.0%	0.0%
	<i>Total</i>	<i>100</i>	<i>100.0%</i>	<i>\$4,289</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,678</i>	<i>100.0%</i>	<i>100.0%</i>	<i>47</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,919</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.9%	0	0.0%	45.5%	\$0	0.0%	19.9%	0	0.0%	26.7%	\$0	0.0%	17.9%
	Middle	0	0.0%	\$0	0.0%	66.1%	0	0.0%	45.5%	\$0	0.0%	80.1%	0	0.0%	66.7%	\$0	0.0%	79.6%
	Upper	0	0.0%	\$0	0.0%	11.0%	0	0.0%	9.1%	\$0	0.0%	0.0%	0	0.0%	6.7%	\$0	0.0%	2.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	132	11.7%	\$9,324	8.2%	11.5%	62	13.3%	10.9%	\$3,951	8.6%	7.9%	51	10.6%	10.7%	\$3,746	7.6%	7.5%
	Middle	678	60.2%	\$63,519	55.9%	66.5%	275	58.9%	67.6%	\$25,264	55.2%	65.9%	301	62.7%	67.0%	\$28,766	58.2%	65.7%
	Upper	316	28.1%	\$40,810	35.9%	22.0%	130	27.8%	21.1%	\$16,589	36.2%	25.6%	128	26.7%	22.2%	\$16,941	34.3%	26.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.7%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>1,126</i>	<i>100.0%</i>	<i>\$113,653</i>	<i>100.0%</i>	<i>100.0%</i>	<i>467</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45,804</i>	<i>100.0%</i>	<i>100.0%</i>	<i>480</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$49,453</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: IN Southern IN

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	78	15.2%	\$5,733	9.7%	17.6%	40	16.5%	7.7%	\$2,723	9.9%	4.4%	30	15.7%	8.8%	\$2,404	10.9%	5.0%
	Moderate	160	31.2%	\$15,318	26.0%	17.7%	72	29.6%	21.1%	\$6,759	24.5%	16.3%	62	32.5%	23.4%	\$6,231	28.2%	18.2%
	Middle	136	26.5%	\$16,018	27.2%	22.9%	66	27.2%	19.9%	\$7,899	28.6%	18.8%	48	25.1%	21.2%	\$5,543	25.1%	20.6%
	Upper	127	24.8%	\$20,386	34.6%	41.8%	58	23.9%	28.4%	\$9,413	34.1%	39.9%	48	25.1%	26.4%	\$7,581	34.3%	37.1%
	Unknown	12	2.3%	\$1,474	2.5%	0.0%	7	2.9%	22.9%	\$805	2.9%	20.6%	3	1.6%	20.2%	\$363	1.6%	19.0%
	<i>Total</i>	<i>513</i>	<i>100.0%</i>	<i>\$58,929</i>	<i>100.0%</i>	<i>100.0%</i>	<i>243</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$27,599</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$22,122</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	68	13.3%	\$4,180	8.3%	17.6%	30	16.0%	9.7%	\$1,689	10.2%	5.2%	31	12.8%	7.3%	\$2,112	8.3%	3.9%
	Moderate	131	25.5%	\$9,910	19.6%	17.7%	48	25.7%	17.0%	\$3,283	19.9%	11.6%	61	25.2%	17.0%	\$4,825	19.0%	11.1%
	Middle	122	23.8%	\$11,301	22.4%	22.9%	51	27.3%	23.3%	\$4,290	26.0%	19.1%	52	21.5%	20.7%	\$5,188	20.4%	17.7%
	Upper	173	33.7%	\$22,602	44.8%	41.8%	52	27.8%	32.6%	\$6,427	38.9%	44.4%	86	35.5%	35.0%	\$11,813	46.5%	45.1%
	Unknown	19	3.7%	\$2,442	4.8%	0.0%	6	3.2%	17.3%	\$838	5.1%	19.7%	12	5.0%	20.0%	\$1,474	5.8%	22.2%
	<i>Total</i>	<i>513</i>	<i>100.0%</i>	<i>\$50,435</i>	<i>100.0%</i>	<i>100.0%</i>	<i>187</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,527</i>	<i>100.0%</i>	<i>100.0%</i>	<i>242</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$25,412</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	16	16.0%	\$567	13.2%	17.6%	8	21.6%	12.6%	\$241	14.4%	6.4%	5	10.6%	12.3%	\$225	11.7%	7.0%
	Moderate	31	31.0%	\$1,076	25.1%	17.7%	10	27.0%	21.3%	\$294	17.5%	13.9%	16	34.0%	20.2%	\$614	32.0%	13.9%
	Middle	25	25.0%	\$1,054	24.6%	22.9%	9	24.3%	26.9%	\$540	32.2%	23.8%	13	27.7%	27.1%	\$310	16.2%	19.5%
	Upper	27	27.0%	\$1,587	37.0%	41.8%	9	24.3%	35.5%	\$598	35.6%	49.7%	13	27.7%	37.5%	\$770	40.1%	55.2%
	Unknown	1	1.0%	\$5	0.1%	0.0%	1	2.7%	3.7%	\$5	0.3%	6.3%	0	0.0%	3.0%	\$0	0.0%	4.4%
	<i>Total</i>	<i>100</i>	<i>100.0%</i>	<i>\$4,289</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,678</i>	<i>100.0%</i>	<i>100.0%</i>	<i>47</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,919</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	162	14.4%	\$10,480	9.2%	17.6%	78	16.7%	9.0%	\$4,653	10.2%	4.7%	66	13.8%	8.5%	\$4,741	9.6%	4.6%
	Moderate	322	28.6%	\$26,304	23.1%	17.7%	130	27.8%	19.6%	\$10,336	22.6%	14.2%	139	29.0%	20.5%	\$11,670	23.6%	14.9%
	Middle	283	25.1%	\$28,373	25.0%	22.9%	126	27.0%	21.8%	\$12,729	27.8%	18.8%	113	23.5%	21.5%	\$11,041	22.3%	19.2%
	Upper	327	29.0%	\$44,575	39.2%	41.8%	119	25.5%	30.6%	\$16,438	35.9%	41.2%	147	30.6%	30.8%	\$20,164	40.8%	40.9%
	Unknown	32	2.8%	\$3,921	3.4%	0.0%	14	3.0%	19.0%	\$1,648	3.6%	21.2%	15	3.1%	18.6%	\$1,837	3.7%	20.4%
	<i>Total</i>	<i>1,126</i>	<i>100.0%</i>	<i>\$113,653</i>	<i>100.0%</i>	<i>100.0%</i>	<i>467</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45,804</i>	<i>100.0%</i>	<i>100.0%</i>	<i>480</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$49,453</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: IN Southern IN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	32	9.4%	\$6,301	19.0%	14.2%	13	8.4%	12.2%	\$2,487	19.4%	11.9%	14	10.8%	11.7%	\$2,693	18.9%	11.9%
	Middle	188	55.5%	\$18,635	56.3%	63.0%	89	57.4%	60.2%	\$6,483	50.7%	58.9%	67	51.5%	60.6%	\$8,429	59.1%	58.8%
	Upper	119	35.1%	\$8,170	24.7%	22.8%	53	34.2%	24.1%	\$3,821	29.9%	28.4%	49	37.7%	25.4%	\$3,139	22.0%	28.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	0.8%	0	0.0%	2.3%	\$0	0.0%	0.6%
	Total	339	100.0%	\$33,106	100.0%	100.0%	155	100.0%	100.0%	\$12,791	100.0%	100.0%	130	100.0%	100.0%	\$14,261	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.3%	0	0.0%	3.1%	\$0	0.0%	2.9%	0	0.0%	2.0%	\$0	0.0%	2.3%
	Middle	38	82.6%	\$2,699	80.4%	72.3%	17	85.0%	72.3%	\$1,411	82.0%	73.5%	15	75.0%	72.5%	\$913	72.4%	73.1%
	Upper	8	17.4%	\$658	19.6%	24.4%	3	15.0%	24.2%	\$310	18.0%	23.5%	5	25.0%	25.0%	\$348	27.6%	24.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.4%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.1%
Total	46	100.0%	\$3,357	100.0%	100.0%	20	100.0%	100.0%	\$1,721	100.0%	100.0%	20	100.0%	100.0%	\$1,261	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: IN Southern IN

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2014			2015										
	Count		Dollar			Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	%	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
				%	#	%	%	\$ 000s	%	%	#	%	%	\$ 000s	%	%			
Small Business	Revenue	\$1 Million or Less	207	61.1%	\$6,028	18.2%	91.7%	99	63.9%	42.8%	\$2,522	19.7%	31.2%	69	53.1%	46.9%	\$1,910	13.4%	32.9%
		Over \$1 Million	55	16.2%	\$19,085	57.6%	6.6%	20	12.9%				26	20.0%					
		Total Rev. available	262	77.3%	\$25,113	75.8%	98.3%	119	76.8%				95	73.1%					
		Rev. Not Known	77	22.7%	\$7,993	24.1%	1.7%	36	23.2%				35	26.9%					
		Total	339	100.0%	\$33,106	100.0%	100.0%	155	100.0%				130	100.0%					
	Loan Size	\$100,000 or Less	273	80.5%	\$8,301	25.1%		128	82.6%	88.2%	\$3,512	27.5%	28.6%	103	79.2%	88.7%	\$3,521	24.7%	30.7%
		\$100,001 - \$250,000	32	9.4%	\$5,702	17.2%		13	8.4%	6.8%	\$2,298	18.0%	21.4%	12	9.2%	6.7%	\$2,118	14.9%	21.3%
		\$250,001 - \$1 Million	34	10.0%	\$19,103	57.7%		14	9.0%	5.0%	\$6,981	54.6%	49.9%	15	11.5%	4.7%	\$8,622	60.5%	48.0%
		Total	339	100.0%	\$33,106	100.0%		155	100.0%	100.0%	\$12,791	100.0%	100.0%	130	100.0%	100.0%	\$14,261	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	199	96.1%	\$4,267	70.8%													
\$100,001 - \$250,000		6	2.9%	\$1,171	19.4%														
\$250,001 - \$1 Million		2	1.0%	\$590	9.8%														
Total		207	100.0%	\$6,028	100.0%														
Small Farm	Revenue	\$1 Million or Less	19	41.3%	\$926	27.6%	99.2%	3	15.0%	63.7%	\$51	3.0%	64.8%	11	55.0%	62.6%	\$550	43.6%	70.7%
		Over \$1 Million	1	2.2%	\$165	4.9%	0.8%	1	5.0%				0	0.0%					
		Total Rev. available	20	43.5%	\$1,091	32.5%	100.0%	4	20.0%				11	55.0%					
		Not Known	26	56.5%	\$2,266	67.5%	0.0%	16	80.0%				9	45.0%					
		Total	46	100.0%	\$3,357	100.0%	100.0%	20	100.0%				20	100.0%					
	Loan Size	\$100,000 or Less	37	80.4%	\$1,726	51.4%		15	75.0%	66.4%	\$766	44.5%	23.9%	17	85.0%	67.7%	\$710	56.3%	23.4%
		\$100,001 - \$250,000	9	19.6%	\$1,631	48.6%		5	25.0%	22.6%	\$955	55.5%	38.0%	3	15.0%	19.8%	\$551	43.7%	33.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.0%	\$0	0.0%	38.1%	0	0.0%	12.5%	\$0	0.0%	43.6%
		Total	46	100.0%	\$3,357	100.0%		20	100.0%	100.0%	\$1,721	100.0%	100.0%	20	100.0%	100.0%	\$1,261	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	16	84.2%	\$450	48.6%													
\$100,001 - \$250,000		3	15.8%	\$476	51.4%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		19	100.0%	\$926	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: KY Lexington

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	13	2.1%	\$1,300	1.2%	4.0%	4	1.7%	2.8%	\$368	0.9%	2.2%	6	2.5%	3.3%	\$647	1.5%	2.7%
	Moderate	88	14.4%	\$9,543	8.4%	21.9%	46	19.2%	16.5%	\$4,735	11.9%	11.1%	28	11.7%	16.5%	\$3,223	7.2%	11.5%
	Middle	235	38.5%	\$36,600	32.4%	40.5%	94	39.2%	41.1%	\$14,432	36.2%	36.7%	94	39.2%	39.9%	\$14,598	32.7%	35.7%
	Upper	275	45.0%	\$65,530	58.0%	33.7%	96	40.0%	39.5%	\$20,324	51.0%	49.9%	112	46.7%	40.3%	\$26,129	58.6%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>611</i>	<i>100.0%</i>	<i>\$112,973</i>	<i>100.0%</i>	<i>100.0%</i>	<i>240</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$39,859</i>	<i>100.0%</i>	<i>100.0%</i>	<i>240</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$44,597</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	18	3.2%	\$1,777	2.0%	4.0%	9	4.9%	4.1%	\$1,242	4.4%	2.6%	9	3.1%	3.2%	\$535	1.2%	2.3%
	Moderate	103	18.1%	\$10,512	11.7%	21.9%	38	20.8%	20.8%	\$3,498	12.3%	15.6%	54	18.5%	17.8%	\$5,697	13.1%	12.8%
	Middle	198	34.7%	\$26,444	29.4%	40.5%	62	33.9%	38.9%	\$8,365	29.4%	35.1%	103	35.3%	38.9%	\$13,509	31.0%	34.9%
	Upper	251	44.0%	\$51,365	57.0%	33.7%	74	40.4%	36.2%	\$15,342	53.9%	46.6%	126	43.2%	40.1%	\$23,870	54.7%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>570</i>	<i>100.0%</i>	<i>\$90,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>183</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$28,447</i>	<i>100.0%</i>	<i>100.0%</i>	<i>292</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$43,611</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	2.6%	\$55	1.6%	4.0%	1	6.7%	5.2%	\$55	4.1%	6.1%	0	0.0%	4.5%	\$0	0.0%	2.3%
	Moderate	9	23.1%	\$591	16.8%	21.9%	4	26.7%	24.2%	\$264	19.8%	16.7%	4	21.1%	21.4%	\$267	14.6%	12.4%
	Middle	18	46.2%	\$1,243	35.4%	40.5%	6	40.0%	41.8%	\$506	38.0%	36.9%	9	47.4%	38.9%	\$596	32.6%	34.8%
	Upper	11	28.2%	\$1,625	46.2%	33.7%	4	26.7%	28.9%	\$505	38.0%	40.3%	6	31.6%	35.3%	\$965	52.8%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>\$3,514</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,330</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,828</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	15.2%	0	0.0%	17.6%	\$0	0.0%	7.5%	0	0.0%	10.5%	\$0	0.0%	25.5%
	Moderate	0	0.0%	\$0	0.0%	40.3%	0	0.0%	44.0%	\$0	0.0%	45.6%	0	0.0%	48.8%	\$0	0.0%	28.6%
	Middle	0	0.0%	\$0	0.0%	25.8%	0	0.0%	25.3%	\$0	0.0%	41.6%	0	0.0%	27.9%	\$0	0.0%	24.8%
	Upper	0	0.0%	\$0	0.0%	18.7%	0	0.0%	13.2%	\$0	0.0%	5.3%	0	0.0%	12.8%	\$0	0.0%	21.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	32	2.6%	\$3,132	1.5%	4.0%	14	3.2%	3.5%	\$1,665	2.4%	2.8%	15	2.7%	3.4%	\$1,182	1.3%	4.0%
	Moderate	200	16.4%	\$20,646	10.0%	21.9%	88	20.1%	18.5%	\$8,497	12.2%	14.9%	86	15.6%	17.3%	\$9,187	10.2%	13.0%
	Middle	451	37.0%	\$64,287	31.1%	40.5%	162	37.0%	40.3%	\$23,303	33.5%	36.5%	206	37.4%	39.4%	\$28,703	31.9%	34.7%
	Upper	537	44.0%	\$118,520	57.4%	33.7%	174	39.7%	37.7%	\$36,171	51.9%	45.8%	244	44.3%	39.9%	\$50,964	56.6%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,220</i>	<i>100.0%</i>	<i>\$206,585</i>	<i>100.0%</i>	<i>100.0%</i>	<i>438</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$69,636</i>	<i>100.0%</i>	<i>100.0%</i>	<i>551</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$90,036</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: KY Lexington

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	83	13.6%	\$8,043	7.1%	23.3%	39	16.3%	8.6%	\$3,672	9.2%	4.9%	25	10.4%	8.4%	\$2,661	6.0%	4.8%
	Moderate	146	23.9%	\$19,240	17.0%	16.3%	62	25.8%	21.1%	\$7,854	19.7%	15.6%	57	23.8%	20.6%	\$7,118	16.0%	15.0%
	Middle	128	20.9%	\$18,762	16.6%	20.1%	53	22.1%	20.4%	\$7,387	18.5%	19.2%	47	19.6%	19.9%	\$6,865	15.4%	18.0%
	Upper	239	39.1%	\$63,771	56.4%	40.3%	79	32.9%	31.3%	\$19,404	48.7%	42.0%	107	44.6%	32.2%	\$27,047	60.6%	43.7%
	Unknown	15	2.5%	\$3,157	2.8%	0.0%	7	2.9%	18.6%	\$1,542	3.9%	18.3%	4	1.7%	19.0%	\$906	2.0%	18.6%
	<i>Total</i>	<i>611</i>	<i>100.0%</i>	<i>\$112,973</i>	<i>100.0%</i>	<i>100.0%</i>	<i>240</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$39,859</i>	<i>100.0%</i>	<i>100.0%</i>	<i>240</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$44,597</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	78	13.7%	\$6,687	7.4%	23.3%	27	14.8%	8.6%	\$2,104	7.4%	4.7%	38	13.0%	8.3%	\$3,324	7.6%	4.3%
	Moderate	122	21.4%	\$11,827	13.1%	16.3%	36	19.7%	16.0%	\$3,536	12.4%	10.6%	68	23.3%	15.2%	\$6,420	14.7%	9.9%
	Middle	147	25.8%	\$20,011	22.2%	20.1%	45	24.6%	19.9%	\$5,745	20.2%	16.4%	82	28.1%	19.2%	\$11,468	26.3%	15.7%
	Upper	197	34.6%	\$47,001	52.2%	40.3%	66	36.1%	32.9%	\$15,430	54.2%	43.6%	89	30.5%	35.4%	\$19,636	45.0%	46.1%
	Unknown	26	4.6%	\$4,572	5.1%	0.0%	9	4.9%	22.5%	\$1,632	5.7%	24.7%	15	5.1%	22.0%	\$2,763	6.3%	24.0%
	<i>Total</i>	<i>570</i>	<i>100.0%</i>	<i>\$90,098</i>	<i>100.0%</i>	<i>100.0%</i>	<i>183</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$28,447</i>	<i>100.0%</i>	<i>100.0%</i>	<i>292</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$43,611</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	8	20.5%	\$371	10.6%	23.3%	4	26.7%	10.9%	\$174	13.1%	4.2%	3	15.8%	13.5%	\$137	7.5%	6.0%
	Moderate	7	17.9%	\$519	14.8%	16.3%	4	26.7%	16.6%	\$161	12.1%	8.3%	2	10.5%	18.1%	\$333	18.2%	9.4%
	Middle	10	25.6%	\$712	20.3%	20.1%	4	26.7%	23.5%	\$456	34.3%	18.3%	6	31.6%	21.4%	\$256	14.0%	14.6%
	Upper	14	35.9%	\$1,912	54.4%	40.3%	3	20.0%	37.6%	\$539	40.5%	52.8%	8	42.1%	37.5%	\$1,102	60.3%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.4%	\$0	0.0%	16.3%	0	0.0%	9.6%	\$0	0.0%	16.2%
	<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>\$3,514</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,330</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,828</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	169	13.9%	\$15,101	7.3%	23.3%	70	16.0%	8.7%	\$5,950	8.5%	4.5%	66	12.0%	8.5%	\$6,122	6.8%	4.3%
	Moderate	275	22.5%	\$31,586	15.3%	16.3%	102	23.3%	19.0%	\$11,551	16.6%	12.9%	127	23.0%	18.4%	\$13,871	15.4%	12.2%
	Middle	285	23.4%	\$39,485	19.1%	20.1%	102	23.3%	20.3%	\$13,588	19.5%	17.0%	135	24.5%	19.6%	\$18,589	20.6%	16.0%
	Upper	450	36.9%	\$112,684	54.5%	40.3%	148	33.8%	31.9%	\$35,373	50.8%	40.0%	204	37.0%	33.4%	\$47,785	53.1%	42.0%
	Unknown	41	3.4%	\$7,729	3.7%	0.0%	16	3.7%	20.1%	\$3,174	4.6%	25.6%	19	3.4%	20.1%	\$3,669	4.1%	25.5%
	<i>Total</i>	<i>1,220</i>	<i>100.0%</i>	<i>\$206,585</i>	<i>100.0%</i>	<i>100.0%</i>	<i>438</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$69,636</i>	<i>100.0%</i>	<i>100.0%</i>	<i>551</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$90,036</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: KY Lexington

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %		
SMALL BUSINESSES	Low	31	7.0%	\$4,488	8.1%	5.8%	13	6.6%	7.5%	\$1,693	7.3%	8.2%	15	9.1%	7.4%	\$2,422	10.7%	7.8%
	Moderate	106	24.0%	\$18,269	32.9%	23.7%	52	26.3%	20.3%	\$7,623	32.8%	20.4%	30	18.3%	20.3%	\$5,601	24.8%	21.8%
	Middle	149	33.8%	\$18,679	33.6%	38.1%	70	35.4%	37.9%	\$7,842	33.8%	40.6%	56	34.1%	37.9%	\$7,437	33.0%	39.4%
	Upper	155	35.1%	\$14,091	25.4%	32.3%	63	31.8%	33.2%	\$6,061	26.1%	30.6%	63	38.4%	33.3%	\$7,098	31.5%	30.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.1%	\$0	0.0%	0.2%	0	0.0%	1.1%	\$0	0.0%	0.3%
	Total	441	100.0%	\$55,527	100.0%	100.0%	198	100.0%	100.0%	\$23,219	100.0%	100.0%	164	100.0%	100.0%	\$22,558	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.7%	\$0	0.0%	0.5%	0	0.0%	1.1%	\$0	0.0%	0.4%
	Moderate	5	14.7%	\$1,375	26.7%	16.0%	3	20.0%	14.0%	\$855	35.6%	12.7%	1	7.7%	14.7%	\$500	19.3%	10.5%
	Middle	19	55.9%	\$2,269	44.0%	47.7%	7	46.7%	51.4%	\$902	37.5%	45.9%	7	53.8%	46.2%	\$1,230	47.4%	46.1%
	Upper	10	29.4%	\$1,511	29.3%	35.3%	5	33.3%	33.8%	\$646	26.9%	40.9%	5	38.5%	36.2%	\$865	33.3%	42.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	0.4%
Total	34	100.0%	\$5,155	100.0%	100.0%	15	100.0%	100.0%	\$2,403	100.0%	100.0%	13	100.0%	100.0%	\$2,595	100.0%	100.0%	

Originations & Purchases

2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: KY Lexington

Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
		1/1/2014-6/30/2016					2014					2015								
		Bank		Total		Businesses	Count		Dollar			Count		Dollar						
		Count	Dollar	Count	Agg		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %				
Small Business	Revenue	\$1 Million or Less	257	58.3%	\$11,578	20.9%	92.6%	112	56.6%	47.2%	\$3,575	15.4%	42.0%	96	58.5%	49.9%	\$5,346	23.7%	42.6%	
		Over \$1 Million	111	25.2%	\$35,367	63.7%	7.2%	49	24.7%				41	25.0%						
		Total Rev. available	368	83.5%	\$46,945	84.6%	99.8%	161	81.3%				137	83.5%						
		Rev. Not Known	73	16.6%	\$8,582	15.5%	0.3%	37	18.7%				27	16.5%						
		Total	441	100.0%	\$55,527	100.0%	100.0%	198	100.0%				164	100.0%						
	Loan Size	\$100,000 or Less	317	71.9%	\$8,834	15.9%		147	74.2%	91.0%	\$3,737	16.1%	30.3%	113	68.9%	91.6%	\$3,495	15.5%	33.1%	
		\$100,001 - \$250,000	56	12.7%	\$10,531	19.0%		24	12.1%	4.7%	\$4,544	19.6%	18.3%	23	14.0%	4.4%	\$4,257	18.9%	18.1%	
		\$250,001 - \$1 Million	68	15.4%	\$36,162	65.1%		27	13.6%	4.4%	\$14,938	64.3%	51.4%	28	17.1%	4.0%	\$14,806	65.6%	48.8%	
		Total	441	100.0%	\$55,527	100.0%		198	100.0%	100.0%	\$23,219	100.0%	100.0%	164	100.0%	100.0%	\$22,558	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	230	89.5%	\$4,409	38.1%														
		\$100,001 - \$250,000	20	7.8%	\$3,496	30.2%														
		\$250,001 - \$1 Million	7	2.7%	\$3,673	31.7%														
		Total	257	100.0%	\$11,578	100.0%														
	Small Farm	Revenue	\$1 Million or Less	21	61.8%	\$2,606	50.6%	96.2%	9	60.0%	68.7%	\$1,178	49.0%	79.0%	8	61.5%	64.9%	\$1,342	51.7%	64.5%
			Over \$1 Million	11	32.4%	\$2,462	47.8%	3.8%	5	33.3%				4	30.8%					
Total Rev. available			32	94.2%	\$5,068	98.4%	100.0%	14	93.3%				12	92.3%						
Not Known			2	5.9%	\$87	1.7%	0.0%	1	6.7%				1	7.7%						
Total			34	100.0%	\$5,155	100.0%	100.0%	15	100.0%				13	100.0%						
Loan Size		\$100,000 or Less	20	58.8%	\$992	19.2%		8	53.3%	78.8%	\$561	23.3%	30.6%	6	46.2%	81.0%	\$274	10.6%	31.6%	
		\$100,001 - \$250,000	7	20.6%	\$1,240	24.1%		4	26.7%	14.4%	\$642	26.7%	35.5%	3	23.1%	11.5%	\$598	23.0%	29.6%	
		\$250,001 - \$500,000	7	20.6%	\$2,923	56.7%		3	20.0%	6.8%	\$1,200	49.9%	33.9%	4	30.8%	7.5%	\$1,723	66.4%	38.9%	
		Total	34	100.0%	\$5,155	100.0%		15	100.0%	100.0%	\$2,403	100.0%	100.0%	13	100.0%	100.0%	\$2,595	100.0%	100.0%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	14	66.7%	\$753	28.9%														
		\$100,001 - \$250,000	4	19.0%	\$653	25.1%														
		\$250,001 - \$500,000	3	14.3%	\$1,200	46.0%														
		Total	21	100.0%	\$2,606	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: MI Detroit

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	154	3.2%	\$14,980	1.9%	4.5%	20	1.4%	1.2%	\$1,343	0.5%	0.7%	80	3.4%	1.2%	\$8,763	2.3%	0.8%
	Moderate	930	19.4%	\$100,515	12.8%	18.9%	131	8.9%	10.8%	\$12,292	4.6%	6.7%	524	22.0%	12.1%	\$57,789	15.4%	7.5%
	Middle	2,043	42.6%	\$279,728	35.5%	42.0%	655	44.3%	44.5%	\$91,992	34.3%	37.8%	1,049	44.0%	44.4%	\$143,176	38.1%	38.5%
	Upper	1,671	34.8%	\$391,764	49.8%	34.6%	673	45.5%	43.4%	\$162,812	60.7%	54.9%	732	30.7%	42.2%	\$165,593	44.1%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>4,798</i>	<i>100.0%</i>	<i>\$786,987</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,479</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$268,439</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,385</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$375,321</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	73	1.7%	\$6,887	1.0%	4.5%	14	1.2%	1.2%	\$1,003	0.5%	0.8%	32	1.6%	0.9%	\$3,381	1.0%	0.5%
	Moderate	750	17.9%	\$79,587	11.7%	18.9%	125	10.7%	10.1%	\$11,864	6.3%	6.3%	382	18.8%	8.6%	\$40,709	11.9%	5.3%
	Middle	1,701	40.7%	\$223,464	32.9%	42.0%	492	42.2%	42.5%	\$63,888	33.9%	36.2%	830	40.9%	42.0%	\$110,053	32.2%	35.3%
	Upper	1,656	39.6%	\$368,712	54.3%	34.6%	536	45.9%	46.1%	\$111,623	59.3%	56.7%	783	38.6%	48.5%	\$187,472	54.9%	58.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>4,180</i>	<i>100.0%</i>	<i>\$678,650</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,167</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$188,378</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,027</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$341,615</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	8	1.8%	\$482	1.3%	4.5%	2	1.6%	2.4%	\$63	0.7%	0.7%	6	2.4%	2.5%	\$419	1.8%	0.7%
	Moderate	103	22.6%	\$6,839	17.8%	18.9%	18	14.1%	14.3%	\$584	6.3%	5.9%	67	26.6%	12.6%	\$5,385	22.9%	5.3%
	Middle	206	45.2%	\$15,275	39.8%	42.0%	61	47.7%	42.8%	\$3,901	41.9%	35.1%	105	41.7%	42.8%	\$8,778	37.4%	32.2%
	Upper	139	30.5%	\$15,789	41.1%	34.6%	47	36.7%	40.4%	\$4,754	51.1%	58.2%	74	29.4%	42.1%	\$8,894	37.9%	61.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>456</i>	<i>100.0%</i>	<i>\$38,385</i>	<i>100.0%</i>	<i>100.0%</i>	<i>128</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,302</i>	<i>100.0%</i>	<i>100.0%</i>	<i>252</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,476</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	12.0%	\$0	0.0%	15.3%	0	0.0%	11.8%	\$0	0.0%	12.3%
	Moderate	0	0.0%	\$0	0.0%	27.7%	0	0.0%	24.4%	\$0	0.0%	17.8%	0	0.0%	17.1%	\$0	0.0%	10.6%
	Middle	1	100.0%	\$2,000	100.0%	37.7%	0	0.0%	43.3%	\$0	0.0%	44.9%	1	100.0%	47.1%	\$2,000	100.0%	54.9%
	Upper	0	0.0%	\$0	0.0%	17.8%	0	0.0%	20.3%	\$0	0.0%	22.0%	0	0.0%	23.6%	\$0	0.0%	21.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.5%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$2,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,000</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	235	2.5%	\$22,349	1.5%	4.5%	36	1.3%	1.3%	\$2,409	0.5%	1.3%	118	2.5%	1.2%	\$12,563	1.7%	1.0%
	Moderate	1,783	18.9%	\$186,941	12.4%	18.9%	274	9.9%	10.7%	\$24,740	5.3%	7.0%	973	20.9%	10.6%	\$103,883	14.0%	6.5%
	Middle	3,951	41.9%	\$520,467	34.6%	42.0%	1,208	43.5%	43.6%	\$159,781	34.3%	37.4%	1,985	42.6%	43.2%	\$264,007	35.6%	37.3%
	Upper	3,466	36.7%	\$776,265	51.5%	34.6%	1,256	45.3%	44.4%	\$279,189	59.9%	54.2%	1,589	34.1%	45.0%	\$361,959	48.8%	55.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>9,435</i>	<i>100.0%</i>	<i>\$1,506,022</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,774</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$466,119</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4,665</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$742,412</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: MI Detroit

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	1,058	22.1%	\$97,768	12.4%	21.9%	144	9.7%	8.8%	\$10,687	4.0%	4.2%	644	27.0%	9.6%	\$62,392	16.6%	4.9%
	Moderate	1,197	24.9%	\$143,336	18.2%	17.2%	334	22.6%	20.5%	\$38,400	14.3%	14.0%	645	27.0%	20.7%	\$80,916	21.6%	14.6%
	Middle	918	19.1%	\$136,710	17.4%	20.1%	339	22.9%	21.9%	\$51,566	19.2%	19.9%	383	16.1%	22.5%	\$57,367	15.3%	20.6%
	Upper	1,364	28.4%	\$356,417	45.3%	40.9%	561	37.9%	34.4%	\$145,475	54.2%	48.7%	566	23.7%	32.6%	\$146,023	38.9%	46.4%
	Unknown	261	5.4%	\$52,756	6.7%	0.0%	101	6.8%	14.4%	\$22,311	8.3%	13.2%	147	6.2%	14.6%	\$28,623	7.6%	13.5%
	Total	4,798	100.0%	\$786,987	100.0%	100.0%	1,479	100.0%	100.0%	\$268,439	100.0%	100.0%	2,385	100.0%	100.0%	\$375,321	100.0%	100.0%
REFINANCE	Low	698	16.7%	\$62,862	9.3%	21.9%	108	9.3%	7.6%	\$8,619	4.6%	4.1%	357	17.6%	6.1%	\$32,164	9.4%	3.1%
	Moderate	757	18.1%	\$78,318	11.5%	17.2%	205	17.6%	15.0%	\$20,257	10.8%	10.1%	376	18.5%	14.0%	\$39,548	11.6%	9.3%
	Middle	838	20.0%	\$108,315	16.0%	20.1%	249	21.3%	20.3%	\$29,877	15.9%	16.9%	374	18.5%	20.3%	\$49,535	14.5%	17.0%
	Upper	1,506	36.0%	\$352,482	51.9%	40.9%	497	42.6%	41.9%	\$108,267	57.5%	53.3%	687	33.9%	40.5%	\$170,921	50.0%	51.8%
	Unknown	381	9.1%	\$76,673	11.3%	0.0%	108	9.3%	15.2%	\$21,358	11.3%	15.5%	233	11.5%	19.0%	\$49,447	14.5%	18.8%
	Total	4,180	100.0%	\$678,650	100.0%	100.0%	1,167	100.0%	100.0%	\$188,378	100.0%	100.0%	2,027	100.0%	100.0%	\$341,615	100.0%	100.0%
HOME IMPROVEMENT	Low	92	20.2%	\$5,954	15.5%	21.9%	25	19.5%	10.2%	\$792	8.5%	4.0%	61	24.2%	10.5%	\$4,873	20.8%	4.5%
	Moderate	120	26.3%	\$7,721	20.1%	17.2%	31	24.2%	19.4%	\$1,645	17.7%	12.7%	61	24.2%	20.0%	\$4,771	20.3%	11.9%
	Middle	106	23.2%	\$8,400	21.9%	20.1%	34	26.6%	23.7%	\$2,258	24.3%	21.3%	55	21.8%	25.4%	\$4,983	21.2%	20.6%
	Upper	134	29.4%	\$15,793	41.1%	40.9%	38	29.7%	41.0%	\$4,607	49.5%	56.6%	72	28.6%	40.8%	\$8,373	35.7%	58.0%
	Unknown	4	0.9%	\$517	1.3%	0.0%	0	0.0%	5.8%	\$0	0.0%	5.5%	3	1.2%	3.3%	\$476	2.0%	5.0%
	Total	456	100.0%	\$38,385	100.0%	100.0%	128	100.0%	100.0%	\$9,302	100.0%	100.0%	252	100.0%	100.0%	\$23,476	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$2,000	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,000	100.0%	100.0%
	Total	1	100.0%	\$2,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,000	100.0%	100.0%
HMDA TOTALS	Low	1,848	19.6%	\$166,584	11.1%	21.9%	277	10.0%	8.3%	\$20,098	4.3%	4.0%	1,062	22.8%	8.1%	\$99,429	13.4%	3.9%
	Moderate	2,074	22.0%	\$229,375	15.2%	17.2%	570	20.5%	18.1%	\$60,302	12.9%	11.8%	1,082	23.2%	17.6%	\$125,235	16.9%	11.7%
	Middle	1,862	19.7%	\$253,425	16.8%	20.1%	622	22.4%	21.3%	\$83,701	18.0%	17.8%	812	17.4%	21.6%	\$111,885	15.1%	18.4%
	Upper	3,004	31.8%	\$724,692	48.1%	40.9%	1,096	39.5%	37.8%	\$258,349	55.4%	48.5%	1,325	28.4%	36.6%	\$325,317	43.8%	47.9%
	Unknown	647	6.9%	\$131,946	8.8%	0.0%	209	7.5%	14.5%	\$43,669	9.4%	17.9%	384	8.2%	16.2%	\$80,546	10.8%	18.0%
	Total	9,435	100.0%	\$1,506,022	100.0%	100.0%	2,774	100.0%	100.0%	\$466,119	100.0%	100.0%	4,665	100.0%	100.0%	\$742,412	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MI Detroit

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Count		Bank Dollar		Small Businesses %	Count		Dollar				Count		Dollar			
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %		
SMALL BUSINESSES	Low	226	6.2%	\$57,342	9.2%	5.8%	84	5.8%	5.1%	\$24,728	9.7%	7.3%	96	6.5%	5.2%	\$22,673	9.2%	7.0%
	Moderate	657	18.0%	\$144,150	23.2%	17.3%	258	17.8%	16.2%	\$60,949	23.9%	19.5%	259	17.7%	16.8%	\$56,585	22.9%	19.9%
	Middle	1,420	38.8%	\$201,273	32.4%	39.2%	596	41.2%	37.3%	\$87,247	34.2%	36.8%	531	36.2%	37.0%	\$74,093	30.0%	36.9%
	Upper	1,335	36.5%	\$211,953	34.1%	37.4%	500	34.5%	39.9%	\$79,818	31.3%	34.8%	572	39.0%	39.7%	\$91,551	37.0%	34.7%
	Unknown	21	0.6%	\$6,064	1.0%	0.3%	10	0.7%	0.5%	\$2,513	1.0%	1.3%	8	0.5%	0.5%	\$2,201	0.9%	1.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Total	3,659	100.0%	\$620,782	100.0%	100.0%	1,448	100.0%	100.0%	\$255,255	100.0%	100.0%	1,466	100.0%	100.0%	\$247,103	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.5%	0	0.0%	0.9%	\$0	0.0%	0.2%	0	0.0%	1.2%	\$0	0.0%	0.8%
	Moderate	1	5.9%	\$25	4.4%	8.9%	1	16.7%	6.3%	\$25	18.2%	3.8%	0	0.0%	6.6%	\$0	0.0%	6.0%
	Middle	11	64.7%	\$247	43.6%	64.1%	4	66.7%	70.6%	\$103	75.2%	84.9%	4	57.1%	70.0%	\$68	19.7%	82.2%
	Upper	5	29.4%	\$294	51.9%	25.5%	1	16.7%	20.3%	\$9	6.6%	10.1%	3	42.9%	21.0%	\$277	80.3%	10.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	0.7%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.4%	0	0.0%	0.9%	\$0	0.0%	0.3%
Total	17	100.0%	\$566	100.0%	100.0%	6	100.0%	100.0%	\$137	100.0%	100.0%	7	100.0%	100.0%	\$345	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MI Detroit

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison													
		Bank				Total Businesses	2014			2015										
		Count		Dollar			Count		Dollar			Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	1,768	48.3%	\$130,075	21.0%	91.5%	669	46.2%	40.7%	\$60,300	23.6%	26.6%	697	47.5%	46.3%	\$47,134	19.1%	27.5%	
		Over \$1 Million	1,211	33.1%	\$401,552	64.7%	8.2%	452	31.2%					515	35.1%					
		Total Rev. available	2,979	81.4%	\$531,627	85.7%	99.7%	1,121	77.4%					1,212	82.6%					
		Rev. Not Known	680	18.6%	\$89,155	14.4%	0.3%	327	22.6%					254	17.3%					
		Total	3,659	100.0%	\$620,782	100.0%	100.0%	1,448	100.0%					1,466	100.0%					
	Loan Size	\$100,000 or Less	2,304	63.0%	\$77,074	12.4%		893	61.7%	91.4%	\$29,842	11.7%	26.8%	931	63.5%	92.1%	\$31,262	12.7%	29.1%	
		\$100,001 - \$250,000	568	15.5%	\$102,873	16.6%		235	16.2%	3.9%	\$41,880	16.4%	15.2%	223	15.2%	3.6%	\$40,889	16.5%	14.7%	
		\$250,001 - \$1 Million	787	21.5%	\$440,835	71.0%		320	22.1%	4.7%	\$183,533	71.9%	58.0%	312	21.3%	4.3%	\$174,952	70.8%	56.1%	
		Total	3,659	100.0%	\$620,782	100.0%		1,448	100.0%	100.0%	\$255,255	100.0%	100.0%	1,466	100.0%	100.0%	\$247,103	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,504	85.1%	\$33,855	26.0%														
		\$100,001 - \$250,000	118	6.7%	\$19,952	15.3%														
		\$250,001 - \$1 Million	146	8.3%	\$76,268	58.6%														
		Total	1,768	100.0%	\$130,075	100.0%														
	Small Farm	Revenue	\$1 Million or Less	16	94.1%	\$524	92.6%	98.2%	5	83.3%	49.1%	\$95	69.3%	78.0%	7	100.0%	50.8%	\$345	100.0%	67.5%
			Over \$1 Million	0	0.0%	\$0	0.0%	1.8%	0	0.0%				0	0.0%					
			Total Rev. available	16	94.1%	\$524	92.6%	100.0%	5	83.3%				7	100.0%					
Not Known			1	5.9%	\$42	7.4%	0.0%	1	16.7%				0	0.0%						
Total			17	100.0%	\$566	100.0%	100.0%	6	100.0%				7	100.0%						
Loan Size		\$100,000 or Less	16	94.1%	\$329	58.1%		6	100.0%	83.9%	\$137	100.0%	29.7%	6	85.7%	85.0%	\$108	31.3%	33.7%	
		\$100,001 - \$250,000	1	5.9%	\$237	41.9%		0	0.0%	12.0%	\$0	0.0%	43.6%	1	14.3%	9.0%	\$237	68.7%	29.0%	
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.1%	\$0	0.0%	26.7%	0	0.0%	6.0%	\$0	0.0%	37.3%	
		Total	17	100.0%	\$566	100.0%		6	100.0%	100.0%	\$137	100.0%	100.0%	7	100.0%	100.0%	\$345	100.0%	100.0%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	15	93.8%	\$287	54.8%														
		\$100,001 - \$250,000	1	6.3%	\$237	45.2%														
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%														
		Total	16	100.0%	\$524	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: MI Grand Rapids

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	74	2.1%	\$6,484	1.3%	2.0%	18	1.3%	1.2%	\$1,415	0.7%	0.8%	37	2.5%	1.6%	\$3,677	1.7%	1.0%
	Moderate	573	16.6%	\$52,493	10.4%	16.4%	194	14.5%	14.6%	\$16,776	8.8%	9.4%	265	18.0%	14.8%	\$24,545	11.4%	9.5%
	Middle	1,801	52.2%	\$243,504	48.4%	54.6%	696	52.2%	53.9%	\$90,895	47.9%	49.5%	787	53.4%	54.3%	\$107,744	50.3%	49.7%
	Upper	999	29.0%	\$200,316	39.8%	27.0%	426	31.9%	30.3%	\$80,526	42.5%	40.3%	385	26.1%	29.4%	\$78,424	36.6%	39.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3,447	100.0%	\$502,797	100.0%	100.0%	1,334	100.0%	100.0%	\$189,612	100.0%	100.0%	1,474	100.0%	100.0%	\$214,390	100.0%	100.0%
REFINANCE	Low	59	1.6%	\$3,835	0.8%	2.0%	11	1.1%	1.3%	\$646	0.5%	0.9%	19	1.0%	1.1%	\$1,143	0.5%	0.6%
	Moderate	522	14.1%	\$45,423	9.4%	16.4%	124	12.4%	12.9%	\$11,040	8.8%	9.1%	247	13.6%	11.3%	\$21,683	9.1%	7.4%
	Middle	1,925	52.1%	\$229,120	47.6%	54.6%	555	55.4%	53.1%	\$62,151	49.7%	47.9%	943	52.1%	51.9%	\$115,177	48.3%	46.3%
	Upper	1,188	32.2%	\$203,412	42.2%	27.0%	311	31.1%	32.6%	\$51,208	41.0%	42.1%	601	33.2%	35.7%	\$100,422	42.1%	45.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3,694	100.0%	\$481,790	100.0%	100.0%	1,001	100.0%	100.0%	\$125,045	100.0%	100.0%	1,810	100.0%	100.0%	\$238,425	100.0%	100.0%
HOME IMPROVEMENT	Low	3	1.0%	\$131	0.6%	2.0%	3	2.9%	1.2%	\$131	2.0%	0.6%	0	0.0%	0.9%	\$0	0.0%	0.5%
	Moderate	76	24.9%	\$3,843	18.7%	16.4%	21	20.6%	15.7%	\$1,196	18.4%	10.7%	37	26.6%	15.9%	\$1,869	20.6%	11.8%
	Middle	140	45.9%	\$9,416	45.7%	54.6%	40	39.2%	53.9%	\$2,251	34.6%	47.3%	74	53.2%	52.5%	\$5,393	59.4%	45.4%
	Upper	86	28.2%	\$7,215	35.0%	27.0%	38	37.3%	29.2%	\$2,933	45.0%	41.4%	28	20.1%	30.7%	\$1,820	20.0%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	305	100.0%	\$20,605	100.0%	100.0%	102	100.0%	100.0%	\$6,511	100.0%	100.0%	139	100.0%	100.0%	\$9,082	100.0%	100.0%
MULTI FAMILY	Low	1	33.3%	\$83	27.0%	5.3%	0	0.0%	8.5%	\$0	0.0%	13.4%	0	0.0%	8.0%	\$0	0.0%	7.9%
	Moderate	2	66.7%	\$224	73.0%	34.9%	0	0.0%	40.2%	\$0	0.0%	13.0%	1	100.0%	45.3%	\$145	100.0%	36.6%
	Middle	0	0.0%	\$0	0.0%	50.1%	0	0.0%	43.9%	\$0	0.0%	65.8%	0	0.0%	36.0%	\$0	0.0%	36.6%
	Upper	0	0.0%	\$0	0.0%	9.7%	0	0.0%	7.3%	\$0	0.0%	7.9%	0	0.0%	10.7%	\$0	0.0%	18.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$307	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$145	100.0%	100.0%
HMDA TOTALS	Low	137	1.8%	\$10,533	1.0%	2.0%	32	1.3%	1.2%	\$2,192	0.7%	1.6%	56	1.6%	1.3%	\$4,820	1.0%	1.1%
	Moderate	1,173	15.7%	\$101,983	10.1%	16.4%	339	13.9%	14.2%	\$29,012	9.0%	9.5%	550	16.1%	13.5%	\$48,242	10.4%	9.7%
	Middle	3,866	51.9%	\$482,040	47.9%	54.6%	1,291	53.0%	53.6%	\$155,297	48.4%	50.0%	1,804	52.7%	53.2%	\$228,314	49.4%	47.8%
	Upper	2,273	30.5%	\$410,943	40.9%	27.0%	775	31.8%	31.0%	\$134,667	41.9%	38.9%	1,014	29.6%	31.9%	\$180,666	39.1%	41.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7,449	100.0%	\$1,005,499	100.0%	100.0%	2,437	100.0%	100.0%	\$321,168	100.0%	100.0%	3,424	100.0%	100.0%	\$462,042	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: MI Grand Rapids

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	629	18.2%	\$51,941	10.3%	19.8%	229	17.2%	10.8%	\$18,186	9.6%	5.8%	286	19.4%	10.0%	\$24,183	11.3%	5.4%
	Moderate	882	25.6%	\$99,041	19.7%	18.3%	357	26.8%	21.9%	\$37,516	19.8%	15.9%	377	25.6%	23.8%	\$43,465	20.3%	17.2%
	Middle	654	19.0%	\$91,837	18.3%	22.3%	249	18.7%	21.5%	\$33,967	17.9%	20.3%	268	18.2%	21.0%	\$38,064	17.8%	19.7%
	Upper	1,015	29.4%	\$217,654	43.3%	39.5%	411	30.8%	28.4%	\$84,252	44.4%	41.8%	395	26.8%	28.6%	\$87,427	40.8%	41.7%
	Unknown	267	7.7%	\$42,324	8.4%	0.0%	88	6.6%	17.4%	\$15,691	8.3%	16.2%	148	10.0%	16.6%	\$21,251	9.9%	15.9%
	<i>Total</i>	<i>3,447</i>	<i>100.0%</i>	<i>\$502,797</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,334</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$189,612</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,474</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$214,390</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	507	13.7%	\$38,948	8.1%	19.8%	142	14.2%	8.7%	\$11,054	8.8%	5.0%	242	13.4%	6.7%	\$18,915	7.9%	3.6%
	Moderate	826	22.4%	\$76,816	15.9%	18.3%	203	20.3%	17.8%	\$18,123	14.5%	12.5%	418	23.1%	17.6%	\$39,925	16.7%	12.1%
	Middle	878	23.8%	\$97,911	20.3%	22.3%	248	24.8%	21.2%	\$26,208	21.0%	18.1%	435	24.0%	20.7%	\$49,562	20.8%	17.4%
	Upper	1,271	34.4%	\$234,591	48.7%	39.5%	353	35.3%	32.7%	\$62,587	50.1%	43.9%	596	32.9%	33.9%	\$110,185	46.2%	45.3%
	Unknown	212	5.7%	\$33,524	7.0%	0.0%	55	5.5%	19.6%	\$7,073	5.7%	20.6%	119	6.6%	21.0%	\$19,838	8.3%	21.7%
	<i>Total</i>	<i>3,694</i>	<i>100.0%</i>	<i>\$481,790</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,001</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$125,045</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,810</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$238,425</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	48	15.7%	\$2,330	11.3%	19.8%	15	14.7%	10.9%	\$561	8.6%	5.5%	25	18.0%	10.0%	\$1,441	15.9%	5.3%
	Moderate	91	29.8%	\$4,877	23.7%	18.3%	28	27.5%	22.1%	\$1,048	16.1%	14.9%	42	30.2%	21.5%	\$2,456	27.0%	15.7%
	Middle	86	28.2%	\$4,502	21.8%	22.3%	29	28.4%	26.8%	\$1,695	26.0%	22.6%	42	30.2%	24.9%	\$1,766	19.4%	20.4%
	Upper	73	23.9%	\$8,243	40.0%	39.5%	27	26.5%	35.6%	\$2,931	45.0%	50.3%	28	20.1%	40.9%	\$3,197	35.2%	54.2%
	Unknown	7	2.3%	\$653	3.2%	0.0%	3	2.9%	4.6%	\$276	4.2%	6.6%	2	1.4%	2.7%	\$222	2.4%	4.4%
	<i>Total</i>	<i>305</i>	<i>100.0%</i>	<i>\$20,605</i>	<i>100.0%</i>	<i>100.0%</i>	<i>102</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,511</i>	<i>100.0%</i>	<i>100.0%</i>	<i>139</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,082</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$307	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$145	100.0%	100.0%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$307</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$145</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1,184	15.9%	\$93,219	9.3%	19.8%	386	15.8%	10.0%	\$29,801	9.3%	5.2%	553	16.2%	8.7%	\$44,539	9.6%	4.5%
	Moderate	1,799	24.2%	\$180,734	18.0%	18.3%	588	24.1%	20.4%	\$56,687	17.7%	13.8%	837	24.4%	21.2%	\$85,846	18.6%	14.6%
	Middle	1,618	21.7%	\$194,250	19.3%	22.3%	526	21.6%	21.6%	\$61,870	19.3%	18.4%	745	21.8%	21.1%	\$89,392	19.3%	18.1%
	Upper	2,359	31.7%	\$460,488	45.8%	39.5%	791	32.5%	30.2%	\$149,770	46.6%	40.0%	1,019	29.8%	31.3%	\$200,809	43.5%	41.9%
	Unknown	489	6.6%	\$76,808	7.6%	0.0%	146	6.0%	17.7%	\$23,040	7.2%	22.6%	270	7.9%	17.8%	\$41,456	9.0%	20.9%
	<i>Total</i>	<i>7,449</i>	<i>100.0%</i>	<i>\$1,005,499</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,437</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$321,168</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3,424</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$462,042</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: MI Grand Rapids

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Count		Bank Dollar		Small Businesses	Count		Dollar				Count		Dollar			
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %
SMALL BUSINESSES	Low	176	6.5%	\$36,893	9.5%	3.6%	70	5.9%	4.5%	\$14,561	9.8%	7.1%	70	6.9%	4.5%	\$13,996	8.8%	7.2%
	Moderate	502	18.5%	\$70,430	18.2%	18.3%	230	19.4%	17.4%	\$27,744	18.8%	18.4%	192	18.8%	17.2%	\$29,614	18.5%	19.1%
	Middle	1,197	44.2%	\$174,108	44.9%	49.4%	535	45.1%	45.8%	\$68,265	46.2%	45.1%	442	43.4%	46.2%	\$69,590	43.6%	44.7%
	Upper	833	30.8%	\$105,966	27.4%	28.7%	351	29.6%	31.0%	\$37,283	25.2%	29.1%	315	30.9%	31.1%	\$46,504	29.1%	28.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.3%	0	0.0%	0.9%	\$0	0.0%	0.1%
	Total	2,708	100.0%	\$387,397	100.0%	100.0%	1,186	100.0%	100.0%	\$147,853	100.0%	100.0%	1,019	100.0%	100.0%	\$159,704	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	9.2%	0	0.0%	12.7%	\$0	0.0%	9.7%	0	0.0%	14.0%	\$0	0.0%	13.6%
	Middle	18	75.0%	\$2,636	94.2%	69.7%	10	83.3%	68.3%	\$2,322	97.4%	69.6%	4	66.7%	65.6%	\$168	85.7%	63.3%
	Upper	6	25.0%	\$161	5.8%	20.9%	2	16.7%	18.4%	\$63	2.6%	20.7%	2	33.3%	19.8%	\$28	14.3%	22.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.5%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	24	100.0%	\$2,797	100.0%	100.0%	12	100.0%	100.0%	\$2,385	100.0%	100.0%	6	100.0%	100.0%	\$196	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MI Grand Rapids

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	1,339	49.4%	\$61,465	15.9%	89.7%	594	50.1%	39.5%	\$22,966	15.5%	28.1%	469	46.0%	41.7%	\$24,548	15.4%	28.0%
		Over \$1 Million	808	29.8%	\$261,989	67.6%	9.8%	296	25.0%					350	34.3%				
		Total Rev. available	2,147	79.2%	\$323,454	83.5%	99.5%	890	75.1%					819	80.3%				
		Rev. Not Known	561	20.7%	\$63,943	16.5%	0.5%	296	25.0%					200	19.6%				
		Total	2,708	100.0%	\$387,397	100.0%	100.0%	1,186	100.0%					1,019	100.0%				
	Loan Size	\$100,000 or Less	1,887	69.7%	\$59,270	15.3%		869	73.3%	84.2%	\$25,487	17.2%	19.7%	676	66.3%	83.6%	\$22,184	13.9%	19.8%
		\$100,001 - \$250,000	359	13.3%	\$63,875	16.5%		142	12.0%	7.1%	\$24,484	16.6%	16.9%	152	14.9%	7.5%	\$27,224	17.0%	17.0%
		\$250,001 - \$1 Million	462	17.1%	\$264,252	68.2%		175	14.8%	8.6%	\$97,882	66.2%	63.3%	191	18.7%	8.9%	\$110,296	69.1%	63.2%
		Total	2,708	100.0%	\$387,397	100.0%		1,186	100.0%	100.0%	\$147,853	100.0%	100.0%	1,019	100.0%	100.0%	\$159,704	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,225	91.5%	\$25,778	41.9%													
		\$100,001 - \$250,000	69	5.2%	\$11,603	18.9%													
		\$250,001 - \$1 Million	45	3.4%	\$24,084	39.2%													
Total		1,339	100.0%	\$61,465	100.0%														
Small Farm	Revenue	\$1 Million or Less	12	50.0%	\$330	11.8%	95.2%	2	16.7%	46.3%	\$48	2.0%	49.3%	4	66.7%	44.1%	\$66	33.7%	58.2%
		Over \$1 Million	8	33.3%	\$2,217	79.3%	4.7%	8	66.7%				0	0.0%					
		Total Rev. available	20	83.3%	\$2,547	91.1%	99.9%	10	83.4%				4	66.7%					
		Not Known	4	16.7%	\$250	8.9%	0.1%	2	16.7%				2	33.3%					
		Total	24	100.0%	\$2,797	100.0%	100.0%	12	100.0%				6	100.0%					
	Loan Size	\$100,000 or Less	18	75.0%	\$647	23.1%		6	50.0%	72.6%	\$235	9.9%	22.5%	6	100.0%	77.9%	\$196	100.0%	24.8%
		\$100,001 - \$250,000	2	8.3%	\$350	12.5%		2	16.7%	17.1%	\$350	14.7%	33.6%	0	0.0%	13.2%	\$0	0.0%	29.6%
		\$250,001 - \$500,000	4	16.7%	\$1,800	64.4%		4	33.3%	10.3%	\$1,800	75.5%	44.0%	0	0.0%	8.9%	\$0	0.0%	45.5%
		Total	24	100.0%	\$2,797	100.0%		12	100.0%	100.0%	\$2,385	100.0%	100.0%	6	100.0%	100.0%	\$196	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	100.0%	\$330	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
Total		12	100.0%	\$330	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: MO St Louis

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	4	1.1%	\$785	0.7%	5.1%	2	1.1%	1.9%	\$549	1.0%	1.0%	2	1.3%	2.1%	\$236	0.6%	1.3%
	Moderate	30	8.1%	\$5,684	5.4%	16.4%	11	5.9%	10.6%	\$2,243	4.0%	6.3%	15	10.0%	10.0%	\$2,454	5.9%	6.2%
	Middle	116	31.4%	\$23,390	22.1%	32.7%	61	32.4%	32.9%	\$12,081	21.6%	25.3%	49	32.7%	34.5%	\$10,466	25.2%	26.8%
	Upper	220	59.5%	\$76,215	71.9%	45.9%	114	60.6%	54.6%	\$40,940	73.4%	67.4%	84	56.0%	53.3%	\$28,308	68.3%	65.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>370</i>	<i>100.0%</i>	<i>\$106,074</i>	<i>100.0%</i>	<i>100.0%</i>	<i>188</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$55,813</i>	<i>100.0%</i>	<i>100.0%</i>	<i>150</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$41,464</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	7	2.2%	\$800	1.0%	5.1%	1	0.9%	2.4%	\$31	0.1%	1.3%	6	3.6%	1.6%	\$769	1.8%	0.9%
	Moderate	24	7.5%	\$2,295	2.8%	16.4%	13	11.9%	11.6%	\$1,279	5.3%	6.7%	8	4.8%	8.8%	\$767	1.8%	5.0%
	Middle	66	20.7%	\$9,921	12.2%	32.7%	34	31.2%	32.2%	\$5,074	21.2%	24.3%	24	14.5%	30.1%	\$3,568	8.3%	22.2%
	Upper	222	69.6%	\$68,433	84.0%	45.9%	61	56.0%	53.8%	\$17,560	73.3%	67.7%	127	77.0%	59.5%	\$37,911	88.1%	71.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>319</i>	<i>100.0%</i>	<i>\$81,449</i>	<i>100.0%</i>	<i>100.0%</i>	<i>109</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,944</i>	<i>100.0%</i>	<i>100.0%</i>	<i>165</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$43,015</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	8.3%	\$6	0.9%	5.1%	0	0.0%	5.2%	\$0	0.0%	1.6%	1	16.7%	5.3%	\$6	2.9%	1.3%
	Moderate	3	25.0%	\$133	20.8%	16.4%	2	33.3%	15.4%	\$111	25.9%	6.4%	1	16.7%	15.1%	\$22	10.5%	7.1%
	Middle	1	8.3%	\$60	9.4%	32.7%	1	16.7%	28.0%	\$60	14.0%	18.3%	0	0.0%	27.4%	\$0	0.0%	20.4%
	Upper	7	58.3%	\$440	68.9%	45.9%	3	50.0%	51.5%	\$258	60.1%	73.7%	4	66.7%	52.2%	\$182	86.7%	71.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$639</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$429</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$210</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	1	100.0%	\$314	100.0%	12.9%	1	100.0%	16.9%	\$314	100.0%	7.8%	0	0.0%	19.2%	\$0	0.0%	13.3%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	31.9%	\$0	0.0%	12.4%	0	0.0%	31.6%	\$0	0.0%	19.6%
	Middle	0	0.0%	\$0	0.0%	35.2%	0	0.0%	23.7%	\$0	0.0%	23.4%	0	0.0%	24.8%	\$0	0.0%	15.0%
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	27.5%	\$0	0.0%	56.4%	0	0.0%	24.4%	\$0	0.0%	52.1%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$314</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$314</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	13	1.9%	\$1,905	1.0%	5.1%	4	1.3%	2.3%	\$894	1.1%	1.6%	9	2.8%	2.1%	\$1,011	1.2%	1.6%
	Moderate	57	8.1%	\$8,112	4.3%	16.4%	26	8.6%	11.2%	\$3,633	4.5%	6.8%	24	7.5%	9.7%	\$3,243	3.8%	6.2%
	Middle	183	26.1%	\$33,371	17.7%	32.7%	96	31.6%	32.4%	\$17,215	21.4%	24.7%	73	22.7%	32.2%	\$14,034	16.6%	24.0%
	Upper	449	64.0%	\$145,088	77.0%	45.9%	178	58.6%	54.1%	\$58,758	73.0%	66.9%	215	67.0%	56.1%	\$66,401	78.4%	68.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>702</i>	<i>100.0%</i>	<i>\$188,476</i>	<i>100.0%</i>	<i>100.0%</i>	<i>304</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$80,500</i>	<i>100.0%</i>	<i>100.0%</i>	<i>321</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$84,689</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: MO St Louis

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	17	4.6%	\$1,377	1.3%	20.1%	9	4.8%	8.7%	\$762	1.4%	4.1%	7	4.7%	8.8%	\$536	1.3%	4.2%
	Moderate	81	21.9%	\$13,610	12.8%	16.2%	35	18.6%	18.0%	\$5,650	10.1%	12.0%	36	24.0%	16.9%	\$6,191	14.9%	11.3%
	Middle	46	12.4%	\$7,842	7.4%	19.9%	30	16.0%	18.0%	\$5,422	9.7%	15.8%	13	8.7%	17.7%	\$1,996	4.8%	15.7%
	Upper	209	56.5%	\$79,935	75.4%	43.8%	105	55.9%	32.1%	\$42,165	75.5%	46.3%	86	57.3%	31.5%	\$31,245	75.4%	44.9%
	Unknown	17	4.6%	\$3,310	3.1%	0.0%	9	4.8%	23.2%	\$1,814	3.3%	21.8%	8	5.3%	25.1%	\$1,496	3.6%	23.8%
	<i>Total</i>	<i>370</i>	<i>100.0%</i>	<i>\$106,074</i>	<i>100.0%</i>	<i>100.0%</i>	<i>188</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$55,813</i>	<i>100.0%</i>	<i>100.0%</i>	<i>150</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$41,464</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	19	6.0%	\$1,803	2.2%	20.1%	10	9.2%	7.0%	\$889	3.7%	3.3%	6	3.6%	5.2%	\$664	1.5%	2.3%
	Moderate	36	11.3%	\$4,298	5.3%	16.2%	11	10.1%	13.4%	\$1,359	5.7%	8.4%	23	13.9%	11.6%	\$2,741	6.4%	7.1%
	Middle	65	20.4%	\$9,950	12.2%	19.9%	25	22.9%	18.2%	\$3,652	15.3%	14.4%	35	21.2%	16.4%	\$5,438	12.6%	12.8%
	Upper	175	54.9%	\$61,016	74.9%	43.8%	50	45.9%	35.8%	\$15,528	64.9%	49.6%	92	55.8%	36.1%	\$32,789	76.2%	48.9%
	Unknown	24	7.5%	\$4,382	5.4%	0.0%	13	11.9%	25.5%	\$2,516	10.5%	24.3%	9	5.5%	30.8%	\$1,383	3.2%	28.9%
	<i>Total</i>	<i>319</i>	<i>100.0%</i>	<i>\$81,449</i>	<i>100.0%</i>	<i>100.0%</i>	<i>109</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,944</i>	<i>100.0%</i>	<i>100.0%</i>	<i>165</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$43,015</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	2	16.7%	\$107	16.7%	20.1%	1	16.7%	9.1%	\$53	12.4%	2.5%	1	16.7%	8.7%	\$54	25.7%	2.9%
	Moderate	3	25.0%	\$51	8.0%	16.2%	1	16.7%	17.7%	\$23	5.4%	7.7%	2	33.3%	15.1%	\$28	13.3%	8.2%
	Middle	3	25.0%	\$120	18.8%	19.9%	2	33.3%	20.0%	\$118	27.5%	14.8%	1	16.7%	19.2%	\$2	1.0%	14.7%
	Upper	4	33.3%	\$361	56.5%	43.8%	2	33.3%	41.4%	\$235	54.8%	56.3%	2	33.3%	43.6%	\$126	60.0%	57.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.9%	\$0	0.0%	18.7%	0	0.0%	13.4%	\$0	0.0%	17.0%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$639</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$429</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$210</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$314	100.0%	0.0%	1	100.0%	100.0%	\$314	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$314</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$314</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	38	5.4%	\$3,287	1.7%	20.1%	20	6.6%	8.0%	\$1,704	2.1%	3.5%	14	4.4%	7.0%	\$1,254	1.5%	3.1%
	Moderate	120	17.1%	\$17,959	9.5%	16.2%	47	15.5%	16.1%	\$7,032	8.7%	9.8%	61	19.0%	14.3%	\$8,960	10.6%	8.8%
	Middle	114	16.2%	\$17,912	9.5%	19.9%	57	18.8%	18.1%	\$9,192	11.4%	14.2%	49	15.3%	17.0%	\$7,436	8.8%	13.6%
	Upper	388	55.3%	\$141,312	75.0%	43.8%	157	51.6%	33.8%	\$57,928	72.0%	44.6%	180	56.1%	33.9%	\$64,160	75.8%	44.9%
	Unknown	42	6.0%	\$8,006	4.2%	0.0%	23	7.6%	24.1%	\$4,644	5.8%	27.9%	17	5.3%	27.7%	\$2,879	3.4%	29.6%
	<i>Total</i>	<i>702</i>	<i>100.0%</i>	<i>\$188,476</i>	<i>100.0%</i>	<i>100.0%</i>	<i>304</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$80,500</i>	<i>100.0%</i>	<i>100.0%</i>	<i>321</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$84,689</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MO St Louis

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ 000s	\$ %	\$ %	Bank #	Agg %	\$ 000s	\$ %	Agg \$ %		
SMALL BUSINESSES	Low	33	11.1%	\$9,522	19.9%	6.2%	11	7.2%	5.3%	\$2,967	13.1%	7.1%	18	13.6%	5.5%	\$5,494	25.4%	6.9%
	Moderate	45	15.1%	\$5,928	12.4%	14.7%	25	16.3%	13.9%	\$3,170	14.0%	16.3%	19	14.4%	14.4%	\$2,608	12.0%	16.6%
	Middle	90	30.2%	\$12,943	27.0%	28.6%	45	29.4%	27.8%	\$6,455	28.5%	26.4%	43	32.6%	27.7%	\$6,225	28.8%	26.6%
	Upper	130	43.6%	\$19,504	40.7%	50.5%	72	47.1%	52.2%	\$10,095	44.5%	49.7%	52	39.4%	51.7%	\$7,319	33.8%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.3%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.1%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Total	298	100.0%	\$47,897	100.0%	100.0%	153	100.0%	100.0%	\$22,687	100.0%	100.0%	132	100.0%	100.0%	\$21,646	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.7%	\$0	0.0%	0.1%	0	0.0%	2.0%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	8.0%	0	0.0%	4.4%	\$0	0.0%	3.7%	0	0.0%	4.7%	\$0	0.0%	0.6%
	Middle	0	0.0%	\$0	0.0%	30.1%	0	0.0%	31.4%	\$0	0.0%	33.9%	0	0.0%	36.2%	\$0	0.0%	27.4%
	Upper	0	0.0%	\$0	0.0%	60.4%	0	0.0%	62.8%	\$0	0.0%	62.3%	0	0.0%	57.0%	\$0	0.0%	69.3%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MO St Louis

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	116	38.9%	\$4,635	9.7%	89.8%	64	41.8%	43.2%	\$1,667	7.3%	30.3%	49	37.1%	45.4%	\$2,865	13.2%	29.6%
		Over \$1 Million	105	35.2%	\$32,526	67.9%	9.8%	50	32.7%				49	37.1%					
		Total Rev. available	221	74.1%	\$37,161	77.6%	99.6%	114	74.5%				98	74.2%					
		Rev. Not Known	77	25.8%	\$10,736	22.4%	0.3%	39	25.5%				34	25.8%					
		Total	298	100.0%	\$47,897	100.0%	100.0%	153	100.0%				132	100.0%					
	Loan Size	\$100,000 or Less	191	64.1%	\$7,012	14.6%		101	66.0%	90.6%	\$3,293	14.5%	24.7%	85	64.4%	91.1%	\$3,466	16.0%	27.0%
		\$100,001 - \$250,000	49	16.4%	\$9,194	19.2%		25	16.3%	4.3%	\$4,814	21.2%	16.0%	21	15.9%	4.0%	\$3,862	17.8%	15.4%
		\$250,001 - \$1 Million	58	19.5%	\$31,691	66.2%		27	17.6%	5.1%	\$14,580	64.3%	59.2%	26	19.7%	4.9%	\$14,318	66.1%	57.6%
		Total	298	100.0%	\$47,897	100.0%		153	100.0%	100.0%	\$22,687	100.0%	100.0%	132	100.0%	100.0%	\$21,646	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	112	96.6%	\$3,079	66.4%													
		\$100,001 - \$250,000	2	1.7%	\$418	9.0%													
		\$250,001 - \$1 Million	2	1.7%	\$1,138	24.6%													
		Total	116	100.0%	\$4,635	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	97.4%	0	0.0%	56.9%	\$0	0.0%	66.4%	0	0.0%	50.3%	\$0	0.0%	60.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	2.6%	0	0.0%				0	0.0%					
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	83.9%	\$0	0.0%	25.8%	0	0.0%	78.5%	\$0	0.0%	22.8%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.2%	\$0	0.0%	34.3%	0	0.0%	14.1%	\$0	0.0%	33.4%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.8%	\$0	0.0%	39.9%	0	0.0%	7.4%	\$0	0.0%	43.8%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: NC Charlotte

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	69	4.6%	\$9,233	3.3%	3.4%	20	3.3%	2.1%	\$2,304	2.0%	1.5%	42	6.8%	2.8%	\$6,228	5.8%	2.2%
	Moderate	267	17.9%	\$30,984	11.2%	18.4%	103	17.1%	12.8%	\$11,314	10.0%	7.8%	123	20.0%	13.4%	\$14,522	13.5%	8.3%
	Middle	547	36.6%	\$78,478	28.4%	39.9%	224	37.1%	34.4%	\$32,009	28.3%	25.8%	219	35.6%	35.2%	\$29,912	27.8%	27.2%
	Upper	610	40.8%	\$156,885	56.9%	38.3%	257	42.5%	50.5%	\$67,506	59.7%	64.8%	232	37.7%	48.6%	\$57,060	53.0%	62.3%
	Unknown	1	0.1%	\$268	0.1%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>1,494</i>	<i>100.0%</i>	<i>\$275,848</i>	<i>100.0%</i>	<i>100.0%</i>	<i>604</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$113,133</i>	<i>100.0%</i>	<i>100.0%</i>	<i>616</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,722</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	45	2.9%	\$5,539	2.2%	3.4%	7	1.9%	2.6%	\$499	0.9%	6.9%	22	3.0%	1.8%	\$2,735	2.3%	1.1%
	Moderate	256	16.7%	\$27,511	11.0%	18.4%	38	10.1%	13.5%	\$4,113	7.2%	15.3%	126	17.2%	11.6%	\$13,193	11.1%	6.8%
	Middle	570	37.1%	\$71,780	28.7%	39.9%	170	45.3%	37.5%	\$19,467	33.9%	31.9%	261	35.6%	33.8%	\$33,815	28.3%	24.6%
	Upper	663	43.2%	\$144,611	57.9%	38.3%	159	42.4%	46.3%	\$33,034	57.6%	45.9%	324	44.2%	52.8%	\$69,548	58.3%	67.4%
	Unknown	2	0.1%	\$340	0.1%	0.0%	1	0.3%	0.0%	\$235	0.4%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,536</i>	<i>100.0%</i>	<i>\$249,781</i>	<i>100.0%</i>	<i>100.0%</i>	<i>375</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$57,348</i>	<i>100.0%</i>	<i>100.0%</i>	<i>733</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$119,291</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	4	2.3%	\$203	1.4%	3.4%	1	1.7%	3.6%	\$52	1.1%	1.4%	2	2.6%	2.4%	\$53	0.9%	1.3%
	Moderate	31	18.1%	\$2,042	14.5%	18.4%	6	10.2%	17.2%	\$182	3.7%	8.5%	22	28.6%	16.5%	\$1,701	29.3%	7.3%
	Middle	79	46.2%	\$5,457	38.7%	39.9%	31	52.5%	36.7%	\$2,259	46.2%	24.4%	34	44.2%	35.9%	\$2,110	36.4%	21.5%
	Upper	57	33.3%	\$6,415	45.4%	38.3%	21	35.6%	42.5%	\$2,396	49.0%	65.7%	19	24.7%	45.2%	\$1,938	33.4%	69.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>171</i>	<i>100.0%</i>	<i>\$14,117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>59</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,889</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,802</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	14.0%	0	0.0%	22.5%	\$0	0.0%	10.9%	0	0.0%	20.0%	\$0	0.0%	13.9%
	Moderate	0	0.0%	\$0	0.0%	29.7%	0	0.0%	23.6%	\$0	0.0%	13.9%	0	0.0%	29.2%	\$0	0.0%	25.8%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	22.5%	\$0	0.0%	20.8%	0	0.0%	26.9%	\$0	0.0%	27.8%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	31.5%	\$0	0.0%	54.4%	0	0.0%	23.8%	\$0	0.0%	32.5%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	118	3.7%	\$14,975	2.8%	3.4%	28	2.7%	2.4%	\$2,855	1.6%	3.9%	66	4.6%	2.4%	\$9,016	3.9%	2.6%
	Moderate	554	17.3%	\$60,537	11.2%	18.4%	147	14.2%	13.2%	\$15,609	8.9%	10.8%	271	19.0%	12.8%	\$29,416	12.6%	8.9%
	Middle	1,196	37.4%	\$155,715	28.8%	39.9%	425	40.9%	35.5%	\$53,735	30.6%	27.8%	514	36.0%	34.7%	\$65,837	28.3%	26.3%
	Upper	1,330	41.5%	\$307,911	57.0%	38.3%	437	42.1%	48.9%	\$102,936	58.7%	57.5%	575	40.3%	50.0%	\$128,546	55.2%	62.2%
	Unknown	3	0.1%	\$608	0.1%	0.0%	1	0.1%	0.1%	\$235	0.1%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>3,201</i>	<i>100.0%</i>	<i>\$539,746</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,038</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$175,370</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,426</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$232,815</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: NC Charlotte

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	307	20.5%	\$28,568	10.4%	21.0%	127	21.0%	6.3%	\$10,969	9.7%	2.8%	151	24.5%	6.1%	\$14,743	13.7%	2.8%
	Moderate	348	23.3%	\$42,904	15.6%	17.3%	138	22.8%	17.6%	\$16,030	14.2%	10.6%	151	24.5%	18.5%	\$19,575	18.2%	11.3%
	Middle	223	14.9%	\$35,809	13.0%	20.4%	80	13.2%	17.7%	\$12,832	11.3%	14.3%	93	15.1%	18.8%	\$14,701	13.6%	15.4%
	Upper	494	33.1%	\$137,275	49.8%	41.4%	216	35.8%	38.5%	\$60,368	53.4%	54.0%	157	25.5%	38.7%	\$43,473	40.4%	53.6%
	Unknown	122	8.2%	\$31,292	11.3%	0.0%	43	7.1%	19.8%	\$12,934	11.4%	18.2%	64	10.4%	17.9%	\$15,230	14.1%	17.0%
	<i>Total</i>	<i>1,494</i>	<i>100.0%</i>	<i>\$275,848</i>	<i>100.0%</i>	<i>100.0%</i>	<i>604</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$113,133</i>	<i>100.0%</i>	<i>100.0%</i>	<i>616</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,722</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	189	12.3%	\$17,095	6.8%	21.0%	48	12.8%	6.7%	\$3,999	7.0%	2.3%	86	11.7%	5.0%	\$7,790	6.5%	2.2%
	Moderate	303	19.7%	\$31,157	12.5%	17.3%	76	20.3%	13.9%	\$7,500	13.1%	6.1%	150	20.5%	11.9%	\$14,940	12.5%	6.8%
	Middle	314	20.4%	\$39,038	15.6%	20.4%	84	22.4%	17.0%	\$9,962	17.4%	9.3%	137	18.7%	16.5%	\$17,116	14.3%	12.1%
	Upper	581	37.8%	\$131,831	52.8%	41.4%	135	36.0%	37.7%	\$30,669	53.5%	37.3%	257	35.1%	41.0%	\$57,534	48.2%	55.2%
	Unknown	149	9.7%	\$30,660	12.3%	0.0%	32	8.5%	24.7%	\$5,218	9.1%	45.0%	103	14.1%	25.7%	\$21,911	18.4%	23.8%
	<i>Total</i>	<i>1,536</i>	<i>100.0%</i>	<i>\$249,781</i>	<i>100.0%</i>	<i>100.0%</i>	<i>375</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$57,348</i>	<i>100.0%</i>	<i>100.0%</i>	<i>733</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$119,291</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	37	21.6%	\$1,746	12.4%	21.0%	14	23.7%	9.7%	\$501	10.2%	2.7%	19	24.7%	7.6%	\$1,138	19.6%	2.2%
	Moderate	42	24.6%	\$2,375	16.8%	17.3%	17	28.8%	17.1%	\$1,151	23.5%	6.7%	17	22.1%	16.3%	\$918	15.8%	7.0%
	Middle	42	24.6%	\$3,628	25.7%	20.4%	16	27.1%	20.3%	\$1,705	34.9%	13.9%	18	23.4%	19.9%	\$1,328	22.9%	12.0%
	Upper	50	29.2%	\$6,368	45.1%	41.4%	12	20.3%	43.8%	\$1,532	31.3%	67.5%	23	29.9%	47.8%	\$2,418	41.7%	66.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	9.3%	0	0.0%	8.4%	\$0	0.0%	12.5%
	<i>Total</i>	<i>171</i>	<i>100.0%</i>	<i>\$14,117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>59</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,889</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,802</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	533	16.7%	\$47,409	8.8%	21.0%	189	18.2%	6.5%	\$15,469	8.8%	2.5%	256	18.0%	5.7%	\$23,671	10.2%	2.4%
	Moderate	693	21.6%	\$76,436	14.2%	17.3%	231	22.3%	16.3%	\$24,681	14.1%	8.5%	318	22.3%	15.9%	\$35,433	15.2%	8.9%
	Middle	579	18.1%	\$78,475	14.5%	20.4%	180	17.3%	17.5%	\$24,499	14.0%	11.9%	248	17.4%	17.9%	\$33,145	14.2%	13.1%
	Upper	1,125	35.1%	\$275,474	51.0%	41.4%	363	35.0%	38.4%	\$92,569	52.8%	45.9%	437	30.6%	39.8%	\$103,425	44.4%	50.7%
	Unknown	271	8.5%	\$61,952	11.5%	0.0%	75	7.2%	21.3%	\$18,152	10.4%	31.3%	167	11.7%	20.7%	\$37,141	16.0%	24.9%
	<i>Total</i>	<i>3,201</i>	<i>100.0%</i>	<i>\$539,746</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,038</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$175,370</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,426</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$232,815</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: NC Charlotte

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Small Businesses		Count %	Count		Dollar		Count %	Dollar		Count %	Dollar			
		Count #	Dollar \$ (000s)	Dollar \$ %	%		Bank #	Agg %	Bank \$ 000s	Agg \$ %		Bank #	Agg %		Bank \$ 000s	Agg \$ %		
SMALL BUSINESSES	Low	100	6.6%	\$15,611	10.8%	6.9%	49	8.2%	8.2%	\$8,387	14.7%	10.9%	34	6.0%	8.4%	\$5,580	10.6%	11.7%
	Moderate	238	15.7%	\$27,462	19.1%	17.5%	87	14.6%	14.8%	\$9,471	16.6%	15.8%	95	16.8%	14.8%	\$9,972	18.9%	15.8%
	Middle	530	34.9%	\$46,344	32.2%	33.5%	202	34.0%	31.6%	\$16,389	28.7%	32.1%	198	35.0%	31.7%	\$17,636	33.5%	30.9%
	Upper	637	41.9%	\$50,777	35.2%	41.4%	248	41.8%	42.7%	\$20,483	35.9%	37.7%	234	41.4%	42.6%	\$18,401	34.9%	38.6%
	Unknown	15	1.0%	\$3,876	2.7%	0.7%	8	1.3%	0.9%	\$2,368	4.1%	2.5%	4	0.7%	1.0%	\$1,114	2.1%	2.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.7%	\$0	0.0%	1.0%	0	0.0%	1.5%	\$0	0.0%	0.9%
	Total	1,520	100.0%	\$144,070	100.0%	100.0%	594	100.0%	100.0%	\$57,098	100.0%	100.0%	565	100.0%	100.0%	\$52,703	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.4%	0	0.0%	1.6%	\$0	0.0%	1.4%	0	0.0%	1.4%	\$0	0.0%	0.1%
	Moderate	2	12.5%	\$354	20.3%	18.3%	1	20.0%	18.0%	\$154	24.8%	15.2%	1	14.3%	18.1%	\$200	33.6%	13.9%
	Middle	11	68.8%	\$1,298	74.3%	57.7%	4	80.0%	65.2%	\$468	75.2%	72.5%	3	42.9%	62.5%	\$300	50.4%	74.1%
	Upper	3	18.8%	\$95	5.4%	22.3%	0	0.0%	14.8%	\$0	0.0%	10.4%	3	42.9%	16.7%	\$95	16.0%	11.0%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.4%	\$0	0.0%	0.5%	0	0.0%	1.0%	\$0	0.0%	0.7%
Total	16	100.0%	\$1,747	100.0%	100.0%	5	100.0%	100.0%	\$622	100.0%	100.0%	7	100.0%	100.0%	\$595	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: NC Charlotte

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	955	62.8%	\$41,508	28.8%	92.3%	346	58.2%	47.0%	\$19,415	34.0%	35.0%	339	60.0%	52.3%	\$12,620	23.9%	37.9%
		Over \$1 Million	251	16.5%	\$72,786	50.5%	7.4%	88	14.8%				109	19.3%					
		Total Rev. available	1,206	79.3%	\$114,294	79.3%	99.7%	434	73.0%				448	79.3%					
		Rev. Not Known	314	20.7%	\$29,776	20.7%	0.3%	160	26.9%				117	20.7%					
		Total	1,520	100.0%	\$144,070	100.0%	100.0%	594	100.0%				565	100.0%					
	Loan Size	\$100,000 or Less	1,232	81.1%	\$36,700	25.5%		477	80.3%	91.9%	\$14,307	25.1%	32.4%	453	80.2%	91.2%	\$13,982	26.5%	31.9%
		\$100,001 - \$250,000	146	9.6%	\$25,432	17.7%		59	9.9%	3.8%	\$10,295	18.0%	15.2%	64	11.3%	4.1%	\$11,112	21.1%	15.7%
		\$250,001 - \$1 Million	142	9.3%	\$81,938	56.9%		58	9.8%	4.3%	\$32,496	56.9%	52.3%	48	8.5%	4.7%	\$27,609	52.4%	52.5%
		Total	1,520	100.0%	\$144,070	100.0%		594	100.0%	100.0%	\$57,098	100.0%	100.0%	565	100.0%	100.0%	\$52,703	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	889	93.1%	\$18,809	45.3%													
		\$100,001 - \$250,000	38	4.0%	\$6,386	15.4%													
		\$250,001 - \$1 Million	28	2.9%	\$16,313	39.3%													
		Total	955	100.0%	\$41,508	100.0%													
Small Farm	Revenue	\$1 Million or Less	8	50.0%	\$749	42.9%	98.5%	1	20.0%	44.5%	\$154	24.8%	47.0%	4	57.1%	46.8%	\$245	41.2%	66.9%
		Over \$1 Million	1	6.3%	\$38	2.2%	1.5%	1	20.0%				0	0.0%					
		Total Rev. available	9	56.3%	\$787	45.1%	100.0%	2	40.0%				4	57.1%					
		Not Known	7	43.8%	\$960	55.0%	0.0%	3	60.0%				3	42.9%					
		Total	16	100.0%	\$1,747	100.0%	100.0%	5	100.0%				7	100.0%					
	Loan Size	\$100,000 or Less	9	56.3%	\$553	31.7%		2	40.0%	88.3%	\$138	22.2%	39.3%	5	71.4%	85.7%	\$215	36.1%	35.8%
		\$100,001 - \$250,000	7	43.8%	\$1,194	68.3%		3	60.0%	8.6%	\$484	77.8%	35.1%	2	28.6%	9.2%	\$380	63.9%	31.7%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	25.6%	0	0.0%	5.1%	\$0	0.0%	32.5%
		Total	16	100.0%	\$1,747	100.0%		5	100.0%	100.0%	\$622	100.0%	100.0%	7	100.0%	100.0%	\$595	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	62.5%	\$265	35.4%													
		\$100,001 - \$250,000	3	37.5%	\$484	64.6%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	8	100.0%	\$749	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: OH Cleveland

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	136	2.7%	\$10,611	1.5%	5.2%	23	1.3%	1.6%	\$1,505	0.6%	1.0%	72	3.4%	2.0%	\$5,612	1.9%	1.1%
	Moderate	703	14.0%	\$57,239	8.1%	14.4%	153	8.5%	9.5%	\$11,375	4.3%	5.4%	327	15.4%	10.2%	\$26,667	9.0%	5.9%
	Middle	2,072	41.4%	\$231,144	32.6%	44.0%	782	43.3%	44.4%	\$88,801	33.9%	35.0%	862	40.6%	44.0%	\$93,594	31.5%	35.0%
	Upper	2,097	41.9%	\$410,751	57.9%	36.4%	847	46.9%	44.5%	\$160,075	61.2%	58.6%	862	40.6%	43.9%	\$171,190	57.6%	58.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>5,008</i>	<i>100.0%</i>	<i>\$709,745</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,805</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$261,756</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,123</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$297,063</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	89	3.0%	\$6,075	1.6%	5.2%	10	1.2%	2.1%	\$644	0.6%	1.1%	49	3.6%	1.8%	\$3,605	2.1%	1.0%
	Moderate	394	13.3%	\$28,416	7.6%	14.4%	101	12.0%	10.1%	\$7,214	6.6%	7.6%	185	13.6%	8.9%	\$13,861	8.0%	5.2%
	Middle	1,228	41.6%	\$124,780	33.4%	44.0%	369	43.8%	44.8%	\$36,807	33.6%	40.0%	568	41.7%	42.4%	\$58,023	33.6%	34.4%
	Upper	1,242	42.1%	\$214,735	57.4%	36.4%	363	43.1%	43.0%	\$64,995	59.3%	51.4%	560	41.1%	46.9%	\$97,136	56.3%	59.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>2,953</i>	<i>100.0%</i>	<i>\$374,006</i>	<i>100.0%</i>	<i>100.0%</i>	<i>843</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$109,660</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,362</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$172,625</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	5	1.4%	\$420	1.6%	5.2%	1	1.0%	5.6%	\$9	0.1%	2.1%	2	1.1%	4.4%	\$98	0.7%	2.2%
	Moderate	42	11.5%	\$1,854	7.0%	14.4%	12	11.7%	14.7%	\$400	5.9%	6.9%	25	14.1%	14.3%	\$1,267	9.5%	7.0%
	Middle	166	45.4%	\$9,744	36.5%	44.0%	50	48.5%	43.3%	\$2,533	37.3%	34.4%	80	45.2%	42.2%	\$5,002	37.5%	33.3%
	Upper	153	41.8%	\$14,646	54.9%	36.4%	40	38.8%	36.4%	\$3,856	56.7%	56.7%	70	39.5%	39.1%	\$6,956	52.2%	57.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>366</i>	<i>100.0%</i>	<i>\$26,664</i>	<i>100.0%</i>	<i>100.0%</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,798</i>	<i>100.0%</i>	<i>100.0%</i>	<i>177</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,323</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTI FAMILY	Low	2	40.0%	\$142	52.8%	14.9%	0	0.0%	11.6%	\$0	0.0%	21.1%	2	40.0%	13.0%	\$142	52.8%	6.6%
	Moderate	3	60.0%	\$127	47.2%	25.5%	0	0.0%	26.7%	\$0	0.0%	15.3%	3	60.0%	22.5%	\$127	47.2%	12.9%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	42.2%	\$0	0.0%	33.5%	0	0.0%	43.7%	\$0	0.0%	43.4%
	Upper	0	0.0%	\$0	0.0%	20.9%	0	0.0%	19.4%	\$0	0.0%	30.1%	0	0.0%	20.8%	\$0	0.0%	37.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$269</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$269</i>	<i>100.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	232	2.8%	\$17,248	1.6%	5.2%	34	1.2%	2.0%	\$2,158	0.6%	2.3%	125	3.4%	2.1%	\$9,457	2.0%	1.5%
	Moderate	1,142	13.7%	\$87,636	7.9%	14.4%	266	9.7%	10.0%	\$18,989	5.0%	6.9%	540	14.7%	9.9%	\$41,922	8.7%	6.2%
	Middle	3,466	41.6%	\$365,668	32.9%	44.0%	1,201	43.7%	44.5%	\$128,141	33.9%	36.7%	1,510	41.2%	43.3%	\$156,619	32.4%	35.4%
	Upper	3,492	41.9%	\$640,132	57.6%	36.4%	1,250	45.4%	43.4%	\$228,926	60.5%	54.1%	1,492	40.7%	44.7%	\$275,282	57.0%	56.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>8,332</i>	<i>100.0%</i>	<i>\$1,110,684</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,751</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$378,214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3,667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$483,280</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: OH Cleveland

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	908	18.1%	\$65,723	9.3%	21.2%	200	11.1%	7.6%	\$13,422	5.1%	3.5%	453	21.3%	9.2%	\$33,827	11.4%	4.4%
	Moderate	1,209	24.1%	\$119,326	16.8%	17.6%	466	25.8%	21.0%	\$45,523	17.4%	13.5%	514	24.2%	20.8%	\$50,888	17.1%	14.2%
	Middle	1,152	23.0%	\$150,619	21.2%	21.1%	450	24.9%	21.3%	\$60,155	23.0%	18.5%	478	22.5%	21.5%	\$61,327	20.6%	19.6%
	Upper	1,665	33.2%	\$361,253	50.9%	40.1%	668	37.0%	35.3%	\$139,220	53.2%	50.8%	644	30.3%	32.1%	\$145,227	48.9%	47.2%
	Unknown	74	1.5%	\$12,824	1.8%	0.0%	21	1.2%	14.9%	\$3,436	1.3%	13.7%	34	1.6%	16.4%	\$5,794	2.0%	14.6%
	<i>Total</i>	<i>5,008</i>	<i>100.0%</i>	<i>\$709,745</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,805</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$261,756</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,123</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$297,063</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	428	14.5%	\$31,812	8.5%	21.2%	79	9.4%	7.0%	\$5,297	4.8%	3.6%	211	15.5%	6.6%	\$15,952	9.2%	3.5%
	Moderate	560	19.0%	\$49,167	13.1%	17.6%	158	18.7%	15.4%	\$13,298	12.1%	9.4%	271	19.9%	14.3%	\$24,778	14.4%	9.4%
	Middle	772	26.1%	\$82,271	22.0%	21.1%	219	26.0%	21.5%	\$22,817	20.8%	15.9%	351	25.8%	20.3%	\$36,792	21.3%	16.7%
	Upper	1,077	36.5%	\$193,673	51.8%	40.1%	350	41.5%	41.3%	\$62,274	56.8%	46.8%	479	35.2%	38.4%	\$87,956	51.0%	49.3%
	Unknown	116	3.9%	\$17,083	4.6%	0.0%	37	4.4%	14.7%	\$5,974	5.4%	24.3%	50	3.7%	20.4%	\$7,147	4.1%	21.1%
	<i>Total</i>	<i>2,953</i>	<i>100.0%</i>	<i>\$374,006</i>	<i>100.0%</i>	<i>100.0%</i>	<i>843</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$109,660</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,362</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$172,625</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	50	13.7%	\$2,616	9.8%	21.2%	14	13.6%	10.1%	\$411	6.0%	4.5%	31	17.5%	11.2%	\$1,851	13.9%	4.7%
	Moderate	74	20.2%	\$3,730	14.0%	17.6%	22	21.4%	20.4%	\$1,083	15.9%	12.1%	30	16.9%	19.7%	\$1,756	13.2%	10.5%
	Middle	102	27.9%	\$5,418	20.3%	21.1%	31	30.1%	23.3%	\$1,499	22.1%	17.5%	50	28.2%	22.8%	\$2,698	20.3%	18.4%
	Upper	138	37.7%	\$14,558	54.6%	40.1%	34	33.0%	41.1%	\$3,463	50.9%	58.2%	66	37.3%	42.4%	\$7,018	52.7%	59.7%
	Unknown	2	0.5%	\$342	1.3%	0.0%	2	1.9%	5.0%	\$342	5.0%	7.7%	0	0.0%	3.9%	\$0	0.0%	6.6%
	<i>Total</i>	<i>366</i>	<i>100.0%</i>	<i>\$26,664</i>	<i>100.0%</i>	<i>100.0%</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,798</i>	<i>100.0%</i>	<i>100.0%</i>	<i>177</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,323</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	5	100.0%	\$269	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	5	100.0%	100.0%	\$269	100.0%	100.0%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$269</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$269</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1,386	16.6%	\$100,151	9.0%	21.2%	293	10.7%	7.5%	\$19,130	5.1%	3.3%	695	19.0%	8.3%	\$51,630	10.7%	3.7%
	Moderate	1,843	22.1%	\$172,223	15.5%	17.6%	646	23.5%	18.8%	\$59,904	15.8%	11.2%	815	22.2%	18.2%	\$77,422	16.0%	11.3%
	Middle	2,026	24.3%	\$238,308	21.5%	21.1%	700	25.4%	21.4%	\$84,471	22.3%	16.4%	879	24.0%	21.0%	\$100,817	20.9%	17.0%
	Upper	2,880	34.6%	\$569,484	51.3%	40.1%	1,052	38.2%	37.8%	\$204,957	54.2%	46.2%	1,189	32.4%	35.0%	\$240,201	49.7%	44.6%
	Unknown	197	2.4%	\$30,518	2.7%	0.0%	60	2.2%	14.6%	\$9,752	2.6%	23.0%	89	2.4%	17.6%	\$13,210	2.7%	23.3%
	<i>Total</i>	<i>8,332</i>	<i>100.0%</i>	<i>\$1,110,684</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,751</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$378,214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3,667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$483,280</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: OH Cleveland

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Small Businesses		Count %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	\$ %		%	Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %	
SMALL BUSINESSES	Low	163	7.1%	\$31,989	9.2%	6.9%	64	6.8%	6.0%	\$10,482	7.6%	7.3%	63	7.4%	6.4%	\$13,422	9.6%	7.4%
	Moderate	217	9.5%	\$45,028	12.9%	12.6%	88	9.4%	11.7%	\$19,823	14.3%	13.8%	81	9.5%	11.7%	\$15,582	11.2%	13.5%
	Middle	856	37.3%	\$138,042	39.6%	39.8%	340	36.2%	38.0%	\$54,614	39.4%	38.8%	324	37.9%	37.9%	\$56,242	40.4%	37.0%
	Upper	1,058	46.1%	\$133,518	38.3%	40.5%	446	47.4%	43.1%	\$53,705	38.7%	39.4%	388	45.3%	43.0%	\$54,063	38.8%	41.5%
	Unknown	2	0.1%	\$70	0.0%	0.1%	2	0.2%	0.1%	\$70	0.1%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.5%	0	0.0%	1.0%	\$0	0.0%	0.4%
	Total	2,296	100.0%	\$348,647	100.0%	100.0%	940	100.0%	100.0%	\$138,694	100.0%	100.0%	856	100.0%	100.0%	\$139,309	100.0%	100.0%
SMALL FARM						Small Farms												
	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.5%	\$0	0.0%	0.1%	0	0.0%	2.3%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	4.7%	0	0.0%	5.4%	\$0	0.0%	2.2%	0	0.0%	4.0%	\$0	0.0%	3.3%
	Middle	6	60.0%	\$263	86.5%	58.2%	0	0.0%	54.8%	\$0	0.0%	42.7%	4	66.7%	58.9%	\$200	88.5%	47.0%
	Upper	4	40.0%	\$41	13.5%	36.1%	1	100.0%	37.6%	\$5	100.0%	54.6%	2	33.3%	34.3%	\$26	11.5%	48.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.6%
Total	10	100.0%	\$304	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	6	100.0%	100.0%	\$226	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: OH Cleveland

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	1,204	52.4%	\$53,763	15.4%	90.6%	485	51.6%	41.5%	\$22,210	16.0%	26.8%	415	48.5%	45.5%	\$19,796	14.2%	27.7%
		Over \$1 Million	710	30.9%	\$236,885	67.9%	9.0%	266	28.3%					318	37.1%				
		Total Rev. available	1,914	83.3%	\$290,648	83.3%	99.6%	751	79.9%					733	85.6%				
		Rev. Not Known	382	16.6%	\$57,999	16.6%	0.4%	189	20.1%					123	14.4%				
		Total	2,296	100.0%	\$348,647	100.0%	100.0%	940	100.0%					856	100.0%				
	Loan Size	\$100,000 or Less	1,555	67.7%	\$48,955	14.0%		643	68.4%	91.6%	\$18,683	13.5%	31.2%	553	64.6%	91.7%	\$19,408	13.9%	32.5%
		\$100,001 - \$250,000	286	12.5%	\$51,487	14.8%		117	12.4%	3.9%	\$20,825	15.0%	14.9%	123	14.4%	4.0%	\$22,285	16.0%	15.2%
		\$250,001 - \$1 Million	455	19.8%	\$248,205	71.2%		180	19.1%	4.5%	\$99,186	71.5%	53.9%	180	21.0%	4.4%	\$97,616	70.1%	52.2%
		Total	2,296	100.0%	\$348,647	100.0%		940	100.0%	100.0%	\$138,694	100.0%	100.0%	856	100.0%	100.0%	\$139,309	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,110	92.2%	\$23,117	43.0%													
\$100,001 - \$250,000		47	3.9%	\$7,485	13.9%														
\$250,001 - \$1 Million		47	3.9%	\$23,161	43.1%														
Total		1,204	100.0%	\$53,763	100.0%														
Small Farm	Revenue	\$1 Million or Less	9	90.0%	\$204	67.1%	98.4%	1	100.0%	45.2%	\$5	100.0%	57.3%	5	83.3%	44.6%	\$126	55.8%	55.9%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.6%	0	0.0%					0	0.0%				
		Total Rev. available	9	90.0%	\$204	67.1%	100.0%	1	100.0%					5	83.3%				
		Not Known	1	10.0%	\$100	32.9%	0.0%	0	0.0%					1	16.7%				
		Total	10	100.0%	\$304	100.0%	100.0%	1	100.0%					6	100.0%				
	Loan Size	\$100,000 or Less	10	100.0%	\$304	100.0%		1	100.0%	93.5%	\$5	100.0%	55.5%	6	100.0%	93.1%	\$226	100.0%	58.3%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	25.0%	0	0.0%	5.1%	\$0	0.0%	23.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	19.6%	0	0.0%	1.7%	\$0	0.0%	18.5%
		Total	10	100.0%	\$304	100.0%		1	100.0%	100.0%	\$5	100.0%	100.0%	6	100.0%	100.0%	\$226	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	9	100.0%	\$204	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		9	100.0%	\$204	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: OH Columbus

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	171	6.0%	\$16,879	3.4%	5.1%	12	1.3%	2.6%	\$1,421	0.8%	1.5%	140	10.5%	2.9%	\$14,306	6.6%	1.8%
	Moderate	539	18.9%	\$56,506	11.3%	17.1%	112	12.2%	12.8%	\$12,770	7.2%	7.6%	270	20.2%	13.3%	\$27,099	12.6%	8.1%
	Middle	905	31.7%	\$126,607	25.3%	37.2%	303	32.9%	35.9%	\$44,516	25.1%	29.3%	423	31.6%	35.6%	\$55,523	25.8%	29.3%
	Upper	1,238	43.4%	\$300,905	60.1%	40.7%	493	53.6%	48.8%	\$118,675	66.9%	61.6%	506	37.8%	48.2%	\$118,307	55.0%	60.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2,853</i>	<i>100.0%</i>	<i>\$500,897</i>	<i>100.0%</i>	<i>100.0%</i>	<i>920</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$177,382</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,339</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$215,235</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	138	5.9%	\$10,688	2.9%	5.1%	35	4.7%	3.5%	\$2,286	2.1%	3.0%	76	6.8%	2.5%	\$6,145	3.4%	1.4%
	Moderate	381	16.3%	\$35,316	9.6%	17.1%	116	15.6%	14.2%	\$9,099	8.5%	13.9%	169	15.0%	11.6%	\$16,637	9.2%	6.9%
	Middle	740	31.6%	\$89,584	24.3%	37.2%	233	31.4%	36.8%	\$26,628	24.9%	29.8%	358	31.8%	34.1%	\$44,027	24.4%	27.7%
	Upper	1,080	46.2%	\$232,577	63.2%	40.7%	359	48.3%	45.5%	\$69,139	64.5%	53.2%	522	46.4%	51.9%	\$113,290	62.9%	64.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2,339</i>	<i>100.0%</i>	<i>\$368,165</i>	<i>100.0%</i>	<i>100.0%</i>	<i>743</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,152</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,125</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$180,099</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	14	7.2%	\$458	2.5%	5.1%	4	6.9%	4.0%	\$114	2.0%	3.4%	4	3.8%	3.6%	\$112	1.2%	2.6%
	Moderate	33	16.9%	\$1,594	8.8%	17.1%	9	15.5%	14.9%	\$278	5.0%	6.8%	21	19.8%	15.3%	\$1,145	12.1%	8.1%
	Middle	68	34.9%	\$4,848	26.8%	37.2%	17	29.3%	38.5%	\$1,191	21.3%	32.2%	43	40.6%	37.5%	\$3,085	32.7%	28.3%
	Upper	80	41.0%	\$11,160	61.8%	40.7%	28	48.3%	42.6%	\$4,012	71.7%	57.5%	38	35.8%	43.6%	\$5,097	54.0%	61.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>195</i>	<i>100.0%</i>	<i>\$18,060</i>	<i>100.0%</i>	<i>100.0%</i>	<i>58</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,595</i>	<i>100.0%</i>	<i>100.0%</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,439</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	19.1%	\$0	0.0%	7.4%	0	0.0%	22.4%	\$0	0.0%	8.3%
	Moderate	2	50.0%	\$12,300	87.5%	27.2%	2	66.7%	22.4%	\$12,300	87.9%	19.2%	0	0.0%	21.5%	\$0	0.0%	19.1%
	Middle	2	50.0%	\$1,756	12.5%	32.0%	1	33.3%	36.6%	\$1,700	12.1%	39.5%	1	100.0%	35.0%	\$56	100.0%	33.8%
	Upper	0	0.0%	\$0	0.0%	18.9%	0	0.0%	21.9%	\$0	0.0%	33.8%	0	0.0%	21.1%	\$0	0.0%	38.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$14,056</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$56</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	323	6.0%	\$28,025	3.1%	5.1%	51	3.0%	3.0%	\$3,821	1.3%	2.4%	220	8.6%	2.8%	\$20,563	5.1%	2.2%
	Moderate	955	17.7%	\$105,716	11.7%	17.1%	239	13.9%	13.4%	\$34,447	11.3%	10.4%	460	17.9%	12.8%	\$44,881	11.1%	8.6%
	Middle	1,715	31.8%	\$222,795	24.7%	37.2%	554	32.1%	36.3%	\$74,035	24.3%	30.3%	825	32.1%	35.1%	\$102,691	25.4%	29.1%
	Upper	2,398	44.5%	\$544,642	60.4%	40.7%	880	51.0%	47.4%	\$191,826	63.1%	56.9%	1,066	41.5%	49.3%	\$236,694	58.5%	60.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>5,391</i>	<i>100.0%</i>	<i>\$901,178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,724</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$304,129</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,571</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$404,829</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: OH Columbus

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	577	20.2%	\$51,103	10.2%	21.0%	81	8.8%	7.0%	\$6,699	3.8%	3.2%	392	29.3%	8.2%	\$34,905	16.2%	3.9%
	Moderate	628	22.0%	\$75,298	15.0%	16.9%	185	20.1%	18.7%	\$22,971	13.0%	12.5%	300	22.4%	18.8%	\$35,585	16.5%	13.0%
	Middle	515	18.1%	\$79,403	15.9%	20.4%	188	20.4%	19.6%	\$28,946	16.3%	17.2%	230	17.2%	20.4%	\$35,566	16.5%	18.6%
	Upper	1,024	35.9%	\$276,286	55.2%	41.7%	408	44.3%	34.2%	\$108,446	61.1%	47.5%	389	29.1%	33.9%	\$103,847	48.2%	47.8%
	Unknown	109	3.8%	\$18,807	3.8%	0.0%	58	6.3%	20.5%	\$10,320	5.8%	19.5%	28	2.1%	18.6%	\$5,332	2.5%	16.7%
	<i>Total</i>	<i>2,853</i>	<i>100.0%</i>	<i>\$500,897</i>	<i>100.0%</i>	<i>100.0%</i>	<i>920</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$177,382</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,339</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$215,235</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	322	13.8%	\$28,360	7.7%	21.0%	78	10.5%	7.4%	\$6,632	6.2%	3.5%	163	14.5%	5.6%	\$14,794	8.2%	2.8%
	Moderate	445	19.0%	\$43,854	11.9%	16.9%	145	19.5%	15.1%	\$13,232	12.3%	9.1%	219	19.5%	12.6%	\$21,855	12.1%	7.9%
	Middle	516	22.1%	\$63,690	17.3%	20.4%	164	22.1%	19.3%	\$19,585	18.3%	14.5%	250	22.2%	18.9%	\$31,612	17.6%	15.2%
	Upper	953	40.7%	\$213,531	58.0%	41.7%	306	41.2%	38.2%	\$59,333	55.4%	44.6%	456	40.5%	39.3%	\$104,190	57.9%	50.5%
	Unknown	103	4.4%	\$18,730	5.1%	0.0%	50	6.7%	20.0%	\$8,370	7.8%	28.3%	37	3.3%	23.7%	\$7,648	4.2%	23.7%
	<i>Total</i>	<i>2,339</i>	<i>100.0%</i>	<i>\$368,165</i>	<i>100.0%</i>	<i>100.0%</i>	<i>743</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,152</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,125</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$180,099</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	37	19.0%	\$2,378	13.2%	21.0%	9	15.5%	9.9%	\$472	8.4%	3.2%	21	19.8%	8.6%	\$1,454	15.4%	3.1%
	Moderate	47	24.1%	\$2,304	12.8%	16.9%	17	29.3%	18.8%	\$696	12.4%	10.0%	24	22.6%	18.2%	\$1,224	13.0%	9.9%
	Middle	43	22.1%	\$3,372	18.7%	20.4%	12	20.7%	20.5%	\$919	16.4%	14.8%	25	23.6%	20.7%	\$1,989	21.1%	15.8%
	Upper	67	34.4%	\$9,868	54.6%	41.7%	20	34.5%	44.2%	\$3,508	62.7%	58.3%	35	33.0%	45.0%	\$4,634	49.1%	62.3%
	Unknown	1	0.5%	\$138	0.8%	0.0%	0	0.0%	6.7%	\$0	0.0%	13.7%	1	0.9%	7.5%	\$138	1.5%	8.9%
	<i>Total</i>	<i>195</i>	<i>100.0%</i>	<i>\$18,060</i>	<i>100.0%</i>	<i>100.0%</i>	<i>58</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,595</i>	<i>100.0%</i>	<i>100.0%</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,439</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$14,056	100.0%	0.0%	3	100.0%	100.0%	\$14,000	100.0%	100.0%	1	100.0%	100.0%	\$56	100.0%	100.0%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$14,056</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$56</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	936	17.4%	\$81,841	9.1%	21.0%	168	9.7%	7.2%	\$13,803	4.5%	3.0%	576	22.4%	7.2%	\$51,153	12.6%	3.2%
	Moderate	1,120	20.8%	\$121,456	13.5%	16.9%	347	20.1%	17.4%	\$36,899	12.1%	10.5%	543	21.1%	16.4%	\$58,664	14.5%	10.1%
	Middle	1,074	19.9%	\$146,465	16.3%	20.4%	364	21.1%	19.4%	\$49,450	16.3%	15.1%	505	19.6%	19.8%	\$69,167	17.1%	15.9%
	Upper	2,044	37.9%	\$499,685	55.4%	41.7%	734	42.6%	35.8%	\$171,287	56.3%	43.2%	880	34.2%	36.3%	\$212,671	52.5%	45.1%
	Unknown	217	4.0%	\$51,731	5.7%	0.0%	111	6.4%	20.1%	\$32,690	10.7%	28.2%	67	2.6%	20.4%	\$13,174	3.3%	25.7%
	<i>Total</i>	<i>5,391</i>	<i>100.0%</i>	<i>\$901,178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,724</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$304,129</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2,571</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$404,829</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: OH Columbus

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Small Businesses		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
SMALL BUSINESSES	Low	117	7.3%	\$19,577	12.5%	7.6%	50	7.9%	6.8%	\$8,460	13.5%	8.7%	39	6.4%	7.5%	\$7,174	11.7%	8.9%
	Moderate	196	12.3%	\$31,553	20.1%	17.9%	72	11.4%	21.6%	\$13,811	22.0%	28.3%	82	13.5%	22.8%	\$12,714	20.8%	27.2%
	Middle	442	27.7%	\$45,303	28.8%	32.3%	171	27.1%	28.0%	\$15,149	24.1%	23.9%	173	28.5%	27.5%	\$18,966	31.1%	24.7%
	Upper	835	52.4%	\$60,404	38.5%	42.1%	338	53.5%	42.4%	\$25,329	40.3%	38.3%	311	51.2%	41.0%	\$22,103	36.2%	38.5%
	Unknown	3	0.2%	\$215	0.1%	0.2%	1	0.2%	0.2%	\$100	0.2%	0.3%	2	0.3%	0.2%	\$115	0.2%	0.5%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.4%	0	0.0%	1.0%	\$0	0.0%	0.3%
	Total	1,593	100.0%	\$157,052	100.0%	100.0%	632	100.0%	100.0%	\$62,849	100.0%	100.0%	607	100.0%	100.0%	\$61,072	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	1	8.3%	\$20	1.6%	1.2%	0	0.0%	0.6%	\$0	0.0%	1.3%	0	0.0%	0.3%	\$0	0.0%	1.0%
	Moderate	1	8.3%	\$71	5.7%	8.6%	1	14.3%	6.9%	\$71	8.7%	6.7%	0	0.0%	6.4%	\$0	0.0%	8.4%
	Middle	5	41.7%	\$1,043	84.0%	59.0%	2	28.6%	59.3%	\$673	82.1%	60.1%	2	100.0%	57.8%	\$195	100.0%	66.2%
	Upper	5	41.7%	\$108	8.7%	31.2%	4	57.1%	32.6%	\$76	9.3%	31.1%	0	0.0%	35.0%	\$0	0.0%	22.9%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.6%	\$0	0.0%	0.9%	0	0.0%	0.6%	\$0	0.0%	1.5%
Total	12	100.0%	\$1,242	100.0%	100.0%	7	100.0%	100.0%	\$820	100.0%	100.0%	2	100.0%	100.0%	\$195	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: OH Columbus

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	1,002	62.9%	\$39,603	25.2%	91.9%	365	57.8%	36.4%	\$13,408	21.3%	26.9%	362	59.6%	39.5%	\$13,137	21.5%	27.1%
		Over \$1 Million	286	18.0%	\$82,555	52.6%	7.5%	123	19.5%				108	17.8%					
		Total Rev. available	1,288	80.9%	\$122,158	77.8%	99.4%	488	77.3%				470	77.4%					
		Rev. Not Known	305	19.1%	\$34,894	22.2%	0.6%	144	22.8%				137	22.6%					
		Total	1,593	100.0%	\$157,052	100.0%	100.0%	632	100.0%				607	100.0%					
	Loan Size	\$100,000 or Less	1,258	79.0%	\$34,429	21.9%		500	79.1%	90.1%	\$13,479	21.4%	30.8%	479	78.9%	90.3%	\$13,990	22.9%	31.7%
		\$100,001 - \$250,000	164	10.3%	\$30,315	19.3%		64	10.1%	5.1%	\$11,822	18.8%	18.0%	60	9.9%	5.2%	\$11,207	18.4%	18.5%
		\$250,001 - \$1 Million	171	10.7%	\$92,308	58.8%		68	10.8%	4.7%	\$37,548	59.7%	51.3%	68	11.2%	4.5%	\$35,875	58.7%	49.8%
		Total	1,593	100.0%	\$157,052	100.0%		632	100.0%	100.0%	\$62,849	100.0%	100.0%	607	100.0%	100.0%	\$61,072	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	938	93.6%	\$17,923	45.3%													
\$100,001 - \$250,000		30	3.0%	\$4,909	12.4%														
\$250,001 - \$1 Million		34	3.4%	\$16,771	42.3%														
Total		1,002	100.0%	\$39,603	100.0%														
Small Farm	Revenue	\$1 Million or Less	10	83.3%	\$892	71.8%	98.8%	6	85.7%	47.6%	\$645	78.7%	52.0%	1	50.0%	44.5%	\$20	10.3%	51.0%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.2%	0	0.0%				0	0.0%					
		Total Rev. available	10	83.3%	\$892	71.8%	100.0%	6	85.7%				1	50.0%					
		Not Known	2	16.7%	\$350	28.2%	0.0%	1	14.3%				1	50.0%					
		Total	12	100.0%	\$1,242	100.0%	100.0%	7	100.0%				2	100.0%					
	Loan Size	\$100,000 or Less	8	66.7%	\$219	17.6%		5	71.4%	77.2%	\$147	17.9%	23.0%	1	50.0%	80.1%	\$20	10.3%	26.9%
		\$100,001 - \$250,000	3	25.0%	\$525	42.3%		1	14.3%	12.3%	\$175	21.3%	26.1%	1	50.0%	11.8%	\$175	89.7%	28.1%
		\$250,001 - \$500,000	1	8.3%	\$498	40.1%		1	14.3%	10.5%	\$498	60.7%	50.9%	0	0.0%	8.1%	\$0	0.0%	45.0%
		Total	12	100.0%	\$1,242	100.0%		7	100.0%	100.0%	\$820	100.0%	100.0%	2	100.0%	100.0%	\$195	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	8	80.0%	\$219	24.6%													
\$100,001 - \$250,000		1	10.0%	\$175	19.6%														
\$250,001 - \$500,000		1	10.0%	\$498	55.8%														
Total		10	100.0%	\$892	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: PA Pittsburgh

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	5	1.7%	\$1,280	1.8%	2.7%	3	2.6%	1.4%	\$732	2.8%	1.1%	2	1.8%	1.3%	\$548	1.7%	1.1%
	Moderate	31	10.7%	\$3,616	5.0%	15.8%	10	8.8%	10.1%	\$949	3.6%	5.7%	11	9.7%	9.9%	\$1,692	5.3%	5.5%
	Middle	94	32.5%	\$16,009	22.3%	42.5%	31	27.2%	40.3%	\$5,070	19.2%	30.3%	37	32.7%	40.0%	\$6,804	21.1%	29.4%
	Upper	159	55.0%	\$50,821	70.9%	39.0%	70	61.4%	48.2%	\$19,604	74.4%	62.9%	63	55.8%	48.7%	\$23,156	71.9%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	289	100.0%	\$71,726	100.0%	100.0%	114	100.0%	100.0%	\$26,355	100.0%	100.0%	113	100.0%	100.0%	\$32,200	100.0%	100.0%
REFINANCE	Low	1	0.6%	\$43	0.2%	2.7%	1	1.7%	1.3%	\$43	0.5%	0.9%	0	0.0%	1.3%	\$0	0.0%	1.0%
	Moderate	15	9.7%	\$1,002	4.3%	15.8%	10	16.7%	11.1%	\$633	8.0%	6.4%	3	3.8%	9.1%	\$179	1.4%	4.8%
	Middle	66	42.9%	\$6,812	29.0%	42.5%	22	36.7%	40.9%	\$1,829	23.1%	31.4%	40	50.0%	38.9%	\$4,598	36.3%	29.2%
	Upper	72	46.8%	\$15,605	66.5%	39.0%	27	45.0%	46.6%	\$5,407	68.3%	61.4%	37	46.3%	50.7%	\$7,881	62.3%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	154	100.0%	\$23,462	100.0%	100.0%	60	100.0%	100.0%	\$7,912	100.0%	100.0%	80	100.0%	100.0%	\$12,658	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.7%	0	0.0%	3.1%	\$0	0.0%	2.6%	0	0.0%	3.0%	\$0	0.0%	2.4%
	Moderate	2	14.3%	\$59	8.3%	15.8%	1	20.0%	16.1%	\$8	7.2%	10.1%	1	11.1%	13.7%	\$51	8.5%	8.2%
	Middle	4	28.6%	\$103	14.5%	42.5%	4	80.0%	41.7%	\$103	92.8%	32.8%	0	0.0%	42.8%	\$0	0.0%	35.3%
	Upper	8	57.1%	\$550	77.2%	39.0%	0	0.0%	39.1%	\$0	0.0%	54.4%	8	88.9%	40.4%	\$550	91.5%	54.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	14	100.0%	\$712	100.0%	100.0%	5	100.0%	100.0%	\$111	100.0%	100.0%	9	100.0%	100.0%	\$601	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	9.4%	0	0.0%	10.8%	\$0	0.0%	39.8%	0	0.0%	10.2%	\$0	0.0%	16.5%
	Moderate	0	0.0%	\$0	0.0%	20.0%	0	0.0%	27.4%	\$0	0.0%	10.9%	0	0.0%	29.8%	\$0	0.0%	24.9%
	Middle	1	100.0%	\$4,450	100.0%	42.7%	0	0.0%	38.9%	\$0	0.0%	27.3%	1	100.0%	32.7%	\$4,450	100.0%	22.9%
	Upper	0	0.0%	\$0	0.0%	27.6%	0	0.0%	22.9%	\$0	0.0%	22.1%	0	0.0%	27.3%	\$0	0.0%	35.7%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	1	100.0%	\$4,450	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$4,450	100.0%	100.0%
HMDA TOTALS	Low	6	1.3%	\$1,323	1.3%	2.7%	4	2.2%	1.6%	\$775	2.3%	4.7%	2	1.0%	1.5%	\$548	1.1%	2.1%
	Moderate	48	10.5%	\$4,677	4.7%	15.8%	21	11.7%	11.2%	\$1,590	4.6%	6.6%	15	7.4%	10.2%	\$1,922	3.9%	6.6%
	Middle	165	36.0%	\$27,374	27.3%	42.5%	57	31.8%	40.7%	\$7,002	20.4%	30.4%	78	38.4%	39.9%	\$15,852	31.8%	29.1%
	Upper	239	52.2%	\$66,976	66.7%	39.0%	97	54.2%	46.5%	\$25,011	72.8%	58.3%	108	53.2%	48.4%	\$31,587	63.3%	62.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	458	100.0%	\$100,350	100.0%	100.0%	179	100.0%	100.0%	\$34,378	100.0%	100.0%	203	100.0%	100.0%	\$49,909	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: PA Pittsburgh

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count		Dollar				Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg			Bank	Agg	Bank		Agg	
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	12	4.2%	\$956	1.3%	19.2%	4	3.5%	6.0%	\$247	0.9%	2.5%	6	5.3%	7.0%	\$581	1.8%	3.0%
	Moderate	54	18.7%	\$6,558	9.1%	17.0%	18	15.8%	18.8%	\$2,208	8.4%	11.3%	19	16.8%	19.5%	\$2,311	7.2%	11.8%
	Middle	38	13.1%	\$5,289	7.4%	20.8%	15	13.2%	20.9%	\$2,147	8.1%	16.8%	12	10.6%	20.2%	\$1,771	5.5%	16.4%
	Upper	178	61.6%	\$57,870	80.7%	43.0%	74	64.9%	40.8%	\$21,430	81.3%	57.0%	72	63.7%	38.5%	\$26,807	83.3%	55.2%
	Unknown	7	2.4%	\$1,053	1.5%	0.0%	3	2.6%	13.5%	\$323	1.2%	12.4%	4	3.5%	14.8%	\$730	2.3%	13.7%
	<i>Total</i>	<i>289</i>	<i>100.0%</i>	<i>\$71,726</i>	<i>100.0%</i>	<i>100.0%</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26,355</i>	<i>100.0%</i>	<i>100.0%</i>	<i>113</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,200</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	6	3.9%	\$459	2.0%	19.2%	2	3.3%	6.3%	\$96	1.2%	3.1%	3	3.8%	5.6%	\$257	2.0%	2.5%
	Moderate	35	22.7%	\$2,939	12.5%	17.0%	16	26.7%	15.1%	\$1,091	13.8%	9.2%	19	23.8%	14.2%	\$1,848	14.6%	8.6%
	Middle	35	22.7%	\$4,204	17.9%	20.8%	13	21.7%	21.1%	\$1,802	22.8%	15.9%	18	22.5%	20.3%	\$2,026	16.0%	15.2%
	Upper	67	43.5%	\$14,099	60.1%	43.0%	24	40.0%	46.6%	\$4,126	52.1%	59.1%	35	43.8%	45.8%	\$7,674	60.6%	58.5%
	Unknown	11	7.1%	\$1,761	7.5%	0.0%	5	8.3%	11.0%	\$797	10.1%	12.8%	5	6.3%	14.1%	\$853	6.7%	15.3%
	<i>Total</i>	<i>154</i>	<i>100.0%</i>	<i>\$23,462</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,912</i>	<i>100.0%</i>	<i>100.0%</i>	<i>80</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,658</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.2%	0	0.0%	8.8%	\$0	0.0%	3.3%	0	0.0%	9.6%	\$0	0.0%	3.9%
	Moderate	2	14.3%	\$33	4.6%	17.0%	2	40.0%	18.1%	\$33	29.7%	9.7%	0	0.0%	18.8%	\$0	0.0%	11.3%
	Middle	3	21.4%	\$20	2.8%	20.8%	1	20.0%	21.7%	\$8	7.2%	16.9%	2	22.2%	22.3%	\$12	2.0%	18.3%
	Upper	9	64.3%	\$659	92.6%	43.0%	2	40.0%	48.1%	\$70	63.1%	64.4%	7	77.8%	46.6%	\$589	98.0%	61.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	5.7%	0	0.0%	2.7%	\$0	0.0%	5.1%
	<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>\$712</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$111</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$601</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$4,450	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$4,450	100.0%	100.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$4,450</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,450</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	18	3.9%	\$1,415	1.4%	19.2%	6	3.4%	6.4%	\$343	1.0%	2.4%	9	4.4%	6.8%	\$838	1.7%	2.7%
	Moderate	91	19.9%	\$9,530	9.5%	17.0%	36	20.1%	17.4%	\$3,332	9.7%	9.6%	38	18.7%	17.5%	\$4,159	8.3%	10.0%
	Middle	76	16.6%	\$9,513	9.5%	20.8%	29	16.2%	20.9%	\$3,957	11.5%	15.0%	32	15.8%	20.3%	\$3,809	7.6%	15.1%
	Upper	254	55.5%	\$72,628	72.4%	43.0%	100	55.9%	43.4%	\$25,626	74.5%	52.6%	114	56.2%	41.7%	\$35,070	70.3%	53.0%
	Unknown	19	4.1%	\$7,264	7.2%	0.0%	8	4.5%	11.9%	\$1,120	3.3%	20.3%	10	4.9%	13.7%	\$6,033	12.1%	19.3%
	<i>Total</i>	<i>458</i>	<i>100.0%</i>	<i>\$100,350</i>	<i>100.0%</i>	<i>100.0%</i>	<i>179</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34,378</i>	<i>100.0%</i>	<i>100.0%</i>	<i>203</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$49,909</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: PA Pittsburgh

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	Bank	Agg
#	%			%	#	%	%				#	%	%	\$ 000s	\$ %	\$ %		
SMALL BUSINESSES	Low	13	9.3%	\$1,491	4.6%	4.5%	3	4.6%	4.1%	\$390	2.3%	5.6%	7	12.1%	4.7%	\$781	6.9%	4.4%
	Moderate	24	17.1%	\$7,429	23.1%	13.1%	14	21.5%	11.8%	\$3,029	17.6%	11.1%	9	15.5%	13.5%	\$3,750	32.9%	11.6%
	Middle	49	35.0%	\$14,048	43.7%	41.0%	22	33.8%	40.2%	\$8,646	50.1%	40.1%	20	34.5%	39.1%	\$3,498	30.7%	40.9%
	Upper	53	37.9%	\$9,044	28.1%	40.9%	25	38.5%	42.8%	\$5,042	29.2%	41.8%	22	37.9%	41.6%	\$3,352	29.5%	41.9%
	Unknown	1	0.7%	\$150	0.5%	0.5%	1	1.5%	0.6%	\$150	0.9%	1.4%	0	0.0%	0.6%	\$0	0.0%	1.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Total	140	100.0%	\$32,162	100.0%	100.0%	65	100.0%	100.0%	\$17,257	100.0%	100.0%	58	100.0%	100.0%	\$11,381	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	5.3%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	5.3%	\$0	0.0%	8.1%	0	0.0%	10.5%	\$0	0.0%	9.6%
	Middle	0	0.0%	\$0	0.0%	50.3%	0	0.0%	63.2%	\$0	0.0%	77.6%	0	0.0%	47.4%	\$0	0.0%	32.5%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	26.3%	\$0	0.0%	13.8%	0	0.0%	42.1%	\$0	0.0%	58.0%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: PA Pittsburgh

Product Type	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016						Bank & Aggregate Lending Comparison													
	Bank				Total Businesses	2014			2015											
	Count		Dollar			Count		Dollar		Count		Dollar								
	#	%	\$ (000s)	%	%	Bank	Agg	%	\$ 000s	%	%	Bank	Agg	%	\$ 000s	%	%			
Small Business	Revenue	\$1 Million or Less	47	33.6%	\$1,798	5.6%	90.2%	17	26.2%	46.4%	\$1,012	5.9%	32.1%	26	44.8%	50.5%	\$696	6.1%	34.0%	
		Over \$1 Million	56	40.0%	\$26,228	81.5%	9.0%	32	49.2%					18	31.0%					
		Total Rev. available	103	73.6%	\$28,026	87.1%	99.2%	49	75.4%					44	75.8%					
		Rev. Not Known	37	26.4%	\$4,136	12.9%	0.8%	16	24.6%					14	24.1%					
		Total	140	100.0%	\$32,162	100.0%	100.0%	65	100.0%					58	100.0%					
	Loan Size	\$100,000 or Less	75	53.6%	\$2,429	7.6%		31	47.7%	90.4%	\$968	5.6%	34.8%	35	60.3%	91.9%	\$1,041	9.1%	38.5%	
		\$100,001 - \$250,000	26	18.6%	\$4,875	15.2%		13	20.0%	4.8%	\$2,475	14.3%	16.4%	10	17.2%	4.2%	\$1,860	16.3%	16.3%	
		\$250,001 - \$1 Million	39	27.9%	\$24,858	77.3%		21	32.3%	4.8%	\$13,814	80.0%	48.7%	13	22.4%	3.9%	\$8,480	74.5%	45.2%	
		Total	140	100.0%	\$32,162	100.0%		65	100.0%	100.0%	\$17,257	100.0%	100.0%	58	100.0%	100.0%	\$11,381	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	43	91.5%	\$768	42.7%														
		\$100,001 - \$250,000	3	6.4%	\$430	23.9%														
		\$250,001 - \$1 Million	1	2.1%	\$600	33.4%														
		Total	47	100.0%	\$1,798	100.0%														
	Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.5%	0	0.0%	42.1%	\$0	0.0%	35.8%	0	0.0%	42.1%	\$0	0.0%	69.7%
			Over \$1 Million	0	0.0%	\$0	0.0%	1.5%	0	0.0%					0	0.0%				
Total Rev. available			0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Not Known			0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
Total			0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Loan Size		\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	94.7%	\$0	0.0%	57.8%	0	0.0%	94.7%	\$0	0.0%	58.8%	
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	41.2%	
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	0	0.0%	\$0	0.0%														
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%														
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%														
		Total	0	0.0%	\$0	0.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: TN Nashville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	37	4.1%	\$7,056	3.5%	3.9%	13	4.0%	3.7%	\$2,543	3.7%	2.9%	12	3.3%	3.8%	\$2,269	2.7%	3.2%
	Moderate	110	12.2%	\$18,862	9.2%	13.8%	38	11.8%	11.9%	\$6,109	8.9%	8.3%	40	10.9%	11.8%	\$7,098	8.5%	8.7%
	Middle	319	35.4%	\$54,770	26.8%	41.1%	114	35.4%	38.2%	\$17,805	26.0%	29.3%	138	37.5%	39.0%	\$24,847	29.9%	30.6%
	Upper	436	48.3%	\$123,517	60.5%	41.2%	157	48.8%	46.2%	\$42,127	61.4%	59.5%	178	48.4%	45.4%	\$49,013	58.9%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>902</i>	<i>100.0%</i>	<i>\$204,205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>322</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$68,584</i>	<i>100.0%</i>	<i>100.0%</i>	<i>368</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$83,227</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	30	3.7%	\$3,534	2.2%	3.9%	11	4.4%	3.7%	\$1,361	2.8%	6.1%	13	3.7%	3.0%	\$1,658	2.4%	2.2%
	Moderate	81	9.9%	\$9,178	5.7%	13.8%	24	9.7%	12.3%	\$2,710	5.5%	11.2%	36	10.1%	10.4%	\$4,341	6.3%	6.7%
	Middle	312	38.0%	\$45,251	28.2%	41.1%	79	31.9%	40.0%	\$10,671	21.6%	32.5%	149	42.0%	37.5%	\$21,043	30.8%	28.8%
	Upper	397	48.4%	\$102,755	63.9%	41.2%	134	54.0%	44.0%	\$34,744	70.2%	50.2%	157	44.2%	49.1%	\$41,327	60.4%	62.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>820</i>	<i>100.0%</i>	<i>\$160,718</i>	<i>100.0%</i>	<i>100.0%</i>	<i>248</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$49,486</i>	<i>100.0%</i>	<i>100.0%</i>	<i>355</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$68,369</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	2	1.8%	\$67	0.5%	3.9%	1	2.8%	6.3%	\$64	1.5%	4.4%	1	1.9%	4.7%	\$3	0.1%	4.4%
	Moderate	15	13.2%	\$1,323	10.8%	13.8%	4	11.1%	15.3%	\$517	12.1%	7.8%	7	13.2%	12.8%	\$577	10.0%	8.4%
	Middle	43	37.7%	\$3,459	28.2%	41.1%	12	33.3%	42.0%	\$773	18.1%	33.5%	22	41.5%	40.2%	\$1,865	32.4%	27.5%
	Upper	54	47.4%	\$7,412	60.5%	41.2%	19	52.8%	36.4%	\$2,907	68.2%	54.3%	23	43.4%	42.3%	\$3,304	57.5%	59.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>114</i>	<i>100.0%</i>	<i>\$12,261</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,261</i>	<i>100.0%</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,749</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	17.0%	0	0.0%	15.2%	\$0	0.0%	9.3%	0	0.0%	14.8%	\$0	0.0%	8.4%
	Moderate	0	0.0%	\$0	0.0%	29.2%	0	0.0%	36.2%	\$0	0.0%	30.3%	0	0.0%	41.7%	\$0	0.0%	31.8%
	Middle	0	0.0%	\$0	0.0%	31.9%	0	0.0%	31.4%	\$0	0.0%	38.2%	0	0.0%	25.2%	\$0	0.0%	28.8%
	Upper	0	0.0%	\$0	0.0%	21.9%	0	0.0%	17.1%	\$0	0.0%	22.2%	0	0.0%	18.3%	\$0	0.0%	31.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	69	3.8%	\$10,657	2.8%	3.9%	25	4.1%	3.8%	\$3,968	3.2%	4.3%	26	3.4%	3.5%	\$3,930	2.5%	3.2%
	Moderate	206	11.2%	\$29,363	7.8%	13.8%	66	10.9%	12.2%	\$9,336	7.6%	10.7%	83	10.7%	11.3%	\$12,016	7.6%	9.6%
	Middle	674	36.7%	\$103,480	27.4%	41.1%	205	33.8%	38.8%	\$29,249	23.9%	30.9%	309	39.8%	38.5%	\$47,755	30.4%	29.8%
	Upper	887	48.3%	\$233,684	62.0%	41.2%	310	51.2%	45.1%	\$79,778	65.2%	54.1%	358	46.1%	46.6%	\$93,644	59.5%	57.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,836</i>	<i>100.0%</i>	<i>\$377,184</i>	<i>100.0%</i>	<i>100.0%</i>	<i>606</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$122,331</i>	<i>100.0%</i>	<i>100.0%</i>	<i>776</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$157,345</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: TN Nashville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	61	6.8%	\$6,209	3.0%	19.7%	35	10.9%	6.3%	\$3,189	4.6%	3.0%	17	4.6%	5.8%	\$1,844	2.2%	2.9%
	Moderate	179	19.8%	\$25,446	12.5%	16.9%	70	21.7%	18.2%	\$8,814	12.9%	11.8%	66	17.9%	16.9%	\$9,501	11.4%	11.1%
	Middle	166	18.4%	\$32,898	16.1%	20.6%	61	18.9%	18.1%	\$10,773	15.7%	15.5%	70	19.0%	19.0%	\$14,361	17.3%	16.6%
	Upper	374	41.5%	\$110,556	54.1%	42.7%	127	39.4%	36.6%	\$39,049	56.9%	50.0%	125	34.0%	37.2%	\$35,694	42.9%	49.9%
	Unknown	122	13.5%	\$29,096	14.2%	0.0%	29	9.0%	20.8%	\$6,759	9.9%	19.6%	90	24.5%	21.0%	\$21,827	26.2%	19.5%
	<i>Total</i>	<i>902</i>	<i>100.0%</i>	<i>\$204,205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>322</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$68,584</i>	<i>100.0%</i>	<i>100.0%</i>	<i>368</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$83,227</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	56	6.8%	\$5,704	3.5%	19.7%	12	4.8%	6.3%	\$1,113	2.2%	2.5%	28	7.9%	4.9%	\$3,238	4.7%	2.3%
	Moderate	163	19.9%	\$17,992	11.2%	16.9%	48	19.4%	14.7%	\$4,996	10.1%	7.8%	68	19.2%	12.6%	\$7,583	11.1%	7.7%
	Middle	162	19.8%	\$24,206	15.1%	20.6%	44	17.7%	16.9%	\$6,289	12.7%	11.2%	73	20.6%	17.1%	\$10,559	15.4%	13.3%
	Upper	349	42.6%	\$91,065	56.7%	42.7%	124	50.0%	35.7%	\$32,472	65.6%	40.6%	127	35.8%	37.0%	\$33,117	48.4%	49.2%
	Unknown	90	11.0%	\$21,751	13.5%	0.0%	20	8.1%	26.4%	\$4,616	9.3%	37.8%	59	16.6%	28.4%	\$13,872	20.3%	27.5%
	<i>Total</i>	<i>820</i>	<i>100.0%</i>	<i>\$160,718</i>	<i>100.0%</i>	<i>100.0%</i>	<i>248</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$49,486</i>	<i>100.0%</i>	<i>100.0%</i>	<i>355</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$68,369</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	3	2.6%	\$165	1.3%	19.7%	1	2.8%	8.1%	\$67	1.6%	3.2%	1	1.9%	8.2%	\$88	1.5%	2.5%
	Moderate	29	25.4%	\$2,081	17.0%	16.9%	11	30.6%	20.3%	\$1,181	27.7%	11.3%	13	24.5%	17.4%	\$580	10.1%	10.3%
	Middle	34	29.8%	\$3,398	27.7%	20.6%	12	33.3%	20.8%	\$731	17.2%	17.0%	14	26.4%	22.7%	\$2,114	36.8%	19.0%
	Upper	43	37.7%	\$5,749	46.9%	42.7%	12	33.3%	39.6%	\$2,282	53.6%	59.7%	22	41.5%	44.1%	\$2,453	42.7%	59.1%
	Unknown	5	4.4%	\$868	7.1%	0.0%	0	0.0%	11.2%	\$0	0.0%	8.8%	3	5.7%	7.5%	\$514	8.9%	9.2%
	<i>Total</i>	<i>114</i>	<i>100.0%</i>	<i>\$12,261</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,261</i>	<i>100.0%</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,749</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	120	6.5%	\$12,078	3.2%	19.7%	48	7.9%	6.3%	\$4,369	3.6%	2.6%	46	5.9%	5.5%	\$5,170	3.3%	2.5%
	Moderate	371	20.2%	\$45,519	12.1%	16.9%	129	21.3%	17.2%	\$14,991	12.3%	9.8%	147	18.9%	15.3%	\$17,664	11.2%	9.2%
	Middle	362	19.7%	\$60,502	16.0%	20.6%	117	19.3%	17.8%	\$17,793	14.5%	13.2%	157	20.2%	18.4%	\$27,034	17.2%	14.4%
	Upper	766	41.7%	\$207,370	55.0%	42.7%	263	43.4%	36.4%	\$73,803	60.3%	43.8%	274	35.3%	37.3%	\$71,264	45.3%	46.5%
	Unknown	217	11.8%	\$51,715	13.7%	0.0%	49	8.1%	22.4%	\$11,375	9.3%	30.6%	152	19.6%	23.4%	\$36,213	23.0%	27.4%
	<i>Total</i>	<i>1,836</i>	<i>100.0%</i>	<i>\$377,184</i>	<i>100.0%</i>	<i>100.0%</i>	<i>606</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$122,331</i>	<i>100.0%</i>	<i>100.0%</i>	<i>776</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$157,345</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Nashville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	Bank	Agg
SMALL BUSINESSES	Low	50	6.7%	\$1,491	2.8%	7.5%	21	6.8%	8.3%	\$492	1.9%	9.3%	19	6.8%	7.7%	\$512	2.5%	9.3%
	Moderate	101	13.6%	\$8,490	15.8%	16.8%	43	13.9%	17.4%	\$4,261	16.1%	20.7%	33	11.9%	17.0%	\$3,553	17.7%	21.0%
	Middle	207	27.9%	\$16,600	30.9%	32.3%	97	31.4%	27.5%	\$8,054	30.4%	22.8%	71	25.5%	27.4%	\$6,023	29.9%	24.0%
	Upper	369	49.7%	\$19,455	36.2%	42.9%	145	46.9%	44.9%	\$11,154	42.2%	44.7%	145	52.2%	46.1%	\$5,777	28.7%	42.8%
	Unknown	15	2.0%	\$7,771	14.4%	0.5%	3	1.0%	0.9%	\$2,499	9.4%	2.2%	10	3.6%	0.9%	\$4,247	21.1%	2.7%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.2%	0	0.0%	0.9%	\$0	0.0%	0.2%
	Total	742	100.0%	\$53,807	100.0%	100.0%	309	100.0%	100.0%	\$26,460	100.0%	100.0%	278	100.0%	100.0%	\$20,112	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	0.6%	\$0	0.0%	4.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	10.7%	0	0.0%	19.0%	\$0	0.0%	7.8%	0	0.0%	21.0%	\$0	0.0%	17.5%
	Middle	0	0.0%	\$0	0.0%	47.7%	0	0.0%	46.6%	\$0	0.0%	47.0%	0	0.0%	45.2%	\$0	0.0%	51.2%
	Upper	2	100.0%	\$79	100.0%	39.6%	0	0.0%	33.7%	\$0	0.0%	40.5%	1	100.0%	33.3%	\$39	100.0%	30.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	1.0%
Total	2	100.0%	\$79	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$39	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Nashville

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	523	70.5%	\$18,560	34.5%	91.5%	197	63.8%	46.5%	\$7,488	28.3%	35.4%	192	69.1%	51.2%	\$7,461	37.1%	36.9%
		Over \$1 Million	127	17.1%	\$28,866	53.6%	8.2%	59	19.1%					54	19.4%				
		Total Rev. available	650	87.6%	\$47,426	88.1%	99.7%	256	82.9%					246	88.5%				
		Rev. Not Known	92	12.4%	\$6,381	11.9%	0.3%	53	17.2%					32	11.5%				
		Total	742	100.0%	\$53,807	100.0%	100.0%	309	100.0%					278	100.0%				
	Loan Size	\$100,000 or Less	652	87.9%	\$17,593	32.7%		263	85.1%	88.5%	\$7,034	26.6%	22.4%	243	87.4%	89.8%	\$6,753	33.6%	24.8%
		\$100,001 - \$250,000	36	4.9%	\$6,540	12.2%		16	5.2%	5.4%	\$2,993	11.3%	17.4%	14	5.0%	4.6%	\$2,521	12.5%	15.7%
		\$250,001 - \$1 Million	54	7.3%	\$29,674	55.1%		30	9.7%	6.1%	\$16,433	62.1%	60.3%	21	7.6%	5.7%	\$10,838	53.9%	59.5%
		Total	742	100.0%	\$53,807	100.0%		309	100.0%	100.0%	\$26,460	100.0%	100.0%	278	100.0%	100.0%	\$20,112	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	500	95.6%	\$10,074	54.3%													
		\$100,001 - \$250,000	10	1.9%	\$1,923	10.4%													
		\$250,001 - \$1 Million	13	2.5%	\$6,563	35.4%													
		Total	523	100.0%	\$18,560	100.0%													
Small Farm	Revenue	\$1 Million or Less	1	50.0%	\$40	50.6%	99.0%	0	0.0%	46.6%	\$0	0.0%	68.7%	0	0.0%	50.0%	\$0	0.0%	58.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.0%	0	0.0%					0	0.0%				
		Total Rev. available	1	50.0%	\$40	50.6%	100.0%	0	0.0%					0	0.0%				
		Not Known	1	50.0%	\$39	49.4%	0.0%	0	0.0%					1	100.0%				
		Total	2	100.0%	\$79	100.0%	100.0%	0	0.0%					1	100.0%				
	Loan Size	\$100,000 or Less	2	100.0%	\$79	100.0%		0	0.0%	87.7%	\$0	0.0%	27.7%	1	100.0%	91.4%	\$39	100.0%	43.5%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.4%	\$0	0.0%	28.7%	0	0.0%	6.5%	\$0	0.0%	34.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.9%	\$0	0.0%	43.5%	0	0.0%	2.2%	\$0	0.0%	22.3%
		Total	2	100.0%	\$79	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$39	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	\$40	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	1	100.0%	\$40	100.0%													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: WV Charleston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg			
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	6	6.5%	\$611	4.1%	14.3%	2	4.4%	11.3%	\$154	2.1%	8.8%	1	3.1%	11.2%	\$120	2.4%	8.9%
	Middle	46	49.5%	\$5,688	38.4%	61.7%	22	48.9%	57.9%	\$2,532	33.9%	51.2%	18	56.3%	57.6%	\$2,571	52.2%	51.9%
	Upper	41	44.1%	\$8,520	57.5%	24.0%	21	46.7%	30.8%	\$4,778	64.0%	40.0%	13	40.6%	31.2%	\$2,232	45.3%	39.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>93</i>	<i>100.0%</i>	<i>\$14,819</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,464</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,923</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	8	11.6%	\$1,275	15.2%	14.3%	2	9.1%	9.1%	\$378	14.2%	7.4%	5	14.3%	9.0%	\$833	18.2%	7.0%
	Middle	38	55.1%	\$3,706	44.1%	61.7%	14	63.6%	60.5%	\$1,426	53.6%	55.2%	16	45.7%	59.0%	\$1,472	32.1%	52.6%
	Upper	23	33.3%	\$3,431	40.8%	24.0%	6	27.3%	30.4%	\$855	32.2%	37.4%	14	40.0%	32.0%	\$2,278	49.7%	40.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>\$8,412</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,659</i>	<i>100.0%</i>	<i>100.0%</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,583</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	4.5%	\$44	3.1%	14.3%	0	0.0%	12.0%	\$0	0.0%	8.2%	1	12.5%	13.1%	\$44	8.1%	9.5%
	Middle	12	54.5%	\$793	56.6%	61.7%	5	62.5%	62.2%	\$357	74.2%	60.3%	5	62.5%	58.6%	\$340	62.8%	55.2%
	Upper	9	40.9%	\$565	40.3%	24.0%	3	37.5%	25.8%	\$124	25.8%	31.5%	2	25.0%	28.3%	\$157	29.0%	35.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>\$1,402</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$481</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$541</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	42.2%	0	0.0%	24.2%	\$0	0.0%	9.7%	0	0.0%	44.0%	\$0	0.0%	53.8%
	Middle	0	0.0%	\$0	0.0%	33.7%	0	0.0%	45.5%	\$0	0.0%	79.3%	0	0.0%	32.0%	\$0	0.0%	14.8%
	Upper	0	0.0%	\$0	0.0%	24.1%	0	0.0%	30.3%	\$0	0.0%	11.0%	0	0.0%	24.0%	\$0	0.0%	31.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	15	8.2%	\$1,930	7.8%	14.3%	4	5.3%	10.6%	\$532	5.0%	8.4%	7	9.3%	10.8%	\$997	9.9%	9.3%
	Middle	96	52.2%	\$10,187	41.4%	61.7%	41	54.7%	59.2%	\$4,315	40.7%	55.7%	39	52.0%	58.0%	\$4,383	43.6%	51.5%
	Upper	73	39.7%	\$12,516	50.8%	24.0%	30	40.0%	30.2%	\$5,757	54.3%	35.9%	29	38.7%	31.1%	\$4,667	46.5%	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>184</i>	<i>100.0%</i>	<i>\$24,633</i>	<i>100.0%</i>	<i>100.0%</i>	<i>75</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,604</i>	<i>100.0%</i>	<i>100.0%</i>	<i>75</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,047</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: WV Charleston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	10	10.8%	\$711	4.8%	18.6%	5	11.1%	9.2%	\$421	5.6%	4.4%	2	6.3%	8.1%	\$139	2.8%	4.1%
	Moderate	18	19.4%	\$1,666	11.2%	18.0%	9	20.0%	17.9%	\$822	11.0%	10.8%	6	18.8%	21.4%	\$538	10.9%	15.3%
	Middle	23	24.7%	\$3,124	21.1%	21.2%	8	17.8%	21.6%	\$1,010	13.5%	18.3%	12	37.5%	21.7%	\$1,666	33.8%	19.5%
	Upper	39	41.9%	\$8,827	59.6%	42.2%	21	46.7%	35.8%	\$4,855	65.0%	52.7%	11	34.4%	30.7%	\$2,445	49.7%	44.4%
	Unknown	3	3.2%	\$491	3.3%	0.0%	2	4.4%	15.5%	\$356	4.8%	13.8%	1	3.1%	18.2%	\$135	2.7%	16.6%
	<i>Total</i>	93	100.0%	\$14,819	100.0%	100.0%	45	100.0%	100.0%	\$7,464	100.0%	100.0%	32	100.0%	100.0%	\$4,923	100.0%	100.0%
REFINANCE	Low	5	7.2%	\$375	4.5%	18.6%	1	4.5%	6.2%	\$48	1.8%	3.3%	3	8.6%	6.1%	\$266	5.8%	3.4%
	Moderate	13	18.8%	\$968	11.5%	18.0%	6	27.3%	15.6%	\$404	15.2%	10.3%	6	17.1%	15.7%	\$468	10.2%	9.9%
	Middle	14	20.3%	\$1,196	14.2%	21.2%	6	27.3%	24.5%	\$486	18.3%	19.9%	5	14.3%	21.9%	\$418	9.1%	15.2%
	Upper	35	50.7%	\$5,688	67.6%	42.2%	8	36.4%	41.5%	\$1,640	61.7%	52.4%	21	60.0%	41.6%	\$3,431	74.9%	53.1%
	Unknown	2	2.9%	\$185	2.2%	0.0%	1	4.5%	12.2%	\$81	3.0%	14.1%	0	0.0%	14.7%	\$0	0.0%	18.4%
	<i>Total</i>	69	100.0%	\$8,412	100.0%	100.0%	22	100.0%	100.0%	\$2,659	100.0%	100.0%	35	100.0%	100.0%	\$4,583	100.0%	100.0%
HOME IMPROVEMENT	Low	2	9.1%	\$49	3.5%	18.6%	0	0.0%	11.4%	\$0	0.0%	3.5%	2	25.0%	14.4%	\$49	9.1%	6.5%
	Moderate	4	18.2%	\$86	6.1%	18.0%	2	25.0%	20.6%	\$13	2.7%	12.8%	1	12.5%	19.4%	\$8	1.5%	11.8%
	Middle	7	31.8%	\$291	20.8%	21.2%	4	50.0%	20.3%	\$208	43.2%	18.3%	2	25.0%	19.9%	\$19	3.5%	16.7%
	Upper	8	36.4%	\$909	64.8%	42.2%	2	25.0%	38.8%	\$260	54.1%	56.3%	3	37.5%	41.7%	\$465	86.0%	58.4%
	Unknown	1	4.5%	\$67	4.8%	0.0%	0	0.0%	8.9%	\$0	0.0%	9.2%	0	0.0%	4.5%	\$0	0.0%	6.6%
	<i>Total</i>	22	100.0%	\$1,402	100.0%	100.0%	8	100.0%	100.0%	\$481	100.0%	100.0%	8	100.0%	100.0%	\$541	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	18.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	17	9.2%	\$1,135	4.6%	18.6%	6	8.0%	8.1%	\$469	4.4%	3.6%	7	9.3%	8.0%	\$454	4.5%	3.9%
	Moderate	35	19.0%	\$2,720	11.0%	18.0%	17	22.7%	17.1%	\$1,239	11.7%	9.6%	13	17.3%	19.0%	\$1,014	10.1%	12.8%
	Middle	44	23.9%	\$4,611	18.7%	21.2%	18	24.0%	22.4%	\$1,704	16.1%	17.0%	19	25.3%	21.4%	\$2,103	20.9%	17.3%
	Upper	82	44.6%	\$15,424	62.6%	42.2%	31	41.3%	37.9%	\$6,755	63.7%	47.4%	35	46.7%	35.6%	\$6,341	63.1%	47.2%
	Unknown	6	3.3%	\$743	3.0%	0.0%	3	4.0%	14.4%	\$437	4.1%	22.5%	1	1.3%	16.0%	\$135	1.3%	18.8%
	<i>Total</i>	184	100.0%	\$24,633	100.0%	100.0%	75	100.0%	100.0%	\$10,604	100.0%	100.0%	75	100.0%	100.0%	\$10,047	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: WV Charleston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	20	32.3%	\$3,682	34.5%	29.5%	8	29.6%	26.1%	\$1,537	31.4%	38.6%	11	37.9%	27.6%	\$1,345	30.7%	37.1%
	Middle	26	41.9%	\$5,252	49.3%	45.7%	13	48.1%	45.6%	\$2,635	53.9%	38.6%	12	41.4%	44.1%	\$2,597	59.2%	35.2%
	Upper	16	25.8%	\$1,728	16.2%	24.8%	6	22.2%	25.5%	\$717	14.7%	22.5%	6	20.7%	25.7%	\$444	10.1%	26.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.8%	\$0	0.0%	0.3%	0	0.0%	2.6%	\$0	0.0%	1.2%
	Total	62	100.0%	\$10,662	100.0%	100.0%	27	100.0%	100.0%	\$4,889	100.0%	100.0%	29	100.0%	100.0%	\$4,386	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	8.3%	\$0	0.0%	0.4%
	Middle	0	0.0%	\$0	0.0%	72.2%	0	0.0%	50.0%	\$0	0.0%	95.4%	0	0.0%	66.7%	\$0	0.0%	61.8%
	Upper	0	0.0%	\$0	0.0%	16.7%	0	0.0%	50.0%	\$0	0.0%	4.6%	0	0.0%	25.0%	\$0	0.0%	37.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2015 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: WV Charleston

Product Type		Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	%	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	\$ 000s	%	%	
Small Business	Revenue	\$1 Million or Less	25	40.3%	\$1,963	18.4%	88.7%	6	22.2%	38.0%	\$784	16.0%	31.8%	15	51.7%	44.0%	\$792	18.1%	36.7%
		Over \$1 Million	24	38.7%	\$6,855	64.3%	9.6%	11	40.7%					11	37.9%				
		Total Rev. available	49	79.0%	\$8,818	82.7%	98.3%	17	62.9%					26	89.6%				
		Rev. Not Known	13	21.0%	\$1,844	17.3%	1.7%	10	37.0%					3	10.3%				
		Total	62	100.0%	\$10,662	100.0%	100.0%	27	100.0%					29	100.0%				
	Loan Size	\$100,000 or Less	37	59.7%	\$1,747	16.4%		13	48.1%	82.8%	\$641	13.1%	18.7%	21	72.4%	84.8%	\$986	22.5%	20.8%
		\$100,001 - \$250,000	9	14.5%	\$1,939	18.2%		7	25.9%	8.0%	\$1,489	30.5%	17.6%	1	3.4%	7.0%	\$250	5.7%	16.6%
		\$250,001 - \$1 Million	16	25.8%	\$6,976	65.4%		7	25.9%	9.2%	\$2,759	56.4%	63.6%	7	24.1%	8.3%	\$3,150	71.8%	62.6%
		Total	62	100.0%	\$10,662	100.0%		27	100.0%	100.0%	\$4,889	100.0%	100.0%	29	100.0%	100.0%	\$4,386	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	20	80.0%	\$658	33.5%													
		\$100,001 - \$250,000	2	8.0%	\$415	21.1%													
		\$250,001 - \$1 Million	3	12.0%	\$890	45.3%													
		Total	25	100.0%	\$1,963	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	41.7%	\$0	0.0%	60.6%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	50.0%	\$0	0.0%	4.6%	0	0.0%	58.3%	\$0	0.0%	13.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	50.0%	\$0	0.0%	95.4%	0	0.0%	25.0%	\$0	0.0%	37.3%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	49.0%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	0	0.0%	\$0	0.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2015 D&B Information

APPENDIX F
LIMITED-SCOPE LENDING TABLES

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: GA Augusta

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014				2015							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	2	2.2%	\$158	1.2%	5.1%	0	0.0%	1.5%	\$0	0.0%	0.8%	1	4.8%	1.4%	\$86	2.5%	0.8%
	Moderate	16	18.0%	\$1,262	9.9%	18.3%	9	18.4%	6.9%	\$593	9.9%	3.8%	4	19.0%	7.7%	\$297	8.5%	4.5%
	Middle	28	31.5%	\$3,097	24.2%	34.3%	19	38.8%	35.8%	\$1,886	31.5%	30.8%	3	14.3%	36.9%	\$474	13.5%	31.8%
	Upper	43	48.3%	\$8,284	64.7%	42.3%	21	42.9%	55.8%	\$3,511	58.6%	64.6%	13	61.9%	53.9%	\$2,651	75.6%	62.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	89	100.0%	\$12,801	100.0%	100.0%	49	100.0%	100.0%	\$5,990	100.0%	100.0%	21	100.0%	100.0%	\$3,508	100.0%	100.0%
REFINANCE	Low	2	6.5%	\$108	2.7%	5.1%	2	15.4%	2.2%	\$108	6.9%	6.2%	0	0.0%	1.8%	\$0	0.0%	1.3%
	Moderate	4	12.9%	\$335	8.4%	18.3%	2	15.4%	12.3%	\$202	13.0%	41.9%	2	13.3%	12.1%	\$133	7.6%	7.1%
	Middle	8	25.8%	\$738	18.6%	34.3%	3	23.1%	41.1%	\$319	20.5%	35.4%	5	33.3%	36.9%	\$419	23.9%	31.7%
	Upper	17	54.8%	\$2,795	70.3%	42.3%	6	46.2%	44.4%	\$927	59.6%	16.5%	8	53.3%	49.3%	\$1,200	68.5%	59.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	31	100.0%	\$3,976	100.0%	100.0%	13	100.0%	100.0%	\$1,556	100.0%	100.0%	15	100.0%	100.0%	\$1,752	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	4.3%	\$0	0.0%	1.3%	0	0.0%	3.2%	\$0	0.0%	0.7%
	Moderate	3	37.5%	\$138	17.0%	18.3%	2	33.3%	16.9%	\$87	12.9%	7.1%	1	100.0%	14.6%	\$51	100.0%	6.5%
	Middle	2	25.0%	\$153	18.9%	34.3%	1	16.7%	33.2%	\$68	10.1%	27.7%	0	0.0%	34.7%	\$0	0.0%	27.4%
	Upper	3	37.5%	\$519	64.1%	42.3%	3	50.0%	45.6%	\$519	77.0%	63.9%	0	0.0%	47.6%	\$0	0.0%	65.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$810	100.0%	100.0%	6	100.0%	100.0%	\$674	100.0%	100.0%	1	100.0%	100.0%	\$51	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	10.9%	0	0.0%	23.5%	\$0	0.0%	9.8%	0	0.0%	7.1%	\$0	0.0%	5.6%
	Moderate	0	0.0%	\$0	0.0%	31.3%	0	0.0%	47.1%	\$0	0.0%	12.9%	0	0.0%	39.3%	\$0	0.0%	17.8%
	Middle	0	0.0%	\$0	0.0%	32.6%	0	0.0%	17.6%	\$0	0.0%	58.0%	0	0.0%	21.4%	\$0	0.0%	25.9%
	Upper	0	0.0%	\$0	0.0%	25.3%	0	0.0%	11.8%	\$0	0.0%	19.3%	0	0.0%	32.1%	\$0	0.0%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	3.1%	\$266	1.5%	5.1%	2	2.9%	1.9%	\$108	1.3%	4.8%	1	2.7%	1.6%	\$86	1.6%	1.3%
	Moderate	23	18.0%	\$1,735	9.9%	18.3%	13	19.1%	9.0%	\$882	10.7%	31.1%	7	18.9%	9.5%	\$481	9.1%	6.2%
	Middle	38	29.7%	\$3,988	22.7%	34.3%	23	33.8%	37.3%	\$2,273	27.7%	34.3%	8	21.6%	36.8%	\$893	16.8%	31.3%
	Upper	63	49.2%	\$11,598	65.9%	42.3%	30	44.1%	51.8%	\$4,957	60.3%	29.8%	21	56.8%	52.1%	\$3,851	72.5%	61.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	128	100.0%	\$17,587	100.0%	100.0%	68	100.0%	100.0%	\$8,220	100.0%	100.0%	37	100.0%	100.0%	\$5,311	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	2	14.3%	\$309	38.3%	7.4%	0	0.0%	7.7%	\$0	0.0%	11.5%	2	40.0%	7.1%	\$309	70.2%	10.3%
	Moderate	1	7.1%	\$6	0.7%	16.2%	0	0.0%	10.8%	\$0	0.0%	8.9%	1	20.0%	12.2%	\$6	1.4%	9.7%
	Middle	5	35.7%	\$111	13.8%	32.9%	1	25.0%	32.0%	\$25	13.0%	34.7%	1	20.0%	30.4%	\$25	5.7%	32.3%
	Upper	6	42.9%	\$381	47.2%	43.5%	3	75.0%	47.9%	\$167	87.0%	44.2%	1	20.0%	48.9%	\$100	22.7%	47.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	0.7%	0	0.0%	1.5%	\$0	0.0%	0.7%
Total	14	100.0%	\$807	100.0%	100.0%	4	100.0%	100.0%	\$192	100.0%	100.0%	5	100.0%	100.0%	\$440	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	6.5%	0	0.0%	2.6%	\$0	0.0%	1.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.9%	0	0.0%	5.3%	\$0	0.0%	2.6%	0	0.0%	9.7%	\$0	0.0%	4.4%
	Middle	0	0.0%	\$0	0.0%	25.8%	0	0.0%	36.8%	\$0	0.0%	34.4%	0	0.0%	22.6%	\$0	0.0%	20.6%
	Upper	0	0.0%	\$0	0.0%	54.8%	0	0.0%	55.3%	\$0	0.0%	61.0%	0	0.0%	67.7%	\$0	0.0%	74.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: GA Augusta

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		Families by Family Income		Count	Count		Dollar		Count	Dollar		Count	Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank		Agg							
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	15	16.9%	\$961	7.5%	22.8%	10	20.4%	3.6%	\$542	9.0%	1.6%	4	19.0%	3.8%	\$350	10.0%	1.7%	
	Moderate	25	28.1%	\$2,678	20.9%	16.1%	18	36.7%	13.0%	\$2,026	33.8%	8.8%	3	14.3%	14.0%	\$295	8.4%	9.8%	
	Middle	22	24.7%	\$3,509	27.4%	18.6%	10	20.4%	21.9%	\$1,405	23.5%	20.1%	7	33.3%	21.1%	\$1,353	38.6%	19.4%	
	Upper	24	27.0%	\$5,121	40.0%	42.6%	11	22.4%	35.6%	\$2,017	33.7%	45.7%	5	23.8%	34.4%	\$1,183	33.7%	44.1%	
	Unknown	3	3.4%	\$532	4.2%	0.0%	0	0.0%	25.9%	\$0	0.0%	23.8%	2	9.5%	26.7%	\$327	9.3%	25.0%	
	Total	89	100.0%	\$12,801	100.0%	100.0%	49	100.0%	100.0%	\$5,990	100.0%	100.0%	21	100.0%	100.0%	\$3,508	100.0%	100.0%	
REFINANCE	Low	6	19.4%	\$363	9.1%	22.8%	2	15.4%	3.6%	\$107	6.9%	0.3%	4	26.7%	3.6%	\$256	14.6%	2.0%	
	Moderate	3	9.7%	\$337	8.5%	16.1%	2	15.4%	8.6%	\$137	8.8%	0.8%	1	6.7%	7.8%	\$200	11.4%	5.1%	
	Middle	8	25.8%	\$1,167	29.4%	18.6%	4	30.8%	12.3%	\$750	48.2%	1.5%	4	26.7%	13.0%	\$417	23.8%	10.3%	
	Upper	10	32.3%	\$1,468	36.9%	42.6%	3	23.1%	28.5%	\$360	23.1%	5.0%	6	40.0%	29.2%	\$879	50.2%	34.1%	
	Unknown	4	12.9%	\$641	16.1%	0.0%	2	15.4%	47.0%	\$202	13.0%	92.5%	0	0.0%	46.4%	\$0	0.0%	48.5%	
	Total	31	100.0%	\$3,976	100.0%	100.0%	13	100.0%	100.0%	\$1,556	100.0%	100.0%	15	100.0%	100.0%	\$1,752	100.0%	100.0%	
HOME IMPROVEMENT	Low	2	25.0%	\$75	9.3%	22.8%	1	16.7%	11.7%	\$24	3.6%	1.9%	1	100.0%	6.8%	\$51	100.0%	2.6%	
	Moderate	3	37.5%	\$188	23.2%	16.1%	2	33.3%	15.3%	\$103	15.3%	7.5%	0	0.0%	18.4%	\$0	0.0%	9.3%	
	Middle	0	0.0%	\$0	0.0%	18.6%	0	0.0%	18.9%	\$0	0.0%	13.2%	0	0.0%	18.4%	\$0	0.0%	10.0%	
	Upper	3	37.5%	\$547	67.5%	42.6%	3	50.0%	43.4%	\$547	81.2%	49.5%	0	0.0%	47.3%	\$0	0.0%	59.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.7%	\$0	0.0%	27.8%	0	0.0%	9.0%	\$0	0.0%	18.6%	
	Total	8	100.0%	\$810	100.0%	100.0%	6	100.0%	100.0%	\$674	100.0%	100.0%	1	100.0%	100.0%	\$51	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	18.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	23	18.0%	\$1,399	8.0%	22.8%	13	19.1%	3.9%	\$673	8.2%	0.6%	9	24.3%	3.8%	\$657	12.4%	1.7%	
	Moderate	31	24.2%	\$3,203	18.2%	16.1%	22	32.4%	11.7%	\$2,266	27.6%	3.0%	4	10.8%	12.1%	\$495	9.3%	7.8%	
	Middle	30	23.4%	\$4,676	26.6%	18.6%	14	20.6%	18.8%	\$2,155	26.2%	6.6%	11	29.7%	18.4%	\$1,770	33.3%	15.5%	
	Upper	37	28.9%	\$7,136	40.6%	42.6%	17	25.0%	33.7%	\$2,924	35.6%	16.1%	11	29.7%	33.1%	\$2,062	38.8%	38.5%	
	Unknown	7	5.5%	\$1,173	6.7%	0.0%	2	2.9%	31.8%	\$202	2.5%	73.7%	2	5.4%	32.5%	\$327	6.2%	36.6%	
	Total	128	100.0%	\$17,587	100.0%	100.0%	68	100.0%	100.0%	\$8,220	100.0%	100.0%	37	100.0%	100.0%	\$5,311	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	7	50.0%	\$145	18.0%	93.3%	1	25.0%	49.9%	\$5	2.6%	44.5%	2	40.0%	52.4%	\$15	3.4%	45.4%	
	Over \$1 Million	2	14.3%	\$350	43.4%	6.4%	0	0.0%					1	20.0%					
	Total Rev. available	9	64.3%	\$495	61.4%	99.7%	1	25.0%					3	60.0%					
	Rev. Not Known	5	35.7%	\$312	38.7%	0.3%	3	75.0%					2	40.0%					
	Total	14	100.0%	\$807	100.0%	100.0%	4	100.0%					5	100.0%					
Small Business Loan Size	\$100,000 or Less	13	92.9%	\$507	62.8%		4	100.0%	88.0%	\$192	100.0%	26.2%	4	80.0%	88.1%	\$140	31.8%	27.1%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.9%	\$0	0.0%	23.2%	0	0.0%	6.7%	\$0	0.0%	22.6%	
	\$250,001 - \$1 Million	1	7.1%	\$300	37.2%		0	0.0%	5.1%	\$0	0.0%	50.6%	1	20.0%	5.2%	\$300	68.2%	50.3%	
	Total	14	100.0%	\$807	100.0%		4	100.0%	100.0%	\$192	100.0%	100.0%	5	100.0%	100.0%	\$440	100.0%	100.0%	
	Small Farm Revenue	Total Farms																	
		\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	57.9%	\$0	0.0%	80.3%	0	0.0%	64.5%	\$0	0.0%	73.9%
Over \$1 Million		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Small Farm Loan Size		\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	73.7%	\$0	0.0%	27.6%	0	0.0%	80.6%	\$0	0.0%	35.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	21.1%	\$0	0.0%	44.9%	0	0.0%	12.9%	\$0	0.0%	26.3%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	27.5%	0	0.0%	6.5%	\$0	0.0%	38.3%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: FL Cape Coral

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014				2015							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		Count					Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	3	0.5%	\$397	0.3%	1.3%	1	0.4%	0.4%	\$77	0.2%	0.2%	1	0.4%	1.2%	\$60	0.1%	1.0%
	Moderate	65	9.8%	\$11,060	7.8%	14.2%	27	9.7%	11.9%	\$3,794	7.7%	8.4%	20	8.1%	12.2%	\$3,304	5.9%	8.8%
	Middle	362	54.4%	\$63,255	44.5%	55.6%	154	55.4%	52.8%	\$23,314	47.2%	44.6%	146	59.1%	54.6%	\$27,588	49.0%	47.1%
	Upper	236	35.4%	\$67,539	47.5%	28.9%	96	34.5%	34.8%	\$22,176	44.9%	46.9%	80	32.4%	32.0%	\$25,307	45.0%	43.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	666	100.0%	\$142,251	100.0%	100.0%	278	100.0%	100.0%	\$49,361	100.0%	100.0%	247	100.0%	100.0%	\$56,259	100.0%	100.0%
REFINANCE	Low	5	1.4%	\$471	0.7%	1.3%	2	1.9%	0.5%	\$194	0.9%	0.3%	2	1.2%	0.4%	\$92	0.3%	0.2%
	Moderate	31	8.6%	\$3,809	5.3%	14.2%	14	13.2%	10.4%	\$1,272	6.1%	7.7%	10	6.2%	9.2%	\$1,867	5.6%	6.5%
	Middle	195	54.3%	\$31,628	43.7%	55.6%	52	49.1%	56.5%	\$7,418	35.5%	47.4%	86	53.4%	56.0%	\$13,935	42.1%	47.3%
	Upper	128	35.7%	\$36,497	50.4%	28.9%	38	35.8%	32.6%	\$11,984	57.4%	44.6%	63	39.1%	34.4%	\$17,242	52.0%	46.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	359	100.0%	\$72,405	100.0%	100.0%	106	100.0%	100.0%	\$20,868	100.0%	100.0%	161	100.0%	100.0%	\$33,136	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.7%	\$0	0.0%	0.1%	0	0.0%	1.2%	\$0	0.0%	0.3%
	Moderate	1	4.2%	\$5	0.1%	14.2%	1	10.0%	12.8%	\$5	0.3%	5.9%	0	0.0%	10.1%	\$0	0.0%	4.1%
	Middle	14	58.3%	\$1,900	54.3%	55.6%	4	40.0%	60.8%	\$631	34.6%	53.7%	7	63.6%	60.4%	\$1,083	72.6%	53.4%
	Upper	9	37.5%	\$1,597	45.6%	28.9%	5	50.0%	25.7%	\$1,189	65.2%	40.3%	4	36.4%	28.0%	\$408	27.4%	42.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Total	24	100.0%	\$3,502	100.0%	100.0%	10	100.0%	100.0%	\$1,825	100.0%	100.0%	11	100.0%	100.0%	\$1,491	100.0%	100.0%
MULTI-FAMILY		Multi-Family Units																
	Low	0	0.0%	\$0	0.0%	7.8%	0	0.0%	5.3%	\$0	0.0%	16.1%	0	0.0%	6.8%	\$0	0.0%	11.8%
	Moderate	0	0.0%	\$0	0.0%	15.0%	0	0.0%	21.1%	\$0	0.0%	19.8%	0	0.0%	29.5%	\$0	0.0%	54.9%
	Middle	0	0.0%	\$0	0.0%	39.7%	0	0.0%	42.1%	\$0	0.0%	7.3%	0	0.0%	36.4%	\$0	0.0%	29.4%
	Upper	0	0.0%	\$0	0.0%	37.4%	0	0.0%	31.6%	\$0	0.0%	56.8%	0	0.0%	27.3%	\$0	0.0%	3.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	8	0.8%	\$868	0.4%	1.3%	3	0.8%	0.4%	\$271	0.4%	0.7%	3	0.7%	1.0%	\$152	0.2%	1.2%
	Moderate	97	9.2%	\$14,874	6.8%	14.2%	42	10.7%	11.6%	\$5,071	7.0%	8.5%	30	7.2%	11.3%	\$5,171	5.7%	10.0%
	Middle	571	54.4%	\$96,783	44.4%	55.6%	210	53.3%	54.0%	\$31,363	43.5%	44.2%	239	57.0%	55.1%	\$42,606	46.9%	46.5%
	Upper	373	35.6%	\$105,633	48.4%	28.9%	139	35.3%	34.0%	\$35,349	49.1%	46.5%	147	35.1%	32.5%	\$42,957	47.3%	42.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,049	100.0%	\$218,158	100.0%	100.0%	394	100.0%	100.0%	\$72,054	100.0%	100.0%	419	100.0%	100.0%	\$90,886	100.0%	100.0%
SMALL BUSINESSES		Small Businesses																
	Low	12	2.8%	\$1,633	4.0%	3.1%	2	1.3%	3.2%	\$83	0.6%	5.6%	4	2.2%	3.0%	\$772	4.4%	5.1%
	Moderate	44	10.3%	\$5,094	12.6%	14.6%	16	10.3%	12.8%	\$1,054	7.7%	13.6%	20	10.9%	12.6%	\$3,158	17.8%	15.1%
	Middle	237	55.5%	\$22,340	55.1%	52.8%	85	54.5%	49.5%	\$8,775	64.2%	45.5%	99	54.1%	49.9%	\$9,310	52.5%	43.7%
	Upper	134	31.4%	\$11,512	28.4%	29.4%	53	34.0%	33.6%	\$3,752	27.5%	34.9%	60	32.8%	33.8%	\$4,481	25.3%	35.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.5%	
Total	427	100.0%	\$40,579	100.0%	100.0%	156	100.0%	100.0%	\$13,664	100.0%	100.0%	183	100.0%	100.0%	\$17,721	100.0%	100.0%	
SMALL FARM		Small Farms																
	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$6	42.9%	14.6%	0	0.0%	8.5%	\$0	0.0%	10.1%	0	0.0%	8.9%	\$0	0.0%	17.3%
	Middle	1	50.0%	\$8	57.1%	43.9%	1	100.0%	38.3%	\$8	100.0%	45.3%	0	0.0%	48.9%	\$0	0.0%	49.3%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	53.2%	\$0	0.0%	44.6%	0	0.0%	42.2%	\$0	0.0%	33.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	2	100.0%	\$14	100.0%	100.0%	1	100.0%	100.0%	\$8	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: FL Jacksonville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	\$ %	\$ %	Bank	Agg	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	4	1.4%	\$233	0.3%	3.1%	3	2.4%	0.8%	\$121	0.4%	0.3%	1	0.9%	0.7%	\$112	0.4%	0.3%
	Moderate	14	4.9%	\$2,898	4.1%	16.5%	3	2.4%	9.3%	\$1,297	4.4%	5.2%	6	5.4%	9.7%	\$638	2.2%	6.0%
	Middle	135	47.4%	\$27,558	39.2%	45.5%	68	54.4%	47.4%	\$14,762	49.6%	41.8%	47	42.3%	47.2%	\$9,080	31.2%	42.2%
	Upper	132	46.3%	\$39,657	56.4%	34.8%	51	40.8%	42.5%	\$13,591	45.7%	52.7%	57	51.4%	42.3%	\$19,255	66.2%	51.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>285</i>	<i>100.0%</i>	<i>\$70,346</i>	<i>100.0%</i>	<i>100.0%</i>	<i>125</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,771</i>	<i>100.0%</i>	<i>100.0%</i>	<i>111</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,085</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Moderate	11	8.2%	\$847	3.0%	16.5%	2	4.8%	11.6%	\$73	0.9%	7.4%	5	9.6%	9.5%	\$432	3.5%	5.9%
	Middle	54	40.3%	\$8,151	29.2%	45.5%	22	52.4%	46.3%	\$3,578	46.1%	39.9%	17	32.7%	44.8%	\$2,561	20.5%	38.8%
	Upper	69	51.5%	\$18,909	67.8%	34.8%	18	42.9%	41.2%	\$4,106	52.9%	52.3%	30	57.7%	44.9%	\$9,473	76.0%	55.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>134</i>	<i>100.0%</i>	<i>\$27,907</i>	<i>100.0%</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,757</i>	<i>100.0%</i>	<i>100.0%</i>	<i>52</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,466</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	9.1%	\$40	5.3%	3.1%	1	33.3%	2.5%	\$40	10.4%	0.8%	0	0.0%	2.2%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	12.2%	\$0	0.0%	7.1%	0	0.0%	12.6%	\$0	0.0%	6.6%
	Middle	4	36.4%	\$290	38.4%	45.5%	0	0.0%	46.7%	\$0	0.0%	39.3%	4	57.1%	47.1%	\$290	80.6%	39.1%
	Upper	6	54.5%	\$425	56.3%	34.8%	2	66.7%	38.6%	\$346	89.6%	52.8%	3	42.9%	38.1%	\$70	19.4%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$755</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$386</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$360</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	31.2%	0	0.0%	30.4%	\$0	0.0%	39.9%	0	0.0%	29.1%	\$0	0.0%	18.1%
	Middle	0	0.0%	\$0	0.0%	36.6%	0	0.0%	52.2%	\$0	0.0%	44.9%	0	0.0%	49.1%	\$0	0.0%	44.1%
	Upper	0	0.0%	\$0	0.0%	26.3%	0	0.0%	17.4%	\$0	0.0%	15.2%	0	0.0%	18.2%	\$0	0.0%	36.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	5	1.2%	\$273	0.3%	3.1%	4	2.4%	0.9%	\$161	0.4%	0.3%	1	0.6%	0.8%	\$112	0.3%	0.3%
	Moderate	25	5.8%	\$3,745	3.8%	16.5%	5	2.9%	10.1%	\$1,370	3.6%	7.8%	11	6.5%	9.8%	\$1,070	2.6%	6.4%
	Middle	193	44.9%	\$35,999	36.4%	45.5%	90	52.9%	47.0%	\$18,340	48.4%	41.5%	68	40.0%	46.4%	\$11,931	28.5%	41.2%
	Upper	207	48.1%	\$58,991	59.6%	34.8%	71	41.8%	41.9%	\$18,043	47.6%	50.4%	90	52.9%	43.0%	\$28,798	68.7%	52.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>430</i>	<i>100.0%</i>	<i>\$99,008</i>	<i>100.0%</i>	<i>100.0%</i>	<i>170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$37,914</i>	<i>100.0%</i>	<i>100.0%</i>	<i>170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$41,911</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	13	4.9%	\$3,186	9.8%	3.5%	5	4.7%	3.4%	\$1,276	9.5%	4.7%	7	6.8%	3.2%	\$1,810	14.9%	4.9%
	Moderate	45	17.1%	\$4,973	15.3%	19.3%	19	17.8%	20.2%	\$2,783	20.8%	24.2%	18	17.5%	19.1%	\$1,820	15.0%	22.4%
	Middle	100	38.0%	\$14,042	43.1%	42.1%	41	38.3%	37.7%	\$5,176	38.6%	35.6%	36	35.0%	38.1%	\$5,074	41.7%	36.7%
	Upper	105	39.9%	\$10,358	31.8%	35.1%	42	39.3%	37.5%	\$4,173	31.1%	34.8%	42	40.8%	38.6%	\$3,467	28.5%	35.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	0.6%	0	0.0%	1.1%	\$0	0.0%	0.9%
<i>Total</i>	<i>263</i>	<i>100.0%</i>	<i>\$32,559</i>	<i>100.0%</i>	<i>100.0%</i>	<i>107</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,408</i>	<i>100.0%</i>	<i>100.0%</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,171</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	1.8%	\$0	0.0%	2.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	14.5%	\$0	0.0%	10.8%	0	0.0%	18.2%	\$0	0.0%	17.6%
	Middle	0	0.0%	\$0	0.0%	48.7%	0	0.0%	41.8%	\$0	0.0%	32.0%	0	0.0%	40.0%	\$0	0.0%	50.6%
	Upper	0	0.0%	\$0	0.0%	38.8%	0	0.0%	41.8%	\$0	0.0%	55.1%	0	0.0%	41.8%	\$0	0.0%	31.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL Jacksonville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	23	8.1%	\$2,061	2.9%	20.6%	7	5.6%	5.2%	\$542	1.8%	2.1%	14	12.6%	5.0%	\$1,365	4.7%	2.0%
	Moderate	55	19.3%	\$7,655	10.9%	17.6%	25	20.0%	16.2%	\$3,286	11.0%	10.1%	16	14.4%	16.0%	\$1,977	6.8%	9.7%
	Middle	38	13.3%	\$6,645	9.4%	21.8%	13	10.4%	20.8%	\$1,746	5.9%	17.7%	19	17.1%	21.1%	\$3,893	13.4%	17.8%
	Upper	124	43.5%	\$41,105	58.4%	40.1%	55	44.0%	42.0%	\$16,211	54.5%	56.4%	44	39.6%	41.1%	\$17,329	59.6%	54.6%
	Unknown	45	15.8%	\$12,880	18.3%	0.0%	25	20.0%	15.8%	\$7,986	26.8%	13.7%	18	16.2%	16.9%	\$4,521	15.5%	15.8%
	Total	285	100.0%	\$70,346	100.0%	100.0%	125	100.0%	100.0%	\$29,771	100.0%	100.0%	111	100.0%	100.0%	\$29,085	100.0%	100.0%
REFINANCE	Low	13	9.7%	\$1,121	4.0%	20.6%	6	14.3%	6.4%	\$465	6.0%	3.5%	3	5.8%	4.5%	\$405	3.2%	2.2%
	Moderate	23	17.2%	\$2,734	9.8%	17.6%	5	11.9%	12.5%	\$784	10.1%	8.0%	12	23.1%	11.1%	\$1,208	9.7%	6.8%
	Middle	20	14.9%	\$3,142	11.3%	21.8%	10	23.8%	17.9%	\$1,402	18.1%	13.7%	4	7.7%	16.2%	\$865	6.9%	12.5%
	Upper	62	46.3%	\$17,837	63.9%	40.1%	16	38.1%	36.8%	\$4,060	52.3%	48.4%	23	44.2%	38.9%	\$8,325	66.8%	49.2%
	Unknown	16	11.9%	\$3,073	11.0%	0.0%	5	11.9%	26.4%	\$1,046	13.5%	26.5%	10	19.2%	29.3%	\$1,663	13.3%	29.3%
	Total	134	100.0%	\$27,907	100.0%	100.0%	42	100.0%	100.0%	\$7,757	100.0%	100.0%	52	100.0%	100.0%	\$12,466	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	8.1%	\$0	0.0%	4.1%	0	0.0%	6.5%	\$0	0.0%	3.2%
	Moderate	5	45.5%	\$372	49.3%	17.6%	2	66.7%	16.2%	\$228	59.1%	9.3%	2	28.6%	16.2%	\$135	37.5%	11.9%
	Middle	1	9.1%	\$5	0.7%	21.8%	0	0.0%	23.0%	\$0	0.0%	16.7%	1	14.3%	22.5%	\$5	1.4%	17.2%
	Upper	5	45.5%	\$378	50.1%	40.1%	1	33.3%	44.0%	\$158	40.9%	60.9%	4	57.1%	48.9%	\$220	61.1%	58.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.8%	\$0	0.0%	9.0%	0	0.0%	5.9%	\$0	0.0%	9.7%
	Total	11	100.0%	\$755	100.0%	100.0%	3	100.0%	100.0%	\$386	100.0%	100.0%	7	100.0%	100.0%	\$360	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	36	8.4%	\$3,182	3.2%	20.6%	13	7.6%	5.7%	\$1,007	2.7%	2.4%	17	10.0%	4.9%	\$1,770	4.2%	2.0%
	Moderate	83	19.3%	\$10,761	10.9%	17.6%	32	18.8%	15.0%	\$4,298	11.3%	8.9%	30	17.6%	14.4%	\$3,320	7.9%	8.5%
	Middle	59	13.7%	\$9,792	9.9%	21.8%	23	13.5%	20.0%	\$3,148	8.3%	15.6%	24	14.1%	19.5%	\$4,763	11.4%	15.6%
	Upper	191	44.4%	\$59,320	59.9%	40.1%	72	42.4%	40.4%	\$20,429	53.9%	51.1%	71	41.8%	40.7%	\$25,874	61.7%	51.0%
	Unknown	61	14.2%	\$15,953	16.1%	0.0%	30	17.6%	18.8%	\$9,032	23.8%	22.1%	28	16.5%	20.5%	\$6,184	14.8%	22.8%
	Total	430	100.0%	\$99,008	100.0%	100.0%	170	100.0%	100.0%	\$37,914	100.0%	100.0%	170	100.0%	100.0%	\$41,911	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	119	45.2%	\$4,180	12.8%	94.3%	38	35.5%	49.9%	\$1,054	7.9%	32.6%	50	48.5%	54.0%	\$1,974	16.2%	35.6%
	Over \$1 Million	74	28.1%	\$22,472	69.0%	5.5%	27	25.2%				32	31.1%					
	Total Rev. available	193	73.3%	\$26,652	81.8%	99.8%	65	60.7%				82	79.6%					
	Rev. Not Known	70	26.6%	\$5,907	18.1%	0.1%	42	39.3%				21	20.4%					
Total	263	100.0%	\$32,559	100.0%	100.0%	107	100.0%				103	100.0%						
Small Business Loan Size	\$100,000 or Less	183	69.6%	\$6,294	19.3%		75	70.1%	94.2%	\$2,614	19.5%	38.4%	71	68.9%	94.7%	\$2,231	18.3%	42.0%
	\$100,001 - \$250,000	44	16.7%	\$7,246	22.3%		17	15.9%	2.7%	\$2,925	21.8%	14.3%	18	17.5%	2.6%	\$2,935	24.1%	13.6%
	\$250,001 - \$1 Million	36	13.7%	\$19,019	58.4%		15	14.0%	3.0%	\$7,869	58.7%	47.3%	14	13.6%	2.7%	\$7,005	57.6%	44.4%
	Total	263	100.0%	\$32,559	100.0%		107	100.0%	100.0%	\$13,408	100.0%	100.0%	103	100.0%	100.0%	\$12,171	100.0%	100.0%
	Total																	
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.8%	0	0.0%	41.8%	\$0	0.0%	33.4%	0	0.0%	45.5%	\$0	0.0%	33.1%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.2%	0	0.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	96.4%	\$0	0.0%	66.5%	0	0.0%	92.7%	\$0	0.0%	65.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.6%	\$0	0.0%	33.5%	0	0.0%	7.3%	\$0	0.0%	34.5%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total																	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: FL Lakeland

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Bank	Agg	Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%			%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.5%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	21	14.3%	\$1,809	7.8%	19.2%	12	15.0%	12.4%	\$837	7.2%	9.7%	5	11.4%	12.2%	\$481	6.9%	9.7%
	Middle	84	57.1%	\$11,510	49.5%	54.7%	44	55.0%	57.5%	\$4,969	42.9%	56.7%	26	59.1%	56.9%	\$3,699	53.1%	55.5%
	Upper	42	28.6%	\$9,948	42.8%	24.9%	24	30.0%	29.6%	\$5,767	49.8%	33.2%	13	29.5%	30.5%	\$2,789	40.0%	34.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	147	100.0%	\$23,267	100.0%	100.0%	80	100.0%	100.0%	\$11,573	100.0%	100.0%	44	100.0%	100.0%	\$6,969	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	8	12.3%	\$944	10.0%	19.2%	5	20.8%	12.2%	\$547	16.1%	10.9%	3	10.3%	11.1%	\$397	9.3%	8.7%
	Middle	31	47.7%	\$4,018	42.5%	54.7%	12	50.0%	52.0%	\$1,558	45.9%	48.0%	16	55.2%	52.5%	\$2,198	51.3%	50.0%
	Upper	26	40.0%	\$4,492	47.5%	24.9%	7	29.2%	35.2%	\$1,286	37.9%	40.7%	10	34.5%	36.1%	\$1,688	39.4%	41.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	65	100.0%	\$9,454	100.0%	100.0%	24	100.0%	100.0%	\$3,391	100.0%	100.0%	29	100.0%	100.0%	\$4,283	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.9%	\$0	0.0%	0.7%	0	0.0%	1.1%	\$0	0.0%	0.2%
	Moderate	2	16.7%	\$90	12.4%	19.2%	0	0.0%	18.5%	\$0	0.0%	8.0%	0	0.0%	18.0%	\$0	0.0%	12.4%
	Middle	5	41.7%	\$122	16.9%	54.7%	1	50.0%	50.8%	\$60	14.3%	51.1%	2	50.0%	51.8%	\$40	21.6%	48.2%
	Upper	5	41.7%	\$512	70.7%	24.9%	1	50.0%	29.7%	\$360	85.7%	40.2%	2	50.0%	29.1%	\$145	78.4%	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$724	100.0%	100.0%	2	100.0%	100.0%	\$420	100.0%	100.0%	4	100.0%	100.0%	\$185	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	11.1%	\$0	0.0%	18.0%	0	0.0%	18.9%	\$0	0.0%	11.7%
	Moderate	0	0.0%	\$0	0.0%	22.5%	0	0.0%	25.9%	\$0	0.0%	12.2%	0	0.0%	16.2%	\$0	0.0%	5.7%
	Middle	0	0.0%	\$0	0.0%	50.7%	0	0.0%	51.9%	\$0	0.0%	69.3%	0	0.0%	59.5%	\$0	0.0%	82.3%
	Upper	0	0.0%	\$0	0.0%	17.7%	0	0.0%	11.1%	\$0	0.0%	0.6%	0	0.0%	5.4%	\$0	0.0%	0.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.6%	\$0	0.0%	3.1%	0	0.0%	0.5%	\$0	0.0%	1.0%
	Moderate	31	13.8%	\$2,843	8.5%	19.2%	17	16.0%	12.7%	\$1,384	9.0%	10.3%	8	10.4%	12.2%	\$878	7.7%	9.2%
	Middle	120	53.6%	\$15,650	46.8%	54.7%	57	53.8%	55.7%	\$6,587	42.8%	56.6%	44	57.1%	55.5%	\$5,937	51.9%	55.8%
	Upper	73	32.6%	\$14,952	44.7%	24.9%	32	30.2%	31.0%	\$7,413	48.2%	30.0%	25	32.5%	31.9%	\$4,622	40.4%	33.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	224	100.0%	\$33,445	100.0%	100.0%	106	100.0%	100.0%	\$15,384	100.0%	100.0%	77	100.0%	100.0%	\$11,437	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	4.8%	\$0	0.0%	8.6%	0	0.0%	4.4%	\$0	0.0%	6.6%
	Moderate	21	18.9%	\$3,083	30.5%	19.4%	8	19.0%	20.0%	\$796	29.7%	18.0%	8	19.0%	19.2%	\$1,782	36.3%	20.1%
	Middle	55	49.5%	\$5,837	57.7%	49.8%	16	38.1%	47.6%	\$1,508	56.2%	48.9%	25	59.5%	49.8%	\$2,850	58.1%	51.8%
	Upper	35	31.5%	\$1,189	11.8%	26.8%	18	42.9%	24.2%	\$380	14.2%	22.1%	9	21.4%	23.9%	\$277	5.6%	19.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	2.4%	0	0.0%	2.7%	\$0	0.0%	2.0%
Total	111	100.0%	\$10,109	100.0%	100.0%	42	100.0%	100.0%	\$2,684	100.0%	100.0%	42	100.0%	100.0%	\$4,909	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	3.6%
	Moderate	0	0.0%	\$0	0.0%	23.0%	0	0.0%	25.3%	\$0	0.0%	16.4%	0	0.0%	22.1%	\$0	0.0%	26.3%
	Middle	1	100.0%	\$14	100.0%	49.7%	0	0.0%	46.7%	\$0	0.0%	46.6%	1	100.0%	42.1%	\$14	100.0%	30.2%
	Upper	0	0.0%	\$0	0.0%	24.7%	0	0.0%	22.7%	\$0	0.0%	26.6%	0	0.0%	28.4%	\$0	0.0%	34.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	10.4%	0	0.0%	5.3%	\$0	0.0%	5.1%
Total	1	100.0%	\$14	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$14	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL Lakeland

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income %	2014			2015									
		Count		Dollar			Bank	Agg	Dollar			Count		Dollar					
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	8	5.4%	\$482	2.1%	20.3%	6	7.5%	3.7%	\$305	2.6%	1.9%	2	4.5%	3.1%	\$177	2.5%	1.6%	
	Moderate	44	29.9%	\$3,956	17.0%	18.6%	29	36.3%	17.2%	\$2,395	20.7%	12.7%	11	25.0%	15.6%	\$1,059	15.2%	11.3%	
	Middle	28	19.0%	\$3,233	13.9%	20.8%	12	15.0%	22.0%	\$1,086	9.4%	20.5%	8	18.2%	23.5%	\$977	14.0%	21.2%	
	Upper	52	35.4%	\$12,280	52.8%	40.3%	27	33.8%	36.0%	\$6,504	56.2%	44.7%	16	36.4%	37.6%	\$3,493	50.1%	46.3%	
	Unknown	15	10.2%	\$3,316	14.3%	0.0%	6	7.5%	21.1%	\$1,283	11.1%	20.1%	7	15.9%	20.2%	\$1,263	18.1%	19.6%	
	Total	147	100.0%	\$23,267	100.0%	100.0%	80	100.0%	100.0%	\$11,573	100.0%	100.0%	44	100.0%	100.0%	\$6,969	100.0%	100.0%	
REFINANCE	Low	6	9.2%	\$600	6.3%	20.3%	4	16.7%	5.3%	\$383	11.3%	3.3%	2	6.9%	4.2%	\$217	5.1%	2.4%	
	Moderate	7	10.8%	\$745	7.9%	18.6%	3	12.5%	11.4%	\$377	11.1%	7.7%	3	10.3%	10.3%	\$252	5.9%	6.8%	
	Middle	17	26.2%	\$2,089	22.1%	20.8%	7	29.2%	17.3%	\$708	20.9%	13.8%	7	24.1%	16.9%	\$1,131	26.4%	13.8%	
	Upper	29	44.6%	\$4,976	52.6%	40.3%	8	33.3%	40.8%	\$1,516	44.7%	48.3%	15	51.7%	39.1%	\$2,439	56.9%	46.1%	
	Unknown	6	9.2%	\$1,044	11.0%	0.0%	2	8.3%	25.2%	\$407	12.0%	26.9%	2	6.9%	29.4%	\$244	5.7%	30.9%	
	Total	65	100.0%	\$9,454	100.0%	100.0%	24	100.0%	100.0%	\$3,391	100.0%	100.0%	29	100.0%	100.0%	\$4,283	100.0%	100.0%	
HOME IMPROVEMENT	Low	2	16.7%	\$90	12.4%	20.3%	0	0.0%	8.2%	\$0	0.0%	2.0%	0	0.0%	7.6%	\$0	0.0%	2.1%	
	Moderate	1	8.3%	\$12	1.7%	18.6%	0	0.0%	20.6%	\$0	0.0%	9.4%	0	0.0%	18.3%	\$0	0.0%	9.2%	
	Middle	3	25.0%	\$175	24.2%	20.8%	1	50.0%	25.5%	\$60	14.3%	22.2%	2	50.0%	20.4%	\$115	62.2%	20.4%	
	Upper	6	50.0%	\$447	61.7%	40.3%	1	50.0%	41.0%	\$360	85.7%	58.7%	2	50.0%	48.4%	\$70	37.8%	58.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.7%	\$0	0.0%	7.7%	0	0.0%	5.4%	\$0	0.0%	9.6%	
	Total	12	100.0%	\$724	100.0%	100.0%	2	100.0%	100.0%	\$420	100.0%	100.0%	4	100.0%	100.0%	\$185	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	16	7.1%	\$1,172	3.5%	20.3%	10	9.4%	4.3%	\$688	4.5%	1.9%	4	5.2%	3.6%	\$394	3.4%	1.7%	
	Moderate	52	23.2%	\$4,713	14.1%	18.6%	32	30.2%	15.8%	\$2,772	18.0%	9.6%	14	18.2%	14.3%	\$1,311	11.5%	9.4%	
	Middle	48	21.4%	\$5,497	16.4%	20.8%	20	18.9%	20.9%	\$1,854	12.1%	15.9%	17	22.1%	21.6%	\$2,223	19.4%	18.0%	
	Upper	87	38.8%	\$17,703	52.9%	40.3%	36	34.0%	37.4%	\$8,380	54.5%	38.9%	33	42.9%	38.4%	\$6,002	52.5%	43.4%	
	Unknown	21	9.4%	\$4,360	13.0%	0.0%	8	7.5%	21.5%	\$1,690	11.0%	33.7%	9	11.7%	22.1%	\$1,507	13.2%	27.5%	
	Total	224	100.0%	\$33,445	100.0%	100.0%	106	100.0%	100.0%	\$15,384	100.0%	100.0%	77	100.0%	100.0%	\$11,437	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	64	57.7%	\$3,682	36.4%	95.0%	23	54.8%	45.2%	\$725	27.0%	36.2%	20	47.6%	51.5%	\$961	19.6%	34.4%	
	Over \$1 Million	15	13.5%	\$3,647	36.1%	4.8%	5	11.9%					6	14.3%					
	Total Rev. available	79	71.2%	\$7,329	72.5%	99.8%	28	66.7%					26	61.9%					
	Rev. Not Known	32	28.8%	\$2,780	27.5%	0.2%	14	33.3%					16	38.1%					
	Total	111	100.0%	\$10,109	100.0%	100.0%	42	100.0%					42	100.0%					
Small Business Loan Size	\$100,000 or Less	95	85.6%	\$2,699	26.7%		38	90.5%	95.0%	\$1,078	40.2%	41.4%	34	81.0%	95.6%	\$858	17.5%	43.4%	
	\$100,001 - \$250,000	4	3.6%	\$605	6.0%		1	2.4%	2.6%	\$130	4.8%	15.2%	2	4.8%	2.3%	\$310	6.3%	14.5%	
	\$250,001 - \$1 Million	12	10.8%	\$6,805	67.3%		3	7.1%	2.4%	\$1,476	55.0%	43.3%	6	14.3%	2.1%	\$3,741	76.2%	42.1%	
	Total	111	100.0%	\$10,109	100.0%		42	100.0%	100.0%	\$2,684	100.0%	100.0%	42	100.0%	100.0%	\$4,909	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	1	100.0%	\$14	100.0%	91.7%	0	0.0%	53.3%	\$0	0.0%	48.2%	1	100.0%	66.3%	\$14	100.0%	72.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	8.3%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	1	100.0%	\$14	100.0%	100.0%	0	0.0%					1	100.0%						
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$14	100.0%		0	0.0%	70.7%	\$0	0.0%	16.3%	1	100.0%	71.6%	\$14	100.0%	19.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.3%	\$0	0.0%	33.9%	0	0.0%	13.7%	\$0	0.0%	26.6%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.0%	\$0	0.0%	49.8%	0	0.0%	14.7%	\$0	0.0%	54.4%	
	Total	1	100.0%	\$14	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$14	100.0%	100.0%	
	Origination & Purchases																		

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: FL Miami

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	2	0.5%	\$468	0.3%	2.1%	0	0.0%	1.3%	\$0	0.0%	0.9%	1	0.7%	1.3%	\$262	0.5%	0.9%
	Moderate	37	8.5%	\$6,925	4.3%	23.1%	14	7.7%	16.0%	\$2,186	3.3%	9.5%	14	9.5%	17.7%	\$3,239	6.0%	11.3%
	Middle	131	30.1%	\$34,689	21.7%	36.3%	47	26.0%	37.6%	\$11,921	18.1%	29.4%	48	32.4%	37.6%	\$12,844	23.7%	30.2%
	Upper	264	60.7%	\$117,559	73.4%	38.6%	119	65.7%	44.9%	\$51,358	77.9%	59.9%	85	57.4%	43.3%	\$37,814	69.8%	57.4%
	Unknown	1	0.2%	\$500	0.3%	0.0%	1	0.6%	0.2%	\$500	0.8%	0.3%	0	0.0%	0.2%	\$0	0.0%	0.2%
	<i>Total</i>	<i>435</i>	<i>100.0%</i>	<i>\$160,141</i>	<i>100.0%</i>	<i>100.0%</i>	<i>181</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$65,965</i>	<i>100.0%</i>	<i>100.0%</i>	<i>148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$54,159</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	0.4%	\$116	0.1%	2.1%	0	0.0%	1.1%	\$0	0.0%	1.1%	1	0.8%	0.9%	\$116	0.3%	0.5%
	Moderate	31	11.1%	\$6,482	6.4%	23.1%	11	12.5%	14.7%	\$1,986	8.4%	9.8%	12	10.0%	13.9%	\$2,653	7.2%	8.8%
	Middle	86	30.7%	\$15,627	15.5%	36.3%	30	34.1%	33.9%	\$4,827	20.3%	26.5%	37	30.8%	34.3%	\$6,437	17.4%	26.7%
	Upper	162	57.9%	\$78,578	78.0%	38.6%	47	53.4%	50.3%	\$16,944	71.3%	62.5%	70	58.3%	50.9%	\$27,791	75.1%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>280</i>	<i>100.0%</i>	<i>\$100,803</i>	<i>100.0%</i>	<i>100.0%</i>	<i>88</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,757</i>	<i>100.0%</i>	<i>100.0%</i>	<i>120</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$36,997</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.7%	\$0	0.0%	1.1%	0	0.0%	1.5%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	23.1%	0	0.0%	17.8%	\$0	0.0%	7.3%	0	0.0%	16.1%	\$0	0.0%	7.0%
	Middle	4	36.4%	\$1,760	56.5%	36.3%	2	40.0%	32.6%	\$1,210	62.1%	22.9%	0	0.0%	34.7%	\$0	0.0%	24.7%
	Upper	7	63.6%	\$1,355	43.5%	38.6%	3	60.0%	47.8%	\$739	37.9%	68.7%	3	100.0%	47.7%	\$221	100.0%	67.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$3,115</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,949</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$221</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	6.6%	0	0.0%	12.1%	\$0	0.0%	10.0%	0	0.0%	15.0%	\$0	0.0%	10.1%
	Moderate	0	0.0%	\$0	0.0%	31.9%	0	0.0%	43.0%	\$0	0.0%	33.4%	0	0.0%	38.8%	\$0	0.0%	32.2%
	Middle	0	0.0%	\$0	0.0%	35.8%	0	0.0%	27.8%	\$0	0.0%	39.2%	0	0.0%	28.1%	\$0	0.0%	37.9%
	Upper	1	100.0%	\$32,000	100.0%	25.6%	0	0.0%	17.0%	\$0	0.0%	17.3%	0	0.0%	18.1%	\$0	0.0%	19.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$32,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	3	0.4%	\$584	0.2%	2.1%	0	0.0%	1.3%	\$0	0.0%	1.5%	2	0.7%	1.2%	\$378	0.4%	1.4%
	Moderate	68	9.4%	\$13,407	4.5%	23.1%	25	9.1%	15.8%	\$4,172	4.6%	11.0%	26	9.6%	16.4%	\$5,892	6.4%	11.9%
	Middle	221	30.4%	\$52,076	17.6%	36.3%	79	28.8%	36.2%	\$17,958	19.6%	29.0%	85	31.4%	36.3%	\$19,281	21.1%	29.5%
	Upper	434	59.7%	\$229,492	77.5%	38.6%	169	61.7%	46.6%	\$69,041	75.3%	58.3%	158	58.3%	46.0%	\$65,826	72.0%	57.0%
	Unknown	1	0.1%	\$500	0.2%	0.0%	1	0.4%	0.2%	\$500	0.5%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.2%
	<i>Total</i>	<i>727</i>	<i>100.0%</i>	<i>\$296,059</i>	<i>100.0%</i>	<i>100.0%</i>	<i>274</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$91,671</i>	<i>100.0%</i>	<i>100.0%</i>	<i>271</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$91,377</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	16	4.7%	\$2,435	3.7%	3.3%	4	3.3%	3.4%	\$1,065	4.2%	4.7%	10	6.8%	3.4%	\$1,070	3.9%	4.5%
	Moderate	92	27.3%	\$21,590	32.8%	22.0%	34	27.6%	20.9%	\$7,955	31.1%	25.1%	41	27.7%	21.0%	\$10,285	37.6%	24.3%
	Middle	99	29.4%	\$13,293	20.2%	30.8%	34	27.6%	27.9%	\$5,378	21.0%	24.9%	42	28.4%	28.3%	\$4,949	18.1%	25.9%
	Upper	120	35.6%	\$24,917	37.8%	43.3%	48	39.0%	46.1%	\$10,163	39.7%	42.9%	51	34.5%	45.8%	\$9,992	36.5%	42.8%
	Unknown	10	3.0%	\$3,625	5.5%	0.6%	3	2.4%	1.0%	\$1,010	3.9%	1.8%	4	2.7%	1.0%	\$1,046	3.8%	2.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.5%	0	0.0%	0.6%	\$0	0.0%	0.5%
<i>Total</i>	<i>337</i>	<i>100.0%</i>	<i>\$65,860</i>	<i>100.0%</i>	<i>100.0%</i>	<i>123</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$25,571</i>	<i>100.0%</i>	<i>100.0%</i>	<i>148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$27,342</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	2.5%	\$0	0.0%	5.1%	0	0.0%	2.0%	\$0	0.0%	5.6%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	9.8%	\$0	0.0%	10.4%	0	0.0%	11.7%	\$0	0.0%	6.6%
	Middle	0	0.0%	\$0	0.0%	24.0%	0	0.0%	24.6%	\$0	0.0%	20.3%	0	0.0%	24.1%	\$0	0.0%	11.4%
	Upper	0	0.0%	\$0	0.0%	59.4%	0	0.0%	61.8%	\$0	0.0%	62.9%	0	0.0%	60.9%	\$0	0.0%	75.0%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	1.2%	0	0.0%	1.3%	\$0	0.0%	1.3%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL Miami

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014					2015							
		Bank		Families by Family Income			Count		Dollar			Count		Dollar					
		Count	Dollar	%	%	%	Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	6	1.4%	\$598	0.4%	22.4%	3	1.7%	2.4%	\$278	0.4%	0.8%	3	2.0%	2.1%	\$320	0.6%	0.8%	
	Moderate	40	9.2%	\$5,950	3.7%	17.3%	20	11.0%	12.1%	\$2,534	3.8%	5.8%	12	8.1%	11.6%	\$2,044	3.8%	6.0%	
	Middle	45	10.3%	\$8,979	5.6%	18.9%	16	8.8%	18.1%	\$3,278	5.0%	12.0%	20	13.5%	18.7%	\$4,247	7.8%	13.1%	
	Upper	290	66.7%	\$127,199	79.4%	41.3%	111	61.3%	51.8%	\$50,333	76.3%	65.2%	92	62.2%	49.6%	\$40,364	74.5%	62.3%	
	Unknown	54	12.4%	\$17,415	10.9%	0.0%	31	17.1%	15.6%	\$9,542	14.5%	16.2%	21	14.2%	17.9%	\$7,184	13.3%	17.9%	
	Total	435	100.0%	\$160,141	100.0%	100.0%	181	100.0%	100.0%	\$65,965	100.0%	100.0%	148	100.0%	100.0%	\$54,159	100.0%	100.0%	
REFINANCE	Low	7	2.5%	\$1,018	1.0%	22.4%	2	2.3%	5.3%	\$260	1.1%	2.4%	4	3.3%	3.5%	\$642	1.7%	1.6%	
	Moderate	23	8.2%	\$2,757	2.7%	17.3%	10	11.4%	9.3%	\$1,026	4.3%	4.6%	10	8.3%	8.4%	\$1,347	3.6%	4.3%	
	Middle	51	18.2%	\$8,910	8.8%	18.9%	17	19.3%	16.0%	\$3,100	13.0%	10.0%	19	15.8%	15.1%	\$3,053	8.3%	10.0%	
	Upper	167	59.6%	\$79,966	79.3%	41.3%	49	55.7%	52.4%	\$17,494	73.6%	62.3%	65	54.2%	50.1%	\$25,680	69.4%	61.7%	
	Unknown	32	11.4%	\$8,152	8.1%	0.0%	10	11.4%	17.0%	\$1,877	7.9%	20.7%	22	18.3%	22.9%	\$6,275	17.0%	22.4%	
	Total	280	100.0%	\$100,803	100.0%	100.0%	88	100.0%	100.0%	\$23,757	100.0%	100.0%	120	100.0%	100.0%	\$36,997	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.4%	0	0.0%	5.1%	\$0	0.0%	0.9%	0	0.0%	4.3%	\$0	0.0%	0.8%	
	Moderate	3	27.3%	\$236	7.6%	17.3%	2	40.0%	13.3%	\$124	6.4%	4.3%	1	33.3%	11.4%	\$112	50.7%	4.2%	
	Middle	1	9.1%	\$9	0.3%	18.9%	0	0.0%	17.6%	\$0	0.0%	9.5%	1	33.3%	18.6%	\$9	4.1%	10.6%	
	Upper	6	54.5%	\$1,670	53.6%	41.3%	2	40.0%	56.1%	\$625	32.1%	73.1%	1	33.3%	59.4%	\$100	45.2%	70.9%	
	Unknown	1	9.1%	\$1,200	38.5%	0.0%	1	20.0%	7.9%	\$1,200	61.6%	12.3%	0	0.0%	6.4%	\$0	0.0%	13.4%	
	Total	11	100.0%	\$3,115	100.0%	100.0%	5	100.0%	100.0%	\$1,949	100.0%	100.0%	3	100.0%	100.0%	\$221	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$32,000	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	1	100.0%	\$32,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	13	1.8%	\$1,616	0.5%	22.4%	5	1.8%	3.4%	\$538	0.6%	1.2%	7	2.6%	2.7%	\$962	1.1%	1.0%	
	Moderate	66	9.1%	\$8,943	3.0%	17.3%	32	11.7%	11.1%	\$3,684	4.0%	5.1%	23	8.5%	10.4%	\$3,503	3.8%	5.0%	
	Middle	97	13.3%	\$17,898	6.0%	18.9%	33	12.0%	17.3%	\$6,378	7.0%	10.7%	40	14.8%	17.4%	\$7,309	8.0%	11.2%	
	Upper	463	63.7%	\$208,835	70.5%	41.3%	162	59.1%	51.9%	\$68,452	74.7%	60.6%	158	58.3%	49.9%	\$66,144	72.4%	58.0%	
	Unknown	88	12.1%	\$58,767	19.8%	0.0%	42	15.3%	16.3%	\$12,619	13.8%	22.4%	43	15.9%	19.6%	\$13,459	14.7%	24.8%	
	Total	727	100.0%	\$296,059	100.0%	100.0%	274	100.0%	100.0%	\$91,671	100.0%	100.0%	271	100.0%	100.0%	\$91,377	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	146	43.3%	\$8,311	12.6%	94.4%	44	35.8%	51.7%	\$3,330	13.0%	32.4%	69	46.6%	57.4%	\$4,328	15.8%	34.9%	
	Over \$1 Million	122	36.2%	\$45,521	69.1%	5.5%	45	36.6%					56	37.8%					
	Total Rev. available	268	79.5%	\$53,832	81.7%	99.9%	89	72.4%					125	84.4%					
	Rev. Not Known	69	20.5%	\$12,028	18.3%	0.1%	34	27.6%					23	15.5%					
	Total	337	100.0%	\$65,860	100.0%	100.0%	123	100.0%					148	100.0%					
Small Business Loan Size	\$100,000 or Less	201	59.6%	\$6,120	9.3%		66	53.7%	96.0%	\$2,273	8.9%	44.3%	94	63.5%	96.4%	\$2,764	10.1%	47.1%	
	\$100,001 - \$250,000	44	13.1%	\$8,090	12.3%		21	17.1%	2.0%	\$3,654	14.3%	13.3%	16	10.8%	1.7%	\$3,036	11.1%	12.3%	
	\$250,001 - \$1 Million	92	27.3%	\$51,650	78.4%		36	29.3%	2.0%	\$19,644	76.8%	42.4%	38	25.7%	1.8%	\$21,542	78.8%	40.5%	
	Total	337	100.0%	\$65,860	100.0%		123	100.0%	100.0%	\$25,571	100.0%	100.0%	148	100.0%	100.0%	\$27,342	100.0%	100.0%	
	Small Farm Revenue	Total Farms																	
		\$1 Million or Less	0	0.0%	\$0	0.0%	93.9%	0	0.0%	50.2%	\$0	0.0%	50.6%	0	0.0%	53.8%	\$0	0.0%	48.6%
Over \$1 Million		0	0.0%	\$0	0.0%	6.1%	0	0.0%					0	0.0%					
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Small Farm Loan Size		\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	94.0%	\$0	0.0%	49.0%	0	0.0%	92.3%	\$0	0.0%	44.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	19.3%	0	0.0%	4.0%	\$0	0.0%	18.7%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.5%	\$0	0.0%	31.7%	0	0.0%	3.7%	\$0	0.0%	37.2%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: FL Naples

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	17	2.8%	\$3,593	2.0%	2.4%	0	0.0%	1.7%	\$0	0.0%	0.8%	12	4.3%	2.2%	\$2,574	3.2%	1.1%
	Moderate	114	18.4%	\$22,907	12.8%	16.4%	0	0.0%	15.2%	\$0	0.0%	10.1%	56	20.0%	15.0%	\$10,153	12.5%	10.8%
	Middle	289	46.8%	\$65,331	36.5%	46.0%	0	0.0%	48.4%	\$0	0.0%	37.2%	135	48.2%	51.8%	\$31,059	38.3%	41.2%
	Upper	198	32.0%	\$87,204	48.7%	35.2%	0	0.0%	34.7%	\$0	0.0%	51.8%	77	27.5%	31.1%	\$37,289	46.0%	47.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>618</i>	<i>100.0%</i>	<i>\$179,035</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>280</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$81,075</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	10	2.8%	\$1,113	1.0%	2.4%	2	20.0%	1.4%	\$150	16.4%	0.6%	6	3.1%	1.3%	\$691	1.3%	0.6%
	Moderate	59	16.5%	\$8,962	8.4%	16.4%	2	20.0%	13.3%	\$110	12.0%	9.1%	33	16.9%	13.0%	\$4,868	9.2%	8.2%
	Middle	178	49.7%	\$35,167	33.1%	46.0%	6	60.0%	49.7%	\$656	71.6%	37.7%	97	49.7%	51.6%	\$20,063	37.7%	40.3%
	Upper	111	31.0%	\$60,882	57.4%	35.2%	0	0.0%	35.7%	\$0	0.0%	52.6%	59	30.3%	34.1%	\$27,580	51.8%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>358</i>	<i>100.0%</i>	<i>\$106,124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$916</i>	<i>100.0%</i>	<i>100.0%</i>	<i>195</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$53,202</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	4.7%	\$0	0.0%	0.8%	0	0.0%	0.9%	\$0	0.0%	0.3%
	Moderate	3	14.3%	\$298	7.5%	16.4%	2	100.0%	12.2%	\$80	100.0%	6.8%	1	7.1%	15.4%	\$169	8.0%	8.2%
	Middle	16	76.2%	\$2,619	65.5%	46.0%	0	0.0%	52.8%	\$0	0.0%	38.0%	13	92.9%	59.3%	\$1,938	92.0%	35.5%
	Upper	2	9.5%	\$1,080	27.0%	35.2%	0	0.0%	30.3%	\$0	0.0%	54.4%	0	0.0%	24.5%	\$0	0.0%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$3,997</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$80</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,107</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	15.8%	\$0	0.0%	11.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$22,000	100.0%	13.8%	1	100.0%	21.1%	\$22,000	100.0%	52.2%	0	0.0%	45.8%	\$0	0.0%	47.1%
	Middle	0	0.0%	\$0	0.0%	39.5%	0	0.0%	36.8%	\$0	0.0%	32.8%	0	0.0%	20.8%	\$0	0.0%	42.3%
	Upper	0	0.0%	\$0	0.0%	43.7%	0	0.0%	26.3%	\$0	0.0%	3.6%	0	0.0%	33.3%	\$0	0.0%	10.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$22,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$22,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	27	2.7%	\$4,706	1.5%	2.4%	2	15.4%	1.8%	\$150	0.7%	1.0%	18	3.7%	1.9%	\$3,265	2.4%	0.9%
	Moderate	177	17.7%	\$54,167	17.4%	16.4%	5	38.5%	14.7%	\$22,190	96.5%	10.6%	90	18.4%	14.4%	\$15,190	11.1%	11.2%
	Middle	483	48.4%	\$103,117	33.1%	46.0%	6	46.2%	48.8%	\$656	2.9%	37.3%	245	50.1%	51.9%	\$53,060	38.9%	40.9%
	Upper	311	31.2%	\$149,166	47.9%	35.2%	0	0.0%	34.8%	\$0	0.0%	51.2%	136	27.8%	31.8%	\$64,869	47.6%	47.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>998</i>	<i>100.0%</i>	<i>\$311,156</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$22,996</i>	<i>100.0%</i>	<i>100.0%</i>	<i>489</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$136,384</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	4	0.8%	\$61	0.2%	3.0%	0	0.0%	1.9%	\$0	0.0%	1.8%	2	1.1%	2.1%	\$17	0.1%	2.2%
	Moderate	49	10.1%	\$2,878	8.0%	13.4%	9	10.5%	10.8%	\$602	9.2%	10.1%	19	10.2%	10.6%	\$1,297	8.7%	8.7%
	Middle	209	43.2%	\$12,549	34.7%	43.5%	40	46.5%	41.5%	\$1,316	20.1%	41.0%	83	44.4%	41.5%	\$5,578	37.6%	40.7%
	Upper	222	45.9%	\$20,636	57.1%	40.1%	37	43.0%	44.7%	\$4,645	70.8%	46.4%	83	44.4%	45.0%	\$7,942	53.5%	47.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	0.8%	\$0	0.0%	0.5%
<i>Total</i>	<i>484</i>	<i>100.0%</i>	<i>\$36,124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,563</i>	<i>100.0%</i>	<i>100.0%</i>	<i>187</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,834</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	8.7%	0	0.0%	23.1%	\$0	0.0%	21.1%	0	0.0%	31.0%	\$0	0.0%	8.3%
	Moderate	0	0.0%	\$0	0.0%	15.4%	0	0.0%	15.4%	\$0	0.0%	5.9%	0	0.0%	13.8%	\$0	0.0%	6.3%
	Middle	0	0.0%	\$0	0.0%	51.3%	0	0.0%	42.3%	\$0	0.0%	62.6%	0	0.0%	37.9%	\$0	0.0%	54.7%
	Upper	1	100.0%	\$18	100.0%	24.6%	0	0.0%	15.4%	\$0	0.0%	8.3%	0	0.0%	10.3%	\$0	0.0%	28.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.8%	\$0	0.0%	2.1%	0	0.0%	6.9%	\$0	0.0%	1.7%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL Naples

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014					2015							
		Bank		Families by Family Income	Count		Dollar			Count		Dollar							
		#	%		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %				
HOME PURCHASE	Low	40	6.5%	\$5,623	3.1%	21.1%	0	0.0%	2.1%	\$0	0.0%	0.7%	25	8.9%	2.4%	\$3,991	4.9%	0.9%	
	Moderate	125	20.2%	\$19,411	10.8%	18.3%	0	0.0%	9.7%	\$0	0.0%	4.4%	70	25.0%	11.3%	\$10,877	13.4%	5.6%	
	Middle	85	13.8%	\$15,321	8.6%	19.0%	0	0.0%	13.3%	\$0	0.0%	7.6%	30	10.7%	13.5%	\$5,170	6.4%	8.5%	
	Upper	301	48.7%	\$121,428	67.8%	41.5%	0	0.0%	60.9%	\$0	0.0%	75.1%	112	40.0%	57.5%	\$50,205	61.9%	72.3%	
	Unknown	67	10.8%	\$17,252	9.6%	0.0%	0	0.0%	14.0%	\$0	0.0%	12.3%	43	15.4%	15.3%	\$10,832	13.4%	12.8%	
	Total	618	100.0%	\$179,035	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	280	100.0%	100.0%	\$81,075	100.0%	100.0%	
REFINANCE	Low	43	12.0%	\$5,709	5.4%	21.1%	2	20.0%	4.8%	\$110	12.0%	2.0%	24	12.3%	4.3%	\$3,295	6.2%	1.7%	
	Moderate	74	20.7%	\$9,919	9.3%	18.3%	0	0.0%	11.3%	\$0	0.0%	5.3%	48	24.6%	11.3%	\$6,377	12.0%	5.5%	
	Middle	46	12.8%	\$6,874	6.5%	19.0%	6	60.0%	16.5%	\$486	53.1%	9.7%	23	11.8%	16.2%	\$3,860	7.3%	10.1%	
	Upper	162	45.3%	\$74,310	70.0%	41.5%	2	20.0%	54.7%	\$320	34.9%	70.0%	77	39.5%	51.3%	\$32,841	61.7%	66.6%	
	Unknown	33	9.2%	\$9,312	8.8%	0.0%	0	0.0%	12.8%	\$0	0.0%	13.1%	23	11.8%	16.9%	\$6,829	12.8%	16.1%	
	Total	358	100.0%	\$106,124	100.0%	100.0%	10	100.0%	100.0%	\$916	100.0%	100.0%	195	100.0%	100.0%	\$53,202	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	4.8%	\$158	4.0%	21.1%	0	0.0%	5.1%	\$0	0.0%	1.0%	1	7.1%	5.1%	\$158	7.5%	0.9%	
	Moderate	8	38.1%	\$1,051	26.3%	18.3%	0	0.0%	18.1%	\$0	0.0%	5.8%	7	50.0%	16.2%	\$962	45.7%	6.8%	
	Middle	6	28.6%	\$648	16.2%	19.0%	2	100.0%	22.4%	\$80	100.0%	12.7%	3	21.4%	23.4%	\$428	20.3%	10.8%	
	Upper	5	23.8%	\$1,820	45.5%	41.5%	0	0.0%	47.2%	\$0	0.0%	72.4%	3	21.4%	48.7%	\$559	26.5%	47.8%	
	Unknown	1	4.8%	\$320	8.0%	0.0%	0	0.0%	7.1%	\$0	0.0%	8.1%	0	0.0%	6.6%	\$0	0.0%	33.7%	
	Total	21	100.0%	\$3,997	100.0%	100.0%	2	100.0%	100.0%	\$80	100.0%	100.0%	14	100.0%	100.0%	\$2,107	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$22,000	100.0%	0.0%	1	100.0%	100.0%	\$22,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	1	100.0%	\$22,000	100.0%	100.0%	1	100.0%	100.0%	\$22,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	84	8.4%	\$11,490	3.7%	21.1%	2	15.4%	2.8%	\$110	0.5%	1.0%	50	10.2%	3.1%	\$7,444	5.5%	1.1%	
	Moderate	207	20.7%	\$30,381	9.8%	18.3%	0	0.0%	10.3%	\$0	0.0%	4.6%	125	25.6%	11.4%	\$18,216	13.4%	5.4%	
	Middle	137	13.7%	\$22,843	7.3%	19.0%	8	61.5%	14.3%	\$566	2.5%	8.0%	56	11.5%	14.6%	\$9,458	6.9%	8.7%	
	Upper	468	46.9%	\$197,558	63.5%	41.5%	2	15.4%	58.9%	\$320	1.4%	72.5%	192	39.3%	55.2%	\$83,605	61.3%	68.0%	
	Unknown	102	10.2%	\$48,884	15.7%	0.0%	1	7.7%	13.7%	\$22,000	95.7%	14.0%	66	13.5%	15.7%	\$17,661	12.9%	16.8%	
	Total	998	100.0%	\$311,156	100.0%	100.0%	13	100.0%	100.0%	\$22,996	100.0%	100.0%	489	100.0%	100.0%	\$136,384	100.0%	100.0%	
Small Business		Total Businesses																	
	Revenue	\$1 Million or Less	310	64.0%	\$8,611	23.8%	95.0%	64	74.4%	49.3%	\$1,836	28.0%	37.1%	117	62.6%	54.2%	\$2,977	20.1%	41.2%
		Over \$1 Million	74	15.3%	\$17,449	48.3%	4.8%	12	14.0%				34	18.2%					
		Total Rev. available	384	79.3%	\$26,060	72.1%	99.8%	76	88.4%				151	80.8%					
		Rev. Not Known	100	20.7%	\$10,064	27.9%	0.2%	10	11.6%				36	19.3%					
		Total	484	100.0%	\$36,124	100.0%	100.0%	86	100.0%				187	100.0%					
	Loan Size	\$100,000 or Less	404	83.5%	\$9,431	26.1%		72	83.7%	94.8%	\$1,681	25.6%	38.3%	154	82.4%	95.5%	\$3,650	24.6%	43.5%
		\$100,001 - \$250,000	43	8.9%	\$8,599	23.8%		6	7.0%	2.7%	\$1,125	17.1%	15.9%	19	10.2%	2.1%	\$3,784	25.5%	13.5%
		\$250,001 - \$1 Million	37	7.6%	\$18,094	50.1%		8	9.3%	2.5%	\$3,757	57.2%	45.7%	14	7.5%	2.4%	\$7,400	49.9%	43.0%
		Total	484	100.0%	\$36,124	100.0%		86	100.0%	100.0%	\$6,563	100.0%	100.0%	187	100.0%	100.0%	\$14,834	100.0%	100.0%
Small Farm		Total Farms																	
	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	90.7%	0	0.0%	65.4%	\$0	0.0%	71.9%	0	0.0%	69.0%	\$0	0.0%	77.1%
		Over \$1 Million	1	100.0%	\$18	100.0%	9.3%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	1	100.0%	\$18	100.0%	100.0%	0	0.0%				0	0.0%					
		Loan Size	\$100,000 or Less	1	100.0%	\$18	100.0%		0	0.0%	92.3%	\$0	0.0%	36.1%	0	0.0%	93.1%	\$0	0.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.8%	\$0	0.0%	14.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.8%	\$0	0.0%	49.7%	0	0.0%	6.9%	\$0	0.0%	62.4%
		Total	1	100.0%	\$18	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: FL North Port

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	2	0.4%	\$176	0.2%	1.0%	1	0.6%	0.3%	\$103	0.3%	0.1%	1	0.6%	0.3%	\$103	0.3%	0.1%
	Moderate	49	10.5%	\$5,662	5.9%	17.3%	22	12.4%	10.6%	\$2,776	8.6%	7.2%	22	12.4%	10.7%	\$2,776	8.6%	7.5%
	Middle	280	60.0%	\$46,639	48.7%	54.6%	112	62.9%	54.9%	\$17,929	55.4%	43.8%	112	62.9%	56.5%	\$17,929	55.4%	46.3%
	Upper	136	29.1%	\$43,204	45.2%	27.1%	43	24.2%	34.2%	\$11,544	35.7%	48.9%	43	24.2%	32.5%	\$11,544	35.7%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>467</i>	<i>100.0%</i>	<i>\$95,681</i>	<i>100.0%</i>	<i>100.0%</i>	<i>178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,352</i>	<i>100.0%</i>	<i>100.0%</i>	<i>178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,352</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	29	11.7%	\$5,658	9.9%	17.3%	15	17.4%	10.8%	\$2,009	9.7%	7.6%	15	17.4%	10.3%	\$2,009	9.7%	7.3%
	Middle	134	54.0%	\$21,662	38.0%	54.6%	44	51.2%	54.8%	\$6,160	29.9%	41.9%	44	51.2%	54.7%	\$6,160	29.9%	43.9%
	Upper	85	34.3%	\$29,678	52.1%	27.1%	27	31.4%	34.1%	\$12,463	60.4%	50.3%	27	31.4%	34.7%	\$12,463	60.4%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>248</i>	<i>100.0%</i>	<i>\$56,998</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,632</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,632</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	3.0%	\$5	0.2%	1.0%	0	0.0%	0.7%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.1%
	Moderate	8	24.2%	\$625	26.0%	17.3%	3	20.0%	16.9%	\$295	29.0%	8.7%	3	20.0%	15.1%	\$295	29.0%	8.7%
	Middle	19	57.6%	\$1,149	47.9%	54.6%	9	60.0%	54.4%	\$487	47.8%	44.3%	9	60.0%	57.7%	\$487	47.8%	42.9%
	Upper	5	15.2%	\$621	25.9%	27.1%	3	20.0%	28.0%	\$236	23.2%	46.8%	3	20.0%	26.6%	\$236	23.2%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>33</i>	<i>100.0%</i>	<i>\$2,400</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,018</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,018</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	5.3%	\$0	0.0%	0.5%	0	0.0%	1.8%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	34.2%	\$0	0.0%	19.4%	0	0.0%	42.9%	\$0	0.0%	25.0%
	Middle	0	0.0%	\$0	0.0%	43.4%	0	0.0%	36.8%	\$0	0.0%	46.8%	0	0.0%	30.4%	\$0	0.0%	44.2%
	Upper	0	0.0%	\$0	0.0%	37.3%	0	0.0%	23.7%	\$0	0.0%	33.3%	0	0.0%	25.0%	\$0	0.0%	30.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	3	0.4%	\$181	0.1%	1.0%	1	0.4%	0.3%	\$103	0.2%	0.1%	1	0.4%	0.3%	\$103	0.2%	0.1%
	Moderate	86	11.5%	\$11,945	7.7%	17.3%	40	14.3%	10.9%	\$5,080	9.4%	8.0%	40	14.3%	10.8%	\$5,080	9.4%	8.4%
	Middle	433	57.9%	\$69,450	44.8%	54.6%	165	59.1%	54.8%	\$24,576	45.5%	43.5%	165	59.1%	55.9%	\$24,576	45.5%	45.4%
	Upper	226	30.2%	\$73,503	47.4%	27.1%	73	26.2%	33.9%	\$24,243	44.9%	48.3%	73	26.2%	33.0%	\$24,243	44.9%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>748</i>	<i>100.0%</i>	<i>\$155,079</i>	<i>100.0%</i>	<i>100.0%</i>	<i>279</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$54,002</i>	<i>100.0%</i>	<i>100.0%</i>	<i>279</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$54,002</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	9	2.0%	\$2,013	4.0%	1.2%	4	2.1%	1.2%	\$472	2.0%	1.6%	4	2.1%	1.3%	\$472	2.0%	2.0%
	Moderate	70	15.8%	\$11,032	22.1%	17.3%	29	15.2%	17.2%	\$5,631	23.4%	20.9%	29	15.2%	17.2%	\$5,631	23.4%	21.8%
	Middle	178	40.3%	\$18,264	36.5%	50.3%	73	38.2%	45.1%	\$9,036	37.5%	40.1%	73	38.2%	45.5%	\$9,036	37.5%	39.4%
	Upper	185	41.9%	\$18,671	37.4%	31.3%	85	44.5%	35.2%	\$8,946	37.1%	36.6%	85	44.5%	35.1%	\$8,946	37.1%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.8%	0	0.0%	1.0%	\$0	0.0%	0.8%
<i>Total</i>	<i>442</i>	<i>100.0%</i>	<i>\$49,980</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$24,085</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$24,085</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.4%	0	0.0%	6.6%	\$0	0.0%	1.5%	0	0.0%	3.8%	\$0	0.0%	2.4%
	Middle	1	100.0%	\$10	100.0%	43.7%	1	100.0%	39.5%	\$10	100.0%	36.0%	1	100.0%	39.2%	\$10	100.0%	43.5%
	Upper	0	0.0%	\$0	0.0%	48.0%	0	0.0%	51.3%	\$0	0.0%	60.6%	0	0.0%	55.7%	\$0	0.0%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	1.9%	0	0.0%	1.3%	\$0	0.0%	0.3%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: FL North Port

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	2	0.4%	\$176	0.2%	1.0%	1	0.6%	0.3%	\$103	0.3%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	49	10.5%	\$5,662	5.9%	17.3%	22	12.4%	10.6%	\$2,776	8.6%	7.2%	13	7.1%	10.7%	\$1,509	3.7%	7.5%
	Middle	280	60.0%	\$46,639	48.7%	54.6%	112	62.9%	54.9%	\$17,929	55.4%	43.8%	108	59.3%	56.5%	\$18,303	44.6%	46.3%
	Upper	136	29.1%	\$43,204	45.2%	27.1%	43	24.2%	34.2%	\$11,544	35.7%	48.9%	61	33.5%	32.5%	\$21,211	51.7%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>467</i>	<i>100.0%</i>	<i>\$95,681</i>	<i>100.0%</i>	<i>100.0%</i>	<i>178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,352</i>	<i>100.0%</i>	<i>100.0%</i>	<i>182</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$41,023</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	29	11.7%	\$5,658	9.9%	17.3%	15	17.4%	10.8%	\$2,009	9.7%	7.6%	9	8.0%	10.3%	\$2,540	9.6%	7.3%
	Middle	134	54.0%	\$21,662	38.0%	54.6%	44	51.2%	54.8%	\$6,160	29.9%	41.9%	63	55.8%	54.7%	\$10,815	40.8%	43.9%
	Upper	85	34.3%	\$29,678	52.1%	27.1%	27	31.4%	34.1%	\$12,463	60.4%	50.3%	41	36.3%	34.7%	\$13,176	49.7%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>248</i>	<i>100.0%</i>	<i>\$56,998</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,632</i>	<i>100.0%</i>	<i>100.0%</i>	<i>113</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26,531</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	3.0%	\$5	0.2%	1.0%	0	0.0%	0.7%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.1%
	Moderate	8	24.2%	\$625	26.0%	17.3%	3	20.0%	16.9%	\$295	29.0%	8.7%	4	40.0%	15.1%	\$320	35.8%	8.7%
	Middle	19	57.6%	\$1,149	47.9%	54.6%	9	60.0%	54.4%	\$487	47.8%	44.3%	6	60.0%	57.7%	\$573	64.2%	42.9%
	Upper	5	15.2%	\$621	25.9%	27.1%	3	20.0%	28.0%	\$236	23.2%	46.8%	0	0.0%	26.6%	\$0	0.0%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>33</i>	<i>100.0%</i>	<i>\$2,400</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,018</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$893</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	5.3%	\$0	0.0%	0.5%	0	0.0%	1.8%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	34.2%	\$0	0.0%	19.4%	0	0.0%	42.9%	\$0	0.0%	25.0%
	Middle	0	0.0%	\$0	0.0%	43.4%	0	0.0%	36.8%	\$0	0.0%	46.8%	0	0.0%	30.4%	\$0	0.0%	44.2%
	Upper	0	0.0%	\$0	0.0%	37.3%	0	0.0%	23.7%	\$0	0.0%	33.3%	0	0.0%	25.0%	\$0	0.0%	30.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	3	0.4%	\$181	0.1%	1.0%	1	0.4%	0.3%	\$103	0.2%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	86	11.5%	\$11,945	7.7%	17.3%	40	14.3%	10.9%	\$5,080	9.4%	8.0%	26	8.5%	10.8%	\$4,369	6.4%	8.4%
	Middle	433	57.9%	\$69,450	44.8%	54.6%	165	59.1%	54.8%	\$24,576	45.5%	43.5%	177	58.0%	55.9%	\$29,691	43.4%	45.4%
	Upper	226	30.2%	\$73,503	47.4%	27.1%	73	26.2%	33.9%	\$24,243	44.9%	48.3%	102	33.4%	33.0%	\$34,387	50.2%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>748</i>	<i>100.0%</i>	<i>\$155,079</i>	<i>100.0%</i>	<i>100.0%</i>	<i>279</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$54,002</i>	<i>100.0%</i>	<i>100.0%</i>	<i>305</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$68,447</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	9	2.0%	\$2,013	4.0%	1.2%	4	2.1%	1.2%	\$472	2.0%	1.6%	4	2.4%	1.3%	\$1,141	6.4%	2.0%
	Moderate	70	15.8%	\$11,032	22.1%	17.3%	29	15.2%	17.2%	\$5,631	23.4%	20.9%	32	19.3%	17.2%	\$4,804	27.0%	21.8%
	Middle	178	40.3%	\$18,264	36.5%	50.3%	73	38.2%	45.1%	\$9,036	37.5%	40.1%	68	41.0%	45.5%	\$6,057	34.0%	39.4%
	Upper	185	41.9%	\$18,671	37.4%	31.3%	85	44.5%	35.2%	\$8,946	37.1%	36.6%	62	37.3%	35.1%	\$5,803	32.6%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.8%	0	0.0%	1.0%	\$0	0.0%	0.8%
<i>Total</i>	<i>442</i>	<i>100.0%</i>	<i>\$49,980</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$24,085</i>	<i>100.0%</i>	<i>100.0%</i>	<i>166</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,805</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.4%	0	0.0%	6.6%	\$0	0.0%	1.5%	0	0.0%	3.8%	\$0	0.0%	2.4%
	Middle	1	100.0%	\$10	100.0%	43.7%	1	100.0%	39.5%	\$10	100.0%	36.0%	0	0.0%	39.2%	\$0	0.0%	43.5%
	Upper	0	0.0%	\$0	0.0%	48.0%	0	0.0%	51.3%	\$0	0.0%	60.6%	0	0.0%	55.7%	\$0	0.0%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	1.9%	0	0.0%	1.3%	\$0	0.0%	0.3%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL North Port

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		Families by Family Income			Count		Dollar				Count		Dollar				
		Count	Dollar		%	%	Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %			
HOME PURCHASE	Low	29	6.2%	\$2,485	2.6%	18.9%	16	9.0%	3.3%	\$1,275	3.9%	1.3%	8	4.4%	4.7%	\$865	2.1%	2.0%	
	Moderate	69	14.8%	\$8,443	8.8%	19.2%	28	15.7%	12.8%	\$3,239	10.0%	7.2%	22	12.1%	14.2%	\$2,660	6.5%	8.3%	
	Middle	99	21.2%	\$14,339	15.0%	21.8%	31	17.4%	18.4%	\$3,771	11.7%	13.6%	45	24.7%	19.5%	\$7,234	17.6%	15.2%	
	Upper	249	53.3%	\$65,942	68.9%	40.1%	92	51.7%	52.5%	\$22,452	69.4%	65.9%	99	54.4%	48.7%	\$28,062	68.4%	62.2%	
	Unknown	21	4.5%	\$4,472	4.7%	0.0%	11	6.2%	13.0%	\$1,615	5.0%	12.0%	8	4.4%	12.9%	\$2,202	5.4%	12.3%	
	Total	467	100.0%	\$95,681	100.0%	100.0%	178	100.0%	100.0%	\$32,352	100.0%	100.0%	182	100.0%	100.0%	\$41,023	100.0%	100.0%	
REFINANCE	Low	17	6.9%	\$1,996	3.5%	18.9%	5	5.8%	6.7%	\$393	1.9%	3.4%	10	8.8%	6.0%	\$1,378	5.2%	2.9%	
	Moderate	45	18.1%	\$5,842	10.2%	19.2%	14	16.3%	12.8%	\$1,508	7.3%	7.3%	24	21.2%	12.7%	\$3,356	12.6%	7.6%	
	Middle	56	22.6%	\$7,021	12.3%	21.8%	18	20.9%	19.8%	\$1,924	9.3%	14.4%	21	18.6%	19.6%	\$2,728	10.3%	14.8%	
	Upper	116	46.8%	\$39,205	68.8%	40.1%	40	46.5%	45.3%	\$15,184	73.6%	58.6%	53	46.9%	42.4%	\$17,758	66.9%	54.8%	
	Unknown	14	5.6%	\$2,934	5.1%	0.0%	9	10.5%	15.4%	\$1,623	7.9%	16.3%	5	4.4%	19.2%	\$1,311	4.9%	20.0%	
	Total	248	100.0%	\$56,998	100.0%	100.0%	86	100.0%	100.0%	\$20,632	100.0%	100.0%	113	100.0%	100.0%	\$26,531	100.0%	100.0%	
HOME IMPROVEMENT	Low	3	9.1%	\$74	3.1%	18.9%	0	0.0%	7.8%	\$0	0.0%	2.0%	2	20.0%	7.6%	\$9	1.0%	2.4%	
	Moderate	8	24.2%	\$187	7.8%	19.2%	6	40.0%	19.2%	\$139	13.7%	8.5%	1	10.0%	18.8%	\$43	4.8%	10.3%	
	Middle	12	36.4%	\$679	28.3%	21.8%	4	26.7%	20.1%	\$203	19.9%	16.8%	4	40.0%	25.0%	\$442	49.5%	18.5%	
	Upper	10	30.3%	\$1,460	60.8%	40.1%	5	33.3%	47.0%	\$676	66.4%	65.1%	3	30.0%	44.3%	\$399	44.7%	62.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.0%	\$0	0.0%	7.6%	0	0.0%	4.3%	\$0	0.0%	6.0%	
	Total	33	100.0%	\$2,400	100.0%	100.0%	15	100.0%	100.0%	\$1,018	100.0%	100.0%	10	100.0%	100.0%	\$893	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	49	6.6%	\$4,555	2.9%	18.9%	21	7.5%	4.4%	\$1,668	3.1%	1.8%	20	6.6%	5.2%	\$2,252	3.3%	2.1%	
	Moderate	122	16.3%	\$14,472	9.3%	19.2%	48	17.2%	13.0%	\$4,886	9.0%	6.8%	47	15.4%	13.9%	\$6,059	8.9%	7.7%	
	Middle	167	22.3%	\$22,039	14.2%	21.8%	53	19.0%	18.8%	\$5,898	10.9%	13.0%	70	23.0%	19.7%	\$10,404	15.2%	14.3%	
	Upper	375	50.1%	\$106,607	68.7%	40.1%	137	49.1%	50.3%	\$38,312	70.9%	60.2%	155	50.8%	46.5%	\$46,219	67.5%	56.9%	
	Unknown	35	4.7%	\$7,406	4.8%	0.0%	20	7.2%	13.5%	\$3,238	6.0%	18.2%	13	4.3%	14.7%	\$3,513	5.1%	18.9%	
	Total	748	100.0%	\$155,079	100.0%	100.0%	279	100.0%	100.0%	\$54,002	100.0%	100.0%	305	100.0%	100.0%	\$68,447	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	256	57.9%	\$7,206	14.4%	95.7%	110	57.6%	50.1%	\$3,514	14.6%	36.2%	90	54.2%	55.4%	\$2,126	11.9%	38.0%	
	Over \$1 Million	118	26.7%	\$35,934	71.9%	4.2%	46	24.1%					51	30.7%					
	Total Rev. available	374	84.6%	\$43,140	86.3%	99.9%	156	81.7%					141	84.9%					
	Rev. Not Known	68	15.4%	\$6,840	13.7%	0.1%	35	18.3%					25	15.1%					
	Total	442	100.0%	\$49,980	100.0%	100.0%	191	100.0%					166	100.0%					
Small Business Loan Size	\$100,000 or Less	339	76.7%	\$8,963	17.9%		141	73.8%	95.1%	\$3,739	15.5%	40.2%	129	77.7%	95.4%	\$3,371	18.9%	40.8%	
	\$100,001 - \$250,000	48	10.9%	\$9,467	18.9%		23	12.0%	2.4%	\$4,579	19.0%	15.6%	17	10.2%	2.3%	\$3,204	18.0%	14.3%	
	\$250,001 - \$1 Million	55	12.4%	\$31,550	63.1%		27	14.1%	2.4%	\$15,767	65.5%	44.2%	20	12.0%	2.4%	\$11,230	63.1%	45.0%	
	Total	442	100.0%	\$49,980	100.0%		191	100.0%	100.0%	\$24,085	100.0%	100.0%	166	100.0%	100.0%	\$17,805	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	1	100.0%	\$10	100.0%	93.6%	1	100.0%	52.6%	\$10	100.0%	39.5%	0	0.0%	62.0%	\$0	0.0%	43.5%	
Over \$1 Million	0	0.0%	\$0	0.0%	6.4%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	1	100.0%	\$10	100.0%	100.0%	1	100.0%					0	0.0%						
\$100,000 or Less	1	100.0%	\$10	100.0%		1	100.0%	93.4%	\$10	100.0%	46.2%	0	0.0%	91.1%	\$0	0.0%	44.1%		
\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	40.2%	0	0.0%	6.3%	\$0	0.0%	31.5%		
\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	13.6%	0	0.0%	2.5%	\$0	0.0%	24.4%		
Total	1	100.0%	\$10	100.0%		1	100.0%	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IL Carbondale

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	9.4%	\$104	2.9%	14.3%	3	15.0%	15.1%	\$104	4.7%	11.5%	0	0.0%	14.2%	\$0	0.0%	11.7%
	Middle	19	59.4%	\$2,309	63.9%	58.9%	12	60.0%	50.8%	\$1,402	64.0%	48.8%	4	50.0%	52.3%	\$439	53.3%	49.6%
	Upper	10	31.3%	\$1,203	33.3%	26.8%	5	25.0%	34.1%	\$686	31.3%	39.7%	4	50.0%	33.5%	\$385	46.7%	38.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	32	100.0%	\$3,616	100.0%	100.0%	20	100.0%	100.0%	\$2,192	100.0%	100.0%	8	100.0%	100.0%	\$824	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	7.4%	\$393	14.3%	14.3%	1	6.7%	12.7%	\$375	21.9%	9.8%	1	10.0%	9.4%	\$18	2.4%	26.8%
	Middle	16	59.3%	\$1,310	47.7%	58.9%	8	53.3%	54.5%	\$655	38.2%	55.1%	7	70.0%	59.3%	\$489	65.3%	44.5%
	Upper	9	33.3%	\$1,045	38.0%	26.8%	6	40.0%	32.8%	\$683	39.9%	35.2%	2	20.0%	31.4%	\$242	32.3%	28.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	27	100.0%	\$2,748	100.0%	100.0%	15	100.0%	100.0%	\$1,713	100.0%	100.0%	10	100.0%	100.0%	\$749	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	17.6%	\$165	18.9%	14.3%	0	0.0%	14.1%	\$0	0.0%	22.5%	1	12.5%	8.5%	\$73	19.8%	7.0%
	Middle	10	58.8%	\$531	60.8%	58.9%	1	50.0%	60.9%	\$75	78.9%	51.5%	5	62.5%	59.4%	\$165	44.8%	57.0%
	Upper	4	23.5%	\$177	20.3%	26.8%	1	50.0%	25.0%	\$20	21.1%	26.0%	2	25.0%	32.1%	\$130	35.3%	36.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	17	100.0%	\$873	100.0%	100.0%	2	100.0%	100.0%	\$95	100.0%	100.0%	8	100.0%	100.0%	\$368	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	53.5%	0	0.0%	50.0%	\$0	0.0%	92.9%	0	0.0%	60.0%	\$0	0.0%	63.5%
	Middle	0	0.0%	\$0	0.0%	28.2%	0	0.0%	20.0%	\$0	0.0%	2.2%	0	0.0%	30.0%	\$0	0.0%	30.0%
	Upper	0	0.0%	\$0	0.0%	18.4%	0	0.0%	30.0%	\$0	0.0%	4.9%	0	0.0%	10.0%	\$0	0.0%	6.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	8	10.5%	\$662	9.1%	14.3%	4	10.8%	14.5%	\$479	12.0%	16.3%	2	7.7%	12.4%	\$91	4.7%	18.9%
	Middle	45	59.2%	\$4,150	57.3%	58.9%	21	56.8%	52.5%	\$2,132	53.3%	48.0%	16	61.5%	55.1%	\$1,093	56.3%	47.4%
	Upper	23	30.3%	\$2,425	33.5%	26.8%	12	32.4%	33.0%	\$1,389	34.7%	35.7%	8	30.8%	32.5%	\$757	39.0%	33.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	76	100.0%	\$7,237	100.0%	100.0%	37	100.0%	100.0%	\$4,000	100.0%	100.0%	26	100.0%	100.0%	\$1,941	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	25.0%	\$69	35.8%	34.8%	3	42.9%	34.6%	\$24	63.2%	56.7%	2	20.0%	32.9%	\$45	33.6%	43.3%
	Middle	11	55.0%	\$88	45.6%	42.1%	4	57.1%	38.5%	\$14	36.8%	24.5%	6	60.0%	38.4%	\$68	50.7%	33.7%
	Upper	4	20.0%	\$36	18.7%	23.1%	0	0.0%	22.6%	\$0	0.0%	17.7%	2	20.0%	27.1%	\$21	15.7%	22.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.3%	\$0	0.0%	1.0%	0	0.0%	1.6%	\$0	0.0%	0.4%
<i>Total</i>	20	100.0%	\$193	100.0%	100.0%	7	100.0%	100.0%	\$38	100.0%	100.0%	10	100.0%	100.0%	\$134	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.2%	0	0.0%	3.3%	\$0	0.0%	2.2%	0	0.0%	6.5%	\$0	0.0%	4.1%
	Middle	0	0.0%	\$0	0.0%	68.1%	0	0.0%	70.0%	\$0	0.0%	82.3%	0	0.0%	89.1%	\$0	0.0%	93.6%
	Upper	0	0.0%	\$0	0.0%	28.7%	0	0.0%	26.7%	\$0	0.0%	15.5%	0	0.0%	2.2%	\$0	0.0%	2.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	0.1%
<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: IL Carbondale

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014				2015							
		Bank		by Family Income		Count	Count	Dollar			Count	Dollar			Count	Dollar		
#	%	\$ (000s)	%	%	\$ (000s)			%	%	#		%	%	\$ (000s)		%	%	
HOME PURCHASE	Low	2	6.3%	\$102	2.8%	21.0%	2	10.0%	4.4%	\$102	4.7%	2.3%	0	0.0%	5.2%	\$0	0.0%	2.3%
	Moderate	9	28.1%	\$645	17.8%	17.8%	7	35.0%	17.0%	\$517	23.6%	11.8%	2	25.0%	16.3%	\$128	15.5%	11.1%
	Middle	9	28.1%	\$963	26.6%	20.1%	3	15.0%	23.0%	\$335	15.3%	20.8%	4	50.0%	22.8%	\$425	51.6%	19.9%
	Upper	12	37.5%	\$1,906	52.7%	41.1%	8	40.0%	38.8%	\$1,238	56.5%	51.2%	2	25.0%	42.2%	\$271	32.9%	55.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	13.9%	0	0.0%	13.5%	\$0	0.0%	10.9%
	Total	32	100.0%	\$3,616	100.0%	100.0%	20	100.0%	100.0%	\$2,192	100.0%	100.0%	8	100.0%	100.0%	\$824	100.0%	100.0%
REFINANCE	Low	2	7.4%	\$118	4.3%	21.0%	1	6.7%	5.1%	\$62	3.6%	1.8%	1	10.0%	5.1%	\$56	7.5%	2.2%
	Moderate	4	14.8%	\$202	7.4%	17.8%	2	13.3%	14.0%	\$134	7.8%	9.4%	2	20.0%	13.4%	\$68	9.1%	5.8%
	Middle	4	14.8%	\$258	9.4%	20.1%	2	13.3%	20.5%	\$154	9.0%	18.5%	2	20.0%	19.3%	\$104	13.9%	11.9%
	Upper	17	63.0%	\$2,170	79.0%	41.1%	10	66.7%	49.0%	\$1,363	79.6%	57.1%	5	50.0%	48.3%	\$521	69.6%	46.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.4%	\$0	0.0%	13.3%	0	0.0%	13.9%	\$0	0.0%	34.2%
	Total	27	100.0%	\$2,748	100.0%	100.0%	15	100.0%	100.0%	\$1,713	100.0%	100.0%	10	100.0%	100.0%	\$749	100.0%	100.0%
HOME IMPROVEMENT	Low	1	5.9%	\$60	6.9%	21.0%	0	0.0%	7.6%	\$0	0.0%	2.5%	1	12.5%	5.7%	\$60	16.3%	3.1%
	Moderate	3	17.6%	\$134	15.3%	17.8%	0	0.0%	21.7%	\$0	0.0%	15.7%	1	12.5%	16.0%	\$50	13.6%	10.3%
	Middle	3	17.6%	\$195	22.3%	20.1%	0	0.0%	10.9%	\$0	0.0%	6.8%	2	25.0%	25.5%	\$129	35.1%	20.7%
	Upper	10	58.8%	\$484	55.4%	41.1%	2	100.0%	46.7%	\$95	100.0%	56.9%	4	50.0%	51.9%	\$129	35.1%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	18.2%	0	0.0%	0.9%	\$0	0.0%	1.8%
	Total	17	100.0%	\$873	100.0%	100.0%	2	100.0%	100.0%	\$95	100.0%	100.0%	8	100.0%	100.0%	\$368	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	6.6%	\$280	3.9%	21.0%	3	8.1%	4.8%	\$164	4.1%	2.0%	2	7.7%	5.2%	\$116	6.0%	2.2%
	Moderate	16	21.1%	\$981	13.6%	17.8%	9	24.3%	16.2%	\$651	16.3%	10.3%	5	19.2%	15.1%	\$246	12.7%	8.6%
	Middle	16	21.1%	\$1,416	19.6%	20.1%	5	13.5%	21.2%	\$489	12.2%	18.4%	8	30.8%	21.6%	\$658	33.9%	16.2%
	Upper	39	51.3%	\$4,560	63.0%	41.1%	20	54.1%	42.5%	\$2,696	67.4%	50.1%	11	42.3%	44.8%	\$921	47.4%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.3%	\$0	0.0%	19.2%	0	0.0%	13.4%	\$0	0.0%	22.1%
	Total	76	100.0%	\$7,237	100.0%	100.0%	37	100.0%	100.0%	\$4,000	100.0%	100.0%	26	100.0%	100.0%	\$1,941	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	17	85.0%	\$176	91.2%	91.2%	5	71.4%	34.6%	\$26	68.4%	41.5%	9	90.0%	46.2%	\$129	96.3%	46.6%
	Over \$1 Million	3	15.0%	\$17	8.8%	7.9%	2	28.6%					1	10.0%				
	Total Rev. available	20	100.0%	\$193	100.0%	99.1%	7	100.0%					10	100.0%				
	Rev. Not Known	0	0.0%	\$0	0.0%	0.9%	0	0.0%					0	0.0%				
	Total	20	100.0%	\$193	100.0%	100.0%	7	100.0%					10	100.0%				
Small Business Loan Size	\$100,000 or Less	20	100.0%	\$193	100.0%		7	100.0%	91.5%	\$38	100.0%	29.2%	10	100.0%	89.2%	\$134	100.0%	30.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.3%	\$0	0.0%	19.0%	0	0.0%	6.0%	\$0	0.0%	22.5%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	4.2%	\$0	0.0%	51.9%	0	0.0%	4.7%	\$0	0.0%	47.4%
	Total	20	100.0%	\$193	100.0%		7	100.0%	100.0%	\$38	100.0%	100.0%	10	100.0%	100.0%	\$134	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	66.7%	\$0	0.0%	44.3%	0	0.0%	69.6%	\$0	0.0%	72.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.0%	\$0	0.0%	34.2%	0	0.0%	78.3%	\$0	0.0%	35.8%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	13.3%	\$0	0.0%	30.7%	0	0.0%	17.4%	\$0	0.0%	43.5%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.7%	\$0	0.0%	35.0%	0	0.0%	4.3%	\$0	0.0%	20.8%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IL Northern IL

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	11.2%	\$0	0.0%	7.0%	0	0.0%	8.9%	\$0	0.0%	5.5%
	Middle	16	64.0%	\$1,802	65.6%	61.2%	7	70.0%	65.8%	\$707	64.9%	64.2%	8	61.5%	65.6%	\$1,019	70.6%	63.3%
	Upper	9	36.0%	\$945	34.4%	26.0%	3	30.0%	22.8%	\$382	35.1%	28.5%	5	38.5%	25.1%	\$425	29.4%	30.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	25	100.0%	\$2,747	100.0%	100.0%	10	100.0%	100.0%	\$1,089	100.0%	100.0%	13	100.0%	100.0%	\$1,444	100.0%	100.0%
REFINANCE	Low	1	2.0%	\$35	0.9%	1.1%	1	7.7%	0.3%	\$35	3.3%	0.2%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	3	6.0%	\$143	3.6%	11.8%	1	7.7%	7.1%	\$33	3.1%	3.9%	1	4.5%	7.6%	\$57	3.3%	3.7%
	Middle	26	52.0%	\$1,947	48.8%	61.2%	7	53.8%	60.9%	\$436	41.1%	56.9%	12	54.5%	61.6%	\$877	50.1%	62.9%
	Upper	20	40.0%	\$1,867	46.8%	26.0%	4	30.8%	31.6%	\$556	52.5%	39.0%	9	40.9%	30.1%	\$818	46.7%	33.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	50	100.0%	\$3,992	100.0%	100.0%	13	100.0%	100.0%	\$1,060	100.0%	100.0%	22	100.0%	100.0%	\$1,752	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	3.1%	\$0	0.0%	0.5%	0	0.0%	0.7%	\$0	0.0%	0.0%
	Moderate	5	33.3%	\$226	36.1%	11.8%	2	28.6%	7.6%	\$96	34.8%	7.6%	2	40.0%	12.3%	\$108	40.8%	7.3%
	Middle	7	46.7%	\$249	39.8%	61.2%	4	57.1%	67.9%	\$175	63.4%	62.3%	2	40.0%	57.5%	\$49	18.5%	53.2%
	Upper	3	20.0%	\$151	24.1%	26.0%	1	14.3%	21.4%	\$5	1.8%	29.6%	1	20.0%	29.5%	\$108	40.8%	39.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$626	100.0%	100.0%	7	100.0%	100.0%	\$276	100.0%	100.0%	5	100.0%	100.0%	\$265	100.0%	100.0%
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	20.0%	\$0	0.0%	0.9%
	Middle	0	0.0%	\$0	0.0%	57.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	60.0%	\$0	0.0%	98.5%
	Upper	0	0.0%	\$0	0.0%	24.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	20.0%	\$0	0.0%	0.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	1.1%	\$35	0.5%	1.1%	1	3.3%	0.4%	\$35	1.4%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	8	8.9%	\$369	5.0%	11.8%	3	10.0%	9.6%	\$129	5.3%	16.2%	3	7.5%	8.7%	\$165	4.8%	4.5%
	Middle	49	54.4%	\$3,998	54.3%	61.2%	18	60.0%	64.1%	\$1,318	54.4%	54.5%	22	55.0%	63.5%	\$1,945	56.2%	65.4%
	Upper	32	35.6%	\$2,963	40.2%	26.0%	8	26.7%	25.8%	\$943	38.9%	29.1%	15	37.5%	27.4%	\$1,351	39.0%	29.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	90	100.0%	\$7,365	100.0%	100.0%	30	100.0%	100.0%	\$2,425	100.0%	100.0%	40	100.0%	100.0%	\$3,461	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	1	2.6%	\$313	18.6%	1.1%	1	5.6%	0.9%	\$313	36.8%	1.0%	0	0.0%	0.9%	\$0	0.0%	0.7%
	Moderate	8	21.1%	\$81	4.8%	15.5%	4	22.2%	13.8%	\$55	6.5%	16.5%	4	23.5%	12.3%	\$26	6.9%	8.9%
	Middle	14	36.8%	\$488	29.0%	59.1%	7	38.9%	54.0%	\$297	34.9%	47.2%	5	29.4%	56.1%	\$131	34.6%	45.0%
	Upper	15	39.5%	\$803	47.7%	24.3%	6	33.3%	27.7%	\$186	21.9%	33.9%	8	47.1%	27.3%	\$222	58.6%	44.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.6%	\$0	0.0%	1.3%	0	0.0%	3.4%	\$0	0.0%	1.1%
Total	38	100.0%	\$1,685	100.0%	100.0%	18	100.0%	100.0%	\$851	100.0%	100.0%	17	100.0%	100.0%	\$379	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.5%	\$0	0.0%	0.7%	0	0.0%	0.5%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	0.9%	0	0.0%	1.6%	\$0	0.0%	4.7%	0	0.0%	2.0%	\$0	0.0%	2.5%
	Middle	0	0.0%	\$0	0.0%	64.9%	0	0.0%	56.6%	\$0	0.0%	45.8%	0	0.0%	67.2%	\$0	0.0%	68.2%
	Upper	0	0.0%	\$0	0.0%	34.1%	0	0.0%	40.7%	\$0	0.0%	48.5%	0	0.0%	29.3%	\$0	0.0%	28.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	1.0%	\$0	0.0%	0.3%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IL Rockford

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	1.3%	\$0	0.0%	0.7%	0	0.0%	1.8%	\$0	0.0%	1.0%
	Moderate	4	6.8%	\$253	3.6%	19.2%	3	13.6%	15.8%	\$153	7.1%	9.7%	1	4.3%	14.6%	\$100	3.6%	9.0%
	Middle	31	52.5%	\$3,574	51.5%	45.6%	8	36.4%	47.0%	\$834	38.5%	43.6%	14	60.9%	48.1%	\$1,567	56.2%	45.2%
	Upper	24	40.7%	\$3,119	44.9%	31.2%	11	50.0%	35.9%	\$1,179	54.4%	46.0%	8	34.8%	35.5%	\$1,121	40.2%	44.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	59	100.0%	\$6,946	100.0%	100.0%	22	100.0%	100.0%	\$2,166	100.0%	100.0%	23	100.0%	100.0%	\$2,788	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.6%	\$0	0.0%	1.2%	0	0.0%	1.2%	\$0	0.0%	0.5%
	Moderate	11	24.4%	\$1,041	22.0%	19.2%	6	26.1%	17.3%	\$502	24.1%	12.9%	4	26.7%	12.9%	\$427	24.5%	8.0%
	Middle	16	35.6%	\$1,408	29.7%	45.6%	10	43.5%	47.2%	\$849	40.8%	44.1%	4	26.7%	47.5%	\$396	22.7%	45.0%
	Upper	18	40.0%	\$2,293	48.4%	31.2%	7	30.4%	32.8%	\$730	35.1%	41.8%	7	46.7%	38.5%	\$921	52.8%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	45	100.0%	\$4,742	100.0%	100.0%	23	100.0%	100.0%	\$2,081	100.0%	100.0%	15	100.0%	100.0%	\$1,744	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.6%	\$0	0.0%	1.7%	0	0.0%	2.3%	\$0	0.0%	2.8%
	Moderate	1	25.0%	\$12	9.2%	19.2%	1	50.0%	17.4%	\$12	12.9%	9.0%	0	0.0%	16.9%	\$0	0.0%	14.6%
	Middle	1	25.0%	\$81	62.3%	45.6%	1	50.0%	48.6%	\$81	87.1%	45.4%	0	0.0%	49.8%	\$0	0.0%	45.5%
	Upper	2	50.0%	\$37	28.5%	31.2%	0	0.0%	31.4%	\$0	0.0%	43.9%	2	100.0%	31.1%	\$37	100.0%	37.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$130	100.0%	100.0%	2	100.0%	100.0%	\$93	100.0%	100.0%	2	100.0%	100.0%	\$37	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	12.7%	0	0.0%	4.4%	\$0	0.0%	2.3%	0	0.0%	6.7%	\$0	0.0%	6.5%
	Moderate	0	0.0%	\$0	0.0%	38.5%	0	0.0%	46.7%	\$0	0.0%	22.4%	0	0.0%	26.7%	\$0	0.0%	19.3%
	Middle	0	0.0%	\$0	0.0%	36.4%	0	0.0%	42.2%	\$0	0.0%	56.5%	0	0.0%	55.6%	\$0	0.0%	59.3%
	Upper	0	0.0%	\$0	0.0%	12.5%	0	0.0%	6.7%	\$0	0.0%	18.7%	0	0.0%	11.1%	\$0	0.0%	14.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	1.9%	\$0	0.0%	1.0%	0	0.0%	1.6%	\$0	0.0%	1.1%
	Moderate	16	14.8%	\$1,306	11.1%	19.2%	10	21.3%	16.6%	\$667	15.4%	11.4%	5	12.5%	14.2%	\$527	11.5%	9.1%
	Middle	48	44.4%	\$5,063	42.8%	45.6%	19	40.4%	47.1%	\$1,764	40.6%	44.3%	18	45.0%	48.0%	\$1,963	43.0%	45.8%
	Upper	44	40.7%	\$5,449	46.1%	31.2%	18	38.3%	34.3%	\$1,909	44.0%	43.3%	17	42.5%	36.2%	\$2,079	45.5%	44.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	108	100.0%	\$11,818	100.0%	100.0%	47	100.0%	100.0%	\$4,340	100.0%	100.0%	40	100.0%	100.0%	\$4,569	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	1	2.4%	\$25	0.7%	6.2%	0	0.0%	6.0%	\$0	0.0%	6.2%	1	5.0%	5.4%	\$25	2.2%	6.0%
	Moderate	8	19.5%	\$747	21.4%	19.6%	2	11.8%	17.3%	\$392	18.6%	19.5%	4	20.0%	16.6%	\$140	12.3%	22.8%
	Middle	21	51.2%	\$1,576	45.2%	45.7%	11	64.7%	43.8%	\$874	41.5%	47.0%	10	50.0%	46.0%	\$702	61.6%	45.9%
	Upper	11	26.8%	\$1,137	32.6%	28.3%	4	23.5%	31.1%	\$842	39.9%	26.1%	5	25.0%	30.2%	\$272	23.9%	23.8%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	1.1%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.9%	0	0.0%	1.3%	\$0	0.0%	0.5%
Total	41	100.0%	\$3,485	100.0%	100.0%	17	100.0%	100.0%	\$2,108	100.0%	100.0%	20	100.0%	100.0%	\$1,139	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.2%
	Middle	0	0.0%	\$0	0.0%	59.5%	0	0.0%	57.7%	\$0	0.0%	68.9%	0	0.0%	56.9%	\$0	0.0%	61.0%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	42.3%	\$0	0.0%	31.1%	0	0.0%	42.2%	\$0	0.0%	38.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IN Bloomington

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014				2015							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	0.9%	\$192	1.1%	2.0%	1	2.0%	1.6%	\$192	2.6%	1.6%	0	0.0%	2.1%	\$0	0.0%	1.5%
	Moderate	16	14.4%	\$1,797	10.4%	13.3%	7	14.0%	14.0%	\$816	10.9%	10.0%	5	15.6%	12.5%	\$458	8.1%	8.8%
	Middle	59	53.2%	\$8,698	50.3%	57.4%	26	52.0%	48.0%	\$3,414	45.6%	45.6%	18	56.3%	51.4%	\$3,258	57.9%	49.8%
	Upper	35	31.5%	\$6,619	38.2%	27.3%	16	32.0%	36.4%	\$3,067	41.0%	42.8%	9	28.1%	33.9%	\$1,909	33.9%	40.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>111</i>	<i>100.0%</i>	<i>\$17,306</i>	<i>100.0%</i>	<i>100.0%</i>	<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,489</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,625</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	3	3.4%	\$1,136	10.9%	2.0%	1	2.8%	2.1%	\$79	2.2%	1.7%	2	5.3%	2.2%	\$1,057	20.5%	2.3%
	Moderate	8	9.0%	\$764	7.4%	13.3%	2	5.6%	10.7%	\$229	6.5%	8.1%	3	7.9%	11.7%	\$276	5.4%	8.5%
	Middle	47	52.8%	\$5,189	50.0%	57.4%	20	55.6%	60.5%	\$2,036	57.7%	59.0%	19	50.0%	55.0%	\$2,126	41.2%	49.9%
	Upper	31	34.8%	\$3,288	31.7%	27.3%	13	36.1%	26.7%	\$1,182	33.5%	31.2%	14	36.8%	31.0%	\$1,699	32.9%	39.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>89</i>	<i>100.0%</i>	<i>\$10,377</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,526</i>	<i>100.0%</i>	<i>100.0%</i>	<i>38</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,158</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	3.1%	\$0	0.0%	4.6%	0	0.0%	1.8%	\$0	0.0%	1.6%
	Moderate	2	18.2%	\$30	8.1%	13.3%	2	50.0%	8.7%	\$30	66.7%	3.9%	0	0.0%	10.4%	\$0	0.0%	5.4%
	Middle	6	54.5%	\$61	16.4%	57.4%	2	50.0%	61.2%	\$15	33.3%	54.9%	2	40.0%	60.0%	\$10	3.4%	50.5%
	Upper	3	27.3%	\$281	75.5%	27.3%	0	0.0%	26.9%	\$0	0.0%	36.7%	3	60.0%	27.8%	\$281	96.6%	42.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$372</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$291</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.7%	0	0.0%	13.3%	\$0	0.0%	53.3%	0	0.0%	11.1%	\$0	0.0%	14.0%
	Moderate	0	0.0%	\$0	0.0%	25.3%	0	0.0%	20.0%	\$0	0.0%	8.1%	0	0.0%	14.8%	\$0	0.0%	3.7%
	Middle	0	0.0%	\$0	0.0%	34.3%	0	0.0%	46.7%	\$0	0.0%	25.7%	0	0.0%	51.9%	\$0	0.0%	59.4%
	Upper	0	0.0%	\$0	0.0%	23.7%	0	0.0%	20.0%	\$0	0.0%	12.9%	0	0.0%	22.2%	\$0	0.0%	22.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	4	1.9%	\$1,328	4.7%	2.0%	2	2.2%	1.9%	\$271	2.5%	7.9%	2	2.7%	2.2%	\$1,057	9.5%	3.4%
	Moderate	26	12.3%	\$2,591	9.2%	13.3%	11	12.2%	12.5%	\$1,075	9.7%	9.0%	8	10.7%	12.1%	\$734	6.6%	7.9%
	Middle	112	53.1%	\$13,948	49.7%	57.4%	48	53.3%	53.2%	\$5,465	49.4%	47.3%	39	52.0%	53.4%	\$5,394	48.7%	51.1%
	Upper	69	32.7%	\$10,188	36.3%	27.3%	29	32.2%	32.4%	\$4,249	38.4%	35.8%	26	34.7%	32.3%	\$3,889	35.1%	37.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>211</i>	<i>100.0%</i>	<i>\$28,055</i>	<i>100.0%</i>	<i>100.0%</i>	<i>90</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,060</i>	<i>100.0%</i>	<i>100.0%</i>	<i>75</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,074</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	1	1.5%	\$25	0.5%	6.3%	1	3.2%	5.5%	\$25	1.6%	6.1%	0	0.0%	5.4%	\$0	0.0%	4.2%
	Moderate	8	11.9%	\$1,089	19.7%	12.5%	6	19.4%	12.0%	\$147	9.4%	17.1%	1	3.8%	13.1%	\$927	30.3%	19.7%
	Middle	30	44.8%	\$1,570	28.4%	56.3%	10	32.3%	50.9%	\$351	22.5%	48.1%	15	57.7%	52.2%	\$1,141	37.3%	45.2%
	Upper	28	41.8%	\$2,843	51.4%	24.9%	14	45.2%	28.6%	\$1,040	66.5%	28.1%	10	38.5%	27.5%	\$990	32.4%	30.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	0.7%	0	0.0%	1.8%	\$0	0.0%	0.5%
<i>Total</i>	<i>67</i>	<i>100.0%</i>	<i>\$5,527</i>	<i>100.0%</i>	<i>100.0%</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,563</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,058</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.1%	0	0.0%	7.3%	\$0	0.0%	15.6%	0	0.0%	2.4%	\$0	0.0%	2.8%
	Middle	2	66.7%	\$26	24.5%	83.8%	0	0.0%	85.4%	\$0	0.0%	82.2%	1	50.0%	90.5%	\$13	14.0%	93.8%
	Upper	1	33.3%	\$80	75.5%	10.7%	0	0.0%	7.3%	\$0	0.0%	2.2%	1	50.0%	7.1%	\$80	86.0%	3.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$93</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: IN Bloomington

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Families by Family Income	Count	Agg	Dollar	Count	Agg	Dollar	Count	Agg	Dollar	Count	Agg	Dollar		
		Count	Dollar														Bank	Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	11	9.9%	\$929	5.4%	20.8%	3	6.0%	6.4%	\$322	4.3%	3.3%	2	6.3%	6.6%	\$120	2.1%	3.4%
	Moderate	25	22.5%	\$2,771	16.0%	17.5%	12	24.0%	18.7%	\$1,144	15.3%	13.2%	6	18.8%	17.3%	\$654	11.6%	12.0%
	Middle	30	27.0%	\$4,128	23.9%	21.3%	13	26.0%	19.4%	\$1,770	23.6%	17.2%	10	31.3%	19.3%	\$1,470	26.1%	16.8%
	Upper	41	36.9%	\$8,947	51.7%	40.4%	20	40.0%	33.3%	\$3,974	53.1%	43.5%	14	43.8%	36.5%	\$3,381	60.1%	47.6%
	Unknown	4	3.6%	\$531	3.1%	0.0%	2	4.0%	22.2%	\$279	3.7%	22.9%	0	0.0%	20.3%	\$0	0.0%	20.2%
	Total	111	100.0%	\$17,306	100.0%	100.0%	50	100.0%	100.0%	\$7,489	100.0%	100.0%	32	100.0%	100.0%	\$5,625	100.0%	100.0%
REFINANCE	Low	14	15.7%	\$1,137	11.0%	20.8%	5	13.9%	9.9%	\$429	12.2%	5.7%	8	21.1%	6.7%	\$588	11.4%	3.8%
	Moderate	19	21.3%	\$1,757	16.9%	17.5%	6	16.7%	15.0%	\$579	16.4%	10.2%	8	21.1%	16.2%	\$641	12.4%	10.3%
	Middle	23	25.8%	\$2,289	22.1%	21.3%	12	33.3%	18.6%	\$1,224	34.7%	16.1%	7	18.4%	17.6%	\$735	14.2%	13.3%
	Upper	28	31.5%	\$4,634	44.7%	40.4%	10	27.8%	34.0%	\$1,022	29.0%	42.3%	13	34.2%	39.6%	\$2,906	56.3%	51.2%
	Unknown	5	5.6%	\$560	5.4%	0.0%	3	8.3%	22.6%	\$272	7.7%	25.7%	2	5.3%	19.9%	\$288	5.6%	21.4%
	Total	89	100.0%	\$10,377	100.0%	100.0%	36	100.0%	100.0%	\$3,526	100.0%	100.0%	38	100.0%	100.0%	\$5,158	100.0%	100.0%
HOME IMPROVEMENT	Low	1	9.1%	\$25	6.7%	20.8%	1	25.0%	8.0%	\$25	55.6%	2.8%	0	0.0%	8.4%	\$0	0.0%	2.1%
	Moderate	6	54.5%	\$171	46.0%	17.5%	2	50.0%	21.7%	\$15	33.3%	15.1%	3	60.0%	24.5%	\$126	43.3%	11.8%
	Middle	2	18.2%	\$10	2.7%	21.3%	1	25.0%	24.1%	\$5	11.1%	14.4%	1	20.0%	17.6%	\$5	1.7%	13.4%
	Upper	2	18.2%	\$166	44.6%	40.4%	0	0.0%	37.4%	\$0	0.0%	57.3%	1	20.0%	43.3%	\$160	55.0%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.7%	\$0	0.0%	10.4%	0	0.0%	6.3%	\$0	0.0%	19.6%
	Total	11	100.0%	\$372	100.0%	100.0%	4	100.0%	100.0%	\$45	100.0%	100.0%	5	100.0%	100.0%	\$291	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	26	12.3%	\$2,091	7.5%	20.8%	9	10.0%	7.7%	\$776	7.0%	3.5%	10	13.3%	6.8%	\$708	6.4%	3.0%
	Moderate	50	23.7%	\$4,699	16.7%	17.5%	20	22.2%	17.6%	\$1,738	15.7%	10.8%	17	22.7%	17.3%	\$1,421	12.8%	9.8%
	Middle	55	26.1%	\$6,427	22.9%	21.3%	26	28.9%	19.4%	\$2,999	27.1%	14.7%	18	24.0%	18.4%	\$2,210	20.0%	13.3%
	Upper	71	33.6%	\$13,747	49.0%	40.4%	30	33.3%	33.7%	\$4,996	45.2%	38.3%	28	37.3%	37.9%	\$6,447	58.2%	42.7%
	Unknown	9	4.3%	\$1,091	3.9%	0.0%	5	5.6%	21.6%	\$551	5.0%	32.6%	2	2.7%	19.6%	\$288	2.6%	31.1%
	Total	211	100.0%	\$28,055	100.0%	100.0%	90	100.0%	100.0%	\$11,060	100.0%	100.0%	75	100.0%	100.0%	\$11,074	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	45	67.2%	\$2,121	38.4%	92.5%	22	71.0%	34.1%	\$452	28.9%	34.0%	14	53.8%	39.9%	\$1,263	41.3%	36.0%
	Over \$1 Million	7	10.4%	\$1,915	34.6%	6.8%	1	3.2%					5	19.2%				
	Total Rev. available	52	77.6%	\$4,036	73.0%	99.3%	23	74.2%					19	73.0%				
	Rev. Not Known	15	22.4%	\$1,491	27.0%	0.7%	8	25.8%					7	26.9%				
	Total	67	100.0%	\$5,527	100.0%	100.0%	31	100.0%					26	100.0%				
Small Business Loan Size	\$100,000 or Less	57	85.1%	\$1,588	28.7%		28	90.3%	86.7%	\$663	42.4%	23.2%	21	80.8%	87.7%	\$719	23.5%	23.4%
	\$100,001 - \$250,000	5	7.5%	\$1,000	18.1%		2	6.5%	6.4%	\$400	25.6%	18.6%	2	7.7%	5.7%	\$400	13.1%	17.0%
	\$250,001 - \$1 Million	5	7.5%	\$2,939	53.2%		1	3.2%	6.9%	\$500	32.0%	58.1%	3	11.5%	6.6%	\$1,939	63.4%	59.6%
	Total	67	100.0%	\$5,527	100.0%		31	100.0%	100.0%	\$1,563	100.0%	100.0%	26	100.0%	100.0%	\$3,058	100.0%	100.0%
	Total Farms																	
Small Farm Revenue	\$1 Million or Less	3	100.0%	\$106	100.0%	99.2%	0	0.0%	65.9%	\$0	0.0%	74.6%	2	100.0%	83.3%	\$93	100.0%	97.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.8%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	3	100.0%	\$106	100.0%	100.0%	0	0.0%					2	100.0%				
	Total Farms																	
Small Farm Loan Size	\$100,000 or Less	3	100.0%	\$106	100.0%		0	0.0%	73.2%	\$0	0.0%	26.4%	2	100.0%	71.4%	\$93	100.0%	28.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	19.5%	\$0	0.0%	45.3%	0	0.0%	23.8%	\$0	0.0%	56.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.3%	\$0	0.0%	28.3%	0	0.0%	4.8%	\$0	0.0%	15.1%
	Total	3	100.0%	\$106	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$93	100.0%	100.0%
	Total Farms																	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IN Fort Wayne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	7	1.4%	\$299	0.4%	5.5%	2	1.0%	1.2%	\$74	0.3%	0.6%	3	1.5%	1.4%	\$138	0.5%	0.6%
	Moderate	66	13.2%	\$4,733	6.2%	21.9%	26	12.9%	16.2%	\$1,874	6.5%	10.2%	27	13.4%	15.1%	\$1,808	6.1%	8.5%
	Middle	156	31.3%	\$17,693	23.3%	37.3%	65	32.2%	38.3%	\$6,843	23.7%	31.1%	69	34.3%	39.0%	\$7,997	27.1%	35.2%
	Upper	270	54.1%	\$53,346	70.1%	35.3%	109	54.0%	44.3%	\$20,054	69.5%	58.0%	102	50.7%	44.5%	\$19,570	66.3%	55.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>499</i>	<i>100.0%</i>	<i>\$76,071</i>	<i>100.0%</i>	<i>100.0%</i>	<i>202</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$28,845</i>	<i>100.0%</i>	<i>100.0%</i>	<i>201</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,513</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	20	4.1%	\$749	1.5%	5.5%	9	5.1%	2.2%	\$389	2.2%	1.2%	9	4.0%	1.7%	\$315	1.3%	0.6%
	Moderate	86	17.5%	\$5,120	10.1%	21.9%	30	16.9%	18.2%	\$1,766	10.1%	12.4%	39	17.2%	14.0%	\$2,357	9.9%	8.6%
	Middle	186	37.9%	\$16,657	32.8%	37.3%	67	37.6%	37.7%	\$6,193	35.4%	32.9%	86	37.9%	36.8%	\$7,796	32.7%	30.6%
	Upper	199	40.5%	\$28,314	55.7%	35.3%	72	40.4%	41.9%	\$9,170	52.3%	53.5%	93	41.0%	47.5%	\$13,375	56.1%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>491</i>	<i>100.0%</i>	<i>\$50,840</i>	<i>100.0%</i>	<i>100.0%</i>	<i>178</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,518</i>	<i>100.0%</i>	<i>100.0%</i>	<i>227</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,843</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	4.2%	\$40	3.2%	5.5%	0	0.0%	4.7%	\$0	0.0%	2.5%	1	8.3%	4.1%	\$40	7.5%	1.5%
	Moderate	5	20.8%	\$230	18.3%	21.9%	3	30.0%	25.3%	\$125	21.2%	22.8%	2	16.7%	21.5%	\$105	19.7%	12.1%
	Middle	9	37.5%	\$504	40.1%	37.3%	4	40.0%	33.9%	\$253	42.9%	23.9%	3	25.0%	39.7%	\$118	22.1%	36.8%
	Upper	9	37.5%	\$483	38.4%	35.3%	3	30.0%	36.1%	\$212	35.9%	50.8%	6	50.0%	34.7%	\$271	50.7%	49.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$1,257</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$590</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$534</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	10.6%	0	0.0%	9.1%	\$0	0.0%	2.0%	0	0.0%	6.7%	\$0	0.0%	6.5%
	Moderate	0	0.0%	\$0	0.0%	54.8%	0	0.0%	36.4%	\$0	0.0%	66.0%	0	0.0%	53.3%	\$0	0.0%	41.4%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	36.4%	\$0	0.0%	9.5%	0	0.0%	26.7%	\$0	0.0%	19.7%
	Upper	0	0.0%	\$0	0.0%	11.3%	0	0.0%	18.2%	\$0	0.0%	22.5%	0	0.0%	13.3%	\$0	0.0%	32.4%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	28	2.8%	\$1,088	0.8%	5.5%	11	2.8%	1.7%	\$463	1.0%	0.9%	13	3.0%	1.6%	\$493	0.9%	0.9%
	Moderate	157	15.5%	\$10,083	7.9%	21.9%	59	15.1%	17.3%	\$3,765	8.0%	15.6%	68	15.5%	15.1%	\$4,270	7.9%	10.0%
	Middle	351	34.6%	\$34,854	27.2%	37.3%	136	34.9%	37.9%	\$13,289	28.3%	29.7%	158	35.9%	38.3%	\$15,911	29.5%	33.1%
	Upper	478	47.1%	\$82,143	64.1%	35.3%	184	47.2%	43.0%	\$29,436	62.7%	53.8%	201	45.7%	45.0%	\$33,216	61.6%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,014</i>	<i>100.0%</i>	<i>\$128,168</i>	<i>100.0%</i>	<i>100.0%</i>	<i>390</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$46,953</i>	<i>100.0%</i>	<i>100.0%</i>	<i>440</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$53,890</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	26	16.9%	\$3,833	24.5%	9.3%	13	21.0%	10.0%	\$2,219	26.2%	12.2%	7	11.7%	10.4%	\$873	21.5%	13.2%
	Moderate	36	23.4%	\$1,124	7.2%	23.2%	12	19.4%	23.0%	\$430	5.1%	21.7%	21	35.0%	23.0%	\$514	12.7%	22.0%
	Middle	42	27.3%	\$5,479	35.0%	32.8%	14	22.6%	33.5%	\$2,419	28.6%	36.6%	15	25.0%	33.7%	\$1,116	27.5%	36.7%
	Upper	50	32.5%	\$5,231	33.4%	34.4%	23	37.1%	31.9%	\$3,398	40.1%	28.6%	17	28.3%	31.1%	\$1,550	38.2%	27.0%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.5%	0	0.0%	0.5%	\$0	0.0%	0.7%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.3%	0	0.0%	1.4%	\$0	0.0%	0.4%
<i>Total</i>	<i>154</i>	<i>100.0%</i>	<i>\$15,667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>62</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,466</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,053</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	4.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$15	100.0%	53.6%	0	0.0%	62.4%	\$0	0.0%	69.9%	0	0.0%	59.9%	\$0	0.0%	60.8%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	37.6%	\$0	0.0%	30.1%	0	0.0%	38.0%	\$0	0.0%	37.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: IN Fort Wayne

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		by Family Income			Count		Dollar				Count		Dollar			
		Count	Dollar		%	%	Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg			
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	45	9.0%	\$3,157	4.2%	19.5%	14	6.9%	11.4%	\$978	3.4%	6.4%	23	11.4%	11.7%	\$1,628	5.5%	6.3%
	Moderate	150	30.1%	\$15,094	19.8%	18.5%	67	33.2%	22.2%	\$6,160	21.4%	16.6%	63	31.3%	23.4%	\$6,565	22.2%	16.4%
	Middle	125	25.1%	\$16,858	22.2%	22.6%	49	24.3%	19.8%	\$6,354	22.0%	18.9%	50	24.9%	19.8%	\$6,655	22.5%	18.5%
	Upper	176	35.3%	\$40,574	53.3%	39.4%	71	35.1%	27.2%	\$15,245	52.9%	41.0%	63	31.3%	25.3%	\$14,385	48.7%	36.1%
	Unknown	3	0.6%	\$388	0.5%	0.0%	1	0.5%	19.4%	\$108	0.4%	17.1%	2	1.0%	19.8%	\$280	0.9%	22.7%
	Total	499	100.0%	\$76,071	100.0%	100.0%	202	100.0%	100.0%	\$28,845	100.0%	100.0%	201	100.0%	100.0%	\$29,513	100.0%	100.0%
REFINANCE	Low	61	12.4%	\$3,917	7.7%	19.5%	20	11.2%	9.9%	\$1,276	7.3%	5.8%	32	14.1%	6.9%	\$2,037	8.5%	3.6%
	Moderate	142	28.9%	\$11,832	23.3%	18.5%	46	25.8%	18.6%	\$3,965	22.6%	13.3%	73	32.2%	16.6%	\$6,038	25.3%	11.2%
	Middle	118	24.0%	\$11,710	23.0%	22.6%	45	25.3%	21.1%	\$4,211	24.0%	18.9%	57	25.1%	19.2%	\$5,868	24.6%	16.7%
	Upper	154	31.4%	\$21,732	42.7%	39.4%	63	35.4%	28.7%	\$7,746	44.2%	37.7%	55	24.2%	29.3%	\$8,805	36.9%	40.2%
	Unknown	16	3.3%	\$1,649	3.2%	0.0%	4	2.2%	21.6%	\$320	1.8%	24.3%	10	4.4%	28.1%	\$1,095	4.6%	28.3%
	Total	491	100.0%	\$50,840	100.0%	100.0%	178	100.0%	100.0%	\$17,518	100.0%	100.0%	227	100.0%	100.0%	\$23,843	100.0%	100.0%
HOME IMPROVEMENT	Low	3	12.5%	\$120	9.5%	19.5%	0	0.0%	11.6%	\$0	0.0%	5.2%	3	25.0%	12.2%	\$120	22.5%	6.7%
	Moderate	7	29.2%	\$210	16.7%	18.5%	4	40.0%	21.9%	\$76	12.9%	14.3%	3	25.0%	24.3%	\$134	25.1%	16.7%
	Middle	6	25.0%	\$338	26.9%	22.6%	3	30.0%	24.3%	\$138	23.4%	18.0%	2	16.7%	26.6%	\$121	22.7%	22.6%
	Upper	8	33.3%	\$589	46.9%	39.4%	3	30.0%	34.6%	\$376	63.7%	47.0%	4	33.3%	32.8%	\$159	29.8%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.6%	\$0	0.0%	15.5%	0	0.0%	4.1%	\$0	0.0%	6.2%
	Total	24	100.0%	\$1,257	100.0%	100.0%	10	100.0%	100.0%	\$590	100.0%	100.0%	12	100.0%	100.0%	\$534	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	109	10.7%	\$7,194	5.6%	19.5%	34	8.7%	11.0%	\$2,254	4.8%	5.7%	58	13.2%	10.1%	\$3,785	7.0%	5.2%
	Moderate	299	29.5%	\$27,136	21.2%	18.5%	117	30.0%	21.1%	\$10,201	21.7%	14.3%	139	31.6%	21.1%	\$12,737	23.6%	14.1%
	Middle	249	24.6%	\$28,906	22.6%	22.6%	97	24.9%	20.4%	\$10,703	22.8%	17.3%	109	24.8%	19.9%	\$12,644	23.5%	17.2%
	Upper	338	33.3%	\$62,895	49.1%	39.4%	137	35.1%	28.0%	\$23,367	49.8%	36.9%	122	27.7%	27.0%	\$23,349	43.3%	36.0%
	Unknown	19	1.9%	\$2,037	1.6%	0.0%	5	1.3%	19.6%	\$428	0.9%	25.8%	12	2.7%	21.9%	\$1,375	2.6%	27.5%
	Total	1,014	100.0%	\$128,168	100.0%	100.0%	390	100.0%	100.0%	\$46,953	100.0%	100.0%	440	100.0%	100.0%	\$53,890	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	109	70.8%	\$2,799	17.9%	88.0%	41	66.1%	42.6%	\$1,406	16.6%	39.2%	44	73.3%	43.0%	\$759	18.7%	27.4%
	Over \$1 Million	24	15.6%	\$10,848	69.2%	11.2%	10	16.1%					8	13.3%				
	Total Rev. available	133	86.4%	\$13,647	87.1%	99.2%	51	82.2%					52	86.6%				
	Rev. Not Known	21	13.6%	\$2,020	12.9%	0.9%	11	17.7%					8	13.3%				
	Total	154	100.0%	\$15,667	100.0%	100.0%	62	100.0%					60	100.0%				
Small Business Loan Size	\$100,000 or Less	131	85.1%	\$3,475	22.2%		49	79.0%	88.5%	\$1,185	14.0%	26.9%	54	90.0%	87.3%	\$1,441	35.6%	25.2%
	\$100,001 - \$250,000	6	3.9%	\$936	6.0%		3	4.8%	5.8%	\$462	5.5%	18.2%	2	3.3%	6.0%	\$350	8.6%	17.2%
	\$250,001 - \$1 Million	17	11.0%	\$11,256	71.8%		10	16.1%	5.6%	\$6,819	80.5%	54.9%	4	6.7%	6.8%	\$2,262	55.8%	57.5%
	Total	154	100.0%	\$15,667	100.0%		62	100.0%	100.0%	\$8,466	100.0%	100.0%	60	100.0%	100.0%	\$4,053	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	1	100.0%	\$15	100.0%	99.2%	0	0.0%	66.0%	\$0	0.0%	69.9%	0	0.0%	59.9%	\$0	0.0%	50.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.8%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$15	100.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$15	100.0%		0	0.0%	75.9%	\$0	0.0%	31.4%	0	0.0%	65.7%	\$0	0.0%	21.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.7%	\$0	0.0%	37.7%	0	0.0%	24.1%	\$0	0.0%	41.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.4%	\$0	0.0%	30.8%	0	0.0%	10.2%	\$0	0.0%	36.6%
	Total	1	100.0%	\$15	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IN Lafayette

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	1.1%	\$0	0.0%	0.5%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Moderate	12	17.9%	\$1,032	10.8%	21.9%	4	13.3%	18.5%	\$413	10.0%	12.2%	4	17.4%	18.7%	\$350	10.7%	12.2%
	Middle	39	58.2%	\$6,196	64.9%	54.6%	18	60.0%	56.3%	\$2,493	60.3%	60.7%	15	65.2%	58.1%	\$2,410	73.7%	62.7%
	Upper	16	23.9%	\$2,317	24.3%	22.7%	8	26.7%	24.0%	\$1,231	29.8%	26.5%	4	17.4%	22.5%	\$512	15.6%	24.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>67</i>	<i>100.0%</i>	<i>\$9,545</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,137</i>	<i>100.0%</i>	<i>100.0%</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,272</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	1.5%	\$0	0.0%	0.9%	0	0.0%	1.2%	\$0	0.0%	0.7%
	Moderate	16	14.8%	\$1,406	12.0%	21.9%	2	5.6%	19.4%	\$156	4.5%	13.2%	9	17.6%	18.6%	\$594	11.3%	11.5%
	Middle	66	61.1%	\$7,168	61.1%	54.6%	24	66.7%	55.3%	\$2,009	58.6%	59.2%	29	56.9%	55.5%	\$3,245	61.8%	60.7%
	Upper	26	24.1%	\$3,157	26.9%	22.7%	10	27.8%	23.8%	\$1,264	36.9%	26.7%	13	25.5%	24.6%	\$1,413	26.9%	27.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>108</i>	<i>100.0%</i>	<i>\$11,731</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,429</i>	<i>100.0%</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,252</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	2.8%	\$0	0.0%	3.3%	0	0.0%	2.3%	\$0	0.0%	15.5%
	Moderate	3	27.3%	\$12	5.5%	21.9%	1	16.7%	19.9%	\$2	1.7%	15.6%	1	33.3%	20.3%	\$4	4.5%	10.5%
	Middle	8	72.7%	\$207	94.5%	54.6%	5	83.3%	57.4%	\$113	98.3%	62.1%	2	66.7%	57.9%	\$84	95.5%	54.6%
	Upper	0	0.0%	\$0	0.0%	22.7%	0	0.0%	19.9%	\$0	0.0%	18.9%	0	0.0%	19.5%	\$0	0.0%	19.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$219</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$115</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$88</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	18.8%	\$0	0.0%	5.0%	0	0.0%	47.3%	\$0	0.0%	45.4%
	Moderate	0	0.0%	\$0	0.0%	40.2%	0	0.0%	52.2%	\$0	0.0%	57.5%	0	0.0%	40.0%	\$0	0.0%	31.5%
	Middle	0	0.0%	\$0	0.0%	23.8%	0	0.0%	21.7%	\$0	0.0%	32.4%	0	0.0%	9.1%	\$0	0.0%	21.3%
	Upper	0	0.0%	\$0	0.0%	16.6%	0	0.0%	7.2%	\$0	0.0%	5.2%	0	0.0%	3.6%	\$0	0.0%	1.7%
	Unknown	0	0.0%	\$0	0.0%	1.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	1.6%	\$0	0.0%	1.2%	0	0.0%	1.4%	\$0	0.0%	5.4%
	Moderate	31	16.7%	\$2,450	11.4%	21.9%	7	9.7%	19.4%	\$571	7.4%	18.3%	14	18.2%	19.0%	\$948	11.0%	13.9%
	Middle	113	60.8%	\$13,571	63.1%	54.6%	47	65.3%	55.5%	\$4,615	60.1%	56.7%	46	59.7%	56.7%	\$5,739	66.6%	57.7%
	Upper	42	22.6%	\$5,474	25.5%	22.7%	18	25.0%	23.5%	\$2,495	32.5%	23.7%	17	22.1%	22.9%	\$1,925	22.4%	22.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>186</i>	<i>100.0%</i>	<i>\$21,495</i>	<i>100.0%</i>	<i>100.0%</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,681</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,612</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	1	3.0%	\$335	6.8%	6.1%	1	5.9%	5.7%	\$335	13.8%	5.6%	0	0.0%	5.2%	\$0	0.0%	4.2%
	Moderate	15	45.5%	\$1,267	25.6%	33.4%	10	58.8%	36.0%	\$797	32.7%	48.0%	4	28.6%	34.3%	\$454	28.3%	42.0%
	Middle	11	33.3%	\$3,194	64.4%	41.9%	4	23.5%	37.7%	\$1,259	51.7%	30.7%	6	42.9%	37.7%	\$1,035	64.5%	28.5%
	Upper	6	18.2%	\$160	3.2%	18.2%	2	11.8%	17.8%	\$45	1.8%	14.0%	4	28.6%	20.1%	\$115	7.2%	24.1%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.9%	0	0.0%	0.2%	\$0	0.0%	0.5%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	0.7%	0	0.0%	2.5%	\$0	0.0%	0.7%
<i>Total</i>	<i>33</i>	<i>100.0%</i>	<i>\$4,956</i>	<i>100.0%</i>	<i>100.0%</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,436</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,604</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.4%	0	0.0%	1.8%	\$0	0.0%	0.1%	0	0.0%	2.3%	\$0	0.0%	2.7%
	Middle	2	100.0%	\$400	100.0%	89.9%	1	100.0%	92.7%	\$200	100.0%	90.5%	1	100.0%	89.1%	\$200	100.0%	91.0%
	Upper	0	0.0%	\$0	0.0%	6.8%	0	0.0%	5.5%	\$0	0.0%	9.4%	0	0.0%	7.8%	\$0	0.0%	4.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	2.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$400</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$200</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$200</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: IN Lafayette

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		by Family Income		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank		Agg						
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	6	9.0%	\$474	5.0%	21.5%	1	3.3%	7.9%	\$80	1.9%	4.5%	3	13.0%	9.1%	\$260	7.9%	5.3%
	Moderate	19	28.4%	\$2,056	21.5%	17.6%	8	26.7%	21.3%	\$896	21.7%	15.9%	7	30.4%	22.6%	\$748	22.9%	16.9%
	Middle	14	20.9%	\$1,619	17.0%	21.4%	7	23.3%	19.6%	\$674	16.3%	18.9%	5	21.7%	22.3%	\$648	19.8%	22.1%
	Upper	27	40.3%	\$5,261	55.1%	39.5%	13	43.3%	32.2%	\$2,352	56.9%	43.2%	8	34.8%	30.6%	\$1,616	49.4%	42.1%
	Unknown	1	1.5%	\$135	1.4%	0.0%	1	3.3%	19.0%	\$135	3.3%	17.5%	0	0.0%	15.5%	\$0	0.0%	13.6%
	Total	67	100.0%	\$9,545	100.0%	100.0%	30	100.0%	100.0%	\$4,137	100.0%	100.0%	23	100.0%	100.0%	\$3,272	100.0%	100.0%
REFINANCE	Low	19	17.6%	\$1,140	9.7%	21.5%	5	13.9%	8.1%	\$282	8.2%	4.8%	10	19.6%	7.4%	\$596	11.3%	3.8%
	Moderate	24	22.2%	\$1,776	15.1%	17.6%	9	25.0%	16.8%	\$585	17.1%	12.4%	12	23.5%	15.3%	\$995	18.9%	10.7%
	Middle	23	21.3%	\$2,481	21.1%	21.4%	7	19.4%	19.4%	\$728	21.2%	16.9%	13	25.5%	19.7%	\$1,360	25.9%	17.0%
	Upper	35	32.4%	\$5,519	47.0%	39.5%	13	36.1%	32.9%	\$1,679	49.0%	42.8%	14	27.5%	34.1%	\$1,862	35.5%	46.1%
	Unknown	7	6.5%	\$815	6.9%	0.0%	2	5.6%	22.7%	\$155	4.5%	23.0%	2	3.9%	23.5%	\$439	8.4%	22.4%
	Total	108	100.0%	\$11,731	100.0%	100.0%	36	100.0%	100.0%	\$3,429	100.0%	100.0%	51	100.0%	100.0%	\$5,252	100.0%	100.0%
HOME IMPROVEMENT	Low	1	9.1%	\$12	5.5%	21.5%	1	16.7%	14.3%	\$12	10.4%	7.3%	0	0.0%	7.9%	\$0	0.0%	2.3%
	Moderate	2	18.2%	\$4	1.8%	17.6%	1	16.7%	20.7%	\$2	1.7%	18.2%	1	33.3%	25.2%	\$2	2.3%	14.0%
	Middle	4	36.4%	\$97	44.3%	21.4%	3	50.0%	25.1%	\$91	79.1%	19.4%	0	0.0%	21.1%	\$0	0.0%	19.7%
	Upper	4	36.4%	\$106	48.4%	39.5%	1	16.7%	37.1%	\$10	8.7%	52.4%	2	66.7%	39.1%	\$86	97.7%	44.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	2.8%	0	0.0%	6.8%	\$0	0.0%	19.9%
	Total	11	100.0%	\$219	100.0%	100.0%	6	100.0%	100.0%	\$115	100.0%	100.0%	3	100.0%	100.0%	\$88	100.0%	100.0%
MUL TIFAMILY	Low	0	0.0%	\$0	0.0%	21.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	26	14.0%	\$1,626	7.6%	21.5%	7	9.7%	8.2%	\$374	4.9%	4.0%	13	16.9%	8.4%	\$856	9.9%	4.3%
	Moderate	45	24.2%	\$3,836	17.8%	17.6%	18	25.0%	19.5%	\$1,483	19.3%	13.0%	20	26.0%	20.0%	\$1,745	20.3%	13.2%
	Middle	41	22.0%	\$4,197	19.5%	21.4%	17	23.6%	19.6%	\$1,493	19.4%	16.0%	18	23.4%	21.1%	\$2,008	23.3%	18.2%
	Upper	66	35.5%	\$10,886	50.6%	39.5%	27	37.5%	32.2%	\$4,041	52.6%	37.7%	24	31.2%	31.9%	\$3,564	41.4%	39.0%
	Unknown	8	4.3%	\$950	4.4%	0.0%	3	4.2%	20.5%	\$290	3.8%	29.3%	2	2.6%	18.6%	\$439	5.1%	25.3%
	Total	186	100.0%	\$21,495	100.0%	100.0%	72	100.0%	100.0%	\$7,681	100.0%	100.0%	77	100.0%	100.0%	\$8,612	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	19	57.6%	\$979	19.8%	90.4%	8	47.1%	39.4%	\$619	25.4%	36.4%	10	71.4%	43.1%	\$344	21.4%	36.5%
	Over \$1 Million	11	33.3%	\$3,832	77.3%	8.4%	6	35.3%					4	28.6%				
	Total Rev. available	30	90.9%	\$4,811	97.1%	98.8%	14	82.4%					14	100.0%				
	Rev. Not Known	3	9.1%	\$145	2.9%	1.2%	3	17.6%					0	0.0%				
	Total	33	100.0%	\$4,956	100.0%	100.0%	17	100.0%					14	100.0%				
Small Business Loan Size	\$100,000 or Less	25	75.8%	\$964	19.5%		12	70.6%	90.6%	\$494	20.3%	27.6%	12	85.7%	88.8%	\$454	28.3%	25.2%
	\$100,001 - \$250,000	4	12.1%	\$857	17.3%		3	17.6%	4.9%	\$607	24.9%	19.6%	1	7.1%	5.5%	\$250	15.6%	19.6%
	\$250,001 - \$1 Million	4	12.1%	\$3,135	63.3%		2	11.8%	4.5%	\$1,335	54.8%	52.8%	1	7.1%	5.6%	\$900	56.1%	55.2%
	Total	33	100.0%	\$4,956	100.0%		17	100.0%	100.0%	\$2,436	100.0%	100.0%	14	100.0%	100.0%	\$1,604	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	1	50.0%	\$200	50.0%	98.8%	0	0.0%	43.6%	\$0	0.0%	51.5%	1	100.0%	43.8%	\$200	100.0%	69.0%
Over \$1 Million	0	0.0%	\$0	0.0%	1.2%	0	0.0%					0	0.0%					
Not Known	1	50.0%	\$200	50.0%	0.0%	1	100.0%					0	0.0%					
Total	2	100.0%	\$400	100.0%	100.0%	1	100.0%					1	100.0%					
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	71.8%	\$0	0.0%	16.8%	0	0.0%	70.3%	\$0	0.0%	17.1%
	\$100,001 - \$250,000	2	100.0%	\$400	100.0%		1	100.0%	14.5%	\$200	100.0%	28.8%	1	100.0%	16.4%	\$200	100.0%	32.1%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	13.6%	\$0	0.0%	54.4%	0	0.0%	13.3%	\$0	0.0%	50.8%
	Total	2	100.0%	\$400	100.0%		1	100.0%	100.0%	\$200	100.0%	100.0%	1	100.0%	100.0%	\$200	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IN Northern IN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	1.1%	\$61	0.6%	4.4%	1	2.5%	6.3%	\$61	1.2%	3.6%	0	0.0%	5.2%	\$0	0.0%	2.7%
	Middle	69	74.2%	\$7,591	69.3%	77.6%	28	70.0%	76.7%	\$3,454	70.1%	72.3%	30	81.1%	77.5%	\$2,890	73.3%	74.7%
	Upper	23	24.7%	\$3,309	30.2%	18.0%	11	27.5%	17.0%	\$1,409	28.6%	24.1%	7	18.9%	17.3%	\$1,053	26.7%	22.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>93</i>	<i>100.0%</i>	<i>\$10,961</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,924</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,943</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	5.1%	\$273	3.9%	4.4%	3	10.3%	4.3%	\$214	9.1%	2.9%	1	2.8%	3.7%	\$59	1.8%	2.0%
	Middle	49	62.0%	\$4,078	57.7%	77.6%	21	72.4%	74.5%	\$1,732	73.9%	70.8%	20	55.6%	68.9%	\$1,532	45.8%	67.8%
	Upper	26	32.9%	\$2,716	38.4%	18.0%	5	17.2%	21.2%	\$397	16.9%	26.3%	15	41.7%	27.4%	\$1,752	52.4%	30.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>79</i>	<i>100.0%</i>	<i>\$7,067</i>	<i>100.0%</i>	<i>100.0%</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,343</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,343</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	9.1%	\$8	1.5%	4.4%	1	33.3%	5.3%	\$8	12.5%	3.1%	0	0.0%	1.1%	\$0	0.0%	0.3%
	Middle	7	63.6%	\$311	59.4%	77.6%	2	66.7%	72.4%	\$56	87.5%	65.6%	4	57.1%	79.8%	\$193	48.5%	71.5%
	Upper	3	27.3%	\$205	39.1%	18.0%	0	0.0%	22.4%	\$0	0.0%	31.3%	3	42.9%	19.1%	\$205	51.5%	28.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$524</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$64</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$398</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	40.0%	\$0	0.0%	60.6%
	Middle	0	0.0%	\$0	0.0%	83.2%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	60.0%	\$0	0.0%	39.4%
	Upper	0	0.0%	\$0	0.0%	4.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	6	3.3%	\$342	1.8%	4.4%	5	6.9%	5.6%	\$283	3.9%	3.3%	1	1.3%	4.4%	\$59	0.8%	3.2%
	Middle	125	68.3%	\$11,980	64.6%	77.6%	51	70.8%	75.6%	\$5,242	71.5%	71.7%	54	67.5%	74.7%	\$4,615	60.1%	71.5%
	Upper	52	28.4%	\$6,230	33.6%	18.0%	16	22.2%	18.9%	\$1,806	24.6%	25.0%	25	31.3%	20.9%	\$3,010	39.2%	25.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>183</i>	<i>100.0%</i>	<i>\$18,552</i>	<i>100.0%</i>	<i>100.0%</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,331</i>	<i>100.0%</i>	<i>100.0%</i>	<i>80</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,684</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.9%	0	0.0%	6.2%	\$0	0.0%	6.2%	0	0.0%	4.4%	\$0	0.0%	1.9%
	Middle	31	81.6%	\$1,457	95.6%	76.8%	9	100.0%	75.1%	\$291	100.0%	79.0%	16	76.2%	78.2%	\$981	95.1%	87.1%
	Upper	7	18.4%	\$67	4.4%	16.3%	0	0.0%	14.9%	\$0	0.0%	12.9%	5	23.8%	14.3%	\$51	4.9%	9.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.8%	\$0	0.0%	2.0%	0	0.0%	3.1%	\$0	0.0%	1.2%
<i>Total</i>	<i>38</i>	<i>100.0%</i>	<i>\$1,524</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$291</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,032</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.2%
	Middle	0	0.0%	\$0	0.0%	68.2%	0	0.0%	79.4%	\$0	0.0%	83.5%	0	0.0%	68.3%	\$0	0.0%	69.9%
	Upper	0	0.0%	\$0	0.0%	30.7%	0	0.0%	20.6%	\$0	0.0%	16.5%	0	0.0%	30.8%	\$0	0.0%	29.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: IN Northern IN

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		by Family Income		Count	Count		Dollar		Count	Dollar		Count	Dollar				
		#	%	\$ (000s)	\$ %		%	#	%	%		\$ (000s)	\$ %		\$ %	#	%	%	\$ (000s)
HOME PURCHASE	Low	14	15.1%	\$1,008	9.2%	16.8%	4	10.0%	11.0%	\$284	5.8%	6.0%	6	16.2%	10.9%	\$427	10.8%	6.2%	
	Moderate	24	25.8%	\$2,286	20.9%	18.9%	14	35.0%	21.9%	\$1,409	28.6%	16.0%	8	21.6%	21.7%	\$557	14.1%	14.7%	
	Middle	29	31.2%	\$3,497	31.9%	23.6%	10	25.0%	18.1%	\$976	19.8%	16.7%	13	35.1%	18.5%	\$1,800	45.7%	18.0%	
	Upper	25	26.9%	\$4,103	37.4%	40.7%	12	30.0%	30.0%	\$2,255	45.8%	45.5%	9	24.3%	28.9%	\$1,092	27.7%	43.2%	
	Unknown	1	1.1%	\$67	0.6%	0.0%	0	0.0%	18.9%	\$0	0.0%	15.9%	1	2.7%	20.0%	\$67	1.7%	17.9%	
	Total	93	100.0%	\$10,961	100.0%	100.0%	40	100.0%	100.0%	\$4,924	100.0%	100.0%	37	100.0%	100.0%	\$3,943	100.0%	100.0%	
REFINANCE	Low	7	8.9%	\$368	5.2%	16.8%	4	13.8%	9.4%	\$167	7.1%	5.3%	3	8.3%	5.8%	\$201	6.0%	3.3%	
	Moderate	17	21.5%	\$1,338	18.9%	18.9%	4	13.8%	21.5%	\$303	12.9%	15.0%	11	30.6%	18.6%	\$878	26.3%	12.1%	
	Middle	24	30.4%	\$1,867	26.4%	23.6%	11	37.9%	21.7%	\$775	33.1%	17.3%	8	22.2%	18.4%	\$683	20.4%	14.9%	
	Upper	27	34.2%	\$3,054	43.2%	40.7%	9	31.0%	33.9%	\$970	41.4%	47.7%	11	30.6%	36.5%	\$1,269	38.0%	50.4%	
	Unknown	4	5.1%	\$440	6.2%	0.0%	1	3.4%	13.5%	\$128	5.5%	14.8%	3	8.3%	20.7%	\$312	9.3%	19.3%	
	Total	79	100.0%	\$7,067	100.0%	100.0%	29	100.0%	100.0%	\$2,343	100.0%	100.0%	36	100.0%	100.0%	\$3,343	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	9.1%	\$14	2.7%	16.8%	0	0.0%	10.5%	\$0	0.0%	10.0%	1	14.3%	7.4%	\$14	3.5%	3.4%	
	Moderate	3	27.3%	\$200	38.2%	18.9%	1	33.3%	26.3%	\$40	62.5%	15.9%	2	28.6%	31.4%	\$160	40.2%	17.3%	
	Middle	4	36.4%	\$149	28.4%	23.6%	2	66.7%	23.7%	\$24	37.5%	21.2%	2	28.6%	19.1%	\$125	31.4%	13.5%	
	Upper	3	27.3%	\$161	30.7%	40.7%	0	0.0%	35.5%	\$0	0.0%	47.9%	2	28.6%	37.2%	\$99	24.9%	53.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	5.0%	0	0.0%	4.8%	\$0	0.0%	12.5%	
	Total	11	100.0%	\$524	100.0%	100.0%	3	100.0%	100.0%	\$64	100.0%	100.0%	7	100.0%	100.0%	\$398	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	23.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	22	12.0%	\$1,390	7.5%	16.8%	8	11.1%	10.4%	\$451	6.2%	5.8%	10	12.5%	8.8%	\$642	8.4%	4.9%	
	Moderate	44	24.0%	\$3,824	20.6%	18.9%	19	26.4%	22.2%	\$1,752	23.9%	15.6%	21	26.3%	21.5%	\$1,595	20.8%	13.6%	
	Middle	57	31.1%	\$5,513	29.7%	23.6%	23	31.9%	19.8%	\$1,775	24.2%	17.0%	23	28.8%	18.5%	\$2,608	33.9%	16.4%	
	Upper	55	30.1%	\$7,318	39.4%	40.7%	21	29.2%	31.7%	\$3,225	44.0%	46.1%	22	27.5%	32.3%	\$2,460	32.0%	45.6%	
	Unknown	5	2.7%	\$507	2.7%	0.0%	1	1.4%	15.9%	\$128	1.7%	15.5%	4	5.0%	18.9%	\$379	4.9%	19.4%	
	Total	183	100.0%	\$18,552	100.0%	100.0%	72	100.0%	100.0%	\$7,331	100.0%	100.0%	80	100.0%	100.0%	\$7,684	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	29	76.3%	\$781	51.2%	89.3%	8	88.9%	42.9%	\$241	82.8%	43.5%	15	71.4%	47.2%	\$429	41.6%	37.4%	
	Over \$1 Million	5	13.2%	\$311	20.4%	8.9%	0	0.0%					4	19.0%					
	Total Rev. available	34	89.5%	\$1,092	71.6%	98.2%	8	88.9%					19	90.4%					
	Rev. Not Known	4	10.5%	\$432	28.3%	1.7%	1	11.1%					2	9.5%					
	Total	38	100.0%	\$1,524	100.0%	100.0%	9	100.0%					21	100.0%					
Small Business Loan Size	\$100,000 or Less	33	86.8%	\$667	43.8%		8	88.9%	92.3%	\$111	38.1%	37.1%	17	81.0%	92.2%	\$355	34.4%	35.9%	
	\$100,001 - \$250,000	5	13.2%	\$857	56.2%		1	11.1%	4.3%	\$180	61.9%	20.8%	4	19.0%	4.4%	\$677	65.6%	19.9%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	42.1%	0	0.0%	3.4%	\$0	0.0%	44.2%	
	Total	38	100.0%	\$1,524	100.0%		9	100.0%	100.0%	\$291	100.0%	100.0%	21	100.0%	100.0%	\$1,032	100.0%	100.0%	
	Small Farm Revenue	Total Farms																	
		\$1 Million or Less	0	0.0%	\$0	0.0%	98.5%	0	0.0%	57.8%	\$0	0.0%	72.1%	0	0.0%	46.2%	\$0	0.0%	59.3%
Over \$1 Million		0	0.0%	\$0	0.0%	1.5%	0	0.0%					0	0.0%					
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Small Farm Loan Size		\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	68.6%	\$0	0.0%	21.3%	0	0.0%	69.2%	\$0	0.0%	21.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.6%	\$0	0.0%	30.2%	0	0.0%	20.2%	\$0	0.0%	38.4%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	13.7%	\$0	0.0%	48.5%	0	0.0%	10.6%	\$0	0.0%	40.1%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FIEEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: IN Terre Haute

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison										
						Owner Occupied Units %	2014				2015						
		Bank		Dollar			Count		Dollar		Count		Dollar				
		Count # %	Dollar \$ (000s) %	Bank # %	Agg %		Bank \$ (000s) %	Agg %	Bank # %	Agg %	Bank \$ (000s) %	Agg %					
HOME PURCHASE	Low	7 2.0%	\$321 1.0%	4.7%	4 2.8%	2.6%	\$208 1.5%	2.1%	2 1.3%	2.7%	\$87 0.6%	3.1%					
	Moderate	50 14.2%	\$2,664 8.1%	12.2%	19 13.4%	10.9%	\$921 6.8%	6.0%	25 16.0%	10.3%	\$1,414 10.0%	5.7%					
	Middle	210 59.8%	\$19,133 58.1%	59.3%	86 60.6%	56.2%	\$8,004 58.9%	52.0%	96 61.5%	54.1%	\$8,393 59.2%	46.9%					
	Upper	84 23.9%	\$10,797 32.8%	23.8%	33 23.2%	30.2%	\$4,460 32.8%	39.9%	33 21.2%	33.0%	\$4,272 30.2%	44.2%					
	Unknown	0 0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%					
	Total	351 100.0%	\$32,915 100.0%	100.0%	142 100.0%	100.0%	\$13,593 100.0%	100.0%	156 100.0%	100.0%	\$14,166 100.0%	100.0%					
REFINANCE	Low	9 3.4%	\$362 1.7%	4.7%	3 3.8%	3.8%	\$124 2.1%	5.4%	4 2.9%	2.1%	\$162 1.4%	1.5%					
	Moderate	27 10.2%	\$1,397 6.4%	12.2%	8 10.3%	9.9%	\$500 8.5%	6.6%	13 9.5%	6.3%	\$614 5.4%	4.7%					
	Middle	159 59.8%	\$12,551 57.7%	59.3%	47 60.3%	58.7%	\$3,360 57.5%	53.8%	81 59.1%	60.4%	\$6,514 56.9%	54.2%					
	Upper	71 26.7%	\$7,427 34.2%	23.8%	20 25.6%	27.7%	\$1,864 31.9%	34.1%	39 28.5%	31.0%	\$4,166 36.4%	39.7%					
	Unknown	0 0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.1%	\$0 0.0%	0.0%					
	Total	266 100.0%	\$21,737 100.0%	100.0%	78 100.0%	100.0%	\$5,848 100.0%	100.0%	137 100.0%	100.0%	\$11,456 100.0%	100.0%					
HOME IMPROVEMENT	Low	1 2.4%	\$30 2.0%	4.7%	1 6.7%	6.2%	\$30 10.7%	3.3%	0 0.0%	5.5%	\$0 0.0%	3.6%					
	Moderate	7 16.7%	\$67 4.5%	12.2%	2 13.3%	10.9%	\$15 5.4%	5.4%	5 26.3%	13.6%	\$52 6.9%	7.5%					
	Middle	24 57.1%	\$879 58.6%	59.3%	6 40.0%	57.3%	\$55 19.6%	56.2%	13 68.4%	58.8%	\$612 81.7%	61.2%					
	Upper	10 23.8%	\$523 34.9%	23.8%	6 40.0%	25.6%	\$180 64.3%	35.1%	1 5.3%	22.1%	\$85 11.3%	27.7%					
	Unknown	0 0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%					
	Total	42 100.0%	\$1,499 100.0%	100.0%	15 100.0%	100.0%	\$280 100.0%	100.0%	19 100.0%	100.0%	\$749 100.0%	100.0%					
MULTI-FAMILY	Multi-Family Units																
	Low	0 0.0%	\$0 0.0%	27.2%	0 0.0%	33.3%	\$0 0.0%	0.6%	0 0.0%	36.4%	\$0 0.0%	26.1%					
	Moderate	0 0.0%	\$0 0.0%	12.1%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	9.1%	\$0 0.0%	0.1%					
	Middle	0 0.0%	\$0 0.0%	39.7%	0 0.0%	33.3%	\$0 0.0%	7.5%	0 0.0%	27.3%	\$0 0.0%	13.8%					
	Upper	0 0.0%	\$0 0.0%	21.0%	0 0.0%	33.3%	\$0 0.0%	92.0%	0 0.0%	27.3%	\$0 0.0%	60.0%					
	Unknown	0 0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%					
Total	0 0.0%	\$0 0.0%	100.0%	0 0.0%	100.0%	\$0 0.0%	100.0%	0 0.0%	100.0%	\$0 0.0%	100.0%						
HMDA TOTALS	Low	17 2.6%	\$713 1.3%	4.7%	8 3.4%	3.4%	\$362 1.8%	3.1%	6 1.9%	2.9%	\$249 0.9%	4.6%					
	Moderate	84 12.7%	\$4,128 7.4%	12.2%	29 12.3%	10.6%	\$1,436 7.3%	5.8%	43 13.8%	9.3%	\$2,080 7.9%	5.0%					
	Middle	393 59.6%	\$32,563 58.0%	59.3%	139 59.1%	57.1%	\$11,419 57.9%	50.3%	190 60.9%	56.6%	\$15,519 58.8%	46.9%					
	Upper	165 25.0%	\$18,747 33.4%	23.8%	59 25.1%	28.9%	\$6,504 33.0%	40.8%	73 23.4%	31.1%	\$8,523 32.3%	43.5%					
	Unknown	0 0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%					
	Total	659 100.0%	\$56,151 100.0%	100.0%	235 100.0%	100.0%	\$19,721 100.0%	100.0%	312 100.0%	100.0%	\$26,371 100.0%	100.0%					
SMALL BUSINESSES	Small Businesses																
	Low	9 14.8%	\$538 7.5%	13.5%	4 13.8%	17.2%	\$166 6.4%	16.5%	3 13.0%	16.0%	\$248 8.2%	16.4%					
	Moderate	3 4.9%	\$113 1.6%	10.6%	2 6.9%	11.8%	\$53 2.0%	13.7%	0 0.0%	10.3%	\$0 0.0%	12.4%					
	Middle	39 63.9%	\$5,323 74.4%	54.7%	18 62.1%	48.6%	\$1,799 69.2%	49.8%	16 69.6%	51.7%	\$2,202 72.4%	53.3%					
	Upper	10 16.4%	\$1,183 16.5%	21.2%	5 17.2%	20.3%	\$583 22.4%	18.7%	4 17.4%	20.0%	\$590 19.4%	17.1%					
	Unknown	0 0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%					
	Tr Unknown	0 0.0%	\$0 0.0%		0 0.0%	2.1%	\$0 0.0%	1.3%	0 0.0%	2.0%	\$0 0.0%	0.8%					
Total	61 100.0%	\$7,157 100.0%	100.0%	29 100.0%	100.0%	\$2,601 100.0%	100.0%	23 100.0%	100.0%	\$3,040 100.0%	100.0%						
SMALL FARM	Small Farms																
	Low	0 0.0%	\$0 0.0%	0.2%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.6%	\$0 0.0%	0.7%					
	Moderate	0 0.0%	\$0 0.0%	0.5%	0 0.0%	0.6%	\$0 0.0%	0.2%	0 0.0%	1.2%	\$0 0.0%	1.4%					
	Middle	1 100.0%	\$20 100.0%	79.5%	0 0.0%	81.0%	\$0 0.0%	83.5%	1 100.0%	81.5%	\$20 100.0%	81.3%					
	Upper	0 0.0%	\$0 0.0%	19.8%	0 0.0%	18.4%	\$0 0.0%	16.3%	0 0.0%	16.6%	\$0 0.0%	16.6%					
	Unknown	0 0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%					
	Tr Unknown	0 0.0%	\$0 0.0%		0 0.0%	0.0%	\$0 0.0%	0.0%	0 0.0%	0.0%	\$0 0.0%	0.0%					
Total	1 100.0%	\$20 100.0%	100.0%	0 0.0%	100.0%	\$0 0.0%	100.0%	1 100.0%	100.0%	\$20 100.0%	100.0%						

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: IN Terre Haute

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		by Family Income		Count	Bank	Agg	Dollar			Count	Bank	Agg	Dollar			
#	%	\$ (000s)	%	%	\$ (000s)				\$ %	\$ %	#				%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	52	14.8%	\$2,759	8.4%	20.7%	27	19.0%	10.9%	\$1,542	11.3%	5.8%	21	13.5%	7.5%	\$1,085	7.7%	3.6%
	Moderate	118	33.6%	\$8,544	26.0%	18.5%	45	31.7%	22.5%	\$3,310	24.4%	16.9%	56	35.9%	21.2%	\$3,920	27.7%	13.6%
	Middle	96	27.4%	\$9,487	28.8%	20.3%	38	26.8%	20.3%	\$3,774	27.8%	19.1%	40	25.6%	22.5%	\$4,100	28.9%	19.6%
	Upper	83	23.6%	\$11,904	36.2%	40.6%	31	21.8%	27.8%	\$4,903	36.1%	39.5%	38	24.4%	31.0%	\$4,904	34.6%	42.1%
	Unknown	2	0.6%	\$221	0.7%	0.0%	1	0.7%	18.6%	\$64	0.5%	18.7%	1	0.6%	17.7%	\$157	1.1%	21.1%
	Total	351	100.0%	\$32,915	100.0%	100.0%	142	100.0%	100.0%	\$13,593	100.0%	100.0%	156	100.0%	100.0%	\$14,166	100.0%	100.0%
REFINANCE	Low	34	12.8%	\$1,779	8.2%	20.7%	16	20.5%	10.6%	\$796	13.6%	5.4%	16	11.7%	7.4%	\$849	7.4%	3.4%
	Moderate	66	24.8%	\$4,538	20.9%	18.5%	18	23.1%	20.9%	\$1,217	20.8%	15.6%	34	24.8%	16.2%	\$2,305	20.1%	10.0%
	Middle	74	27.8%	\$5,270	24.2%	20.3%	28	35.9%	22.7%	\$2,426	41.5%	20.2%	31	22.6%	24.7%	\$2,080	18.2%	19.2%
	Upper	89	33.5%	\$9,867	45.4%	40.6%	15	19.2%	31.0%	\$1,364	23.3%	37.3%	55	40.1%	33.9%	\$6,179	53.9%	45.4%
	Unknown	3	1.1%	\$283	1.3%	0.0%	1	1.3%	14.8%	\$45	0.8%	21.5%	1	0.7%	17.9%	\$43	0.4%	21.9%
	Total	266	100.0%	\$21,737	100.0%	100.0%	78	100.0%	100.0%	\$5,848	100.0%	100.0%	137	100.0%	100.0%	\$11,456	100.0%	100.0%
HOME IMPROVEMENT	Low	7	16.7%	\$214	14.3%	20.7%	4	26.7%	11.1%	\$67	23.9%	5.4%	2	10.5%	9.5%	\$60	8.0%	4.2%
	Moderate	12	28.6%	\$320	21.3%	18.5%	4	26.7%	20.7%	\$25	8.9%	13.1%	6	31.6%	20.4%	\$238	31.8%	15.4%
	Middle	12	28.6%	\$579	38.6%	20.3%	2	13.3%	25.6%	\$61	21.8%	20.9%	5	26.3%	26.1%	\$192	25.6%	23.1%
	Upper	11	26.2%	\$386	25.8%	40.6%	5	33.3%	38.6%	\$127	45.4%	56.5%	6	31.6%	36.9%	\$259	34.6%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	4.0%	0	0.0%	7.0%	\$0	0.0%	7.7%
	Total	42	100.0%	\$1,499	100.0%	100.0%	15	100.0%	100.0%	\$280	100.0%	100.0%	19	100.0%	100.0%	\$749	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	93	14.1%	\$4,752	8.5%	20.7%	47	20.0%	10.9%	\$2,405	12.2%	5.4%	39	12.5%	7.7%	\$1,994	7.6%	3.2%
	Moderate	196	29.7%	\$13,402	23.9%	18.5%	67	28.5%	21.8%	\$4,552	23.1%	15.4%	96	30.8%	19.4%	\$6,463	24.5%	11.4%
	Middle	182	27.6%	\$15,336	27.3%	20.3%	68	28.9%	21.6%	\$6,261	31.7%	18.4%	76	24.4%	23.6%	\$6,372	24.2%	18.0%
	Upper	183	27.8%	\$22,157	39.5%	40.6%	51	21.7%	30.0%	\$6,394	32.4%	37.6%	99	31.7%	32.5%	\$11,342	43.0%	39.9%
	Unknown	5	0.8%	\$504	0.9%	0.0%	2	0.9%	15.7%	\$109	0.6%	23.2%	2	0.6%	16.8%	\$200	0.8%	27.6%
	Total	659	100.0%	\$56,151	100.0%	100.0%	235	100.0%	100.0%	\$19,721	100.0%	100.0%	312	100.0%	100.0%	\$26,371	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	32	52.5%	\$743	10.4%	88.2%	15	51.7%	39.5%	\$320	12.3%	35.6%	10	43.5%	43.4%	\$157	5.2%	40.0%
	Over \$1 Million	14	23.0%	\$5,425	75.8%	9.8%	6	20.7%					6	26.1%				
	Total Rev. available	46	75.5%	\$6,168	86.2%	98.0%	21	72.4%					16	69.6%				
	Rev. Not Known	15	24.6%	\$989	13.8%	2.1%	8	27.6%					7	30.4%				
	Total	61	100.0%	\$7,157	100.0%	100.0%	29	100.0%					23	100.0%				
Small Business Loan Size	\$100,000 or Less	46	75.4%	\$1,255	17.5%		22	75.9%	88.2%	\$547	21.0%	29.1%	18	78.3%	86.7%	\$546	18.0%	26.4%
	\$100,001 - \$250,000	7	11.5%	\$1,056	14.8%		4	13.8%	6.9%	\$558	21.5%	22.2%	2	8.7%	7.3%	\$394	13.0%	21.5%
	\$250,001 - \$1 Million	8	13.1%	\$4,846	67.7%		3	10.3%	4.9%	\$1,496	57.5%	48.7%	3	13.0%	5.9%	\$2,100	69.1%	52.1%
	Total	61	100.0%	\$7,157	100.0%		29	100.0%	100.0%	\$2,601	100.0%	100.0%	23	100.0%	100.0%	\$3,040	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	1	100.0%	\$20	100.0%	99.5%	0	0.0%	75.2%	\$0	0.0%	74.5%	1	100.0%	69.2%	\$20	100.0%	77.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.5%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$20	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$20	100.0%		0	0.0%	68.3%	\$0	0.0%	24.6%	1	100.0%	68.6%	\$20	100.0%	23.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	20.3%	\$0	0.0%	33.4%	0	0.0%	22.8%	\$0	0.0%	41.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.4%	\$0	0.0%	42.0%	0	0.0%	8.6%	\$0	0.0%	34.6%
	Total	1	100.0%	\$20	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$20	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: KY Eastern KY

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	0.5%	\$84	0.3%	1.9%	0	0.0%	2.2%	\$0	0.0%	1.9%	1	1.5%	2.4%	\$84	0.9%	2.0%
	Middle	46	25.1%	\$5,811	23.0%	28.0%	22	26.2%	28.0%	\$2,837	25.1%	26.3%	18	27.3%	32.7%	\$2,188	23.3%	29.4%
	Upper	136	74.3%	\$19,351	76.6%	70.1%	62	73.8%	69.7%	\$8,461	74.9%	71.7%	47	71.2%	64.7%	\$7,100	75.8%	68.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>183</i>	<i>100.0%</i>	<i>\$25,246</i>	<i>100.0%</i>	<i>100.0%</i>	<i>84</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,298</i>	<i>100.0%</i>	<i>100.0%</i>	<i>66</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,372</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	2.1%	\$344	1.5%	1.9%	2	3.1%	2.1%	\$163	2.3%	1.6%	2	2.3%	1.7%	\$181	1.7%	1.4%
	Middle	44	22.6%	\$4,601	20.5%	28.0%	12	18.8%	23.1%	\$1,281	18.2%	21.9%	24	27.3%	23.1%	\$2,438	23.0%	19.9%
	Upper	147	75.4%	\$17,466	77.9%	70.1%	50	78.1%	74.8%	\$5,584	79.5%	76.5%	62	70.5%	75.1%	\$7,966	75.3%	78.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>195</i>	<i>100.0%</i>	<i>\$22,411</i>	<i>100.0%</i>	<i>100.0%</i>	<i>64</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,028</i>	<i>100.0%</i>	<i>100.0%</i>	<i>88</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,585</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.9%	0	0.0%	4.1%	\$0	0.0%	3.9%	0	0.0%	1.9%	\$0	0.0%	1.0%
	Middle	3	30.0%	\$69	9.8%	28.0%	1	20.0%	21.9%	\$3	0.8%	19.0%	2	50.0%	31.4%	\$66	50.8%	33.0%
	Upper	7	70.0%	\$633	90.2%	70.1%	4	80.0%	74.0%	\$394	99.2%	77.1%	2	50.0%	66.7%	\$64	49.2%	66.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$702</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$397</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$130</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.7%	0	0.0%	4.2%	\$0	0.0%	1.4%	0	0.0%	5.9%	\$0	0.0%	0.5%
	Middle	0	0.0%	\$0	0.0%	34.5%	0	0.0%	54.2%	\$0	0.0%	39.9%	0	0.0%	26.5%	\$0	0.0%	50.7%
	Upper	0	0.0%	\$0	0.0%	58.2%	0	0.0%	41.7%	\$0	0.0%	58.7%	0	0.0%	67.6%	\$0	0.0%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	1.3%	\$428	0.9%	1.9%	2	1.3%	2.2%	\$163	0.9%	1.8%	3	1.9%	2.2%	\$265	1.3%	1.7%
	Middle	93	24.0%	\$10,481	21.7%	28.0%	35	22.9%	26.1%	\$4,121	22.0%	24.9%	44	27.8%	29.2%	\$4,692	23.4%	26.9%
	Upper	290	74.7%	\$37,450	77.4%	70.1%	116	75.8%	71.6%	\$14,439	77.1%	73.2%	111	70.3%	68.5%	\$15,130	75.3%	71.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<i>Total</i>	<i>388</i>	<i>100.0%</i>	<i>\$48,359</i>	<i>100.0%</i>	<i>100.0%</i>	<i>153</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,723</i>	<i>100.0%</i>	<i>100.0%</i>	<i>158</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,087</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.9%	0	0.0%	3.2%	\$0	0.0%	2.7%	0	0.0%	3.1%	\$0	0.0%	3.0%
	Middle	24	26.7%	\$3,314	38.5%	32.0%	9	25.0%	30.8%	\$1,269	43.1%	34.5%	9	31.0%	32.1%	\$1,893	42.8%	32.3%
	Upper	66	73.3%	\$5,289	61.5%	64.9%	27	75.0%	63.6%	\$1,678	56.9%	61.7%	20	69.0%	63.4%	\$2,531	57.2%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	1.1%	0	0.0%	1.4%	\$0	0.0%	0.8%
<i>Total</i>	<i>90</i>	<i>100.0%</i>	<i>\$8,603</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,947</i>	<i>100.0%</i>	<i>100.0%</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,424</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	20.0%	\$25	18.8%	24.6%	1	50.0%	25.0%	\$25	45.5%	27.5%	0	0.0%	28.0%	\$0	0.0%	20.2%
	Upper	4	80.0%	\$108	81.2%	75.1%	1	50.0%	75.0%	\$30	54.5%	72.5%	2	100.0%	72.0%	\$48	100.0%	79.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$133</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$48</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: KY Eastern KY

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank				Families by Family Income %	Count		Dollar			Count		Dollar					
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	%	%	Bank #	Agg %	Bank \$ (000s)	%	%			
HOME PURCHASE	Low	3	1.6%	\$202	0.8%	14.8%	1	1.2%	1.5%	\$60	0.5%	0.8%	2	3.0%	2.0%	\$142	1.5%	1.0%	
	Moderate	33	18.0%	\$3,210	12.7%	13.2%	12	14.3%	11.5%	\$1,098	9.7%	7.6%	17	25.8%	14.6%	\$1,684	18.0%	9.4%	
	Middle	56	30.6%	\$6,233	24.7%	17.2%	23	27.4%	23.3%	\$2,614	23.1%	20.0%	17	25.8%	22.2%	\$1,756	18.7%	18.5%	
	Upper	89	48.6%	\$15,211	60.3%	54.8%	47	56.0%	43.2%	\$7,396	65.5%	52.6%	30	45.5%	40.6%	\$5,790	61.8%	50.1%	
	Unknown	2	1.1%	\$390	1.5%	0.0%	1	1.2%	20.5%	\$130	1.2%	19.1%	0	0.0%	20.6%	\$0	0.0%	21.0%	
	Total	183	100.0%	\$25,246	100.0%	100.0%	84	100.0%	100.0%	\$11,298	100.0%	100.0%	66	100.0%	100.0%	\$9,372	100.0%	100.0%	
REFINANCE	Low	12	6.2%	\$888	4.0%	14.8%	6	9.4%	4.2%	\$414	5.9%	2.5%	5	5.7%	3.2%	\$450	4.3%	1.6%	
	Moderate	24	12.3%	\$1,893	8.4%	13.2%	5	7.8%	8.7%	\$313	4.5%	6.0%	13	14.8%	8.7%	\$1,074	10.1%	5.4%	
	Middle	49	25.1%	\$5,206	23.2%	17.2%	20	31.3%	18.7%	\$2,192	31.2%	14.8%	23	26.1%	16.8%	\$2,502	23.6%	13.2%	
	Upper	105	53.8%	\$13,538	60.4%	54.8%	31	48.4%	46.8%	\$3,811	54.2%	52.8%	44	50.0%	47.1%	\$5,971	56.4%	54.3%	
	Unknown	5	2.6%	\$886	4.0%	0.0%	2	3.1%	21.7%	\$298	4.2%	23.9%	3	3.4%	24.3%	\$588	5.6%	25.6%	
	Total	195	100.0%	\$22,411	100.0%	100.0%	64	100.0%	100.0%	\$7,028	100.0%	100.0%	88	100.0%	100.0%	\$10,585	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	6.1%	\$0	0.0%	3.1%	0	0.0%	3.9%	\$0	0.0%	0.9%	
	Moderate	4	40.0%	\$191	27.2%	13.2%	1	20.0%	7.7%	\$115	29.0%	6.0%	3	75.0%	12.1%	\$76	58.5%	6.7%	
	Middle	0	0.0%	\$0	0.0%	17.2%	0	0.0%	21.9%	\$0	0.0%	20.5%	0	0.0%	17.4%	\$0	0.0%	8.9%	
	Upper	6	60.0%	\$511	72.8%	54.8%	4	80.0%	58.2%	\$282	71.0%	64.5%	1	25.0%	62.3%	\$54	41.5%	76.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	5.9%	0	0.0%	4.3%	\$0	0.0%	7.3%	
	Total	10	100.0%	\$702	100.0%	100.0%	5	100.0%	100.0%	\$397	100.0%	100.0%	4	100.0%	100.0%	\$130	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	13.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	54.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	15	3.9%	\$1,090	2.3%	14.8%	7	4.6%	2.7%	\$474	2.5%	1.4%	7	4.4%	2.5%	\$592	2.9%	1.1%	
	Moderate	61	15.7%	\$5,294	10.9%	13.2%	18	11.8%	10.3%	\$1,526	8.2%	6.8%	33	20.9%	12.3%	\$2,834	14.1%	7.6%	
	Middle	105	27.1%	\$11,439	23.7%	17.2%	43	28.1%	21.4%	\$4,806	25.7%	17.7%	40	25.3%	19.9%	\$4,258	21.2%	15.8%	
	Upper	200	51.5%	\$29,260	60.5%	54.8%	82	53.6%	44.9%	\$11,489	61.4%	51.6%	75	47.5%	43.5%	\$11,815	58.8%	50.1%	
	Unknown	7	1.8%	\$1,276	2.6%	0.0%	3	2.0%	20.7%	\$428	2.3%	22.5%	3	1.9%	21.8%	\$588	2.9%	25.4%	
	Total	388	100.0%	\$48,359	100.0%	100.0%	153	100.0%	100.0%	\$18,723	100.0%	100.0%	158	100.0%	100.0%	\$20,087	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	57	63.3%	\$3,055	35.5%	91.4%	20	55.6%	48.0%	\$564	19.1%	46.3%	17	58.6%	47.8%	\$2,064	46.7%	51.1%	
	Over \$1 Million	15	16.7%	\$3,882	45.1%	6.4%	9	25.0%					4	13.8%					
	Total Rev. available	72	80.0%	\$6,937	80.6%	97.8%	29	80.6%					21	72.4%					
	Rev. Not Known	18	20.0%	\$1,666	19.4%	2.2%	7	19.4%					8	27.6%					
	Total	90	100.0%	\$8,603	100.0%	100.0%	36	100.0%					29	100.0%					
Small Business Loan Size	\$100,000 or Less	74	82.2%	\$2,481	28.8%		31	86.1%	94.9%	\$907	30.8%	41.1%	20	69.0%	94.8%	\$912	20.6%	45.3%	
	\$100,001 - \$250,000	5	5.6%	\$925	10.8%		2	5.6%	2.2%	\$440	14.9%	11.9%	3	10.3%	2.7%	\$485	11.0%	14.8%	
	\$250,001 - \$1 Million	11	12.2%	\$5,197	60.4%		3	8.3%	2.9%	\$1,600	54.3%	46.9%	6	20.7%	2.5%	\$3,027	68.4%	39.9%	
	Total	90	100.0%	\$8,603	100.0%		36	100.0%	100.0%	\$2,947	100.0%	100.0%	29	100.0%	100.0%	\$4,424	100.0%	100.0%	
	Small Farm Revenue	Total Farms																	
		\$1 Million or Less	3	60.0%	\$73	54.9%	99.1%	1	50.0%	66.5%	\$25	45.5%	81.7%	1	50.0%	57.1%	\$18	37.5%	77.9%
Over \$1 Million		0	0.0%	\$0	0.0%	0.9%	0	0.0%					0	0.0%					
Not Known		2	40.0%	\$60	45.1%	0.0%	1	50.0%					1	50.0%					
Total		5	100.0%	\$133	100.0%	100.0%	2	100.0%					2	100.0%					
Small Farm Loan Size	\$100,000 or Less	5	100.0%	\$133	100.0%		2	100.0%	91.5%	\$55	100.0%	51.7%	2	100.0%	93.7%	\$48	100.0%	56.3%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.4%	\$0	0.0%	30.4%	0	0.0%	4.8%	\$0	0.0%	24.3%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	17.8%	0	0.0%	1.6%	\$0	0.0%	19.4%	
	Total	5	100.0%	\$133	100.0%		2	100.0%	100.0%	\$55	100.0%	100.0%	2	100.0%	100.0%	\$48	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: KY Western KY

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	Count	Agg		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	4.3%	\$272	2.6%	8.2%	2	4.5%	8.5%	\$136	3.1%	6.6%	2	5.9%	9.1%	\$136	3.5%	5.9%
	Middle	47	50.0%	\$5,354	51.7%	55.0%	22	50.0%	45.0%	\$2,401	54.0%	42.3%	14	41.2%	47.3%	\$1,577	40.8%	47.4%
	Upper	43	45.7%	\$4,722	45.6%	36.8%	20	45.5%	46.5%	\$1,911	43.0%	51.1%	18	52.9%	43.6%	\$2,148	55.6%	46.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	94	100.0%	\$10,348	100.0%	100.0%	44	100.0%	100.0%	\$4,448	100.0%	100.0%	34	100.0%	100.0%	\$3,861	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	10	8.2%	\$559	4.9%	8.2%	4	10.8%	10.7%	\$280	9.3%	6.2%	5	7.9%	7.1%	\$248	4.0%	3.2%
	Middle	61	50.0%	\$5,340	46.7%	55.0%	18	48.6%	46.2%	\$1,196	39.5%	45.1%	32	50.8%	41.1%	\$3,111	50.7%	41.4%
	Upper	51	41.8%	\$5,543	48.4%	36.8%	15	40.5%	43.1%	\$1,550	51.2%	48.7%	26	41.3%	51.5%	\$2,775	45.2%	54.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.4%
	Total	122	100.0%	\$11,442	100.0%	100.0%	37	100.0%	100.0%	\$3,026	100.0%	100.0%	63	100.0%	100.0%	\$6,134	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	7.1%	\$98	5.7%	8.2%	1	11.1%	8.0%	\$31	7.4%	4.9%	1	7.1%	16.8%	\$67	5.8%	12.8%
	Middle	14	50.0%	\$921	53.8%	55.0%	4	44.4%	42.3%	\$170	40.8%	44.9%	7	50.0%	47.7%	\$734	63.7%	55.3%
	Upper	12	42.9%	\$693	40.5%	36.8%	4	44.4%	49.6%	\$216	51.8%	50.2%	6	42.9%	35.5%	\$351	30.5%	31.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$1,712	100.0%	100.0%	9	100.0%	100.0%	\$417	100.0%	100.0%	14	100.0%	100.0%	\$1,152	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	29.3%	0	0.0%	25.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	43.9%	0	0.0%	50.0%	\$0	0.0%	72.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	25.0%	\$0	0.0%	6.6%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	16	6.6%	\$929	4.0%	8.2%	7	7.8%	9.2%	\$447	5.7%	6.6%	8	7.2%	9.0%	\$451	4.0%	5.1%
	Middle	122	50.0%	\$11,615	49.4%	55.0%	44	48.9%	45.1%	\$3,767	47.7%	43.7%	53	47.7%	45.0%	\$5,422	48.6%	45.4%
	Upper	106	43.4%	\$10,958	46.6%	36.8%	39	43.3%	45.7%	\$3,677	46.6%	49.7%	50	45.0%	45.8%	\$5,274	47.3%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Total	244	100.0%	\$23,502	100.0%	100.0%	90	100.0%	100.0%	\$7,891	100.0%	100.0%	111	100.0%	100.0%	\$11,147	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	13.2%	\$45	3.9%	16.4%	3	13.6%	15.7%	\$26	2.7%	8.3%	2	18.2%	16.3%	\$19	14.4%	9.0%
	Middle	14	36.8%	\$232	20.0%	50.3%	9	40.9%	44.3%	\$175	18.2%	55.8%	4	36.4%	44.2%	\$47	35.6%	51.6%
	Upper	19	50.0%	\$881	76.1%	33.3%	10	45.5%	36.6%	\$759	79.1%	35.2%	5	45.5%	37.5%	\$66	50.0%	38.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	0.7%	0	0.0%	1.9%	\$0	0.0%	1.0%
Total	38	100.0%	\$1,158	100.0%	100.0%	22	100.0%	100.0%	\$960	100.0%	100.0%	11	100.0%	100.0%	\$132	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.5%	0	0.0%	2.3%	\$0	0.0%	2.2%	0	0.0%	4.8%	\$0	0.0%	0.8%
	Middle	15	40.5%	\$1,661	23.2%	50.0%	4	28.6%	40.5%	\$691	24.6%	25.6%	7	46.7%	45.6%	\$650	22.6%	30.5%
	Upper	22	59.5%	\$5,505	76.8%	47.5%	10	71.4%	57.3%	\$2,118	75.4%	72.3%	8	53.3%	49.7%	\$2,221	77.4%	68.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	37	100.0%	\$7,166	100.0%	100.0%	14	100.0%	100.0%	\$2,809	100.0%	100.0%	15	100.0%	100.0%	\$2,871	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: KY Western KY

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank				Families by Family Income %	Count		Dollar				Count		Dollar				
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	%	%	Bank #	Agg %	Bank \$ (000s)	%	%			
HOME PURCHASE	Low	1	1.1%	\$116	1.1%	17.3%	0	0.0%	1.9%	\$0	0.0%	0.8%	1	2.9%	2.0%	\$116	3.0%	1.4%	
	Moderate	19	20.2%	\$1,423	13.8%	15.3%	7	15.9%	13.4%	\$518	11.6%	8.8%	8	23.5%	15.3%	\$646	16.7%	10.5%	
	Middle	29	30.9%	\$3,262	31.5%	20.7%	15	34.1%	24.5%	\$1,452	32.6%	21.7%	10	29.4%	24.9%	\$1,313	34.0%	20.7%	
	Upper	42	44.7%	\$5,269	50.9%	46.8%	20	45.5%	40.4%	\$2,289	51.5%	49.1%	14	41.2%	39.2%	\$1,697	44.0%	49.5%	
	Unknown	3	3.2%	\$278	2.7%	0.0%	2	4.5%	19.8%	\$189	4.2%	19.6%	1	2.9%	18.6%	\$89	2.3%	17.9%	
	Total	94	100.0%	\$10,348	100.0%	100.0%	44	100.0%	100.0%	\$4,448	100.0%	100.0%	34	100.0%	100.0%	\$3,861	100.0%	100.0%	
REFINANCE	Low	5	4.1%	\$203	1.8%	17.3%	2	5.4%	3.1%	\$76	2.5%	1.2%	1	1.6%	3.5%	\$53	0.9%	2.0%	
	Moderate	19	15.6%	\$1,252	10.9%	15.3%	5	13.5%	11.7%	\$338	11.2%	7.3%	11	17.5%	9.1%	\$728	11.9%	4.9%	
	Middle	26	21.3%	\$1,778	15.5%	20.7%	7	18.9%	22.2%	\$394	13.0%	16.4%	15	23.8%	20.3%	\$1,110	18.1%	15.3%	
	Upper	69	56.6%	\$7,883	68.9%	46.8%	22	59.5%	50.5%	\$2,164	71.5%	62.6%	34	54.0%	50.6%	\$3,971	64.7%	59.4%	
	Unknown	3	2.5%	\$326	2.8%	0.0%	1	2.7%	12.5%	\$54	1.8%	12.6%	2	3.2%	16.4%	\$272	4.4%	18.4%	
	Total	122	100.0%	\$11,442	100.0%	100.0%	37	100.0%	100.0%	\$3,026	100.0%	100.0%	63	100.0%	100.0%	\$6,134	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	3.6%	\$4	0.2%	17.3%	0	0.0%	5.8%	\$0	0.0%	4.3%	1	7.1%	11.2%	\$4	0.3%	2.3%	
	Moderate	4	14.3%	\$220	12.9%	15.3%	2	22.2%	10.2%	\$97	23.3%	7.3%	0	0.0%	11.2%	\$0	0.0%	6.7%	
	Middle	8	28.6%	\$291	17.0%	20.7%	2	22.2%	27.0%	\$76	18.2%	14.6%	4	28.6%	20.6%	\$205	17.8%	20.3%	
	Upper	15	53.6%	\$1,197	69.9%	46.8%	5	55.6%	53.3%	\$244	58.5%	66.2%	9	64.3%	52.3%	\$943	81.9%	67.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	7.7%	0	0.0%	4.7%	\$0	0.0%	3.6%	
	Total	28	100.0%	\$1,712	100.0%	100.0%	9	100.0%	100.0%	\$417	100.0%	100.0%	14	100.0%	100.0%	\$1,152	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	15.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	7	2.9%	\$323	1.4%	17.3%	2	2.2%	2.7%	\$76	1.0%	1.1%	3	2.7%	3.3%	\$173	1.6%	1.6%	
	Moderate	42	17.2%	\$2,895	12.3%	15.3%	14	15.6%	12.5%	\$953	12.1%	8.1%	19	17.1%	12.7%	\$1,374	12.3%	8.3%	
	Middle	63	25.8%	\$5,331	22.7%	20.7%	24	26.7%	24.0%	\$1,922	24.4%	19.4%	29	26.1%	22.9%	\$2,628	23.6%	18.7%	
	Upper	126	51.6%	\$14,349	61.1%	46.8%	47	52.2%	45.0%	\$4,697	59.5%	53.7%	57	51.4%	44.4%	\$6,611	59.3%	53.7%	
	Unknown	6	2.5%	\$604	2.6%	0.0%	3	3.3%	15.9%	\$243	3.1%	17.8%	3	2.7%	16.8%	\$361	3.2%	17.8%	
	Total	244	100.0%	\$23,502	100.0%	100.0%	90	100.0%	100.0%	\$7,891	100.0%	100.0%	111	100.0%	100.0%	\$11,147	100.0%	100.0%	
Small Business Revenue		Total Businesses																	
	\$1 Million or Less	33	86.8%	\$448	38.7%	89.9%	20	90.9%	43.0%	\$295	30.7%	42.7%	9	81.8%	43.2%	\$97	73.5%	50.7%	
	Over \$1 Million	1	2.6%	\$650	56.1%	7.9%	1	4.5%					0	0.0%					
	Total Rev. available	34	89.4%	\$1,098	94.8%	97.8%	21	95.4%					9	81.8%					
	Rev. Not Known	4	10.5%	\$60	5.2%	2.2%	1	4.5%					2	18.2%					
	Total	38	100.0%	\$1,158	100.0%	100.0%	22	100.0%					11	100.0%					
Small Business Loan Size	\$100,000 or Less	37	97.4%	\$508	43.9%		21	95.5%	93.6%	\$310	32.3%	29.6%	11	100.0%	94.1%	\$132	100.0%	35.4%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.7%	\$0	0.0%	12.8%	0	0.0%	2.8%	\$0	0.0%	15.0%	
	\$250,001 - \$1 Million	1	2.6%	\$650	56.1%		1	4.5%	3.7%	\$650	67.7%	57.7%	0	0.0%	3.1%	\$0	0.0%	49.7%	
	Total	38	100.0%	\$1,158	100.0%		22	100.0%	100.0%	\$960	100.0%	100.0%	11	100.0%	100.0%	\$132	100.0%	100.0%	
Small Farm Revenue		Total Farms																	
	\$1 Million or Less	24	64.9%	\$4,031	56.3%	98.8%	8	57.1%	62.6%	\$1,084	38.6%	47.8%	10	66.7%	44.9%	\$1,836	63.9%	57.7%	
	Over \$1 Million	7	18.9%	\$2,025	28.3%	1.2%	3	21.4%					4	26.7%					
	Not Known	6	16.2%	\$1,110	15.5%	0.0%	3	21.4%					1	6.7%					
	Total	37	100.0%	\$7,166	100.0%	100.0%	14	100.0%					15	100.0%					
Small Farm Loan Size	\$100,000 or Less	9	24.3%	\$458	6.4%		4	28.6%	71.0%	\$307	10.9%	23.1%	3	20.0%	73.5%	\$91	3.2%	21.0%	
	\$100,001 - \$250,000	22	59.5%	\$3,974	55.5%		7	50.0%	20.6%	\$1,268	45.1%	39.0%	10	66.7%	19.0%	\$1,780	62.0%	41.5%	
	\$250,001 - \$500,000	6	16.2%	\$2,734	38.2%		3	21.4%	8.4%	\$1,234	43.9%	37.8%	2	13.3%	7.5%	\$1,000	34.8%	37.5%	
	Total	37	100.0%	\$7,166	100.0%		14	100.0%	100.0%	\$2,809	100.0%	100.0%	15	100.0%	100.0%	\$2,871	100.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: KY Owensboro

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	1.1%	\$66	0.6%	2.6%	1	2.9%	1.9%	\$66	1.6%	1.1%	0	0.0%	2.0%	\$0	0.0%	1.2%
	Moderate	6	6.9%	\$648	5.5%	8.2%	2	5.9%	10.7%	\$254	6.0%	8.0%	3	7.9%	9.5%	\$294	5.5%	7.0%
	Middle	57	65.5%	\$7,152	61.1%	65.3%	21	61.8%	60.7%	\$2,165	51.1%	57.1%	24	63.2%	63.6%	\$3,375	63.5%	58.1%
	Upper	23	26.4%	\$3,841	32.8%	23.9%	10	29.4%	26.7%	\$1,750	41.3%	33.7%	11	28.9%	25.0%	\$1,646	31.0%	33.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	87	100.0%	\$11,707	100.0%	100.0%	34	100.0%	100.0%	\$4,235	100.0%	100.0%	38	100.0%	100.0%	\$5,315	100.0%	100.0%
REFINANCE	Low	5	5.7%	\$326	4.4%	2.6%	2	7.1%	2.9%	\$68	2.8%	1.9%	3	6.7%	2.4%	\$258	7.1%	2.0%
	Moderate	10	11.5%	\$509	6.9%	8.2%	3	10.7%	8.6%	\$174	7.2%	6.1%	4	8.9%	8.2%	\$195	5.4%	5.6%
	Middle	49	56.3%	\$3,846	52.1%	65.3%	17	60.7%	64.5%	\$1,459	60.6%	63.6%	25	55.6%	61.0%	\$1,746	48.4%	55.7%
	Upper	23	26.4%	\$2,704	36.6%	23.9%	6	21.4%	24.0%	\$707	29.4%	28.4%	13	28.9%	28.5%	\$1,412	39.1%	36.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	87	100.0%	\$7,385	100.0%	100.0%	28	100.0%	100.0%	\$2,408	100.0%	100.0%	45	100.0%	100.0%	\$3,611	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.0%	\$0	0.0%	0.7%	0	0.0%	4.4%	\$0	0.0%	4.1%
	Moderate	0	0.0%	\$0	0.0%	8.2%	0	0.0%	4.6%	\$0	0.0%	1.0%	0	0.0%	8.2%	\$0	0.0%	9.0%
	Middle	2	100.0%	\$70	100.0%	65.3%	1	100.0%	71.9%	\$60	100.0%	87.8%	1	100.0%	59.1%	\$10	100.0%	46.8%
	Upper	0	0.0%	\$0	0.0%	23.9%	0	0.0%	21.6%	\$0	0.0%	10.5%	0	0.0%	28.3%	\$0	0.0%	40.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	2	100.0%	\$70	100.0%	100.0%	1	100.0%	100.0%	\$60	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	11.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	40.0%	\$0	0.0%	11.3%
	Middle	0	0.0%	\$0	0.0%	60.9%	0	0.0%	87.5%	\$0	0.0%	14.5%	0	0.0%	50.0%	\$0	0.0%	80.3%
	Upper	0	0.0%	\$0	0.0%	14.5%	0	0.0%	12.5%	\$0	0.0%	85.5%	0	0.0%	10.0%	\$0	0.0%	8.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	3.4%	\$392	2.0%	2.6%	3	4.8%	2.2%	\$134	2.0%	1.2%	3	3.6%	2.2%	\$258	2.9%	1.5%
	Moderate	16	9.1%	\$1,157	6.0%	8.2%	5	7.9%	9.6%	\$428	6.4%	6.6%	7	8.3%	9.1%	\$489	5.5%	6.8%
	Middle	108	61.4%	\$11,068	57.8%	65.3%	39	61.9%	62.6%	\$3,684	55.0%	56.7%	50	59.5%	62.5%	\$5,131	57.4%	57.9%
	Upper	46	26.1%	\$6,545	34.2%	23.9%	16	25.4%	25.5%	\$2,457	36.7%	35.4%	24	28.6%	26.2%	\$3,058	34.2%	33.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	176	100.0%	\$19,162	100.0%	100.0%	63	100.0%	100.0%	\$6,703	100.0%	100.0%	84	100.0%	100.0%	\$8,936	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	1	1.7%	\$16	0.2%	9.7%	0	0.0%	8.0%	\$0	0.0%	6.7%	1	3.8%	9.7%	\$16	0.4%	12.8%
	Moderate	10	16.9%	\$1,472	18.8%	10.7%	4	16.0%	11.1%	\$661	21.0%	15.2%	3	11.5%	10.7%	\$411	11.3%	11.1%
	Middle	30	50.8%	\$4,406	56.4%	54.7%	12	48.0%	57.7%	\$2,192	69.7%	55.5%	16	61.5%	58.9%	\$2,161	59.3%	55.0%
	Upper	18	30.5%	\$1,918	24.6%	25.0%	9	36.0%	22.5%	\$294	9.3%	22.4%	6	23.1%	19.7%	\$1,057	29.0%	20.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.2%	0	0.0%	1.0%	\$0	0.0%	0.2%
<i>Total</i>	59	100.0%	\$7,812	100.0%	100.0%	25	100.0%	100.0%	\$3,147	100.0%	100.0%	26	100.0%	100.0%	\$3,645	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.9%	\$0	0.0%	2.2%
	Middle	0	0.0%	\$0	0.0%	74.1%	0	0.0%	85.0%	\$0	0.0%	87.0%	0	0.0%	85.9%	\$0	0.0%	86.8%
	Upper	0	0.0%	\$0	0.0%	25.0%	0	0.0%	14.1%	\$0	0.0%	12.4%	0	0.0%	12.7%	\$0	0.0%	10.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.2%
<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: KY Owensboro

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	(\$000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	8	9.2%	\$672	5.7%	20.3%	3	8.8%	9.8%	\$247	5.8%	5.6%	4	10.5%	8.8%	\$325	6.1%	5.2%
	Moderate	23	26.4%	\$2,184	18.7%	16.1%	6	17.6%	22.7%	\$507	12.0%	17.4%	13	34.2%	20.1%	\$1,170	22.0%	14.8%
	Middle	26	29.9%	\$3,596	30.7%	24.0%	12	35.3%	20.4%	\$1,447	34.2%	19.5%	10	26.3%	21.3%	\$1,551	29.2%	19.7%
	Upper	28	32.2%	\$4,960	42.4%	39.5%	12	35.3%	27.1%	\$1,967	46.4%	37.9%	10	26.3%	29.2%	\$2,041	38.4%	41.1%
	Unknown	2	2.3%	\$295	2.5%	0.0%	1	2.9%	20.0%	\$67	1.6%	19.6%	1	2.6%	20.6%	\$228	4.3%	19.2%
	Total	87	100.0%	\$11,707	100.0%	100.0%	34	100.0%	100.0%	\$4,235	100.0%	100.0%	38	100.0%	100.0%	\$5,315	100.0%	100.0%
REFINANCE	Low	14	16.1%	\$762	10.3%	20.3%	6	21.4%	10.3%	\$282	11.7%	5.7%	7	15.6%	6.6%	\$424	11.7%	3.3%
	Moderate	18	20.7%	\$1,119	15.2%	16.1%	7	25.0%	18.7%	\$431	17.9%	12.5%	9	20.0%	15.5%	\$575	15.9%	10.8%
	Middle	25	28.7%	\$2,117	28.7%	24.0%	8	28.6%	21.6%	\$787	32.7%	18.2%	12	26.7%	19.1%	\$841	23.3%	15.6%
	Upper	30	34.5%	\$3,387	45.9%	39.5%	7	25.0%	29.2%	\$908	37.7%	39.6%	17	37.8%	37.2%	\$1,771	49.0%	45.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.2%	\$0	0.0%	24.0%	0	0.0%	21.5%	\$0	0.0%	24.6%
	Total	87	100.0%	\$7,385	100.0%	100.0%	28	100.0%	100.0%	\$2,408	100.0%	100.0%	45	100.0%	100.0%	\$3,611	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	12.4%	\$0	0.0%	3.4%	0	0.0%	8.8%	\$0	0.0%	5.8%
	Moderate	1	50.0%	\$10	14.3%	16.1%	0	0.0%	24.2%	\$0	0.0%	33.3%	1	100.0%	15.7%	\$10	100.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	24.0%	0	0.0%	28.8%	\$0	0.0%	44.9%	0	0.0%	24.5%	\$0	0.0%	19.2%
	Upper	1	50.0%	\$60	85.7%	39.5%	1	100.0%	30.1%	\$60	100.0%	16.5%	0	0.0%	42.1%	\$0	0.0%	50.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.6%	\$0	0.0%	1.9%	0	0.0%	8.8%	\$0	0.0%	14.0%
	Total	2	100.0%	\$70	100.0%	100.0%	1	100.0%	100.0%	\$60	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	22	12.5%	\$1,434	7.5%	20.3%	9	14.3%	10.1%	\$529	7.9%	5.1%	11	13.1%	8.1%	\$749	8.4%	4.5%
	Moderate	42	23.9%	\$3,313	17.3%	16.1%	13	20.6%	21.5%	\$938	14.0%	15.4%	23	27.4%	18.3%	\$1,755	19.6%	13.0%
	Middle	51	29.0%	\$5,713	29.8%	24.0%	20	31.7%	21.2%	\$2,234	33.3%	18.7%	22	26.2%	20.7%	\$2,392	26.8%	17.8%
	Upper	59	33.5%	\$8,407	43.9%	39.5%	20	31.7%	27.8%	\$2,935	43.8%	34.4%	27	32.1%	32.4%	\$3,812	42.7%	41.3%
	Unknown	2	1.1%	\$295	1.5%	0.0%	1	1.6%	19.4%	\$67	1.0%	26.3%	1	1.2%	20.5%	\$228	2.6%	23.4%
	Total	176	100.0%	\$19,162	100.0%	100.0%	63	100.0%	100.0%	\$6,703	100.0%	100.0%	84	100.0%	100.0%	\$8,936	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	30	50.8%	\$1,405	18.0%	88.6%	11	44.0%	45.3%	\$184	5.8%	38.6%	15	57.7%	46.8%	\$1,145	31.4%	42.6%
	Over \$1 Million	18	30.5%	\$5,419	69.4%	10.4%	7	28.0%				8	30.8%					
	Total Rev. available	48	81.3%	\$6,824	87.4%	99.0%	18	72.0%				23	88.5%					
	Rev. Not Known	11	18.6%	\$988	12.6%	1.0%	7	28.0%				3	11.5%					
Total	59	100.0%	\$7,812	100.0%	100.0%	25	100.0%	100.0%				26	100.0%	100.0%				
Small Business Loan Size	\$100,000 or Less	42	71.2%	\$1,315	16.8%		18	72.0%	87.0%	\$542	17.2%	24.9%	18	69.2%	87.2%	\$597	16.4%	28.0%
	\$100,001 - \$250,000	7	11.9%	\$1,601	20.5%		2	8.0%	6.1%	\$450	14.3%	17.9%	5	19.2%	6.7%	\$1,151	31.6%	20.0%
	\$250,001 - \$1 Million	10	16.9%	\$4,896	62.7%		5	20.0%	6.9%	\$2,155	68.5%	57.2%	3	11.5%	6.1%	\$1,897	52.0%	52.0%
	Total	59	100.0%	\$7,812	100.0%		25	100.0%	100.0%	\$3,147	100.0%	100.0%	26	100.0%	100.0%	\$3,645	100.0%	100.0%
	Total Farms																	
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	99.1%	0	0.0%	66.5%	\$0	0.0%	62.0%	0	0.0%	66.2%	\$0	0.0%	64.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.9%	0	0.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	70.5%	\$0	0.0%	24.8%	0	0.0%	65.7%	\$0	0.0%	24.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	18.5%	\$0	0.0%	31.9%	0	0.0%	19.2%	\$0	0.0%	27.5%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.0%	\$0	0.0%	43.4%	0	0.0%	15.0%	\$0	0.0%	48.3%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: MI Battle Creek

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Bank	Agg	Dollar			Count		Dollar				
		#	%	\$ (000s)	%	%			%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	0.8%	\$0	0.0%	0.4%	0	0.0%	1.4%	\$0	0.0%	0.9%
	Moderate	42	21.0%	\$3,019	14.6%	22.4%	8	15.4%	16.9%	\$539	9.2%	9.7%	15	17.4%	17.6%	\$1,017	11.2%	10.7%
	Middle	42	21.0%	\$4,368	21.2%	38.9%	16	30.8%	34.4%	\$1,750	30.0%	34.7%	19	22.1%	33.8%	\$2,049	22.5%	34.1%
	Upper	116	58.0%	\$13,243	64.2%	33.7%	28	53.8%	47.8%	\$3,542	60.7%	55.2%	52	60.5%	47.2%	\$6,022	66.3%	54.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	200	100.0%	\$20,630	100.0%	100.0%	52	100.0%	100.0%	\$5,831	100.0%	100.0%	86	100.0%	100.0%	\$9,088	100.0%	100.0%
REFINANCE	Low	2	2.6%	\$86	1.1%	4.9%	1	3.3%	3.1%	\$36	1.2%	1.4%	0	0.0%	1.4%	\$0	0.0%	3.0%
	Moderate	12	15.6%	\$646	8.5%	22.4%	4	13.3%	15.5%	\$208	6.8%	10.3%	5	17.2%	14.6%	\$284	9.0%	9.2%
	Middle	32	41.6%	\$3,003	39.5%	38.9%	17	56.7%	41.2%	\$1,530	50.2%	39.5%	10	34.5%	41.7%	\$1,154	36.7%	40.4%
	Upper	31	40.3%	\$3,861	50.8%	33.7%	8	26.7%	40.2%	\$1,273	41.8%	48.8%	14	48.3%	42.3%	\$1,707	54.3%	47.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	77	100.0%	\$7,596	100.0%	100.0%	30	100.0%	100.0%	\$3,047	100.0%	100.0%	29	100.0%	100.0%	\$3,145	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.9%	\$0	0.0%	1.6%	0	0.0%	1.7%	\$0	0.0%	0.4%
	Moderate	4	23.5%	\$132	13.3%	22.4%	1	16.7%	21.6%	\$25	13.7%	14.8%	1	14.3%	20.7%	\$35	7.3%	10.5%
	Middle	5	29.4%	\$199	20.0%	38.9%	2	33.3%	37.1%	\$60	32.8%	29.5%	3	42.9%	36.4%	\$139	29.0%	35.2%
	Upper	8	47.1%	\$664	66.7%	33.7%	3	50.0%	38.5%	\$98	53.6%	54.1%	3	42.9%	41.2%	\$306	63.8%	54.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$995	100.0%	100.0%	6	100.0%	100.0%	\$183	100.0%	100.0%	7	100.0%	100.0%	\$480	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	9.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	30.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	20.0%	\$0	0.0%	2.2%
	Middle	0	0.0%	\$0	0.0%	42.9%	0	0.0%	83.3%	\$0	0.0%	99.4%	0	0.0%	60.0%	\$0	0.0%	96.0%
	Upper	0	0.0%	\$0	0.0%	16.9%	0	0.0%	16.7%	\$0	0.0%	0.6%	0	0.0%	20.0%	\$0	0.0%	1.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	0.7%	\$86	0.3%	4.9%	1	1.1%	1.9%	\$36	0.4%	0.8%	0	0.0%	1.4%	\$0	0.0%	1.7%
	Moderate	58	19.7%	\$3,797	13.0%	22.4%	13	14.8%	16.8%	\$772	8.5%	9.8%	21	17.2%	16.7%	\$1,336	10.5%	9.6%
	Middle	79	26.9%	\$7,570	25.9%	38.9%	35	39.8%	37.5%	\$3,340	36.9%	38.3%	32	26.2%	37.3%	\$3,342	26.3%	40.0%
	Upper	155	52.7%	\$17,768	60.8%	33.7%	39	44.3%	43.8%	\$4,913	54.2%	51.1%	69	56.6%	44.6%	\$8,035	63.2%	48.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	294	100.0%	\$29,221	100.0%	100.0%	88	100.0%	100.0%	\$9,061	100.0%	100.0%	122	100.0%	100.0%	\$12,713	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	22	18.5%	\$4,997	22.0%	8.0%	11	20.8%	9.9%	\$2,364	22.2%	13.8%	6	15.0%	9.6%	\$2,051	25.6%	14.5%
	Moderate	49	41.2%	\$9,162	40.4%	20.9%	24	45.3%	26.5%	\$4,586	43.0%	34.5%	17	42.5%	26.9%	\$2,747	34.3%	30.3%
	Middle	21	17.6%	\$4,431	19.5%	39.3%	7	13.2%	31.3%	\$1,415	13.3%	28.3%	9	22.5%	33.7%	\$2,342	29.2%	34.2%
	Upper	27	22.7%	\$4,110	18.1%	31.7%	11	20.8%	30.9%	\$2,299	21.6%	23.1%	8	20.0%	28.4%	\$874	10.9%	20.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.3%	0	0.0%	1.3%	\$0	0.0%	0.2%
Total	119	100.0%	\$22,700	100.0%	100.0%	53	100.0%	100.0%	\$10,664	100.0%	100.0%	40	100.0%	100.0%	\$8,014	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	62.1%	0	0.0%	75.9%	\$0	0.0%	72.9%	0	0.0%	60.7%	\$0	0.0%	76.2%
	Upper	0	0.0%	\$0	0.0%	27.7%	0	0.0%	24.1%	\$0	0.0%	27.1%	0	0.0%	39.3%	\$0	0.0%	23.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI Battle Creek

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Families by Family Income			Count		Dollar				Count		Dollar			
		Count	Dollar	%	%	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	34	17.0%	\$2,568	12.4%	21.0%	8	15.4%	6.8%	\$535	9.2%	3.5%	14	16.3%	7.1%	\$1,216	13.4%	3.9%
	Moderate	76	38.0%	\$6,421	31.1%	18.1%	16	30.8%	20.9%	\$1,265	21.7%	14.6%	30	34.9%	21.8%	\$2,470	27.2%	15.2%
	Middle	49	24.5%	\$5,598	27.1%	20.5%	11	21.2%	24.3%	\$1,432	24.6%	22.4%	25	29.1%	24.5%	\$2,783	30.6%	22.9%
	Upper	39	19.5%	\$5,725	27.8%	40.4%	16	30.8%	34.3%	\$2,449	42.0%	46.6%	17	19.8%	32.8%	\$2,619	28.8%	45.6%
	Unknown	2	1.0%	\$318	1.5%	0.0%	1	1.9%	13.7%	\$150	2.6%	13.0%	0	0.0%	13.8%	\$0	0.0%	12.4%
	Total	200	100.0%	\$20,630	100.0%	100.0%	52	100.0%	100.0%	\$5,831	100.0%	100.0%	86	100.0%	100.0%	\$9,088	100.0%	100.0%
REFINANCE	Low	8	10.4%	\$465	6.1%	21.0%	0	0.0%	7.0%	\$0	0.0%	3.6%	4	13.8%	6.6%	\$297	9.4%	3.8%
	Moderate	18	23.4%	\$1,233	16.2%	18.1%	9	30.0%	16.0%	\$676	22.2%	10.9%	7	24.1%	14.6%	\$473	15.0%	9.3%
	Middle	22	28.6%	\$2,136	28.1%	20.5%	9	30.0%	19.5%	\$848	27.8%	16.4%	7	24.1%	20.8%	\$745	23.7%	16.8%
	Upper	27	35.1%	\$3,558	46.8%	40.4%	11	36.7%	40.7%	\$1,360	44.6%	49.6%	10	34.5%	40.7%	\$1,589	50.5%	49.3%
	Unknown	2	2.6%	\$204	2.7%	0.0%	1	3.3%	16.8%	\$163	5.3%	19.5%	1	3.4%	17.4%	\$41	1.3%	20.8%
	Total	77	100.0%	\$7,596	100.0%	100.0%	30	100.0%	100.0%	\$3,047	100.0%	100.0%	29	100.0%	100.0%	\$3,145	100.0%	100.0%
HOME IMPROVEMENT	Low	2	11.8%	\$45	4.5%	21.0%	1	16.7%	11.2%	\$25	13.7%	6.2%	0	0.0%	8.5%	\$0	0.0%	3.6%
	Moderate	1	5.9%	\$90	9.0%	18.1%	0	0.0%	16.9%	\$0	0.0%	11.8%	1	14.3%	17.7%	\$90	18.8%	11.0%
	Middle	8	47.1%	\$464	46.6%	20.5%	2	33.3%	30.2%	\$57	31.1%	31.4%	4	57.1%	23.8%	\$240	50.0%	19.4%
	Upper	6	35.3%	\$396	39.8%	40.4%	3	50.0%	38.5%	\$101	55.2%	43.8%	2	28.6%	46.9%	\$150	31.3%	58.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	6.8%	0	0.0%	3.1%	\$0	0.0%	7.1%
	Total	17	100.0%	\$995	100.0%	100.0%	6	100.0%	100.0%	\$183	100.0%	100.0%	7	100.0%	100.0%	\$480	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	44	15.0%	\$3,078	10.5%	21.0%	9	10.2%	7.3%	\$560	6.2%	3.5%	18	14.8%	7.0%	\$1,513	11.9%	3.7%
	Moderate	95	32.3%	\$7,744	26.5%	18.1%	25	28.4%	18.5%	\$1,941	21.4%	12.7%	38	31.1%	18.4%	\$3,033	23.9%	11.9%
	Middle	79	26.9%	\$8,198	28.1%	20.5%	22	25.0%	22.9%	\$2,337	25.8%	19.7%	36	29.5%	22.9%	\$3,768	29.6%	19.1%
	Upper	72	24.5%	\$9,679	33.1%	40.4%	30	34.1%	37.2%	\$3,910	43.2%	46.2%	29	23.8%	37.3%	\$4,358	34.3%	45.1%
	Unknown	4	1.4%	\$522	1.8%	0.0%	2	2.3%	14.1%	\$313	3.5%	17.9%	1	0.8%	14.4%	\$41	0.3%	20.2%
	Total	294	100.0%	\$29,221	100.0%	100.0%	88	100.0%	100.0%	\$9,061	100.0%	100.0%	122	100.0%	100.0%	\$12,713	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	27	22.7%	\$2,167	9.5%	88.6%	15	28.3%	33.5%	\$1,638	15.4%	27.5%	6	15.0%	38.0%	\$362	4.5%	26.8%
	Over \$1 Million	58	48.7%	\$16,470	72.6%	10.1%	23	43.4%				24	60.0%					
	Total Rev. available	85	71.4%	\$18,637	82.1%	98.7%	38	71.7%				30	75.0%					
	Rev. Not Known	34	28.6%	\$4,063	17.9%	1.3%	15	28.3%				10	25.0%					
	Total	119	100.0%	\$22,700	100.0%	100.0%	53	100.0%				40	100.0%					
Small Business Loan Size	\$100,000 or Less	61	51.3%	\$3,280	14.4%		28	52.8%	87.6%	\$1,459	13.7%	25.0%	19	47.5%	88.2%	\$1,099	13.7%	24.9%
	\$100,001 - \$250,000	35	29.4%	\$6,536	28.8%		14	26.4%	6.6%	\$2,633	24.7%	19.8%	12	30.0%	5.1%	\$2,241	28.0%	15.1%
	\$250,001 - \$1 Million	23	19.3%	\$12,884	56.8%		11	20.8%	5.8%	\$6,572	61.6%	55.2%	9	22.5%	6.6%	\$4,674	58.3%	60.0%
	Total	119	100.0%	\$22,700	100.0%		53	100.0%	100.0%	\$10,664	100.0%	100.0%	40	100.0%	100.0%	\$8,014	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	96.3%	0	0.0%	37.9%	\$0	0.0%	59.6%	0	0.0%	17.9%	\$0	0.0%	40.4%
Over \$1 Million	0	0.0%	\$0	0.0%	3.7%	0	0.0%				0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%						
\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	69.0%	\$0	0.0%	18.5%	0	0.0%	71.4%	\$0	0.0%	15.2%	
\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	20.7%	\$0	0.0%	43.4%	0	0.0%	14.3%	\$0	0.0%	28.8%	
\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.3%	\$0	0.0%	38.0%	0	0.0%	14.3%	\$0	0.0%	55.9%	
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: MI Jackson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units		Count	Bank		Agg		Dollar		Count	Bank		Dollar		Agg
		Count	Dollar	%	#		%	#	%	\$ (000s)	\$ %	\$ %		#	%	%	\$ (000s)	
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	12	3.6%	\$596	1.7%	6.4%	2	1.7%	2.1%	\$65	0.5%	1.1%	5	3.6%	2.6%	\$322	2.1%	1.4%
	Moderate	49	14.7%	\$2,812	8.0%	10.0%	13	11.0%	8.0%	\$679	5.0%	4.1%	16	11.7%	7.0%	\$1,019	6.8%	3.6%
	Middle	158	47.3%	\$16,708	47.7%	54.7%	54	45.8%	55.8%	\$6,305	46.3%	54.3%	69	50.4%	55.6%	\$7,556	50.4%	56.0%
	Upper	115	34.4%	\$14,900	42.6%	28.9%	49	41.5%	34.1%	\$6,555	48.2%	40.5%	47	34.3%	34.9%	\$6,102	40.7%	38.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	334	100.0%	\$35,016	100.0%	100.0%	118	100.0%	100.0%	\$13,604	100.0%	100.0%	137	100.0%	100.0%	\$14,999	100.0%	100.0%
REFINANCE	Low	2	1.9%	\$107	0.9%	6.4%	1	2.6%	4.0%	\$73	1.6%	2.4%	1	2.0%	2.3%	\$34	0.6%	1.4%
	Moderate	7	6.6%	\$535	4.5%	10.0%	3	7.7%	8.2%	\$204	4.5%	5.4%	4	8.0%	5.6%	\$331	6.0%	3.4%
	Middle	57	53.8%	\$6,412	53.4%	54.7%	23	59.0%	56.6%	\$2,863	63.7%	56.9%	26	52.0%	56.1%	\$2,627	47.9%	54.5%
	Upper	40	37.7%	\$4,952	41.2%	28.9%	12	30.8%	31.2%	\$1,357	30.2%	35.3%	19	38.0%	36.0%	\$2,488	45.4%	40.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	106	100.0%	\$12,006	100.0%	100.0%	39	100.0%	100.0%	\$4,497	100.0%	100.0%	50	100.0%	100.0%	\$5,480	100.0%	100.0%
HOME IMPROVEMENT	Low	1	9.1%	\$50	7.3%	6.4%	1	16.7%	6.5%	\$50	19.2%	3.6%	0	0.0%	4.8%	\$0	0.0%	1.7%
	Moderate	1	9.1%	\$25	3.6%	10.0%	1	16.7%	10.2%	\$25	9.6%	5.8%	0	0.0%	6.7%	\$0	0.0%	3.7%
	Middle	6	54.5%	\$381	55.4%	54.7%	3	50.0%	53.4%	\$104	39.8%	55.5%	2	66.7%	53.6%	\$145	50.9%	47.0%
	Upper	3	27.3%	\$232	33.7%	28.9%	1	16.7%	29.9%	\$82	31.4%	35.2%	1	33.3%	35.0%	\$140	49.1%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$688	100.0%	100.0%	6	100.0%	100.0%	\$261	100.0%	100.0%	3	100.0%	100.0%	\$285	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	25.5%	0	0.0%	66.7%	\$0	0.0%	43.6%	0	0.0%	20.0%	\$0	0.0%	10.9%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	33.3%	\$0	0.0%	56.4%	0	0.0%	20.0%	\$0	0.0%	72.4%
	Middle	0	0.0%	\$0	0.0%	37.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	40.0%	\$0	0.0%	10.8%
	Upper	0	0.0%	\$0	0.0%	10.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	20.0%	\$0	0.0%	5.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	15	3.3%	\$753	1.6%	6.4%	4	2.5%	3.3%	\$188	1.0%	2.1%	6	3.2%	2.7%	\$356	1.7%	1.5%
	Moderate	57	12.6%	\$3,372	7.1%	10.0%	17	10.4%	8.3%	\$908	4.9%	5.1%	20	10.5%	6.5%	\$1,350	6.5%	4.0%
	Middle	221	49.0%	\$23,501	49.3%	54.7%	80	49.1%	55.8%	\$9,272	50.5%	54.8%	97	51.1%	55.6%	\$10,328	49.7%	54.8%
	Upper	158	35.0%	\$20,084	42.1%	28.9%	62	38.0%	32.6%	\$7,994	43.5%	38.1%	67	35.3%	35.3%	\$8,730	42.0%	39.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	451	100.0%	\$47,710	100.0%	100.0%	163	100.0%	100.0%	\$18,362	100.0%	100.0%	190	100.0%	100.0%	\$20,764	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	29	19.9%	\$8,294	29.1%	13.5%	11	17.2%	16.7%	\$3,010	25.6%	27.9%	12	23.5%	17.9%	\$2,978	27.8%	31.2%
	Moderate	47	32.2%	\$10,591	37.2%	13.1%	23	35.9%	16.1%	\$5,139	43.8%	19.2%	16	31.4%	15.3%	\$4,175	38.9%	18.2%
	Middle	35	24.0%	\$5,730	20.1%	46.8%	13	20.3%	39.1%	\$2,055	17.5%	29.6%	13	25.5%	40.9%	\$2,552	23.8%	29.1%
	Upper	35	24.0%	\$3,854	13.5%	26.6%	17	26.6%	26.4%	\$1,534	13.1%	23.0%	10	19.6%	24.4%	\$1,024	9.5%	21.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.7%	\$0	0.0%	0.3%	0	0.0%	1.5%	\$0	0.0%	0.3%
Total	146	100.0%	\$28,469	100.0%	100.0%	64	100.0%	100.0%	\$11,738	100.0%	100.0%	51	100.0%	100.0%	\$10,729	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	60.8%	0	0.0%	63.3%	\$0	0.0%	69.4%	0	0.0%	58.8%	\$0	0.0%	75.8%
	Upper	0	0.0%	\$0	0.0%	37.7%	0	0.0%	36.7%	\$0	0.0%	30.6%	0	0.0%	41.2%	\$0	0.0%	24.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI Jackson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar		Count	Dollar		
		Count	Dollar	%	%		Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	53	15.9%	\$3,133	8.9%	20.7%	18	15.3%	7.5%	\$982	7.2%	3.5%	22	16.1%	5.5%	\$1,567	10.4%	2.9%
	Moderate	114	34.1%	\$9,161	26.2%	18.3%	40	33.9%	22.5%	\$3,412	25.1%	15.2%	37	27.0%	22.1%	\$3,119	20.8%	14.6%
	Middle	97	29.0%	\$10,797	30.8%	21.3%	32	27.1%	21.9%	\$3,619	26.6%	20.9%	46	33.6%	23.2%	\$5,181	34.5%	22.0%
	Upper	67	20.1%	\$10,780	30.8%	39.7%	26	22.0%	30.4%	\$4,484	33.0%	43.7%	32	23.4%	32.1%	\$5,132	34.2%	43.0%
	Unknown	3	0.9%	\$1,145	3.3%	0.0%	2	1.7%	17.7%	\$1,107	8.1%	16.6%	0	0.0%	17.1%	\$0	0.0%	17.6%
	<i>Total</i>	<i>334</i>	<i>100.0%</i>	<i>\$35,016</i>	<i>100.0%</i>	<i>100.0%</i>	<i>118</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,604</i>	<i>100.0%</i>	<i>100.0%</i>	<i>137</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,999</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	9	8.5%	\$598	5.0%	20.7%	3	7.7%	6.9%	\$274	6.1%	4.4%	4	8.0%	5.1%	\$253	4.6%	2.6%
	Moderate	18	17.0%	\$1,376	11.5%	18.3%	10	25.6%	15.7%	\$743	16.5%	11.6%	7	14.0%	13.8%	\$569	10.4%	9.4%
	Middle	27	25.5%	\$2,774	23.1%	21.3%	6	15.4%	20.5%	\$654	14.5%	19.0%	21	42.0%	19.9%	\$2,120	38.7%	16.5%
	Upper	50	47.2%	\$7,124	59.3%	39.7%	19	48.7%	37.9%	\$2,751	61.2%	45.3%	18	36.0%	39.9%	\$2,538	46.3%	48.1%
	Unknown	2	1.9%	\$134	1.1%	0.0%	1	2.6%	18.9%	\$75	1.7%	19.8%	0	0.0%	21.4%	\$0	0.0%	23.4%
	<i>Total</i>	<i>106</i>	<i>100.0%</i>	<i>\$12,006</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,497</i>	<i>100.0%</i>	<i>100.0%</i>	<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,480</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	9.1%	\$25	3.6%	20.7%	0	0.0%	11.6%	\$0	0.0%	8.5%	1	33.3%	12.6%	\$25	8.8%	5.8%
	Moderate	1	9.1%	\$25	3.6%	18.3%	1	16.7%	23.7%	\$25	9.6%	16.9%	0	0.0%	14.8%	\$0	0.0%	10.1%
	Middle	5	45.5%	\$285	41.4%	21.3%	3	50.0%	26.1%	\$143	54.8%	19.1%	0	0.0%	24.0%	\$0	0.0%	16.1%
	Upper	4	36.4%	\$353	51.3%	39.7%	2	33.3%	35.3%	\$93	35.6%	51.9%	2	66.7%	44.3%	\$260	91.2%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	3.6%	0	0.0%	4.3%	\$0	0.0%	7.7%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$688</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$261</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$285</i>	<i>100.0%</i>	<i>100.0%</i>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	63	14.0%	\$3,756	7.9%	20.7%	21	12.9%	7.7%	\$1,256	6.8%	3.9%	27	14.2%	6.0%	\$1,845	8.9%	2.8%
	Moderate	133	29.5%	\$10,562	22.1%	18.3%	51	31.3%	20.1%	\$4,180	22.8%	13.8%	44	23.2%	18.2%	\$3,688	17.8%	12.3%
	Middle	129	28.6%	\$13,856	29.0%	21.3%	41	25.2%	21.7%	\$4,416	24.0%	20.0%	67	35.3%	22.0%	\$7,301	35.2%	19.5%
	Upper	121	26.8%	\$18,257	38.3%	39.7%	47	28.8%	33.6%	\$7,328	39.9%	44.1%	52	27.4%	36.2%	\$7,930	38.2%	45.3%
	Unknown	5	1.1%	\$1,279	2.7%	0.0%	3	1.8%	16.9%	\$1,182	6.4%	18.3%	0	0.0%	17.6%	\$0	0.0%	20.0%
	<i>Total</i>	<i>451</i>	<i>100.0%</i>	<i>\$47,710</i>	<i>100.0%</i>	<i>100.0%</i>	<i>163</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,362</i>	<i>100.0%</i>	<i>100.0%</i>	<i>190</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,764</i>	<i>100.0%</i>	<i>100.0%</i>
Small Business Revenue	\$1 Million or Less	33	22.6%	\$2,693	9.5%	88.4%	15	23.4%	35.6%	\$1,359	11.6%	21.0%	11	21.6%	39.9%	\$736	6.9%	23.5%
	Over \$1 Million	66	45.2%	\$21,269	74.7%	10.6%	29	45.3%				25	49.0%					
	Total Rev. available	99	67.8%	\$23,962	84.2%	99.0%	44	68.7%				36	70.6%					
	Rev. Not Known	47	32.2%	\$4,507	15.8%	1.0%	20	31.3%				15	29.4%					
	<i>Total</i>	<i>146</i>	<i>100.0%</i>	<i>\$28,469</i>	<i>100.0%</i>	<i>100.0%</i>	<i>64</i>	<i>100.0%</i>				<i>51</i>	<i>100.0%</i>					
Small Business Loan Size	\$100,000 or Less	64	43.8%	\$2,737	9.6%		29	45.3%	88.5%	\$1,221	10.4%	25.1%	22	43.1%	88.0%	\$927	8.6%	23.5%
	\$100,001 - \$250,000	52	35.6%	\$8,829	31.0%		23	35.9%	6.6%	\$3,978	33.9%	24.3%	17	33.3%	6.5%	\$2,890	26.9%	22.7%
	\$250,001 - \$1 Million	30	20.5%	\$16,903	59.4%		12	18.8%	4.9%	\$6,539	55.7%	50.7%	12	23.5%	5.5%	\$6,912	64.4%	53.9%
	<i>Total</i>	<i>146</i>	<i>100.0%</i>	<i>\$28,469</i>	<i>100.0%</i>		<i>64</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,738</i>	<i>100.0%</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,729</i>	<i>100.0%</i>	<i>100.0%</i>
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.6%	0	0.0%	13.3%	\$0	0.0%	20.2%	0	0.0%	38.2%	\$0	0.0%	85.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.4%	0	0.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>				<i>0</i>	<i>0.0%</i>					
	Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	83.3%	\$0	0.0%	26.5%	0	0.0%	85.3%	\$0	0.0%
\$100,001 - \$250,000		0	0.0%	\$0	0.0%		0	0.0%	6.7%	\$0	0.0%	22.0%	0	0.0%	5.9%	\$0	0.0%	19.2%
\$250,001 - \$500,000		0	0.0%	\$0	0.0%		0	0.0%	10.0%	\$0	0.0%	51.5%	0	0.0%	8.8%	\$0	0.0%	57.7%
<i>Total</i>		<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>		<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI Kalamazoo

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	%	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	7	1.2%	\$282	0.3%	3.6%	4	1.6%	1.1%	\$138	0.4%	0.6%	3	1.2%	1.6%	\$144	0.4%	0.8%
	Moderate	60	10.2%	\$5,095	5.8%	13.5%	24	9.4%	9.3%	\$1,935	5.2%	6.4%	25	10.3%	11.0%	\$2,426	6.4%	7.9%
	Middle	302	51.1%	\$39,077	44.6%	56.2%	126	49.4%	53.0%	\$16,161	43.6%	45.1%	121	50.0%	53.7%	\$16,047	42.2%	46.4%
	Upper	222	37.6%	\$43,240	49.3%	26.7%	101	39.6%	36.5%	\$18,852	50.8%	48.0%	93	38.4%	33.6%	\$19,434	51.1%	44.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>591</i>	<i>100.0%</i>	<i>\$87,694</i>	<i>100.0%</i>	<i>100.0%</i>	<i>255</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$37,086</i>	<i>100.0%</i>	<i>100.0%</i>	<i>242</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$38,051</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	11	1.9%	\$560	0.8%	3.6%	6	2.7%	1.5%	\$381	1.5%	0.9%	5	2.1%	1.3%	\$179	0.6%	0.6%
	Moderate	63	11.2%	\$5,111	7.3%	13.5%	27	12.3%	10.6%	\$1,806	7.3%	7.4%	20	8.3%	9.7%	\$1,562	5.1%	7.0%
	Middle	295	52.2%	\$32,947	47.1%	56.2%	123	56.2%	55.7%	\$12,878	52.1%	50.5%	125	51.9%	52.4%	\$14,407	47.5%	45.3%
	Upper	196	34.7%	\$31,403	44.8%	26.7%	63	28.8%	32.3%	\$9,630	39.0%	41.3%	91	37.8%	36.7%	\$14,214	46.8%	47.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>565</i>	<i>100.0%</i>	<i>\$70,021</i>	<i>100.0%</i>	<i>100.0%</i>	<i>219</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$24,695</i>	<i>100.0%</i>	<i>100.0%</i>	<i>241</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$30,362</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	1.8%	\$5	0.2%	3.6%	1	5.3%	3.5%	\$5	0.4%	2.5%	0	0.0%	2.0%	\$0	0.0%	3.3%
	Moderate	9	16.1%	\$297	9.8%	13.5%	3	15.8%	13.9%	\$69	6.2%	8.7%	4	21.1%	11.1%	\$116	11.3%	6.3%
	Middle	37	66.1%	\$1,983	65.3%	56.2%	10	52.6%	50.0%	\$403	36.2%	41.3%	14	73.7%	54.3%	\$902	87.7%	49.5%
	Upper	9	16.1%	\$750	24.7%	26.7%	5	26.3%	32.7%	\$636	57.1%	47.5%	1	5.3%	32.7%	\$10	1.0%	40.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>\$3,035</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,113</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,028</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	8.9%	0	0.0%	5.6%	\$0	0.0%	2.1%	0	0.0%	5.3%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	25.8%	0	0.0%	5.6%	\$0	0.0%	0.2%	0	0.0%	34.2%	\$0	0.0%	27.4%
	Middle	0	0.0%	\$0	0.0%	52.0%	0	0.0%	55.6%	\$0	0.0%	86.7%	0	0.0%	44.7%	\$0	0.0%	61.0%
	Upper	0	0.0%	\$0	0.0%	13.3%	0	0.0%	33.3%	\$0	0.0%	11.0%	0	0.0%	15.8%	\$0	0.0%	9.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	19	1.6%	\$847	0.5%	3.6%	11	2.2%	1.4%	\$524	0.8%	0.8%	8	1.6%	1.5%	\$323	0.5%	0.8%
	Moderate	132	10.9%	\$10,503	6.5%	13.5%	54	11.0%	10.1%	\$3,810	6.1%	6.4%	49	9.8%	10.5%	\$4,104	5.9%	8.9%
	Middle	634	52.3%	\$74,007	46.0%	56.2%	259	52.5%	53.9%	\$29,442	46.8%	49.5%	260	51.8%	53.1%	\$31,356	45.2%	47.0%
	Upper	427	35.2%	\$75,393	46.9%	26.7%	169	34.3%	34.6%	\$29,118	46.3%	43.4%	185	36.9%	34.8%	\$33,658	48.5%	43.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,212</i>	<i>100.0%</i>	<i>\$160,750</i>	<i>100.0%</i>	<i>100.0%</i>	<i>493</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$62,894</i>	<i>100.0%</i>	<i>100.0%</i>	<i>502</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$69,441</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	31	6.2%	\$4,363	6.0%	5.0%	10	4.5%	4.9%	\$1,519	5.0%	8.2%	13	7.2%	4.7%	\$1,498	5.3%	6.9%
	Moderate	118	23.6%	\$17,113	23.5%	16.6%	56	25.3%	17.4%	\$5,820	19.2%	17.1%	44	24.4%	17.6%	\$8,406	29.9%	19.7%
	Middle	239	47.8%	\$34,681	47.7%	53.8%	109	49.3%	49.5%	\$16,427	54.3%	50.9%	82	45.6%	50.8%	\$12,601	44.8%	49.6%
	Upper	112	22.4%	\$16,613	22.8%	24.6%	46	20.8%	26.8%	\$6,476	21.4%	23.5%	41	22.8%	25.8%	\$5,645	20.1%	23.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.3%	0	0.0%	1.1%	\$0	0.0%	0.2%
<i>Total</i>	<i>500</i>	<i>100.0%</i>	<i>\$72,770</i>	<i>100.0%</i>	<i>100.0%</i>	<i>221</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$30,242</i>	<i>100.0%</i>	<i>100.0%</i>	<i>180</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$28,150</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	71.4%	\$267	83.4%	19.1%	2	100.0%	29.2%	\$62	100.0%	31.3%	2	66.7%	33.3%	\$125	71.4%	41.6%
	Middle	1	14.3%	\$3	0.9%	66.8%	0	0.0%	58.4%	\$0	0.0%	62.9%	0	0.0%	52.2%	\$0	0.0%	47.3%
	Upper	1	14.3%	\$50	15.6%	13.9%	0	0.0%	12.4%	\$0	0.0%	5.8%	1	33.3%	14.4%	\$50	28.6%	11.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$320</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$62</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$175</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI Kalamazoo

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank				Families by Family Income %	Count		Dollar				Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg			Bank	Agg	Bank	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	59	10.0%	\$4,171	4.8%	22.7%	21	8.2%	5.4%	\$1,584	4.3%	2.5%	25	10.3%	8.1%	\$1,623	4.3%	3.9%
	Moderate	141	23.9%	\$13,498	15.4%	16.4%	63	24.7%	19.3%	\$6,102	16.5%	12.4%	53	21.9%	18.2%	\$4,880	12.8%	12.1%
	Middle	142	24.0%	\$19,283	22.0%	20.5%	56	22.0%	19.8%	\$7,151	19.3%	16.8%	59	24.4%	22.0%	\$8,688	22.8%	18.8%
	Upper	235	39.8%	\$48,619	55.4%	40.4%	111	43.5%	39.0%	\$21,593	58.2%	53.9%	101	41.7%	36.7%	\$22,381	58.8%	52.5%
	Unknown	14	2.4%	\$2,123	2.4%	0.0%	4	1.6%	16.6%	\$656	1.8%	14.3%	4	1.7%	15.0%	\$479	1.3%	12.8%
	Total	591	100.0%	\$87,694	100.0%	100.0%	255	100.0%	100.0%	\$37,086	100.0%	100.0%	242	100.0%	100.0%	\$38,051	100.0%	100.0%
REFINANCE	Low	43	7.6%	\$3,228	4.6%	22.7%	19	8.7%	7.0%	\$1,307	5.3%	3.9%	19	7.9%	5.9%	\$1,412	4.7%	2.9%
	Moderate	109	19.3%	\$8,947	12.8%	16.4%	46	21.0%	13.7%	\$3,119	12.6%	8.9%	42	17.4%	13.9%	\$3,851	12.7%	8.9%
	Middle	155	27.4%	\$16,754	23.9%	20.5%	64	29.2%	20.4%	\$6,325	25.6%	16.2%	69	28.6%	20.0%	\$7,676	25.3%	15.8%
	Upper	231	40.9%	\$36,829	52.6%	40.4%	76	34.7%	42.2%	\$11,840	47.9%	52.5%	107	44.4%	43.1%	\$16,745	55.2%	53.9%
	Unknown	27	4.8%	\$4,263	6.1%	0.0%	14	6.4%	16.7%	\$2,104	8.5%	18.5%	4	1.7%	17.1%	\$678	2.2%	18.5%
	Total	565	100.0%	\$70,021	100.0%	100.0%	219	100.0%	100.0%	\$24,695	100.0%	100.0%	241	100.0%	100.0%	\$30,362	100.0%	100.0%
HOME IMPROVEMENT	Low	10	17.9%	\$352	11.6%	22.7%	4	21.1%	8.0%	\$200	18.0%	2.6%	2	10.5%	8.0%	\$11	1.1%	2.5%
	Moderate	10	17.9%	\$288	9.5%	16.4%	2	10.5%	21.4%	\$9	0.8%	9.8%	4	21.1%	20.4%	\$215	20.9%	10.3%
	Middle	16	28.6%	\$864	28.5%	20.5%	2	10.5%	23.6%	\$56	5.0%	18.9%	7	36.8%	24.8%	\$551	53.6%	18.9%
	Upper	20	35.7%	\$1,531	50.4%	40.4%	11	57.9%	43.1%	\$848	76.2%	64.1%	6	31.6%	43.0%	\$251	24.4%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	4.6%	0	0.0%	3.8%	\$0	0.0%	12.4%
	Total	56	100.0%	\$3,035	100.0%	100.0%	19	100.0%	100.0%	\$1,113	100.0%	100.0%	19	100.0%	100.0%	\$1,028	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	112	9.2%	\$7,751	4.8%	22.7%	44	8.9%	6.1%	\$3,091	4.9%	2.8%	46	9.2%	7.1%	\$3,046	4.4%	3.2%
	Moderate	260	21.5%	\$22,733	14.1%	16.4%	111	22.5%	17.1%	\$9,230	14.7%	10.4%	99	19.7%	16.4%	\$8,946	12.9%	10.0%
	Middle	313	25.8%	\$36,901	23.0%	20.5%	122	24.7%	20.2%	\$13,532	21.5%	15.6%	135	26.9%	21.2%	\$16,915	24.4%	16.3%
	Upper	486	40.1%	\$86,979	54.1%	40.4%	198	40.2%	40.4%	\$34,281	54.5%	50.3%	214	42.6%	39.6%	\$39,377	56.7%	49.5%
	Unknown	41	3.4%	\$6,386	4.0%	0.0%	18	3.7%	16.1%	\$2,760	4.4%	20.9%	8	1.6%	15.6%	\$1,157	1.7%	21.0%
	Total	1,212	100.0%	\$160,750	100.0%	100.0%	493	100.0%	100.0%	\$62,894	100.0%	100.0%	502	100.0%	100.0%	\$69,441	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	244	48.8%	\$13,053	17.9%	89.3%	110	49.8%	44.6%	\$5,496	18.2%	32.8%	77	42.8%	48.9%	\$3,675	13.1%	31.6%
	Over \$1 Million	136	27.2%	\$45,462	62.5%	9.8%	54	24.4%					58	32.2%				
	Total Rev. available	380	76.0%	\$58,515	80.4%	99.1%	164	74.2%					135	75.0%				
	Rev. Not Known	120	24.0%	\$14,255	19.6%	1.0%	57	25.8%					45	25.0%				
	Total	500	100.0%	\$72,770	100.0%	100.0%	221	100.0%					180	100.0%				
Small Business Loan Size	\$100,000 or Less	339	67.8%	\$11,546	15.9%		160	72.4%	89.7%	\$5,426	17.9%	31.5%	115	63.9%	87.5%	\$3,852	13.7%	27.2%
	\$100,001 - \$250,000	71	14.2%	\$12,499	17.2%		23	10.4%	5.3%	\$4,101	13.6%	17.9%	30	16.7%	5.7%	\$5,280	18.8%	16.4%
	\$250,001 - \$1 Million	90	18.0%	\$48,725	67.0%		38	17.2%	5.0%	\$20,715	68.5%	50.6%	35	19.4%	6.8%	\$19,018	67.6%	56.4%
	Total	500	100.0%	\$72,770	100.0%		221	100.0%	100.0%	\$30,242	100.0%	100.0%	180	100.0%	100.0%	\$28,150	100.0%	100.0%
	Small Farm Revenue	Total Farms																
		\$1 Million or Less	5	71.4%	\$190	59.4%	92.0%	2	100.0%	34.8%	\$62	100.0%	45.9%	2	66.7%	37.8%	\$125	71.4%
Over \$1 Million		0	0.0%	\$0	0.0%	8.0%	0	0.0%					0	0.0%				
Not Known		2	28.6%	\$130	40.6%	0.0%	0	0.0%					1	33.3%				
Total		7	100.0%	\$320	100.0%	100.0%	2	100.0%					3	100.0%				
Total		7	100.0%	\$320	100.0%		2	100.0%	100.0%	\$62	100.0%	100.0%	3	100.0%	100.0%	\$175	100.0%	22.6%
Small Farm Loan Size	\$100,000 or Less	7	100.0%	\$320	100.0%		2	100.0%	82.0%	\$62	100.0%	22.9%	3	100.0%	78.9%	\$175	100.0%	22.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.6%	\$0	0.0%	13.2%	0	0.0%	11.1%	\$0	0.0%	23.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.4%	\$0	0.0%	63.9%	0	0.0%	10.0%	\$0	0.0%	53.6%
	Total	7	100.0%	\$320	100.0%		2	100.0%	100.0%	\$62	100.0%	100.0%	3	100.0%	100.0%	\$175	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: MI Lansing

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	Count	Agg		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	17	1.9%	\$891	0.8%	3.6%	10	2.6%	1.9%	\$512	1.0%	0.8%	4	1.1%	1.5%	\$237	0.5%	0.7%
	Moderate	107	12.1%	\$8,518	7.2%	15.0%	43	11.2%	11.7%	\$3,130	6.2%	6.9%	54	15.2%	12.8%	\$4,567	9.8%	7.5%
	Middle	465	52.5%	\$57,953	49.3%	52.9%	205	53.2%	53.3%	\$24,620	49.0%	49.4%	182	51.3%	53.0%	\$22,643	48.7%	49.1%
	Upper	296	33.4%	\$50,299	42.7%	28.5%	127	33.0%	33.1%	\$22,013	43.8%	42.9%	115	32.4%	32.7%	\$19,051	41.0%	42.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	885	100.0%	\$117,661	100.0%	100.0%	385	100.0%	100.0%	\$50,275	100.0%	100.0%	355	100.0%	100.0%	\$46,498	100.0%	100.0%
REFINANCE	Low	17	2.5%	\$1,074	1.3%	3.6%	9	3.4%	3.1%	\$683	2.4%	1.7%	6	2.2%	1.9%	\$338	1.0%	1.0%
	Moderate	57	8.5%	\$4,158	5.2%	15.0%	24	9.2%	11.9%	\$1,826	6.4%	7.8%	26	9.4%	9.6%	\$1,851	5.4%	5.9%
	Middle	361	54.1%	\$38,865	48.5%	52.9%	142	54.2%	54.0%	\$14,631	51.0%	50.9%	140	50.7%	52.5%	\$15,107	43.9%	48.6%
	Upper	232	34.8%	\$36,054	45.0%	28.5%	87	33.2%	30.9%	\$11,521	40.2%	39.6%	104	37.7%	36.0%	\$17,094	49.7%	44.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	667	100.0%	\$80,151	100.0%	100.0%	262	100.0%	100.0%	\$28,661	100.0%	100.0%	276	100.0%	100.0%	\$34,390	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.6%	0	0.0%	2.9%	\$0	0.0%	1.6%	0	0.0%	2.0%	\$0	0.0%	0.9%
	Moderate	3	5.6%	\$121	3.3%	15.0%	2	8.0%	14.6%	\$73	4.4%	7.9%	0	0.0%	15.0%	\$0	0.0%	7.6%
	Middle	39	72.2%	\$2,302	61.9%	52.9%	17	68.0%	51.9%	\$1,042	62.8%	55.8%	13	76.5%	52.2%	\$695	59.9%	52.0%
	Upper	12	22.2%	\$1,293	34.8%	28.5%	6	24.0%	30.5%	\$545	32.8%	34.8%	4	23.5%	30.8%	\$465	40.1%	39.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	54	100.0%	\$3,716	100.0%	100.0%	25	100.0%	100.0%	\$1,660	100.0%	100.0%	17	100.0%	100.0%	\$1,160	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	7.7%	0	0.0%	4.2%	\$0	0.0%	4.4%	0	0.0%	6.1%	\$0	0.0%	9.9%
	Moderate	0	0.0%	\$0	0.0%	28.9%	0	0.0%	25.0%	\$0	0.0%	10.3%	0	0.0%	44.9%	\$0	0.0%	41.2%
	Middle	0	0.0%	\$0	0.0%	41.5%	0	0.0%	47.9%	\$0	0.0%	38.0%	0	0.0%	38.8%	\$0	0.0%	27.8%
	Upper	1	100.0%	\$5,390	100.0%	19.0%	1	100.0%	18.8%	\$5,390	100.0%	41.8%	0	0.0%	10.2%	\$0	0.0%	21.1%
	Unknown	0	0.0%	\$0	0.0%	2.9%	0	0.0%	4.2%	\$0	0.0%	5.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$5,390	100.0%	100.0%	1	100.0%	100.0%	\$5,390	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	34	2.1%	\$1,965	0.9%	3.6%	19	2.8%	2.5%	\$1,195	1.4%	1.6%	10	1.5%	1.8%	\$575	0.7%	1.4%
	Moderate	167	10.4%	\$12,797	6.2%	15.0%	69	10.3%	12.2%	\$5,029	5.8%	7.6%	80	12.3%	11.9%	\$6,418	7.8%	8.9%
	Middle	865	53.8%	\$99,120	47.9%	52.9%	364	54.1%	53.3%	\$40,293	46.9%	48.6%	335	51.7%	52.7%	\$38,445	46.9%	47.7%
	Upper	541	33.7%	\$93,036	45.0%	28.5%	221	32.8%	31.9%	\$39,469	45.9%	41.5%	223	34.4%	33.6%	\$36,610	44.6%	42.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,607	100.0%	\$206,918	100.0%	100.0%	673	100.0%	100.0%	\$85,986	100.0%	100.0%	648	100.0%	100.0%	\$82,048	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	41	7.4%	\$7,263	9.2%	3.7%	14	5.8%	4.7%	\$3,148	8.8%	6.2%	17	8.1%	4.4%	\$2,221	7.0%	5.0%
	Moderate	108	19.5%	\$15,617	19.8%	21.6%	53	21.8%	21.3%	\$6,690	18.7%	26.1%	37	17.5%	21.5%	\$6,271	19.9%	26.0%
	Middle	221	40.0%	\$34,354	43.6%	44.3%	93	38.3%	40.5%	\$13,985	39.0%	36.2%	89	42.2%	40.7%	\$15,762	50.0%	38.6%
	Upper	169	30.6%	\$19,044	24.2%	29.1%	74	30.5%	30.5%	\$9,963	27.8%	28.3%	65	30.8%	30.9%	\$6,832	21.7%	28.1%
	Unknown	14	2.5%	\$2,561	3.2%	1.3%	9	3.7%	1.6%	\$2,055	5.7%	2.5%	3	1.4%	1.2%	\$425	1.3%	1.9%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.6%	0	0.0%	1.4%	\$0	0.0%	0.4%
Total	553	100.0%	\$78,839	100.0%	100.0%	243	100.0%	100.0%	\$35,841	100.0%	100.0%	211	100.0%	100.0%	\$31,511	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.7%	0	0.0%	3.1%	\$0	0.0%	0.5%	0	0.0%	3.9%	\$0	0.0%	3.1%
	Middle	8	100.0%	\$637	100.0%	73.3%	4	100.0%	69.5%	\$321	100.0%	68.3%	3	100.0%	68.0%	\$311	100.0%	72.3%
	Upper	0	0.0%	\$0	0.0%	23.4%	0	0.0%	26.6%	\$0	0.0%	31.1%	0	0.0%	27.5%	\$0	0.0%	24.5%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	0.1%	0	0.0%	0.7%	\$0	0.0%	0.1%
Total	8	100.0%	\$637	100.0%	100.0%	4	100.0%	100.0%	\$321	100.0%	100.0%	3	100.0%	100.0%	\$311	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: M/Lansing

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
		1/1/2014-6/30/2016					2014					2015								
		Bank				Families by Family Income	Count			Dollar			Count			Dollar				
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %				
HOME PURCHASE	Low	118	13.3%	\$8,384	7.1%	20.6%	50	13.0%	9.5%	\$3,316	6.6%	4.8%	51	14.4%	9.7%	\$3,891	8.4%	5.0%		
	Moderate	246	27.8%	\$25,256	21.5%	17.8%	107	27.8%	22.4%	\$11,026	21.9%	16.6%	96	27.0%	24.0%	\$9,753	21.0%	17.5%		
	Middle	235	26.6%	\$30,074	25.6%	21.9%	105	27.3%	22.9%	\$13,201	26.3%	22.3%	92	25.9%	22.5%	\$12,063	25.9%	21.9%		
	Upper	268	30.3%	\$51,605	43.9%	39.8%	115	29.9%	29.7%	\$21,686	43.1%	42.5%	108	30.4%	29.2%	\$19,838	42.7%	41.6%		
	Unknown	18	2.0%	\$2,342	2.0%	0.0%	8	2.1%	15.4%	\$1,046	2.1%	13.9%	8	2.3%	14.7%	\$953	2.0%	14.0%		
	Total	885	100.0%	\$117,661	100.0%	100.0%	385	100.0%	100.0%	\$50,275	100.0%	100.0%	355	100.0%	100.0%	\$46,498	100.0%	100.0%		
REFINANCE	Low	56	8.4%	\$4,458	5.6%	20.6%	25	9.5%	8.3%	\$2,405	8.4%	5.1%	17	6.2%	5.8%	\$1,199	3.5%	3.1%		
	Moderate	136	20.4%	\$11,837	14.8%	17.8%	48	18.3%	16.8%	\$3,605	12.6%	12.1%	62	22.5%	15.7%	\$6,004	17.5%	10.9%		
	Middle	198	29.7%	\$21,809	27.2%	21.9%	84	32.1%	22.6%	\$8,768	30.6%	20.4%	79	28.6%	21.0%	\$8,853	25.7%	18.5%		
	Upper	254	38.1%	\$38,690	48.3%	39.8%	96	36.6%	34.3%	\$12,685	44.3%	44.3%	107	38.8%	37.5%	\$16,477	47.9%	47.2%		
	Unknown	23	3.4%	\$3,357	4.2%	0.0%	9	3.4%	18.0%	\$1,198	4.2%	18.1%	11	4.0%	20.0%	\$1,857	5.4%	20.4%		
	Total	667	100.0%	\$80,151	100.0%	100.0%	262	100.0%	100.0%	\$28,661	100.0%	100.0%	276	100.0%	100.0%	\$34,390	100.0%	100.0%		
HOME IMPROVEMENT	Low	5	9.3%	\$218	5.9%	20.6%	4	16.0%	11.2%	\$161	9.7%	5.9%	1	5.9%	8.4%	\$57	4.9%	4.7%		
	Moderate	18	33.3%	\$1,049	28.2%	17.8%	9	36.0%	23.9%	\$631	38.0%	19.3%	5	29.4%	22.6%	\$140	12.1%	14.9%		
	Middle	11	20.4%	\$803	21.6%	21.9%	6	24.0%	26.5%	\$380	22.9%	26.6%	3	17.6%	26.8%	\$168	14.5%	19.4%		
	Upper	17	31.5%	\$1,434	38.6%	39.8%	5	20.0%	34.5%	\$453	27.3%	44.5%	6	35.3%	38.4%	\$618	53.3%	55.0%		
	Unknown	3	5.6%	\$212	5.7%	0.0%	1	4.0%	3.8%	\$35	2.1%	3.7%	2	11.8%	3.8%	\$177	15.3%	6.1%		
	Total	54	100.0%	\$3,716	100.0%	100.0%	25	100.0%	100.0%	\$1,660	100.0%	100.0%	17	100.0%	100.0%	\$1,160	100.0%	100.0%		
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Middle	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Upper	0	0.0%	\$0	0.0%	39.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Unknown	1	100.0%	\$5,390	100.0%	0.0%	1	100.0%	100.0%	\$5,390	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
	Total	1	100.0%	\$5,390	100.0%	100.0%	1	100.0%	100.0%	\$5,390	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
HMDA TOTALS	Low	179	11.1%	\$13,060	6.3%	20.6%	79	11.7%	9.3%	\$5,882	6.8%	4.3%	69	10.6%	8.0%	\$5,147	6.3%	3.9%		
	Moderate	400	24.9%	\$38,142	18.4%	17.8%	164	24.4%	20.6%	\$15,262	17.7%	13.1%	163	25.2%	20.6%	\$15,897	19.4%	13.7%		
	Middle	444	27.6%	\$52,686	25.5%	21.9%	195	29.0%	23.2%	\$22,349	26.0%	19.0%	174	26.9%	22.4%	\$21,084	25.7%	19.1%		
	Upper	539	33.5%	\$91,729	44.3%	39.8%	216	32.1%	31.8%	\$34,824	40.5%	37.8%	221	34.1%	33.5%	\$36,933	45.0%	41.6%		
	Unknown	45	2.8%	\$11,301	5.5%	0.0%	19	2.8%	15.2%	\$7,669	8.9%	25.8%	21	3.2%	15.6%	\$2,987	3.6%	21.6%		
	Total	1,607	100.0%	\$206,918	100.0%	100.0%	673	100.0%	100.0%	\$85,986	100.0%	100.0%	648	100.0%	100.0%	\$82,048	100.0%	100.0%		
Small Business	Revenue		Total Businesses																	
			\$1 Million or Less	260	47.0%	\$14,817	18.8%	89.5%	108	44.4%	39.8%	\$6,062	16.9%	31.5%	97	46.0%	45.7%	\$6,513	20.7%	32.5%
			Over \$1 Million	176	31.8%	\$49,340	62.6%	9.4%	70	28.8%				74	35.1%					
			Total Rev. available	436	78.8%	\$64,157	81.4%	98.9%	178	73.2%				171	81.1%					
			Rev. Not Known	117	21.2%	\$14,682	18.6%	1.1%	65	26.7%				40	19.0%					
	Total	553	100.0%	\$78,839	100.0%	100.0%	243	100.0%				211	100.0%							
	Loan Size	\$100,000 or Less	381	68.9%	\$14,338	18.2%		166	68.3%	89.4%	\$5,878	16.4%	29.8%	143	67.8%	88.7%	\$5,585	17.7%	28.4%	
		\$100,001 - \$250,000	69	12.5%	\$12,916	16.4%		29	11.9%	5.8%	\$4,938	13.8%	21.0%	24	11.4%	5.9%	\$4,581	14.5%	20.0%	
		\$250,001 - \$1 Million	103	18.6%	\$51,585	65.4%		48	19.8%	4.9%	\$25,025	69.8%	49.2%	44	20.9%	5.4%	\$21,345	67.7%	51.6%	
		Total	553	100.0%	\$78,839	100.0%		243	100.0%	100.0%	\$35,841	100.0%	100.0%	211	100.0%	100.0%	\$31,511	100.0%	100.0%	
\$1 Million or Less		3	37.5%	\$35	5.5%	97.8%	1	25.0%	30.5%	\$15	4.7%	53.9%	1	33.3%	31.4%	\$15	4.8%	58.4%		
Over \$1 Million	5	62.5%	\$602	94.5%	2.2%	3	75.0%				2	66.7%								
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%								
Total	8	100.0%	\$637	100.0%	100.0%	4	100.0%				3	100.0%								
Loan Size	\$100,000 or Less	6	75.0%	\$137	21.5%		3	75.0%	90.6%	\$71	22.1%	44.6%	2	66.7%	86.3%	\$61	19.6%	33.7%		
	\$100,001 - \$250,000	2	25.0%	\$500	78.5%		1	25.0%	7.0%	\$250	77.9%	35.7%	1	33.3%	11.8%	\$250	80.4%	46.5%		
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	19.7%	0	0.0%	2.0%	\$0	0.0%	19.7%		
	Total	8	100.0%	\$637	100.0%		4	100.0%	100.0%	\$321	100.0%	100.0%	3	100.0%	100.0%	\$311	100.0%	100.0%		

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: MI Northern MI

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units		Count	Bank	Agg	Dollar			Count	Bank	Agg	Dollar			
		Count	Dollar	%	%				%	%	%				%	%	%	
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	83	9.1%	\$7,515	5.9%	12.7%	35	9.0%	10.2%	\$2,869	5.3%	6.3%	34	9.0%	11.1%	\$3,333	6.0%	6.7%
	Middle	617	67.8%	\$79,139	61.8%	66.6%	256	65.5%	66.8%	\$32,455	60.2%	60.8%	258	68.3%	65.6%	\$34,884	62.7%	59.8%
	Upper	210	23.1%	\$41,340	32.3%	20.7%	100	25.6%	22.7%	\$18,629	34.5%	32.7%	86	22.8%	23.1%	\$17,434	31.3%	33.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Total	910	100.0%	\$127,994	100.0%	100.0%	391	100.0%	100.0%	\$53,953	100.0%	100.0%	378	100.0%	100.0%	\$55,651	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	59	5.6%	\$5,576	3.7%	12.7%	27	7.6%	10.5%	\$2,839	5.7%	6.9%	27	5.6%	8.8%	\$2,365	3.6%	5.4%
	Middle	691	65.2%	\$90,254	60.4%	66.6%	231	65.4%	66.9%	\$29,005	58.3%	59.6%	327	67.8%	65.5%	\$43,631	67.2%	60.7%
	Upper	310	29.2%	\$53,665	35.9%	20.7%	95	26.9%	22.5%	\$17,894	36.0%	33.4%	128	26.6%	25.7%	\$18,947	29.2%	33.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,060	100.0%	\$149,495	100.0%	100.0%	353	100.0%	100.0%	\$49,738	100.0%	100.0%	482	100.0%	100.0%	\$64,943	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	7	6.7%	\$195	3.2%	12.7%	3	6.8%	13.3%	\$80	3.3%	7.5%	3	8.6%	12.2%	\$56	3.0%	8.5%
	Middle	69	66.3%	\$3,968	64.9%	66.6%	31	70.5%	67.4%	\$1,707	71.1%	62.2%	22	62.9%	67.2%	\$1,139	60.6%	58.6%
	Upper	28	26.9%	\$1,953	31.9%	20.7%	10	22.7%	19.0%	\$613	25.5%	29.9%	10	28.6%	20.6%	\$685	36.4%	32.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	104	100.0%	\$6,116	100.0%	100.0%	44	100.0%	100.0%	\$2,400	100.0%	100.0%	35	100.0%	100.0%	\$1,880	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	7.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	10.0%
	Moderate	0	0.0%	\$0	0.0%	13.4%	0	0.0%	10.5%	\$0	0.0%	4.9%	0	0.0%	2.8%	\$0	0.0%	1.1%
	Middle	0	0.0%	\$0	0.0%	56.9%	0	0.0%	63.2%	\$0	0.0%	34.5%	0	0.0%	66.7%	\$0	0.0%	76.3%
	Upper	0	0.0%	\$0	0.0%	21.9%	0	0.0%	21.1%	\$0	0.0%	15.2%	0	0.0%	27.8%	\$0	0.0%	12.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	5.3%	\$0	0.0%	45.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.5%
	Moderate	149	7.2%	\$13,286	4.7%	12.7%	65	8.2%	10.5%	\$5,788	5.5%	6.6%	64	7.2%	10.2%	\$5,754	4.7%	5.9%
	Middle	1,377	66.4%	\$173,361	61.1%	66.6%	518	65.7%	66.9%	\$63,167	59.5%	59.8%	607	67.8%	65.6%	\$79,654	65.0%	60.9%
	Upper	548	26.4%	\$96,958	34.2%	20.7%	205	26.0%	22.4%	\$37,136	35.0%	32.5%	224	25.0%	24.0%	\$37,066	30.3%	32.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	1.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	2,074	100.0%	\$283,605	100.0%	100.0%	788	100.0%	100.0%	\$106,091	100.0%	100.0%	895	100.0%	100.0%	\$122,474	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	1.4%	0	0.0%	0.3%	\$0	0.0%	0.9%
	Moderate	54	6.2%	\$12,753	9.9%	11.1%	24	6.5%	9.8%	\$3,797	7.3%	10.3%	20	6.0%	10.2%	\$5,595	9.9%	9.6%
	Middle	557	63.7%	\$83,822	65.3%	64.9%	231	62.8%	62.6%	\$35,465	67.7%	67.2%	218	65.1%	63.4%	\$37,152	65.4%	66.5%
	Upper	263	30.1%	\$31,775	24.8%	23.6%	113	30.7%	23.2%	\$13,094	25.0%	19.8%	97	29.0%	23.3%	\$14,036	24.7%	22.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	1.3%	0	0.0%	2.9%	\$0	0.0%	0.9%
Total	874	100.0%	\$128,350	100.0%	100.0%	368	100.0%	100.0%	\$52,356	100.0%	100.0%	335	100.0%	100.0%	\$56,783	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.8%	\$0	0.0%	3.3%	0	0.0%	0.9%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	8.1%	0	0.0%	5.1%	\$0	0.0%	7.2%	0	0.0%	5.7%	\$0	0.0%	4.0%
	Middle	9	69.2%	\$921	82.8%	70.8%	1	50.0%	76.5%	\$113	55.7%	70.8%	3	50.0%	77.0%	\$205	67.0%	79.1%
	Upper	4	30.8%	\$191	17.2%	21.0%	1	50.0%	17.3%	\$90	44.3%	18.4%	3	50.0%	15.9%	\$101	33.0%	14.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.0%
Total	13	100.0%	\$1,112	100.0%	100.0%	2	100.0%	100.0%	\$203	100.0%	100.0%	6	100.0%	100.0%	\$306	100.0%	100.0%	

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI Northern MI

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014					2015							
		Bank		Families by Family Income			Count		Dollar			Count		Dollar					
		Count	Dollar	%	%	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg	%		
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%		
HOME PURCHASE	Low	73	8.0%	\$4,714	3.7%	19.2%	31	7.9%	4.8%	\$1,961	3.6%	2.2%	29	7.7%	5.5%	\$1,809	3.3%	2.5%	
	Moderate	196	21.5%	\$17,386	13.6%	18.5%	96	24.6%	17.1%	\$7,970	14.8%	10.7%	64	16.9%	16.0%	\$5,872	10.6%	10.0%	
	Middle	193	21.2%	\$21,976	17.2%	22.2%	67	17.1%	17.4%	\$7,626	14.1%	14.3%	92	24.3%	18.7%	\$10,797	19.4%	14.8%	
	Upper	413	45.4%	\$77,815	60.8%	40.0%	181	46.3%	41.8%	\$33,350	61.8%	55.3%	176	46.6%	42.1%	\$34,444	61.9%	57.1%	
	Unknown	35	3.8%	\$6,103	4.8%	0.0%	16	4.1%	18.9%	\$3,046	5.6%	17.5%	17	4.5%	17.7%	\$2,729	4.9%	15.6%	
	Total	910	100.0%	\$127,994	100.0%	100.0%	391	100.0%	100.0%	\$53,953	100.0%	100.0%	378	100.0%	100.0%	\$55,651	100.0%	100.0%	
REFINANCE	Low	111	10.5%	\$8,377	5.6%	19.2%	47	13.3%	7.8%	\$3,667	7.4%	4.1%	48	10.0%	6.6%	\$3,531	5.4%	3.1%	
	Moderate	208	19.6%	\$17,185	11.5%	18.5%	83	23.5%	15.1%	\$6,702	13.5%	9.1%	85	17.6%	12.5%	\$7,155	11.0%	7.5%	
	Middle	235	22.2%	\$24,551	16.4%	22.2%	72	20.4%	19.7%	\$6,730	13.5%	14.6%	116	24.1%	18.3%	\$12,931	19.9%	13.2%	
	Upper	475	44.8%	\$93,254	62.4%	40.0%	144	40.8%	39.7%	\$31,496	63.3%	52.7%	220	45.6%	43.7%	\$38,152	58.7%	57.5%	
	Unknown	31	2.9%	\$6,128	4.1%	0.0%	7	2.0%	17.8%	\$1,143	2.3%	19.5%	13	2.7%	18.9%	\$3,174	4.9%	18.6%	
	Total	1,060	100.0%	\$149,495	100.0%	100.0%	353	100.0%	100.0%	\$49,738	100.0%	100.0%	482	100.0%	100.0%	\$64,943	100.0%	100.0%	
HOME IMPROVEMENT	Low	10	9.6%	\$155	2.5%	19.2%	5	11.4%	9.5%	\$53	2.2%	4.5%	3	8.6%	8.2%	\$73	3.9%	3.2%	
	Moderate	31	29.8%	\$1,042	17.0%	18.5%	14	31.8%	22.0%	\$332	13.8%	13.1%	9	25.7%	18.5%	\$337	17.9%	11.9%	
	Middle	31	29.8%	\$1,921	31.4%	22.2%	15	34.1%	23.6%	\$1,031	43.0%	18.5%	12	34.3%	24.4%	\$755	40.2%	18.3%	
	Upper	32	30.8%	\$2,998	49.0%	40.0%	10	22.7%	41.9%	\$984	41.0%	58.4%	11	31.4%	45.1%	\$715	38.0%	60.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	5.5%	0	0.0%	3.9%	\$0	0.0%	5.9%	
	Total	104	100.0%	\$6,116	100.0%	100.0%	44	100.0%	100.0%	\$2,400	100.0%	100.0%	35	100.0%	100.0%	\$1,880	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	194	9.4%	\$13,246	4.7%	19.2%	83	10.5%	6.2%	\$5,681	5.4%	3.0%	80	8.9%	6.1%	\$5,413	4.4%	2.6%	
	Moderate	435	21.0%	\$35,613	12.6%	18.5%	193	24.5%	16.6%	\$15,004	14.1%	9.9%	158	17.7%	14.7%	\$13,364	10.9%	8.5%	
	Middle	459	22.1%	\$48,448	17.1%	22.2%	154	19.5%	18.7%	\$15,387	14.5%	14.2%	220	24.6%	18.9%	\$24,483	20.0%	13.5%	
	Upper	920	44.4%	\$174,067	61.4%	40.0%	335	42.5%	40.9%	\$65,830	62.1%	53.2%	407	45.5%	42.8%	\$73,311	59.9%	54.6%	
	Unknown	66	3.2%	\$12,231	4.3%	0.0%	23	2.9%	17.6%	\$4,189	3.9%	19.7%	30	3.4%	17.4%	\$5,903	4.8%	20.7%	
	Total	2,074	100.0%	\$283,605	100.0%	100.0%	788	100.0%	100.0%	\$106,091	100.0%	100.0%	895	100.0%	100.0%	\$122,474	100.0%	100.0%	
Small Business Revenue	\$1 Million or Less	427	48.9%	\$31,070	24.2%	90.3%	170	46.2%	40.1%	\$12,467	23.8%	39.4%	149	44.5%	48.6%	\$12,529	22.1%	46.0%	
	Over \$1 Million	223	25.5%	\$72,750	56.7%	7.9%	92	25.0%				97	29.0%						
	Total Rev. available	650	74.4%	\$103,820	80.9%	98.2%	262	71.2%				246	73.5%						
	Rev. Not Known	224	25.6%	\$24,530	19.1%	1.8%	106	28.8%				89	26.6%						
	Total	874	100.0%	\$128,350	100.0%	100.0%	368	100.0%				335	100.0%						
	Small Business Loan Size	\$100,000 or Less	583	66.7%	\$20,183	15.7%		250	67.9%	91.0%	\$8,778	16.8%	31.2%	205	61.2%	88.1%	\$7,330	12.9%	27.4%
\$100,001 - \$250,000		147	16.8%	\$26,889	20.9%		60	16.3%	4.7%	\$11,043	21.1%	19.0%	64	19.1%	6.3%	\$11,515	20.3%	19.6%	
\$250,001 - \$1 Million		144	16.5%	\$81,278	63.3%		58	15.8%	4.3%	\$32,535	62.1%	49.8%	66	19.7%	5.6%	\$37,938	66.8%	53.0%	
Total		874	100.0%	\$128,350	100.0%		368	100.0%	100.0%	\$52,356	100.0%	100.0%	335	100.0%	100.0%	\$56,783	100.0%	100.0%	
Total Farms																			
Small Farm Revenue	\$1 Million or Less	7	53.8%	\$149	13.4%	97.0%	0	0.0%	60.5%	\$0	0.0%	69.6%	3	50.0%	52.7%	\$46	15.0%	61.2%	
	Over \$1 Million	2	15.4%	\$650	58.5%	3.0%	0	0.0%				1	16.7%						
	Not Known	4	30.8%	\$313	28.1%	0.0%	2	100.0%				2	33.3%						
	Total	13	100.0%	\$1,112	100.0%	100.0%	2	100.0%				6	100.0%						
	Small Farm Loan Size	\$100,000 or Less	10	76.9%	\$349	31.4%		1	50.0%	83.8%	\$90	44.3%	35.7%	5	83.3%	88.4%	\$156	51.0%	41.4%
		\$100,001 - \$250,000	2	15.4%	\$263	23.7%		1	50.0%	11.9%	\$113	55.7%	34.6%	1	16.7%	6.8%	\$150	49.0%	21.9%
\$250,001 - \$500,000		1	7.7%	\$500	45.0%		0	0.0%	4.3%	\$0	0.0%	29.8%	0	0.0%	4.8%	\$0	0.0%	36.7%	
Total		13	100.0%	\$1,112	100.0%		2	100.0%	100.0%	\$203	100.0%	100.0%	6	100.0%	100.0%	\$306	100.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: MI Southern MI

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	1	0.2%	\$90	0.1%	0.3%	1	0.5%	0.2%	\$90	0.4%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	16	3.0%	\$1,424	2.0%	5.4%	7	3.4%	4.5%	\$633	2.5%	2.7%	5	2.4%	4.9%	\$499	1.9%	2.8%
	Middle	346	64.4%	\$41,583	58.7%	67.6%	134	65.4%	63.5%	\$15,117	60.3%	59.5%	137	66.5%	63.5%	\$16,656	62.1%	58.4%
	Upper	174	32.4%	\$27,776	39.2%	26.7%	63	30.7%	31.8%	\$9,225	36.8%	37.7%	64	31.1%	31.5%	\$9,650	36.0%	38.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>537</i>	<i>100.0%</i>	<i>\$70,873</i>	<i>100.0%</i>	<i>100.0%</i>	<i>205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$25,065</i>	<i>100.0%</i>	<i>100.0%</i>	<i>206</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26,805</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	4	0.7%	\$231	0.4%	0.3%	1	0.5%	0.3%	\$112	0.6%	0.2%	3	1.2%	0.4%	\$119	0.4%	0.3%
	Moderate	16	2.8%	\$1,164	1.8%	5.4%	10	5.1%	3.5%	\$658	3.5%	2.1%	2	0.8%	2.8%	\$91	0.3%	2.0%
	Middle	353	61.2%	\$34,356	54.1%	67.6%	115	58.7%	61.4%	\$10,024	52.8%	56.7%	164	63.1%	60.0%	\$16,688	56.3%	54.8%
	Upper	204	35.4%	\$27,758	43.7%	26.7%	70	35.7%	34.9%	\$8,190	43.1%	41.0%	91	35.0%	36.7%	\$12,766	43.0%	42.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>577</i>	<i>100.0%</i>	<i>\$63,509</i>	<i>100.0%</i>	<i>100.0%</i>	<i>196</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,984</i>	<i>100.0%</i>	<i>100.0%</i>	<i>260</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,664</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Moderate	2	2.5%	\$36	0.7%	5.4%	0	0.0%	6.4%	\$0	0.0%	2.9%	1	2.8%	3.4%	\$28	1.2%	2.3%
	Middle	59	72.8%	\$3,647	68.4%	67.6%	24	85.7%	62.3%	\$1,521	78.6%	60.6%	26	72.2%	65.3%	\$1,690	71.5%	60.3%
	Upper	20	24.7%	\$1,648	30.9%	26.7%	4	14.3%	30.9%	\$413	21.4%	36.4%	9	25.0%	30.8%	\$646	27.3%	37.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>\$5,331</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,934</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,364</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	5.0%	\$0	0.0%	2.0%	0	0.0%	7.7%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	8.5%	0	0.0%	5.0%	\$0	0.0%	2.7%	0	0.0%	7.7%	\$0	0.0%	1.1%
	Middle	1	50.0%	\$1,120	76.8%	75.7%	0	0.0%	55.0%	\$0	0.0%	76.3%	0	0.0%	61.5%	\$0	0.0%	65.2%
	Upper	1	50.0%	\$339	23.2%	14.7%	1	100.0%	35.0%	\$339	100.0%	19.0%	0	0.0%	23.1%	\$0	0.0%	30.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$1,459</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$339</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	5	0.4%	\$321	0.2%	0.3%	2	0.5%	0.2%	\$202	0.4%	0.2%	3	0.6%	0.3%	\$119	0.2%	0.2%
	Moderate	34	2.8%	\$2,624	1.9%	5.4%	17	4.0%	4.3%	\$1,291	2.8%	2.5%	8	1.6%	4.0%	\$618	1.1%	2.4%
	Middle	759	63.4%	\$80,706	57.2%	67.6%	273	63.5%	62.6%	\$26,662	57.6%	58.6%	327	65.1%	62.3%	\$35,034	59.5%	57.0%
	Upper	399	33.3%	\$57,521	40.7%	26.7%	138	32.1%	32.9%	\$18,167	39.2%	38.7%	164	32.7%	33.4%	\$23,062	39.2%	40.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,197</i>	<i>100.0%</i>	<i>\$141,172</i>	<i>100.0%</i>	<i>100.0%</i>	<i>430</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$46,322</i>	<i>100.0%</i>	<i>100.0%</i>	<i>502</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$58,833</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	14	3.2%	\$1,763	2.4%	1.9%	4	1.9%	2.2%	\$864	2.5%	2.9%	9	6.2%	2.3%	\$884	3.4%	3.5%
	Moderate	41	9.2%	\$11,597	15.7%	5.6%	15	7.2%	7.2%	\$4,080	11.8%	10.9%	14	9.6%	7.9%	\$3,858	15.0%	13.1%
	Middle	262	59.0%	\$42,699	57.6%	65.2%	124	59.9%	57.4%	\$20,031	58.0%	54.4%	90	61.6%	56.7%	\$16,039	62.4%	53.7%
	Upper	127	28.6%	\$18,034	24.3%	27.4%	64	30.9%	29.7%	\$9,563	27.7%	31.2%	33	22.6%	30.3%	\$4,930	19.2%	29.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	0.6%	0	0.0%	2.9%	\$0	0.0%	0.6%
<i>Total</i>	<i>444</i>	<i>100.0%</i>	<i>\$74,093</i>	<i>100.0%</i>	<i>100.0%</i>	<i>207</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34,538</i>	<i>100.0%</i>	<i>100.0%</i>	<i>146</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$25,711</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.2%	0	0.0%	3.5%	\$0	0.0%	3.8%	0	0.0%	3.6%	\$0	0.0%	3.7%
	Middle	17	81.0%	\$4,078	88.5%	72.9%	6	75.0%	73.9%	\$1,800	78.1%	69.8%	6	85.7%	68.1%	\$1,650	99.5%	69.9%
	Upper	4	19.0%	\$532	11.5%	24.8%	2	25.0%	22.2%	\$505	21.9%	26.4%	1	14.3%	28.0%	\$9	0.5%	26.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.3%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$4,610</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,305</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,659</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI Southern MI

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014					2015							
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar						
		#	%	\$ (000s)	%		%	\$ (000s)		%	%		#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	44	8.2%	\$3,008	4.2%	16.9%	19	9.3%	6.8%	\$1,219	4.9%	3.4%	15	7.3%	6.7%	\$1,082	4.0%	3.4%	
	Moderate	165	30.7%	\$15,395	21.7%	17.4%	72	35.1%	23.1%	\$6,661	26.6%	16.2%	60	29.1%	22.3%	\$5,717	21.3%	15.5%	
	Middle	149	27.7%	\$18,963	26.8%	23.2%	54	26.3%	21.6%	\$6,792	27.1%	20.1%	59	28.6%	22.5%	\$7,472	27.9%	20.8%	
	Upper	159	29.6%	\$29,889	42.2%	42.5%	52	25.4%	31.1%	\$9,011	36.0%	44.8%	60	29.1%	32.1%	\$10,298	38.4%	45.8%	
	Unknown	20	3.7%	\$3,618	5.1%	0.0%	8	3.9%	17.3%	\$1,382	5.5%	15.5%	12	5.8%	16.4%	\$2,236	8.3%	14.7%	
	<i>Total</i>	<i>537</i>	<i>100.0%</i>	<i>\$70,873</i>	<i>100.0%</i>	<i>100.0%</i>	<i>205</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$25,065</i>	<i>100.0%</i>	<i>100.0%</i>	<i>206</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26,805</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	50	8.7%	\$3,253	5.1%	16.9%	24	12.2%	6.4%	\$1,242	6.5%	3.7%	14	5.4%	5.4%	\$916	3.1%	2.8%	
	Moderate	131	22.7%	\$10,046	15.8%	17.4%	53	27.0%	17.1%	\$4,158	21.9%	11.4%	49	18.8%	14.5%	\$3,879	13.1%	9.5%	
	Middle	143	24.8%	\$15,024	23.7%	23.2%	41	20.9%	20.9%	\$4,078	21.5%	17.6%	76	29.2%	20.8%	\$8,016	27.0%	16.7%	
	Upper	239	41.4%	\$33,815	53.2%	42.5%	74	37.8%	38.3%	\$9,046	47.7%	48.8%	114	43.8%	39.8%	\$16,234	54.7%	50.2%	
	Unknown	14	2.4%	\$1,371	2.2%	0.0%	4	2.0%	17.4%	\$460	2.4%	18.5%	7	2.7%	19.4%	\$619	2.1%	20.7%	
	<i>Total</i>	<i>577</i>	<i>100.0%</i>	<i>\$63,509</i>	<i>100.0%</i>	<i>100.0%</i>	<i>196</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,984</i>	<i>100.0%</i>	<i>100.0%</i>	<i>260</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,664</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	10	12.3%	\$399	7.5%	16.9%	4	14.3%	9.9%	\$113	5.8%	4.3%	3	8.3%	8.1%	\$108	4.6%	3.8%	
	Moderate	23	28.4%	\$1,040	19.5%	17.4%	8	28.6%	21.3%	\$436	22.5%	13.3%	11	30.6%	17.5%	\$447	18.9%	9.5%	
	Middle	18	22.2%	\$1,067	20.0%	23.2%	7	25.0%	24.0%	\$504	26.1%	20.5%	9	25.0%	26.8%	\$425	18.0%	22.6%	
	Upper	28	34.6%	\$2,501	46.9%	42.5%	7	25.0%	41.1%	\$557	28.8%	50.7%	13	36.1%	43.8%	\$1,384	58.5%	58.8%	
	Unknown	2	2.5%	\$324	6.1%	0.0%	2	7.1%	3.7%	\$324	16.8%	11.3%	0	0.0%	3.8%	\$0	0.0%	5.4%	
	<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>\$5,331</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,934</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,364</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	2	100.0%	\$1,459	100.0%	0.0%	1	100.0%	100.0%	\$339	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$1,459</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$339</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	104	8.7%	\$6,660	4.7%	16.9%	47	10.9%	6.9%	\$2,574	5.6%	3.5%	32	6.4%	6.3%	\$2,106	3.6%	3.1%	
	Moderate	319	26.6%	\$26,481	18.8%	17.4%	133	30.9%	20.6%	\$11,255	24.3%	14.2%	120	23.9%	18.9%	\$10,043	17.1%	12.8%	
	Middle	310	25.9%	\$35,054	24.8%	23.2%	102	23.7%	21.5%	\$11,374	24.6%	18.9%	144	28.7%	22.2%	\$15,913	27.0%	19.1%	
	Upper	426	35.6%	\$66,205	46.9%	42.5%	133	30.9%	34.6%	\$18,614	40.2%	46.0%	187	37.3%	35.9%	\$27,916	47.4%	47.7%	
	Unknown	38	3.2%	\$6,772	4.8%	0.0%	15	3.5%	16.4%	\$2,505	5.4%	17.4%	19	3.8%	16.7%	\$2,855	4.9%	17.3%	
	<i>Total</i>	<i>1,197</i>	<i>100.0%</i>	<i>\$141,172</i>	<i>100.0%</i>	<i>100.0%</i>	<i>430</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$46,322</i>	<i>100.0%</i>	<i>100.0%</i>	<i>502</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$58,833</i>	<i>100.0%</i>	<i>100.0%</i>	
Small Business Revenue	\$1 Million or Less	193	43.5%	\$11,614	15.7%	90.5%	87	42.0%	40.8%	\$5,375	15.6%	30.7%	56	38.4%	45.9%	\$3,147	12.2%	29.5%	
	Over \$1 Million	152	34.2%	\$52,719	71.2%	8.0%	65	31.4%					58	39.7%					
	Total Rev. available	345	77.7%	\$64,333	86.9%	98.5%	152	73.4%					114	78.1%					
	Rev. Not Known	99	22.3%	\$9,760	13.2%	1.5%	55	26.6%					32	21.9%					
	Total	444	100.0%	\$74,093	100.0%	100.0%	207	100.0%					146	100.0%					
	Small Business Loan Size	\$100,000 or Less	293	66.0%	\$10,177	13.7%		138	66.7%	87.0%	\$4,627	13.4%	23.1%	94	64.4%	86.5%	\$3,408	13.3%	24.5%
\$100,001 - \$250,000		51	11.5%	\$9,055	12.2%		19	9.2%	6.0%	\$3,575	10.4%	17.2%	20	13.7%	7.0%	\$3,596	14.0%	19.7%	
\$250,001 - \$1 Million		100	22.5%	\$54,861	74.0%		50	24.2%	6.9%	\$26,336	76.3%	59.7%	32	21.9%	6.5%	\$18,707	72.8%	55.9%	
Total		444	100.0%	\$74,093	100.0%		207	100.0%	100.0%	\$34,538	100.0%	100.0%	146	100.0%	100.0%	\$25,711	100.0%	100.0%	
Small Farm Revenue		\$1 Million or Less	11	52.4%	\$1,810	39.3%	97.1%	4	50.0%	43.7%	\$1,205	52.3%	51.4%	2	28.6%	38.4%	\$259	15.6%	55.9%
	Over \$1 Million	7	33.3%	\$2,450	53.1%	2.9%	2	25.0%					4	57.1%					
	Not Known	3	14.3%	\$350	7.6%	0.0%	2	25.0%					1	14.3%					
	Total	21	100.0%	\$4,610	100.0%	100.0%	8	100.0%					7	100.0%					
	Small Farm Loan Size	\$100,000 or Less	8	38.1%	\$210	4.6%		2	25.0%	75.4%	\$55	2.4%	22.5%	2	28.6%	78.2%	\$59	3.6%	20.9%
		\$100,001 - \$250,000	4	19.0%	\$950	20.6%		1	12.5%	16.2%	\$250	10.8%	36.6%	2	28.6%	11.1%	\$450	27.1%	26.8%
\$250,001 - \$500,000		9	42.9%	\$3,450	74.8%		5	62.5%	8.5%	\$2,000	86.8%	40.9%	3	42.9%	10.7%	\$1,150	69.3%	52.3%	
Total		21	100.0%	\$4,610	100.0%		8	100.0%	100.0%	\$2,305	100.0%	100.0%	7	100.0%	100.0%	\$1,659	100.0%	100.0%	
Total		21	100.0%	\$4,610	100.0%		8	100.0%	100.0%	\$2,305	100.0%	100.0%	7	100.0%	100.0%	\$1,659	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MISaginaw

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Bank	Agg	Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	1.4%	\$20	0.2%	3.4%	0	0.0%	0.9%	\$0	0.0%	0.4%	1	3.4%	0.8%	\$20	0.5%	0.4%
	Moderate	9	12.3%	\$608	7.0%	13.2%	7	26.9%	10.0%	\$498	17.5%	9.7%	1	3.4%	8.8%	\$45	1.2%	5.0%
	Middle	28	38.4%	\$2,774	31.8%	52.7%	9	34.6%	49.3%	\$910	32.1%	42.0%	10	34.5%	50.5%	\$946	25.8%	44.4%
	Upper	35	47.9%	\$5,324	61.0%	30.7%	10	38.5%	39.8%	\$1,431	50.4%	47.9%	17	58.6%	39.9%	\$2,653	72.4%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	73	100.0%	\$8,726	100.0%	100.0%	26	100.0%	100.0%	\$2,839	100.0%	100.0%	29	100.0%	100.0%	\$3,664	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.4%	0	0.0%	1.0%	\$0	0.0%	0.6%	0	0.0%	1.0%	\$0	0.0%	0.5%
	Moderate	10	9.8%	\$621	5.9%	13.2%	2	5.4%	10.2%	\$81	2.1%	6.1%	5	10.4%	7.5%	\$293	6.4%	4.6%
	Middle	57	55.9%	\$5,427	52.0%	52.7%	21	56.8%	53.0%	\$2,126	54.2%	49.3%	33	68.8%	54.1%	\$3,068	66.5%	50.1%
	Upper	35	34.3%	\$4,393	42.1%	30.7%	14	37.8%	35.8%	\$1,715	43.7%	43.9%	10	20.8%	37.4%	\$1,252	27.1%	44.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	102	100.0%	\$10,441	100.0%	100.0%	37	100.0%	100.0%	\$3,922	100.0%	100.0%	48	100.0%	100.0%	\$4,613	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.4%	0	0.0%	2.8%	\$0	0.0%	2.2%	0	0.0%	2.8%	\$0	0.0%	0.7%
	Moderate	1	5.9%	\$232	16.5%	13.2%	0	0.0%	12.4%	\$0	0.0%	7.8%	1	25.0%	12.3%	\$232	45.0%	6.6%
	Middle	10	58.8%	\$630	44.9%	52.7%	5	71.4%	58.5%	\$264	53.2%	59.4%	1	25.0%	56.2%	\$62	12.0%	51.9%
	Upper	6	35.3%	\$541	38.6%	30.7%	2	28.6%	26.3%	\$232	46.8%	30.7%	2	50.0%	28.7%	\$221	42.9%	40.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$1,403	100.0%	100.0%	7	100.0%	100.0%	\$496	100.0%	100.0%	4	100.0%	100.0%	\$515	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	8.7%	0	0.0%	6.3%	\$0	0.0%	0.2%	0	0.0%	10.5%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	24.6%	0	0.0%	12.5%	\$0	0.0%	2.8%	0	0.0%	31.6%	\$0	0.0%	12.4%
	Middle	0	0.0%	\$0	0.0%	33.7%	0	0.0%	31.3%	\$0	0.0%	27.7%	0	0.0%	21.1%	\$0	0.0%	14.9%
	Upper	0	0.0%	\$0	0.0%	32.9%	0	0.0%	50.0%	\$0	0.0%	69.3%	0	0.0%	36.8%	\$0	0.0%	71.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	0.5%	\$20	0.1%	3.4%	0	0.0%	1.1%	\$0	0.0%	0.5%	1	1.2%	1.0%	\$20	0.2%	0.5%
	Moderate	20	10.4%	\$1,461	7.1%	13.2%	9	12.9%	10.3%	\$579	8.0%	8.1%	7	8.6%	8.7%	\$570	6.5%	5.3%
	Middle	95	49.5%	\$8,831	42.9%	52.7%	35	50.0%	51.7%	\$3,300	45.5%	44.7%	44	54.3%	52.4%	\$4,076	46.4%	45.3%
	Upper	76	39.6%	\$10,258	49.9%	30.7%	26	37.1%	36.8%	\$3,378	46.5%	46.6%	29	35.8%	37.9%	\$4,126	46.9%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	192	100.0%	\$20,570	100.0%	100.0%	70	100.0%	100.0%	\$7,257	100.0%	100.0%	81	100.0%	100.0%	\$8,792	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	12	5.6%	\$561	1.6%	4.2%	5	6.3%	4.7%	\$233	2.2%	6.9%	6	6.7%	4.8%	\$288	1.7%	8.5%
	Moderate	27	12.6%	\$5,522	16.1%	15.3%	10	12.5%	14.7%	\$1,531	14.5%	14.9%	8	9.0%	13.9%	\$2,767	16.6%	14.9%
	Middle	104	48.6%	\$15,992	46.6%	47.7%	39	48.8%	42.8%	\$6,631	62.7%	42.9%	45	50.6%	44.6%	\$7,187	43.2%	42.1%
	Upper	71	33.2%	\$12,253	35.7%	32.8%	26	32.5%	36.1%	\$2,182	20.6%	34.7%	30	33.7%	35.3%	\$6,390	38.4%	33.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.7%	\$0	0.0%	0.6%	0	0.0%	1.3%	\$0	0.0%	0.8%
Total	214	100.0%	\$34,328	100.0%	100.0%	80	100.0%	100.0%	\$10,577	100.0%	100.0%	89	100.0%	100.0%	\$16,632	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.3%	0	0.0%	1.7%	\$0	0.0%	0.3%	0	0.0%	1.0%	\$0	0.0%	0.2%
	Middle	0	0.0%	\$0	0.0%	69.4%	0	0.0%	80.1%	\$0	0.0%	76.5%	0	0.0%	75.6%	\$0	0.0%	77.2%
	Upper	0	0.0%	\$0	0.0%	27.2%	0	0.0%	18.2%	\$0	0.0%	23.3%	0	0.0%	23.4%	\$0	0.0%	22.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI Saginaw

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank				Families by Family Income %	Count		Dollar				Count		Dollar				
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	%	%	Bank #	Agg %	Bank \$ (000s)	%	Agg %			
HOME PURCHASE	Low	10	13.7%	\$564	6.5%	20.6%	4	15.4%	10.9%	\$258	9.1%	5.4%	5	17.2%	11.6%	\$230	6.3%	5.8%	
	Moderate	15	20.5%	\$1,357	15.6%	17.6%	6	23.1%	20.2%	\$556	19.6%	13.8%	4	13.8%	21.6%	\$389	10.6%	15.2%	
	Middle	20	27.4%	\$2,315	26.5%	21.3%	7	26.9%	21.6%	\$666	23.5%	19.0%	8	27.6%	22.0%	\$1,186	32.4%	21.1%	
	Upper	26	35.6%	\$4,231	48.5%	40.6%	8	30.8%	30.1%	\$1,271	44.8%	44.1%	11	37.9%	28.7%	\$1,688	46.1%	44.3%	
	Unknown	2	2.7%	\$259	3.0%	0.0%	1	3.8%	17.2%	\$88	3.1%	17.7%	1	3.4%	16.1%	\$171	4.7%	13.6%	
	Total	73	100.0%	\$8,726	100.0%	100.0%	26	100.0%	100.0%	\$2,839	100.0%	100.0%	29	100.0%	100.0%	\$3,664	100.0%	100.0%	
REFINANCE	Low	6	5.9%	\$383	3.7%	20.6%	2	5.4%	9.1%	\$79	2.0%	5.4%	3	6.3%	7.4%	\$193	4.2%	3.9%	
	Moderate	16	15.7%	\$1,491	14.3%	17.6%	9	24.3%	18.5%	\$1,013	25.8%	13.2%	4	8.3%	17.0%	\$331	7.2%	12.1%	
	Middle	34	33.3%	\$3,342	32.0%	21.3%	11	29.7%	23.0%	\$976	24.9%	18.9%	15	31.3%	22.4%	\$1,310	28.4%	18.8%	
	Upper	41	40.2%	\$4,630	44.3%	40.6%	12	32.4%	34.3%	\$1,476	37.6%	45.4%	24	50.0%	35.8%	\$2,562	55.5%	46.6%	
	Unknown	5	4.9%	\$595	5.7%	0.0%	3	8.1%	15.1%	\$378	9.6%	17.1%	2	4.2%	17.3%	\$217	4.7%	18.7%	
	Total	102	100.0%	\$10,441	100.0%	100.0%	37	100.0%	100.0%	\$3,922	100.0%	100.0%	48	100.0%	100.0%	\$4,613	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	5.9%	\$64	4.6%	20.6%	0	0.0%	14.5%	\$0	0.0%	5.4%	0	0.0%	15.3%	\$0	0.0%	4.1%	
	Moderate	2	11.8%	\$10	0.7%	17.6%	1	14.3%	26.2%	\$6	1.2%	14.3%	0	0.0%	22.6%	\$0	0.0%	12.1%	
	Middle	6	35.3%	\$460	32.8%	21.3%	3	42.9%	25.5%	\$172	34.7%	25.0%	1	25.0%	23.5%	\$62	12.0%	20.1%	
	Upper	8	47.1%	\$869	61.9%	40.6%	3	42.9%	30.3%	\$318	64.1%	51.0%	3	75.0%	35.8%	\$453	88.0%	58.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	4.3%	0	0.0%	2.8%	\$0	0.0%	5.2%	
	Total	17	100.0%	\$1,403	100.0%	100.0%	7	100.0%	100.0%	\$496	100.0%	100.0%	4	100.0%	100.0%	\$515	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	17	8.9%	\$1,011	4.9%	20.6%	6	8.6%	10.6%	\$337	4.6%	5.2%	8	9.9%	10.2%	\$423	4.8%	4.7%	
	Moderate	33	17.2%	\$2,858	13.9%	17.6%	16	22.9%	20.1%	\$1,575	21.7%	13.1%	8	9.9%	19.8%	\$720	8.2%	13.1%	
	Middle	60	31.3%	\$6,117	29.7%	21.3%	21	30.0%	22.5%	\$1,814	25.0%	18.5%	24	29.6%	22.2%	\$2,558	29.1%	19.1%	
	Upper	75	39.1%	\$9,730	47.3%	40.6%	23	32.9%	31.7%	\$3,065	42.2%	43.3%	38	46.9%	32.1%	\$4,703	53.5%	43.3%	
	Unknown	7	3.6%	\$854	4.2%	0.0%	4	5.7%	15.1%	\$466	6.4%	19.8%	3	3.7%	15.6%	\$388	4.4%	19.9%	
	Total	192	100.0%	\$20,570	100.0%	100.0%	70	100.0%	100.0%	\$7,257	100.0%	100.0%	81	100.0%	100.0%	\$8,792	100.0%	100.0%	
Small Business Revenue	\$1 Million or Less	93	43.5%	\$4,467	13.0%	89.3%	34	42.5%	38.9%	\$1,503	14.2%	33.3%	37	41.6%	45.8%	\$1,670	10.0%	33.8%	
	Over \$1 Million	73	34.1%	\$22,677	66.1%	9.7%	25	31.3%					35	39.3%					
	Total Rev. available	166	77.6%	\$27,144	79.1%	99.0%	59	73.8%					72	80.9%					
	Rev. Not Known	48	22.4%	\$7,184	20.9%	1.0%	21	26.3%					17	19.1%					
	Total	214	100.0%	\$34,328	100.0%	100.0%	80	100.0%					89	100.0%					
	Small Business Loan Size	\$100,000 or Less	136	63.6%	\$4,822	14.0%		54	67.5%	89.2%	\$1,962	18.5%	28.1%	51	57.3%	88.1%	\$1,779	10.7%	25.2%
\$100,001 - \$250,000		32	15.0%	\$5,899	17.2%		13	16.3%	5.4%	\$2,599	24.6%	17.6%	15	16.9%	5.9%	\$2,569	15.4%	17.5%	
\$250,001 - \$1 Million		46	21.5%	\$23,607	68.8%		13	16.3%	5.4%	\$6,016	56.9%	54.4%	23	25.8%	6.1%	\$12,284	73.9%	57.2%	
Total		214	100.0%	\$34,328	100.0%		80	100.0%	100.0%	\$10,577	100.0%	100.0%	89	100.0%	100.0%	\$16,632	100.0%	100.0%	
Small Farm Revenue		\$1 Million or Less	0	0.0%	\$0	0.0%	99.3%	0	0.0%	64.2%	\$0	0.0%	68.7%	0	0.0%	54.3%	\$0	0.0%	72.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.7%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
	Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	83.0%	\$0	0.0%	35.1%	0	0.0%	81.2%	\$0	0.0%	38.6%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	13.6%	\$0	0.0%	41.6%	0	0.0%	15.2%	\$0	0.0%	40.0%
\$250,001 - \$500,000		0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	23.3%	0	0.0%	3.6%	\$0	0.0%	21.4%	
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses w ith revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: NC Asheville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Bank	Agg	Dollar			Count		Dollar				
		#	%	\$ (000s)	%	%			%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	1	2.0%	\$128	0.9%	1.1%	1	3.1%	1.7%	\$128	1.7%	1.6%	0	0.0%	1.5%	\$0	0.0%	1.7%
	Moderate	1	2.0%	\$539	3.9%	12.8%	1	3.1%	14.9%	\$539	7.3%	11.5%	0	0.0%	14.3%	\$0	0.0%	11.0%
	Middle	37	72.5%	\$8,253	60.3%	63.7%	23	71.9%	61.2%	\$4,206	57.1%	55.3%	9	81.8%	61.4%	\$2,278	83.5%	55.7%
	Upper	12	23.5%	\$4,773	34.9%	22.4%	7	21.9%	22.1%	\$2,492	33.8%	31.5%	2	18.2%	22.8%	\$450	16.5%	31.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>\$13,693</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,365</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,728</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	1.7%	\$0	0.0%	1.4%	0	0.0%	1.7%	\$0	0.0%	1.6%
	Moderate	5	10.6%	\$909	10.0%	12.8%	3	13.6%	14.3%	\$574	13.7%	10.2%	1	6.7%	15.3%	\$139	5.1%	10.7%
	Middle	35	74.5%	\$5,077	56.1%	63.7%	16	72.7%	61.4%	\$2,216	52.9%	56.6%	13	86.7%	59.2%	\$2,003	73.2%	53.7%
	Upper	7	14.9%	\$3,065	33.9%	22.4%	3	13.6%	22.6%	\$1,398	33.4%	31.8%	1	6.7%	23.8%	\$595	21.7%	33.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>47</i>	<i>100.0%</i>	<i>\$9,051</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,188</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,737</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.4%	\$0	0.0%	0.6%	0	0.0%	1.4%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	12.8%	0	0.0%	17.6%	\$0	0.0%	10.6%	0	0.0%	16.0%	\$0	0.0%	11.4%
	Middle	10	83.3%	\$908	83.5%	63.7%	5	83.3%	61.8%	\$559	98.2%	58.2%	3	75.0%	61.2%	\$182	51.9%	56.8%
	Upper	2	16.7%	\$179	16.5%	22.4%	1	16.7%	20.2%	\$10	1.8%	30.6%	1	25.0%	21.5%	\$169	48.1%	29.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$1,087</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$569</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$351</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	6.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	18.8%	\$0	0.0%	16.6%	0	0.0%	14.3%	\$0	0.0%	2.9%
	Middle	0	0.0%	\$0	0.0%	39.4%	0	0.0%	62.5%	\$0	0.0%	13.9%	0	0.0%	53.6%	\$0	0.0%	34.8%
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	18.8%	\$0	0.0%	69.5%	0	0.0%	32.1%	\$0	0.0%	62.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	1	0.9%	\$128	0.5%	1.1%	1	1.7%	1.7%	\$128	1.1%	1.5%	0	0.0%	1.5%	\$0	0.0%	1.6%
	Moderate	6	5.5%	\$1,448	6.1%	12.8%	4	6.7%	14.8%	\$1,113	9.2%	11.3%	1	3.3%	14.8%	\$139	2.4%	10.6%
	Middle	82	74.5%	\$14,238	59.7%	63.7%	44	73.3%	61.3%	\$6,981	57.6%	54.3%	25	83.3%	60.5%	\$4,463	76.7%	54.1%
	Upper	21	19.1%	\$8,017	33.6%	22.4%	11	18.3%	22.2%	\$3,900	32.2%	33.0%	4	13.3%	23.2%	\$1,214	20.9%	33.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>110</i>	<i>100.0%</i>	<i>\$23,831</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,122</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,816</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	3.6%	0	0.0%	4.2%	\$0	0.0%	6.5%	0	0.0%	4.1%	\$0	0.0%	6.8%
	Moderate	3	8.8%	\$46	1.1%	15.1%	1	5.6%	16.9%	\$3	0.1%	20.2%	1	8.3%	17.6%	\$10	1.3%	21.6%
	Middle	23	67.6%	\$2,503	62.5%	51.4%	13	72.2%	46.1%	\$2,027	74.2%	39.5%	8	66.7%	46.8%	\$98	12.4%	37.0%
	Upper	8	23.5%	\$1,456	36.4%	29.9%	4	22.2%	29.9%	\$701	25.7%	32.5%	3	25.0%	29.4%	\$680	86.3%	33.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	1.3%	0	0.0%	2.1%	\$0	0.0%	1.2%
<i>Total</i>	<i>34</i>	<i>100.0%</i>	<i>\$4,005</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,731</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$788</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	15.9%	0	0.0%	2.8%	\$0	0.0%	10.4%
	Moderate	0	0.0%	\$0	0.0%	13.2%	0	0.0%	13.3%	\$0	0.0%	22.2%	0	0.0%	2.8%	\$0	0.0%	6.6%
	Middle	0	0.0%	\$0	0.0%	63.0%	0	0.0%	53.3%	\$0	0.0%	21.8%	0	0.0%	63.9%	\$0	0.0%	57.4%
	Upper	0	0.0%	\$0	0.0%	23.8%	0	0.0%	23.3%	\$0	0.0%	32.8%	0	0.0%	22.2%	\$0	0.0%	20.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	6.7%	\$0	0.0%	7.3%	0	0.0%	8.3%	\$0	0.0%	5.1%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: NC Asheville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		Families by Family Income			Count		Dollar				Count		Dollar				
		Count	Dollar			%	Bank	Agg	Bank	Agg		Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %			
HOME PURCHASE	Low	2	3.9%	\$100	0.7%	19.8%	2	6.3%	3.5%	\$100	1.4%	1.4%	0	0.0%	3.2%	\$0	0.0%	1.4%	
	Moderate	6	11.8%	\$871	6.4%	18.5%	3	9.4%	14.1%	\$377	5.1%	8.5%	3	27.3%	15.0%	\$494	18.1%	9.2%	
	Middle	8	15.7%	\$1,284	9.4%	21.4%	6	18.8%	20.6%	\$868	11.8%	16.3%	1	9.1%	21.7%	\$170	6.2%	17.4%	
	Upper	33	64.7%	\$11,180	81.6%	40.2%	20	62.5%	46.0%	\$5,892	80.0%	59.5%	6	54.5%	47.0%	\$1,934	70.9%	60.0%	
	Unknown	2	3.9%	\$258	1.9%	0.0%	1	3.1%	15.8%	\$128	1.7%	14.3%	1	9.1%	13.2%	\$130	4.8%	11.9%	
	Total	51	100.0%	\$13,693	100.0%	100.0%	32	100.0%	100.0%	\$7,365	100.0%	100.0%	11	100.0%	100.0%	\$2,728	100.0%	100.0%	
REFINANCE	Low	3	6.4%	\$393	4.3%	19.8%	2	9.1%	7.3%	\$296	7.1%	3.7%	0	0.0%	4.8%	\$0	0.0%	2.3%	
	Moderate	8	17.0%	\$760	8.4%	18.5%	4	18.2%	14.9%	\$331	7.9%	9.4%	2	13.3%	12.2%	\$274	10.0%	7.4%	
	Middle	10	21.3%	\$1,146	12.7%	21.4%	4	18.2%	21.2%	\$422	10.1%	16.2%	3	20.0%	19.1%	\$342	12.5%	14.7%	
	Upper	19	40.4%	\$5,437	60.1%	40.2%	9	40.9%	40.6%	\$2,535	60.5%	52.5%	6	40.0%	44.9%	\$1,410	51.5%	57.0%	
	Unknown	7	14.9%	\$1,315	14.5%	0.0%	3	13.6%	16.0%	\$604	14.4%	18.1%	4	26.7%	19.0%	\$711	26.0%	18.5%	
	Total	47	100.0%	\$9,051	100.0%	100.0%	22	100.0%	100.0%	\$4,188	100.0%	100.0%	15	100.0%	100.0%	\$2,737	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	8.3%	\$7	0.6%	19.8%	0	0.0%	9.4%	\$0	0.0%	1.7%	0	0.0%	8.5%	\$0	0.0%	1.4%	
	Moderate	1	8.3%	\$107	9.8%	18.5%	1	16.7%	22.5%	\$107	18.8%	10.2%	0	0.0%	15.7%	\$0	0.0%	9.6%	
	Middle	3	25.0%	\$341	31.4%	21.4%	0	0.0%	20.6%	\$0	0.0%	18.3%	3	75.0%	22.3%	\$341	97.2%	18.4%	
	Upper	7	58.3%	\$632	58.1%	40.2%	5	83.3%	43.4%	\$462	81.2%	59.5%	1	25.0%	45.7%	\$10	2.8%	63.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	10.2%	0	0.0%	7.7%	\$0	0.0%	7.4%	
	Total	12	100.0%	\$1,087	100.0%	100.0%	6	100.0%	100.0%	\$569	100.0%	100.0%	4	100.0%	100.0%	\$351	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	5.5%	\$500	2.1%	19.8%	4	6.7%	5.1%	\$396	3.3%	2.1%	0	0.0%	4.0%	\$0	0.0%	1.7%	
	Moderate	15	13.6%	\$1,738	7.3%	18.5%	8	13.3%	14.7%	\$815	6.7%	8.5%	5	16.7%	14.0%	\$768	13.2%	8.2%	
	Middle	21	19.1%	\$2,771	11.6%	21.4%	10	16.7%	20.8%	\$1,290	10.6%	15.7%	7	23.3%	20.6%	\$853	14.7%	15.7%	
	Upper	59	53.6%	\$17,249	72.4%	40.2%	34	56.7%	43.9%	\$8,889	73.3%	55.1%	13	43.3%	46.0%	\$3,354	57.7%	56.5%	
	Unknown	9	8.2%	\$1,573	6.6%	0.0%	4	6.7%	15.6%	\$732	6.0%	18.5%	5	16.7%	15.4%	\$841	14.5%	17.9%	
	Total	110	100.0%	\$23,831	100.0%	100.0%	60	100.0%	100.0%	\$12,122	100.0%	100.0%	30	100.0%	100.0%	\$5,816	100.0%	100.0%	
Small Business Revenue	\$1 Million or Less	32	94.1%	\$3,190	79.7%	92.8%	17	94.4%	48.3%	\$1,981	72.5%	43.4%	11	91.7%	52.7%	\$723	91.8%	43.3%	
	Over \$1 Million	2	5.9%	\$815	20.3%	6.6%	1	5.6%					1	8.3%					
	Total Rev. available	34	100.0%	\$4,005	100.0%	99.4%	18	100.0%					12	100.0%					
	Rev. Not Known	0	0.0%	\$0	0.0%	0.6%	0	0.0%					0	0.0%					
	Total	34	100.0%	\$4,005	100.0%	100.0%	18	100.0%					12	100.0%					
	Small Business Loan Size	\$100,000 or Less	28	82.4%	\$478	11.9%		14	77.8%	90.9%	\$184	6.7%	28.6%	11	91.7%	90.9%	\$183	23.2%	28.7%
\$100,001 - \$250,000		0	0.0%	\$0	0.0%		0	0.0%	4.2%	\$0	0.0%	16.0%	0	0.0%	3.8%	\$0	0.0%	14.2%	
\$250,001 - \$1 Million		6	17.6%	\$3,527	88.1%		4	22.2%	4.9%	\$2,547	93.3%	55.3%	1	8.3%	5.3%	\$605	76.8%	57.1%	
Total		34	100.0%	\$4,005	100.0%		18	100.0%	100.0%	\$2,731	100.0%	100.0%	12	100.0%	100.0%	\$788	100.0%	100.0%	
Small Farm Revenue		\$1 Million or Less	0	0.0%	\$0	0.0%	98.3%	0	0.0%	30.0%	\$0	0.0%	37.7%	0	0.0%	33.3%	\$0	0.0%	33.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
	Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	97.2%	\$0	0.0%	83.8%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	16.2%
\$250,001 - \$500,000		0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
Originations & Purchases																			
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.																			
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information																			

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: NC Hickory

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.5%	0	0.0%	3.4%	\$0	0.0%	3.2%	0	0.0%	3.1%	\$0	0.0%	1.6%
	Middle	34	64.2%	\$3,826	47.1%	64.1%	13	61.9%	60.8%	\$1,272	55.8%	49.1%	14	63.6%	60.8%	\$1,843	43.2%	49.5%
	Upper	19	35.8%	\$4,298	52.9%	30.4%	8	38.1%	35.8%	\$1,006	44.2%	47.7%	8	36.4%	36.1%	\$2,419	56.8%	48.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$8,124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,278</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,262</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.5%	0	0.0%	4.3%	\$0	0.0%	3.2%	0	0.0%	2.4%	\$0	0.0%	1.4%
	Middle	17	36.2%	\$1,723	22.5%	64.1%	8	57.1%	59.8%	\$858	46.9%	49.8%	5	27.8%	58.8%	\$466	16.7%	47.3%
	Upper	30	63.8%	\$5,940	77.5%	30.4%	6	42.9%	35.9%	\$971	53.1%	47.0%	13	72.2%	38.8%	\$2,319	83.3%	51.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>47</i>	<i>100.0%</i>	<i>\$7,663</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,829</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,785</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.5%	0	0.0%	2.7%	\$0	0.0%	0.5%	0	0.0%	4.8%	\$0	0.0%	1.2%
	Middle	4	50.0%	\$148	27.5%	64.1%	1	50.0%	63.3%	\$62	23.4%	52.8%	2	40.0%	64.7%	\$78	29.3%	58.1%
	Upper	4	50.0%	\$391	72.5%	30.4%	1	50.0%	34.0%	\$203	76.6%	46.6%	3	60.0%	30.5%	\$188	70.7%	40.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$539</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$265</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$266</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.9%	0	0.0%	66.7%	\$0	0.0%	21.0%	0	0.0%	26.7%	\$0	0.0%	4.6%
	Middle	0	0.0%	\$0	0.0%	60.5%	0	0.0%	16.7%	\$0	0.0%	56.0%	0	0.0%	53.3%	\$0	0.0%	13.5%
	Upper	0	0.0%	\$0	0.0%	16.7%	0	0.0%	16.7%	\$0	0.0%	23.0%	0	0.0%	20.0%	\$0	0.0%	81.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.5%	0	0.0%	3.8%	\$0	0.0%	3.3%	0	0.0%	3.0%	\$0	0.0%	1.7%
	Middle	55	50.9%	\$5,697	34.9%	64.1%	22	59.5%	60.5%	\$2,192	50.1%	49.5%	21	46.7%	60.2%	\$2,387	32.6%	47.1%
	Upper	53	49.1%	\$10,629	65.1%	30.4%	15	40.5%	35.7%	\$2,180	49.9%	47.1%	24	53.3%	36.8%	\$4,926	67.4%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>108</i>	<i>100.0%</i>	<i>\$16,326</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,372</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,313</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	2.4%	\$25	2.4%	13.8%	0	0.0%	18.3%	\$0	0.0%	22.6%	1	4.2%	18.7%	\$25	4.4%	31.4%
	Middle	13	31.0%	\$204	19.3%	52.4%	3	30.0%	45.7%	\$71	26.3%	44.1%	7	29.2%	42.8%	\$105	18.6%	39.3%
	Upper	28	66.7%	\$830	78.4%	33.8%	7	70.0%	33.4%	\$199	73.7%	32.5%	16	66.7%	35.4%	\$434	77.0%	28.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	0.8%	0	0.0%	3.0%	\$0	0.0%	0.8%
<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>\$1,059</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$270</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$564</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.8%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$30	100.0%	61.4%	1	100.0%	85.7%	\$30	100.0%	96.6%	0	0.0%	77.3%	\$0	0.0%	88.7%
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	9.5%	\$0	0.0%	2.7%	0	0.0%	13.6%	\$0	0.0%	6.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	5.1%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: NC Hickory

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		Families by Family Income			Count		Dollar				Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg				
#	\$ (000s)	\$ %	Bank %		Agg %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	6	11.3%	\$465	5.7%	17.8%	3	14.3%	4.9%	\$235	10.3%	2.2%	2	9.1%	5.3%	\$132	3.1%	2.6%	
	Moderate	14	26.4%	\$1,287	15.8%	17.5%	6	28.6%	19.5%	\$550	24.1%	11.5%	3	13.6%	20.4%	\$259	6.1%	12.9%	
	Middle	9	17.0%	\$1,166	14.4%	21.3%	3	14.3%	16.0%	\$390	17.1%	12.7%	5	22.7%	18.9%	\$698	16.4%	15.9%	
	Upper	20	37.7%	\$4,451	54.8%	43.3%	8	38.1%	38.1%	\$1,006	44.2%	52.8%	9	40.9%	37.2%	\$2,515	59.0%	52.3%	
	Unknown	4	7.5%	\$755	9.3%	0.0%	1	4.8%	21.5%	\$97	4.3%	20.8%	3	13.6%	18.3%	\$658	15.4%	16.3%	
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$8,124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,278</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,262</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	6	12.8%	\$338	4.4%	17.8%	0	0.0%	6.5%	\$0	0.0%	3.3%	3	16.7%	4.6%	\$227	8.2%	2.2%	
	Moderate	6	12.8%	\$602	7.9%	17.5%	3	21.4%	14.7%	\$194	10.6%	9.0%	2	11.1%	14.0%	\$231	8.3%	8.5%	
	Middle	9	19.1%	\$914	11.9%	21.3%	2	14.3%	15.1%	\$97	5.3%	11.8%	5	27.8%	17.3%	\$625	22.4%	12.6%	
	Upper	21	44.7%	\$4,987	65.1%	43.3%	6	42.9%	42.7%	\$1,047	57.2%	51.9%	6	33.3%	41.5%	\$1,371	49.2%	53.7%	
	Unknown	5	10.6%	\$822	10.7%	0.0%	3	21.4%	21.0%	\$491	26.8%	24.0%	2	11.1%	22.6%	\$331	11.9%	23.0%	
	<i>Total</i>	<i>47</i>	<i>100.0%</i>	<i>\$7,663</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,829</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,785</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.8%	0	0.0%	7.3%	\$0	0.0%	4.8%	0	0.0%	5.4%	\$0	0.0%	1.4%	
	Moderate	2	25.0%	\$70	13.0%	17.5%	1	50.0%	15.3%	\$62	23.4%	8.7%	1	20.0%	16.2%	\$8	3.0%	5.8%	
	Middle	1	12.5%	\$10	1.9%	21.3%	0	0.0%	18.7%	\$0	0.0%	11.2%	1	20.0%	20.4%	\$10	3.8%	14.6%	
	Upper	5	62.5%	\$459	85.2%	43.3%	1	50.0%	48.7%	\$203	76.6%	65.5%	3	60.0%	51.5%	\$248	93.2%	58.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	9.7%	0	0.0%	6.6%	\$0	0.0%	19.8%	
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$539</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$265</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$266</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	43.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	12	11.1%	\$803	4.9%	17.8%	3	8.1%	5.6%	\$235	5.4%	2.7%	5	11.1%	5.0%	\$359	4.9%	2.3%	
	Moderate	22	20.4%	\$1,959	12.0%	17.5%	10	27.0%	17.4%	\$806	18.4%	10.4%	6	13.3%	17.7%	\$498	6.8%	10.5%	
	Middle	19	17.6%	\$2,090	12.8%	21.3%	5	13.5%	15.7%	\$487	11.1%	12.1%	11	24.4%	18.3%	\$1,333	18.2%	13.9%	
	Upper	46	42.6%	\$9,897	60.6%	43.3%	15	40.5%	40.3%	\$2,256	51.6%	52.1%	18	40.0%	39.3%	\$4,134	56.5%	50.3%	
	Unknown	9	8.3%	\$1,577	9.7%	0.0%	4	10.8%	20.9%	\$588	13.4%	22.7%	5	11.1%	19.7%	\$989	13.5%	23.0%	
	<i>Total</i>	<i>108</i>	<i>100.0%</i>	<i>\$16,326</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,372</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,313</i>	<i>100.0%</i>	<i>100.0%</i>	
Small Business	Total Businesses																		
	Revenue	\$1 Million or Less	37	88.1%	\$808	76.3%	87.9%	8	80.0%	44.4%	\$165	61.1%	46.1%	21	87.5%	47.6%	\$418	74.1%	42.8%
		Over \$1 Million	1	2.4%	\$25	2.4%	11.2%	0	0.0%				1	4.2%					
		Total Rev. available	38	90.5%	\$833	78.7%	99.1%	8	80.0%				22	91.7%					
		Rev. Not Known	4	9.5%	\$226	21.3%	0.9%	2	20.0%				2	8.3%					
		<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>\$1,059</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>				<i>24</i>	<i>100.0%</i>					
	Loan Size	\$100,000 or Less	42	100.0%	\$1,059	100.0%		10	100.0%	88.8%	\$270	100.0%	26.4%	24	100.0%	88.1%	\$564	100.0%	27.5%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.5%	\$0	0.0%	17.2%	0	0.0%	5.9%	\$0	0.0%	17.3%
		\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	5.7%	\$0	0.0%	56.4%	0	0.0%	6.0%	\$0	0.0%	55.2%
		<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>\$1,059</i>	<i>100.0%</i>		<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$270</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$564</i>	<i>100.0%</i>	<i>100.0%</i>
Small Farm	Total Farms																		
	Revenue	\$1 Million or Less	1	100.0%	\$30	100.0%	95.7%	1	100.0%	38.1%	\$30	100.0%	25.9%	0	0.0%	45.5%	\$0	0.0%	37.6%
		Over \$1 Million	0	0.0%	\$0	0.0%	4.3%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>				<i>0</i>	<i>0.0%</i>					
	Loan Size	\$100,000 or Less	1	100.0%	\$30	100.0%		1	100.0%	90.5%	\$30	100.0%	38.6%	0	0.0%	86.4%	\$0	0.0%	45.5%
\$100,001 - \$250,000		0	0.0%	\$0	0.0%		0	0.0%	9.5%	\$0	0.0%	61.4%	0	0.0%	13.6%	\$0	0.0%	54.5%	
\$250,001 - \$500,000		0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>		<i>1</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>		<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: NC Western NC

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank		Owner Occupied Units			2014			2015								
		Count		Dollar		%	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	2	1.4%	\$91	0.5%	1.0%	1	1.6%	0.7%	\$43	0.6%	0.3%	1	2.0%	0.6%	\$48	0.8%	0.3%
	Moderate	4	2.8%	\$398	2.3%	8.2%	2	3.3%	5.8%	\$238	3.3%	4.3%	1	2.0%	4.9%	\$70	1.2%	3.3%
	Middle	114	79.7%	\$13,592	77.8%	74.5%	51	83.6%	69.5%	\$6,169	85.3%	66.6%	40	80.0%	68.2%	\$4,604	76.0%	64.9%
	Upper	23	16.1%	\$3,391	19.4%	16.3%	7	11.5%	24.1%	\$784	10.8%	28.8%	8	16.0%	26.3%	\$1,337	22.1%	31.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	143	100.0%	\$17,472	100.0%	100.0%	61	100.0%	100.0%	\$7,234	100.0%	100.0%	50	100.0%	100.0%	\$6,059	100.0%	100.0%
REFINANCE	Low	1	0.5%	\$60	0.2%	1.0%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	13	6.2%	\$1,278	4.9%	8.2%	5	7.2%	6.8%	\$504	6.1%	4.9%	5	5.1%	4.9%	\$485	3.9%	3.8%
	Middle	154	73.0%	\$18,466	70.7%	74.5%	48	69.6%	71.1%	\$5,932	71.6%	69.8%	73	73.7%	70.3%	\$8,632	69.1%	66.7%
	Upper	43	20.4%	\$6,314	24.2%	16.3%	16	23.2%	21.5%	\$1,847	22.3%	25.0%	21	21.2%	24.4%	\$3,383	27.1%	29.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	211	100.0%	\$26,118	100.0%	100.0%	69	100.0%	100.0%	\$8,283	100.0%	100.0%	99	100.0%	100.0%	\$12,500	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	1.9%	\$0	0.0%	1.1%	0	0.0%	1.6%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	8.2%	0	0.0%	5.6%	\$0	0.0%	4.2%	0	0.0%	6.5%	\$0	0.0%	3.7%
	Middle	46	80.7%	\$2,359	73.9%	74.5%	19	73.1%	67.6%	\$855	58.2%	60.9%	16	80.0%	72.9%	\$1,083	83.0%	60.4%
	Upper	11	19.3%	\$835	26.1%	16.3%	7	26.9%	24.9%	\$613	41.8%	33.8%	4	20.0%	19.0%	\$222	17.0%	35.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	57	100.0%	\$3,194	100.0%	100.0%	26	100.0%	100.0%	\$1,468	100.0%	100.0%	20	100.0%	100.0%	\$1,305	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	3.2%	0	0.0%	5.0%	\$0	0.0%	0.5%	0	0.0%	7.4%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	7.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	14.8%	\$0	0.0%	5.4%
	Middle	0	0.0%	\$0	0.0%	50.0%	0	0.0%	55.0%	\$0	0.0%	11.9%	0	0.0%	40.7%	\$0	0.0%	37.4%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	40.0%	\$0	0.0%	87.6%	0	0.0%	37.0%	\$0	0.0%	56.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	0.7%	\$151	0.3%	1.0%	1	0.6%	0.7%	\$43	0.3%	0.3%	1	0.6%	0.6%	\$48	0.2%	0.3%
	Moderate	17	4.1%	\$1,676	3.6%	8.2%	7	4.5%	6.2%	\$742	4.4%	4.4%	6	3.6%	5.0%	\$555	2.8%	3.6%
	Middle	314	76.4%	\$34,417	73.6%	74.5%	118	75.6%	70.0%	\$12,956	76.3%	65.6%	129	76.3%	69.2%	\$14,319	72.1%	64.6%
	Upper	77	18.7%	\$10,540	22.5%	16.3%	30	19.2%	23.1%	\$3,244	19.1%	29.8%	33	19.5%	25.2%	\$4,942	24.9%	31.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	411	100.0%	\$46,784	100.0%	100.0%	156	100.0%	100.0%	\$16,985	100.0%	100.0%	169	100.0%	100.0%	\$19,864	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	4	2.3%	\$126	1.7%	1.9%	1	2.0%	1.7%	\$18	0.7%	2.1%	2	3.2%	1.8%	\$93	3.2%	1.5%
	Moderate	18	10.2%	\$1,609	22.1%	9.0%	7	14.0%	7.9%	\$1,182	45.7%	8.2%	6	9.5%	8.3%	\$229	7.9%	7.4%
	Middle	125	70.6%	\$3,972	54.5%	69.6%	33	66.0%	64.5%	\$831	32.1%	68.7%	43	68.3%	63.9%	\$1,921	66.0%	63.9%
	Upper	30	16.9%	\$1,585	21.7%	19.4%	9	18.0%	20.6%	\$556	21.5%	18.8%	12	19.0%	22.0%	\$669	23.0%	25.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.4%	\$0	0.0%	2.3%	0	0.0%	3.9%	\$0	0.0%	2.0%
Total	177	100.0%	\$7,292	100.0%	100.0%	50	100.0%	100.0%	\$2,587	100.0%	100.0%	63	100.0%	100.0%	\$2,912	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	9.3%	0	0.0%	12.9%	\$0	0.0%	6.6%	0	0.0%	12.4%	\$0	0.0%	5.6%
	Middle	3	60.0%	\$105	76.6%	78.5%	0	0.0%	75.4%	\$0	0.0%	78.5%	1	50.0%	71.9%	\$25	55.6%	82.9%
	Upper	2	40.0%	\$32	23.4%	12.2%	0	0.0%	10.5%	\$0	0.0%	14.2%	1	50.0%	13.0%	\$20	44.4%	10.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.6%	0	0.0%	2.2%	\$0	0.0%	0.9%
Total	5	100.0%	\$137	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$45	100.0%	100.0%	

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: NC Western NC

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income %	2014			2015									
		Count		Dollar			Bank	Agg	Dollar		Count		Dollar						
		#	%	\$(000s)	\$ %	#			%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	13	9.1%	\$893	5.1%	21.7%	5	8.2%	4.2%	\$344	4.8%	1.8%	6	12.0%	2.9%	\$396	6.5%	1.2%	
	Moderate	39	27.3%	\$3,296	18.9%	17.3%	17	27.9%	14.7%	\$1,569	21.7%	8.6%	15	30.0%	14.6%	\$1,094	18.1%	8.3%	
	Middle	37	25.9%	\$4,423	25.3%	20.5%	18	29.5%	18.8%	\$2,277	31.5%	14.3%	11	22.0%	19.6%	\$1,424	23.5%	15.0%	
	Upper	54	37.8%	\$8,860	50.7%	40.5%	21	34.4%	46.5%	\$3,044	42.1%	61.0%	18	36.0%	48.0%	\$3,145	51.9%	61.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.9%	\$0	0.0%	14.2%	0	0.0%	14.8%	\$0	0.0%	13.8%	
	Total	143	100.0%	\$17,472	100.0%	100.0%	61	100.0%	100.0%	\$7,234	100.0%	100.0%	50	100.0%	100.0%	\$6,059	100.0%	100.0%	
REFINANCE	Low	15	7.1%	\$680	2.6%	21.7%	3	4.3%	5.0%	\$112	1.4%	2.3%	11	11.1%	4.0%	\$524	4.2%	1.7%	
	Moderate	43	20.4%	\$3,252	12.5%	17.3%	16	23.2%	13.3%	\$1,368	16.5%	7.4%	16	16.2%	10.5%	\$1,020	8.2%	5.5%	
	Middle	51	24.2%	\$5,356	20.5%	20.5%	24	34.8%	20.3%	\$2,314	27.9%	14.5%	20	20.2%	17.4%	\$2,213	17.7%	12.5%	
	Upper	93	44.1%	\$15,408	59.0%	40.5%	21	30.4%	47.5%	\$3,805	45.9%	62.1%	48	48.5%	51.9%	\$8,005	64.0%	64.7%	
	Unknown	9	4.3%	\$1,422	5.4%	0.0%	5	7.2%	14.0%	\$684	8.3%	13.6%	4	4.0%	16.3%	\$738	5.9%	15.6%	
	Total	211	100.0%	\$26,118	100.0%	100.0%	69	100.0%	100.0%	\$8,283	100.0%	100.0%	99	100.0%	100.0%	\$12,500	100.0%	100.0%	
HOME IMPROVEMENT	Low	8	14.0%	\$226	7.1%	21.7%	5	19.2%	8.1%	\$100	6.8%	3.0%	2	10.0%	5.2%	\$102	7.8%	1.4%	
	Moderate	17	29.8%	\$604	18.9%	17.3%	5	19.2%	17.1%	\$270	18.4%	9.0%	10	50.0%	14.8%	\$320	24.5%	5.0%	
	Middle	13	22.8%	\$714	22.4%	20.5%	7	26.9%	22.4%	\$364	24.8%	15.0%	4	20.0%	19.4%	\$252	19.3%	15.0%	
	Upper	18	31.6%	\$1,645	51.5%	40.5%	8	30.8%	49.8%	\$729	49.7%	67.2%	4	20.0%	54.5%	\$631	48.4%	70.6%	
	Unknown	1	1.8%	\$5	0.2%	0.0%	1	3.8%	2.5%	\$5	0.3%	5.8%	0	0.0%	6.1%	\$0	0.0%	8.1%	
	Total	57	100.0%	\$3,194	100.0%	100.0%	26	100.0%	100.0%	\$1,468	100.0%	100.0%	20	100.0%	100.0%	\$1,305	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	36	8.8%	\$1,799	3.8%	21.7%	13	8.3%	4.7%	\$556	3.3%	2.0%	19	11.2%	3.4%	\$1,022	5.1%	1.4%	
	Moderate	99	24.1%	\$7,152	15.3%	17.3%	38	24.4%	14.2%	\$3,207	18.9%	7.8%	41	24.3%	12.9%	\$2,434	12.3%	6.8%	
	Middle	101	24.6%	\$10,493	22.4%	20.5%	49	31.4%	19.5%	\$4,955	29.2%	13.9%	35	20.7%	18.6%	\$3,889	19.6%	13.4%	
	Upper	165	40.1%	\$25,913	55.4%	40.5%	50	32.1%	46.9%	\$7,578	44.6%	59.2%	70	41.4%	49.7%	\$11,781	59.3%	61.1%	
	Unknown	10	2.4%	\$1,427	3.1%	0.0%	6	3.8%	14.7%	\$689	4.1%	17.2%	4	2.4%	15.3%	\$738	3.7%	17.3%	
	Total	411	100.0%	\$46,784	100.0%	100.0%	156	100.0%	100.0%	\$16,985	100.0%	100.0%	169	100.0%	100.0%	\$19,864	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	138	78.0%	\$2,902	39.8%	91.2%	32	64.0%	48.0%	\$539	20.8%	45.2%	49	77.8%	52.5%	\$1,163	39.9%	49.4%	
	Over \$1 Million	25	14.1%	\$3,424	47.0%	7.3%	9	18.0%					9	14.3%					
	Total Rev. available	163	92.1%	\$6,326	86.8%	98.5%	41	82.0%					58	92.1%					
	Rev. Not Known	14	7.9%	\$966	13.2%	1.5%	9	18.0%					5	7.9%					
	Total	177	100.0%	\$7,292	100.0%	100.0%	50	100.0%	100.0%				63	100.0%					
Small Business Loan Size	\$100,000 or Less	167	94.4%	\$4,252	58.3%		47	94.0%	91.8%	\$1,262	48.8%	36.2%	58	92.1%	91.5%	\$1,572	54.0%	37.4%	
	\$100,001 - \$250,000	8	4.5%	\$1,590	21.8%		2	4.0%	4.6%	\$375	14.5%	19.6%	4	6.3%	4.6%	\$840	28.8%	18.2%	
	\$250,001 - \$1 Million	2	1.1%	\$1,450	19.9%		1	2.0%	3.6%	\$950	36.7%	44.2%	1	1.6%	4.0%	\$500	17.2%	44.5%	
	Total	177	100.0%	\$7,292	100.0%		50	100.0%	100.0%	\$2,587	100.0%	100.0%	63	100.0%	100.0%	\$2,912	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	3	60.0%	\$47	34.3%	98.0%	0	0.0%	64.3%	\$0	0.0%	61.7%	1	50.0%	58.9%	\$20	44.4%	65.6%	
Over \$1 Million	2	40.0%	\$90	65.7%	1.8%	0	0.0%					1	50.0%						
Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%					0	0.0%						
Total	5	100.0%	\$137	100.0%	100.0%	0	0.0%					2	100.0%						
Small Farm Loan Size	\$100,000 or Less	5	100.0%	\$137	100.0%		0	0.0%	90.1%	\$0	0.0%	43.3%	2	100.0%	88.6%	\$45	100.0%	42.5%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.4%	\$0	0.0%	24.1%	0	0.0%	7.6%	\$0	0.0%	27.7%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	32.6%	0	0.0%	3.8%	\$0	0.0%	29.8%	
	Total	5	100.0%	\$137	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$45	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: NC Raleigh

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		Owner Occupied Units		Count	Bank	Agg	Dollar			Count	Bank	Agg	Dollar				
		Count	Dollar	%	#				%	%	Bank				Agg	%	#	%	%
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%			
HOME PURCHASE	Low	5	1.9%	\$523	0.7%	2.0%	0	0.0%	1.4%	\$0	0.0%	0.9%	2	2.9%	1.6%	\$207	1.0%	1.0%	
	Moderate	23	8.8%	\$3,288	4.4%	17.0%	16	11.6%	14.3%	\$2,144	5.6%	9.5%	3	4.3%	14.0%	\$681	3.3%	9.7%	
	Middle	74	28.5%	\$17,555	23.7%	38.2%	32	23.2%	45.1%	\$6,476	17.0%	40.3%	23	33.3%	46.1%	\$5,374	26.2%	41.8%	
	Upper	158	60.8%	\$52,796	71.2%	42.9%	90	65.2%	39.1%	\$29,504	77.4%	49.2%	41	59.4%	38.3%	\$14,228	69.4%	47.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	260	100.0%	\$74,162	100.0%	100.0%	138	100.0%	100.0%	\$38,124	100.0%	100.0%	69	100.0%	100.0%	\$20,490	100.0%	100.0%	
REFINANCE	Low	2	0.9%	\$667	1.2%	2.0%	0	0.0%	1.9%	\$0	0.0%	1.2%	0	0.0%	1.8%	\$0	0.0%	1.2%	
	Moderate	23	10.3%	\$3,819	6.9%	17.0%	5	9.8%	15.6%	\$1,058	8.5%	18.0%	12	11.3%	13.7%	\$1,802	6.4%	9.1%	
	Middle	75	33.5%	\$15,305	27.6%	38.2%	15	29.4%	40.4%	\$2,671	21.4%	35.7%	33	31.1%	39.6%	\$6,754	24.1%	34.9%	
	Upper	124	55.4%	\$35,708	64.3%	42.9%	31	60.8%	42.1%	\$8,776	70.2%	45.1%	61	57.5%	44.8%	\$19,490	69.5%	54.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	224	100.0%	\$55,499	100.0%	100.0%	51	100.0%	100.0%	\$12,505	100.0%	100.0%	106	100.0%	100.0%	\$28,046	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	2.6%	\$0	0.0%	2.2%	0	0.0%	3.0%	\$0	0.0%	1.9%	
	Moderate	1	33.3%	\$78	19.3%	17.0%	1	33.3%	15.1%	\$78	19.3%	9.9%	0	0.0%	14.6%	\$0	0.0%	11.0%	
	Middle	1	33.3%	\$324	80.2%	38.2%	1	33.3%	39.0%	\$324	80.2%	32.3%	0	0.0%	38.2%	\$0	0.0%	28.3%	
	Upper	1	33.3%	\$2	0.5%	42.9%	1	33.3%	43.3%	\$2	0.5%	55.6%	0	0.0%	44.2%	\$0	0.0%	58.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	3	100.0%	\$404	100.0%	100.0%	3	100.0%	100.0%	\$404	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTI FAMILY	Multi-Family Units						Low	0	0.0%	9.6%	\$0	0.0%	2.7%	0	0.0%	12.5%	\$0	0.0%	7.7%
	Moderate	0	0.0%	\$0	0.0%	25.3%	0	0.0%	32.7%	\$0	0.0%	22.3%	0	0.0%	30.4%	\$0	0.0%	25.4%	
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	25.0%	\$0	0.0%	14.8%	0	0.0%	35.7%	\$0	0.0%	41.3%	
	Upper	0	0.0%	\$0	0.0%	33.5%	0	0.0%	32.7%	\$0	0.0%	60.2%	0	0.0%	21.4%	\$0	0.0%	25.6%	
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	7	1.4%	\$1,190	0.9%	2.0%	0	0.0%	1.6%	\$0	0.0%	1.1%	2	1.1%	1.7%	\$207	0.4%	1.4%	
	Moderate	47	9.7%	\$7,185	5.5%	17.0%	22	11.5%	14.8%	\$3,280	6.4%	12.8%	15	8.6%	14.0%	\$2,483	5.1%	10.3%	
	Middle	150	30.8%	\$33,184	25.5%	38.2%	48	25.0%	43.4%	\$9,471	18.6%	37.5%	56	32.0%	43.4%	\$12,128	25.0%	39.2%	
	Upper	283	58.1%	\$88,506	68.0%	42.9%	122	63.5%	40.2%	\$38,282	75.0%	48.6%	102	58.3%	40.9%	\$33,718	69.5%	49.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	487	100.0%	\$130,065	100.0%	100.0%	192	100.0%	100.0%	\$51,033	100.0%	100.0%	175	100.0%	100.0%	\$48,536	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses						Low	9	4.6%	3.4%	\$1,100	8.0%	4.1%	4	5.4%	3.4%	\$429	3.7%	4.1%
	Moderate	24	12.2%	\$2,036	6.3%	16.2%	8	9.4%	15.2%	\$238	1.7%	16.8%	8	10.8%	15.4%	\$828	7.2%	16.2%	
	Middle	62	31.5%	\$8,819	27.4%	33.9%	32	37.6%	34.1%	\$4,506	32.6%	33.1%	17	23.0%	34.2%	\$2,413	21.0%	31.5%	
	Upper	102	51.8%	\$18,645	57.9%	46.2%	42	49.4%	45.7%	\$7,984	57.7%	44.8%	45	60.8%	45.7%	\$7,821	68.1%	47.4%	
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.4%	0	0.0%	0.1%	\$0	0.0%	0.1%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	1.5%	\$0	0.0%	0.8%	0	0.0%	1.2%	\$0	0.0%	0.7%	
	Total	197	100.0%	\$32,202	100.0%	100.0%	85	100.0%	100.0%	\$13,828	100.0%	100.0%	74	100.0%	100.0%	\$11,491	100.0%	100.0%	
SMALL FARM	Small Farms						Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	7.3%	\$0	0.0%	6.6%	0	0.0%	8.8%	\$0	0.0%	11.9%	
	Middle	1	100.0%	\$130	100.0%	48.9%	1	100.0%	39.0%	\$130	100.0%	34.7%	0	0.0%	47.5%	\$0	0.0%	45.5%	
	Upper	0	0.0%	\$0	0.0%	37.4%	0	0.0%	53.7%	\$0	0.0%	58.7%	0	0.0%	41.3%	\$0	0.0%	42.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.2%	
	Total	1	100.0%	\$130	100.0%	100.0%	1	100.0%	100.0%	\$130	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: NC Raleigh

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		Families by Family Income			Count			Dollar			Count			Dollar			
		#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ (000s)	\$ %	%	
HOME PURCHASE	Low	19	7.3%	\$2,546	3.4%	19.5%	12	8.7%	6.4%	\$1,545	4.1%	3.1%	3	4.3%	6.8%	\$410	2.0%	3.4%	
	Moderate	28	10.8%	\$5,365	7.2%	15.8%	18	13.0%	16.5%	\$3,410	8.9%	11.2%	5	7.2%	17.2%	\$887	4.3%	12.0%	
	Middle	26	10.0%	\$6,045	8.2%	19.6%	11	8.0%	19.7%	\$2,383	6.3%	17.7%	7	10.1%	20.3%	\$1,743	8.5%	18.5%	
	Upper	105	40.4%	\$34,494	46.5%	45.1%	46	33.3%	40.8%	\$13,722	36.0%	52.6%	25	36.2%	40.7%	\$9,724	47.5%	52.2%	
	Unknown	82	31.5%	\$25,712	34.7%	0.0%	51	37.0%	16.6%	\$17,064	44.8%	15.4%	29	42.0%	15.0%	\$7,726	37.7%	13.9%	
	Total	260	100.0%	\$74,162	100.0%	100.0%	138	100.0%	100.0%	\$38,124	100.0%	100.0%	69	100.0%	100.0%	\$20,490	100.0%	100.0%	
REFINANCE	Low	9	4.0%	\$1,045	1.9%	19.5%	2	3.9%	6.3%	\$224	1.8%	2.8%	4	3.8%	4.9%	\$544	1.9%	2.5%	
	Moderate	24	10.7%	\$4,307	7.8%	15.8%	4	7.8%	13.5%	\$668	5.3%	7.9%	10	9.4%	12.8%	\$1,949	6.9%	8.6%	
	Middle	33	14.7%	\$6,510	11.7%	19.6%	11	21.6%	17.7%	\$2,041	16.3%	12.9%	11	10.4%	17.4%	\$2,221	7.9%	14.9%	
	Upper	105	46.9%	\$30,171	54.4%	45.1%	19	37.3%	41.5%	\$5,802	46.4%	44.0%	43	40.6%	41.7%	\$13,636	48.6%	52.1%	
	Unknown	53	23.7%	\$13,466	24.3%	0.0%	15	29.4%	21.0%	\$3,770	30.1%	32.4%	38	35.8%	23.1%	\$9,696	34.6%	21.9%	
	Total	224	100.0%	\$55,499	100.0%	100.0%	51	100.0%	100.0%	\$12,505	100.0%	100.0%	106	100.0%	100.0%	\$28,046	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	33.3%	\$78	19.3%	19.5%	1	33.3%	6.5%	\$78	19.3%	2.4%	0	0.0%	6.8%	\$0	0.0%	3.1%	
	Moderate	1	33.3%	\$2	0.5%	15.8%	1	33.3%	15.4%	\$2	0.5%	9.1%	0	0.0%	14.5%	\$0	0.0%	8.5%	
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	21.2%	\$0	0.0%	20.2%	0	0.0%	20.4%	\$0	0.0%	16.6%	
	Upper	1	33.3%	\$324	80.2%	45.1%	1	33.3%	42.1%	\$324	80.2%	57.5%	0	0.0%	51.3%	\$0	0.0%	64.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.7%	\$0	0.0%	10.8%	0	0.0%	7.1%	\$0	0.0%	7.7%	
	Total	3	100.0%	\$404	100.0%	100.0%	3	100.0%	100.0%	\$404	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	45.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	29	6.0%	\$3,669	2.8%	19.5%	15	7.8%	6.4%	\$1,847	3.6%	2.9%	7	4.0%	6.1%	\$954	2.0%	2.9%	
	Moderate	53	10.9%	\$9,674	7.4%	15.8%	23	12.0%	15.5%	\$4,080	8.0%	9.6%	15	8.6%	15.4%	\$2,836	5.8%	10.2%	
	Middle	59	12.1%	\$12,555	9.7%	19.6%	22	11.5%	19.1%	\$4,424	8.7%	15.3%	18	10.3%	19.2%	\$3,964	8.2%	16.3%	
	Upper	211	43.3%	\$64,989	50.0%	45.1%	66	34.4%	41.0%	\$19,848	38.9%	47.3%	68	38.9%	41.3%	\$23,360	48.1%	49.7%	
	Unknown	135	27.7%	\$39,178	30.1%	0.0%	66	34.4%	18.1%	\$20,834	40.8%	24.9%	67	38.3%	18.1%	\$17,422	35.9%	21.0%	
	Total	487	100.0%	\$130,065	100.0%	100.0%	192	100.0%	100.0%	\$51,033	100.0%	100.0%	175	100.0%	100.0%	\$48,536	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	92	46.7%	\$6,159	19.1%	91.2%	36	42.4%	48.8%	\$2,500	18.1%	36.6%	34	45.9%	53.4%	\$1,858	16.2%	39.9%	
	Over \$1 Million	74	37.6%	\$21,303	66.2%	7.9%	34	40.0%					29	39.2%					
	Total Rev. available	166	84.3%	\$27,462	85.3%	99.1%	70	82.4%					63	85.1%					
	Rev. Not Known	31	15.7%	\$4,740	14.7%	0.9%	15	17.6%					11	14.9%					
	Total	197	100.0%	\$32,202	100.0%	100.0%	85	100.0%					74	100.0%					
Small Business Loan Size	\$100,000 or Less	128	65.0%	\$4,199	13.0%		53	62.4%	91.8%	\$1,777	12.9%	31.7%	50	67.6%	91.5%	\$1,806	15.7%	32.2%	
	\$100,001 - \$250,000	24	12.2%	\$4,628	14.4%		12	14.1%	3.8%	\$2,244	16.2%	15.4%	8	10.8%	3.9%	\$1,665	14.5%	15.0%	
	\$250,001 - \$1 Million	45	22.8%	\$23,375	72.6%		20	23.5%	4.4%	\$9,807	70.9%	52.9%	16	21.6%	4.6%	\$8,020	69.8%	52.8%	
	Total	197	100.0%	\$32,202	100.0%		85	100.0%	100.0%	\$13,828	100.0%	100.0%	74	100.0%	100.0%	\$11,491	100.0%	100.0%	
	Small Farm Revenue	Total Farms																	
		\$1 Million or Less	1	100.0%	\$130	100.0%	98.5%	1	100.0%	48.8%	\$130	100.0%	51.3%	0	0.0%	58.8%	\$0	0.0%	74.9%
Over \$1 Million		0	0.0%	\$0	0.0%	1.5%	0	0.0%					0	0.0%					
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
Total		1	100.0%	\$130	100.0%	100.0%	1	100.0%					0	0.0%					
Small Farm Loan Size		\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	74.4%	\$0	0.0%	23.2%	0	0.0%	83.8%	\$0	0.0%	32.1%
	\$100,001 - \$250,000	1	100.0%	\$130	100.0%		1	100.0%	20.7%	\$130	100.0%	51.0%	0	0.0%	12.5%	\$0	0.0%	41.7%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.9%	\$0	0.0%	25.8%	0	0.0%	3.8%	\$0	0.0%	26.2%	
	Total	1	100.0%	\$130	100.0%		1	100.0%	100.0%	\$130	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FIEEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: OHDayton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank		Owner Occupied Units		2014			2015									
		Count		Dollar		%	Count		Dollar		%	Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	29	2.3%	\$1,950	1.3%	4.5%	8	1.8%	1.6%	\$621	1.1%	0.9%	14	2.6%	1.6%	\$915	1.4%	1.0%
	Moderate	223	17.8%	\$16,404	10.6%	17.6%	42	9.7%	12.0%	\$2,722	4.8%	7.2%	116	21.3%	12.1%	\$8,539	13.1%	7.4%
	Middle	594	47.5%	\$60,677	39.3%	44.2%	210	48.5%	45.8%	\$21,792	38.5%	38.5%	256	47.1%	44.7%	\$25,815	39.7%	37.3%
	Upper	404	32.3%	\$75,231	48.8%	33.7%	173	40.0%	40.6%	\$31,437	55.6%	53.4%	158	29.0%	41.6%	\$29,794	45.8%	54.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,250	100.0%	\$154,262	100.0%	100.0%	433	100.0%	100.0%	\$56,572	100.0%	100.0%	544	100.0%	100.0%	\$65,063	100.0%	100.0%
REFINANCE	Low	55	3.5%	\$2,916	1.9%	4.5%	15	2.6%	2.2%	\$747	1.4%	1.3%	20	2.8%	1.8%	\$1,007	1.5%	1.0%
	Moderate	294	18.4%	\$18,495	12.2%	17.6%	113	19.8%	14.4%	\$7,086	13.4%	9.3%	136	18.9%	11.8%	\$8,800	12.8%	7.8%
	Middle	750	47.1%	\$62,519	41.4%	44.2%	265	46.5%	44.9%	\$22,397	42.5%	39.9%	337	46.8%	43.8%	\$27,730	40.5%	37.4%
	Upper	495	31.1%	\$67,150	44.4%	33.7%	177	31.1%	38.4%	\$22,519	42.7%	49.6%	227	31.5%	42.6%	\$31,006	45.2%	53.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,594	100.0%	\$151,080	100.0%	100.0%	570	100.0%	100.0%	\$52,749	100.0%	100.0%	720	100.0%	100.0%	\$68,543	100.0%	100.0%
HOME IMPROVEMENT	Low	5	3.2%	\$109	1.6%	4.5%	2	4.4%	2.4%	\$50	2.5%	1.1%	2	2.5%	3.3%	\$20	0.5%	1.3%
	Moderate	34	21.9%	\$1,060	15.3%	17.6%	11	24.4%	14.1%	\$218	11.1%	6.6%	16	20.3%	12.9%	\$495	13.0%	6.7%
	Middle	85	54.8%	\$3,266	47.0%	44.2%	23	51.1%	48.0%	\$803	40.9%	41.0%	45	57.0%	46.1%	\$1,892	49.8%	42.7%
	Upper	31	20.0%	\$2,513	36.2%	33.7%	9	20.0%	35.6%	\$892	45.4%	51.3%	16	20.3%	37.7%	\$1,395	36.7%	49.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	155	100.0%	\$6,948	100.0%	100.0%	45	100.0%	100.0%	\$1,963	100.0%	100.0%	79	100.0%	100.0%	\$3,802	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	11.4%	0	0.0%	6.8%	\$0	0.0%	1.8%	0	0.0%	6.5%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	26.6%	0	0.0%	16.9%	\$0	0.0%	17.9%	0	0.0%	23.9%	\$0	0.0%	26.6%
	Middle	0	0.0%	\$0	0.0%	42.0%	0	0.0%	62.7%	\$0	0.0%	60.2%	0	0.0%	45.7%	\$0	0.0%	35.0%
	Upper	1	100.0%	\$2,700	100.0%	20.0%	0	0.0%	13.6%	\$0	0.0%	20.1%	1	100.0%	23.9%	\$2,700	100.0%	35.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$2,700	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,700	100.0%	100.0%	
HMDA TOTALS	Low	89	3.0%	\$4,975	1.6%	4.5%	25	2.4%	1.9%	\$1,418	1.3%	1.1%	36	2.7%	1.8%	\$1,942	1.4%	1.2%
	Moderate	551	18.4%	\$35,959	11.4%	17.6%	166	15.8%	13.0%	\$10,026	9.0%	8.4%	268	19.9%	12.1%	\$17,834	12.7%	9.2%
	Middle	1,429	47.6%	\$126,462	40.1%	44.2%	498	47.5%	45.6%	\$44,992	40.4%	40.1%	638	47.5%	44.4%	\$55,437	39.6%	37.2%
	Upper	931	31.0%	\$147,594	46.9%	33.7%	359	34.3%	39.5%	\$54,848	49.3%	50.3%	402	29.9%	41.7%	\$64,895	46.3%	52.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3,000	100.0%	\$314,990	100.0%	100.0%	1,048	100.0%	100.0%	\$111,284	100.0%	100.0%	1,344	100.0%	100.0%	\$140,108	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	63	6.5%	\$12,441	7.7%	6.7%	23	5.6%	6.3%	\$4,573	6.7%	9.6%	27	7.8%	6.1%	\$6,154	10.0%	8.8%
	Moderate	188	19.3%	\$47,702	29.4%	17.5%	78	19.1%	17.2%	\$18,100	26.6%	22.8%	64	18.5%	16.7%	\$17,964	29.1%	22.3%
	Middle	408	41.9%	\$62,035	38.2%	41.8%	180	44.1%	38.6%	\$27,747	40.8%	36.0%	156	45.1%	39.4%	\$25,449	41.2%	36.6%
	Upper	315	32.3%	\$40,163	24.7%	34.0%	127	31.1%	36.6%	\$17,537	25.8%	31.2%	99	28.6%	36.8%	\$12,249	19.8%	32.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.3%	0	0.0%	1.0%	\$0	0.0%	0.2%
Total	974	100.0%	\$162,341	100.0%	100.0%	408	100.0%	100.0%	\$67,957	100.0%	100.0%	346	100.0%	100.0%	\$61,816	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.6%	0	0.0%	4.8%	\$0	0.0%	6.7%	0	0.0%	3.7%	\$0	0.0%	2.1%
	Middle	11	57.9%	\$726	48.2%	57.9%	2	40.0%	49.5%	\$185	34.0%	47.2%	5	55.6%	49.2%	\$183	32.5%	46.4%
	Upper	8	42.1%	\$779	51.8%	35.7%	3	60.0%	45.6%	\$359	66.0%	46.1%	4	44.4%	46.5%	\$380	67.5%	51.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%
Total	19	100.0%	\$1,505	100.0%	100.0%	5	100.0%	100.0%	\$544	100.0%	100.0%	9	100.0%	100.0%	\$563	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: OH Dayton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		1/1/2014-6/30/2016					2014						2015						
		Bank		Families by Family Income			Count		Dollar				Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank		Agg		Bank	Agg	Bank		Agg		
#	\$ (000s)	#	%		%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %				
HOME PURCHASE	Low	218	17.4%	\$13,728	8.9%	20.8%	48	11.1%	8.3%	\$3,042	5.4%	4.1%	113	20.8%	7.9%	\$7,160	11.0%	3.8%	
	Moderate	313	25.0%	\$25,858	16.8%	18.1%	108	24.9%	20.8%	\$9,126	16.1%	14.1%	132	24.3%	19.1%	\$10,448	16.1%	13.2%	
	Middle	265	21.2%	\$30,284	19.6%	21.0%	93	21.5%	22.2%	\$10,600	18.7%	20.5%	122	22.4%	21.7%	\$14,350	22.1%	19.9%	
	Upper	412	33.0%	\$79,389	51.5%	40.2%	166	38.3%	33.5%	\$31,795	56.2%	47.3%	164	30.1%	33.1%	\$31,400	48.3%	46.6%	
	Unknown	42	3.4%	\$5,003	3.2%	0.0%	18	4.2%	15.2%	\$2,009	3.6%	14.0%	13	2.4%	18.1%	\$1,705	2.6%	16.5%	
	Total	1,250	100.0%	\$154,262	100.0%	100.0%	433	100.0%	100.0%	\$56,572	100.0%	100.0%	544	100.0%	100.0%	\$65,063	100.0%	100.0%	
REFINANCE	Low	275	17.3%	\$16,676	11.0%	20.8%	95	16.7%	7.9%	\$5,703	10.8%	4.8%	124	17.2%	6.8%	\$7,633	11.1%	3.5%	
	Moderate	331	20.8%	\$23,368	15.5%	18.1%	125	21.9%	15.8%	\$8,806	16.7%	11.1%	150	20.8%	12.7%	\$10,744	15.7%	8.3%	
	Middle	367	23.0%	\$32,533	21.5%	21.0%	123	21.6%	20.2%	\$10,551	20.0%	17.3%	173	24.0%	18.3%	\$15,818	23.1%	14.7%	
	Upper	550	34.5%	\$70,365	46.6%	40.2%	199	34.9%	36.8%	\$24,267	46.0%	46.2%	244	33.9%	36.2%	\$31,294	45.7%	44.7%	
	Unknown	71	4.5%	\$8,138	5.4%	0.0%	28	4.9%	19.3%	\$3,422	6.5%	20.6%	29	4.0%	26.0%	\$3,054	4.5%	28.7%	
	Total	1,594	100.0%	\$151,080	100.0%	100.0%	570	100.0%	100.0%	\$52,749	100.0%	100.0%	720	100.0%	100.0%	\$68,543	100.0%	100.0%	
HOME IMPROVEMENT	Low	38	24.5%	\$941	13.5%	20.8%	12	26.7%	6.9%	\$294	15.0%	3.9%	20	25.3%	9.4%	\$537	14.1%	3.2%	
	Moderate	45	29.0%	\$1,388	20.0%	18.1%	14	31.1%	17.5%	\$357	18.2%	9.5%	25	31.6%	17.0%	\$888	23.4%	8.1%	
	Middle	27	17.4%	\$1,317	19.0%	21.0%	8	17.8%	20.4%	\$263	13.4%	16.7%	14	17.7%	22.8%	\$889	23.4%	19.6%	
	Upper	45	29.0%	\$3,302	47.5%	40.2%	11	24.4%	41.1%	\$1,049	53.4%	59.7%	20	25.3%	46.2%	\$1,488	39.1%	63.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.1%	\$0	0.0%	10.2%	0	0.0%	4.5%	\$0	0.0%	5.6%	
	Total	155	100.0%	\$6,948	100.0%	100.0%	45	100.0%	100.0%	\$1,963	100.0%	100.0%	79	100.0%	100.0%	\$3,802	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$2,700	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,700	100.0%	100.0%	
	Total	1	100.0%	\$2,700	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2,700	100.0%	100.0%	
HMDA TOTALS	Low	531	17.7%	\$31,345	10.0%	20.8%	155	14.8%	8.1%	\$9,039	8.1%	4.1%	257	19.1%	7.5%	\$15,330	10.9%	3.4%	
	Moderate	689	23.0%	\$50,614	16.1%	18.1%	247	23.6%	18.7%	\$18,289	16.4%	12.3%	307	22.8%	16.4%	\$22,080	15.8%	10.2%	
	Middle	659	22.0%	\$64,134	20.4%	21.0%	224	21.4%	21.3%	\$21,414	19.2%	18.3%	309	23.0%	20.4%	\$31,057	22.2%	16.3%	
	Upper	1,007	33.6%	\$153,056	48.6%	40.2%	376	35.9%	35.0%	\$57,111	51.3%	44.7%	428	31.8%	34.8%	\$64,182	45.8%	42.0%	
	Unknown	114	3.8%	\$15,841	5.0%	0.0%	46	4.4%	16.9%	\$5,431	4.9%	20.6%	43	3.2%	20.9%	\$7,459	5.3%	28.1%	
	Total	3,000	100.0%	\$314,990	100.0%	100.0%	1,048	100.0%	100.0%	\$111,284	100.0%	100.0%	1,344	100.0%	100.0%	\$140,108	100.0%	100.0%	
Small Business	Total Businesses					176	43.1%	41.8%	\$8,862	13.0%	27.5%	161	46.5%	45.1%	\$7,179	11.6%	29.1%		
	Revenue	\$1 Million or Less	463	47.5%	\$21,509	13.2%	89.0%												
		Over \$1 Million	338	34.7%	\$121,259	74.7%	10.1%	136	33.3%				132	38.2%					
		Total Rev. available	801	82.2%	\$142,768	87.9%	99.1%	312	76.4%				293	84.7%					
		Rev. Not Known	173	17.8%	\$19,573	12.1%	0.9%	96	23.5%				53	15.3%					
		Total	974	100.0%	\$162,341	100.0%	100.0%	408	100.0%				346	100.0%					
	Loan Size	\$100,000 or Less	644	66.1%	\$21,861	13.5%		265	65.0%	88.3%	\$8,885	13.1%	25.9%	226	65.3%	89.4%	\$8,279	13.4%	27.6%
		\$100,001 - \$250,000	135	13.9%	\$24,734	15.2%		62	15.2%	6.0%	\$11,254	16.6%	18.8%	46	13.3%	5.4%	\$8,523	13.8%	17.8%
		\$250,001 - \$1 Million	195	20.0%	\$115,746	71.3%		81	19.9%	5.8%	\$47,818	70.4%	55.3%	74	21.4%	5.3%	\$45,014	72.8%	54.6%
		Total	974	100.0%	\$162,341	100.0%		408	100.0%	100.0%	\$67,957	100.0%	100.0%	346	100.0%	100.0%	\$61,816	100.0%	100.0%
	Small Farm	Total Farms					3	60.0%	60.4%	\$204	37.5%	58.9%	6	66.7%	55.4%	\$80	14.2%	56.6%	
Revenue		\$1 Million or Less	13	68.4%	\$382	25.4%	97.8%												
		Over \$1 Million	1	5.3%	\$300	19.9%	2.3%	0	0.0%				1	11.1%					
		Not Known	5	26.3%	\$823	54.7%	0.0%	2	40.0%				2	22.2%					
		Total	19	100.0%	\$1,505	100.0%	100.0%	5	100.0%				9	100.0%					
Loan Size		\$100,000 or Less	14	73.7%	\$308	20.5%		3	60.0%	69.7%	\$90	16.5%	20.3%	7	77.8%	71.1%	\$120	21.3%	19.3%
		\$100,001 - \$250,000	2	10.5%	\$297	19.7%		1	20.0%	18.0%	\$154	28.3%	32.5%	1	11.1%	15.7%	\$143	25.4%	27.8%
		\$250,001 - \$500,000	3	15.8%	\$900	59.8%		1	20.0%	12.3%	\$300	55.1%	47.2%	1	11.1%	13.2%	\$300	53.3%	52.9%
		Total	19	100.0%	\$1,505	100.0%		5	100.0%	100.0%	\$544	100.0%	100.0%	9	100.0%	100.0%	\$563	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: OH Lima

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	%	%	\$ (000s)	%	%	%	%	%	%	%	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.6%	0	0.0%	3.1%	\$0	0.0%	1.4%	0	0.0%	1.5%	\$0	0.0%	0.7%
	Moderate	3	6.7%	\$175	3.3%	10.4%	2	7.4%	6.9%	\$107	3.4%	4.2%	1	8.3%	6.4%	\$68	4.3%	3.6%
	Middle	22	48.9%	\$2,388	44.8%	51.3%	14	51.9%	50.3%	\$1,568	50.0%	45.4%	3	25.0%	50.9%	\$387	24.2%	45.5%
	Upper	20	44.4%	\$2,762	51.9%	32.7%	11	40.7%	39.7%	\$1,464	46.6%	49.0%	8	66.7%	41.3%	\$1,143	71.5%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	45	100.0%	\$5,325	100.0%	100.0%	27	100.0%	100.0%	\$3,139	100.0%	100.0%	12	100.0%	100.0%	\$1,598	100.0%	100.0%
REFINANCE	Low	8	10.4%	\$343	5.8%	5.6%	4	10.0%	3.5%	\$170	7.1%	1.9%	4	13.3%	3.4%	\$173	6.2%	1.7%
	Moderate	11	14.3%	\$489	8.2%	10.4%	6	15.0%	6.9%	\$212	8.9%	3.8%	3	10.0%	8.3%	\$178	6.3%	4.4%
	Middle	35	45.5%	\$2,810	47.3%	51.3%	17	42.5%	50.6%	\$971	40.6%	46.9%	15	50.0%	51.6%	\$1,493	53.1%	50.8%
	Upper	23	29.9%	\$2,300	38.7%	32.7%	13	32.5%	39.0%	\$1,041	43.5%	47.4%	8	26.7%	36.7%	\$968	34.4%	43.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	77	100.0%	\$5,942	100.0%	100.0%	40	100.0%	100.0%	\$2,394	100.0%	100.0%	30	100.0%	100.0%	\$2,812	100.0%	100.0%
HOME IMPROVEMENT	Low	1	14.3%	\$10	2.2%	5.6%	1	25.0%	2.5%	\$10	5.0%	2.4%	0	0.0%	2.6%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	10.4%	0	0.0%	6.3%	\$0	0.0%	5.7%	0	0.0%	7.0%	\$0	0.0%	1.7%
	Middle	5	71.4%	\$396	85.3%	51.3%	2	50.0%	46.3%	\$132	66.0%	46.0%	2	100.0%	62.6%	\$53	100.0%	65.2%
	Upper	1	14.3%	\$58	12.5%	32.7%	1	25.0%	45.0%	\$58	29.0%	45.8%	0	0.0%	27.8%	\$0	0.0%	32.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$464	100.0%	100.0%	4	100.0%	100.0%	\$200	100.0%	100.0%	2	100.0%	100.0%	\$53	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	13.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	16.9%
	Moderate	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	54.9%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	75.0%	\$0	0.0%	83.1%
	Upper	0	0.0%	\$0	0.0%	10.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	9	7.0%	\$353	3.0%	5.6%	5	7.0%	3.2%	\$180	3.1%	1.5%	4	9.1%	2.3%	\$173	3.9%	1.3%
	Moderate	14	10.9%	\$664	5.7%	10.4%	8	11.3%	6.9%	\$319	5.6%	4.0%	4	9.1%	7.1%	\$246	5.5%	3.8%
	Middle	62	48.1%	\$5,594	47.7%	51.3%	33	46.5%	50.3%	\$2,671	46.6%	46.8%	20	45.5%	51.9%	\$1,933	43.3%	48.5%
	Upper	44	34.1%	\$5,120	43.6%	32.7%	25	35.2%	39.6%	\$2,563	44.7%	47.6%	16	36.4%	38.8%	\$2,111	47.3%	46.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	129	100.0%	\$11,731	100.0%	100.0%	71	100.0%	100.0%	\$5,733	100.0%	100.0%	44	100.0%	100.0%	\$4,463	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	12	27.3%	\$913	31.0%	14.2%	1	8.3%	13.0%	\$25	2.6%	17.4%	6	26.1%	14.2%	\$439	31.9%	24.0%
	Moderate	6	13.6%	\$195	6.6%	10.4%	2	16.7%	9.7%	\$57	6.0%	10.3%	3	13.0%	6.3%	\$88	6.4%	6.6%
	Middle	13	29.5%	\$876	29.7%	48.4%	4	33.3%	45.0%	\$228	24.1%	40.9%	7	30.4%	48.5%	\$528	38.4%	44.1%
	Upper	13	29.5%	\$964	32.7%	27.0%	5	41.7%	30.9%	\$635	67.2%	31.1%	7	30.4%	30.1%	\$320	23.3%	25.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.3%	0	0.0%	0.9%	\$0	0.0%	0.2%
Total	44	100.0%	\$2,948	100.0%	100.0%	12	100.0%	100.0%	\$945	100.0%	100.0%	23	100.0%	100.0%	\$1,375	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	1.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$12	100.0%	83.2%	0	0.0%	80.8%	\$0	0.0%	79.0%	1	100.0%	87.2%	\$12	100.0%	86.0%
	Upper	0	0.0%	\$0	0.0%	16.4%	0	0.0%	16.2%	\$0	0.0%	17.6%	0	0.0%	12.8%	\$0	0.0%	14.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	1.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$12	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$12	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: OHLima

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income %	2014			2015									
		Count		Dollar			Bank	Agg		Bank	Agg	Bank	Agg	Dollar					
		#	%	\$(000s)	\$ %			\$ (000s)	\$ %					\$ %	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	3	6.7%	\$173	3.2%	21.5%	0	0.0%	9.9%	\$0	0.0%	5.4%	1	8.3%	8.2%	\$69	4.3%	4.6%	
	Moderate	14	31.1%	\$1,544	29.0%	17.5%	7	25.9%	22.3%	\$691	22.0%	16.3%	4	33.3%	19.9%	\$491	30.7%	14.0%	
	Middle	15	33.3%	\$1,548	29.1%	22.4%	12	44.4%	25.3%	\$1,110	35.4%	24.2%	3	25.0%	22.9%	\$438	27.4%	22.8%	
	Upper	13	28.9%	\$2,060	38.7%	38.7%	8	29.6%	31.1%	\$1,338	42.6%	43.4%	4	33.3%	30.8%	\$600	37.5%	42.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.5%	\$0	0.0%	10.6%	0	0.0%	18.1%	\$0	0.0%	15.7%	
	<i>Total</i>	<i>45</i>	<i>100.0%</i>	<i>\$5,325</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,139</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,598</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	11	14.3%	\$514	8.7%	21.5%	6	15.0%	8.1%	\$251	10.5%	4.2%	5	16.7%	6.4%	\$263	9.4%	3.1%	
	Moderate	17	22.1%	\$815	13.7%	17.5%	12	30.0%	20.0%	\$573	23.9%	15.0%	5	16.7%	19.2%	\$242	8.6%	12.4%	
	Middle	21	27.3%	\$1,153	19.4%	22.4%	8	20.0%	24.8%	\$439	18.3%	21.2%	10	33.3%	22.8%	\$525	18.7%	18.0%	
	Upper	26	33.8%	\$3,006	50.6%	38.7%	13	32.5%	35.6%	\$1,035	43.2%	46.8%	9	30.0%	35.2%	\$1,424	50.6%	46.9%	
	Unknown	2	2.6%	\$454	7.6%	0.0%	1	2.5%	11.5%	\$96	4.0%	12.7%	1	3.3%	16.4%	\$358	12.7%	19.6%	
	<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>\$5,942</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,394</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,812</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	3	42.9%	\$83	17.9%	21.5%	2	50.0%	8.8%	\$38	19.0%	4.1%	1	50.0%	6.1%	\$45	84.9%	3.0%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	21.3%	\$0	0.0%	19.0%	0	0.0%	17.4%	\$0	0.0%	8.4%	
	Middle	1	14.3%	\$8	1.7%	22.4%	0	0.0%	16.3%	\$0	0.0%	11.4%	1	50.0%	29.6%	\$8	15.1%	17.8%	
	Upper	3	42.9%	\$373	80.4%	38.7%	2	50.0%	48.8%	\$162	81.0%	63.9%	0	0.0%	40.0%	\$0	0.0%	66.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.0%	\$0	0.0%	1.6%	0	0.0%	7.0%	\$0	0.0%	4.1%	
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$464</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$200</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$53</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	38.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	17	13.2%	\$770	6.6%	21.5%	8	11.3%	9.2%	\$289	5.0%	4.9%	7	15.9%	7.4%	\$377	8.4%	3.9%	
	Moderate	31	24.0%	\$2,359	20.1%	17.5%	19	26.8%	21.4%	\$1,264	22.0%	15.7%	9	20.5%	19.5%	\$733	16.4%	13.1%	
	Middle	37	28.7%	\$2,709	23.1%	22.4%	20	28.2%	24.7%	\$1,549	27.0%	22.6%	14	31.8%	23.2%	\$971	21.8%	20.6%	
	Upper	42	32.6%	\$5,439	46.4%	38.7%	23	32.4%	33.4%	\$2,535	44.2%	44.1%	13	29.5%	32.9%	\$2,024	45.4%	44.6%	
	Unknown	2	1.6%	\$454	3.9%	0.0%	1	1.4%	11.3%	\$96	1.7%	12.6%	1	2.3%	17.0%	\$358	8.0%	17.8%	
	<i>Total</i>	<i>129</i>	<i>100.0%</i>	<i>\$11,731</i>	<i>100.0%</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,733</i>	<i>100.0%</i>	<i>100.0%</i>	<i>44</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,463</i>	<i>100.0%</i>	<i>100.0%</i>	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	22	50.0%	\$886	30.1%	88.3%	5	41.7%	32.7%	\$188	19.9%	25.3%	13	56.5%	30.3%	\$420	30.5%	23.7%	
	Over \$1 Million	9	20.5%	\$1,335	45.3%	10.7%	1	8.3%					5	21.7%					
	Total Rev. available	31	70.5%	\$2,221	75.4%	99.0%	6	50.0%					18	78.2%					
	Rev. Not Known	13	29.5%	\$727	24.7%	1.0%	6	50.0%					5	21.7%					
	<i>Total</i>	<i>44</i>	<i>100.0%</i>	<i>\$2,948</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>					<i>23</i>	<i>100.0%</i>					
Small Business Loan Size	\$100,000 or Less	39	88.6%	\$1,400	47.5%		10	83.3%	88.3%	\$385	40.7%	21.2%	21	91.3%	87.7%	\$641	46.6%	23.6%	
	\$100,001 - \$250,000	1	2.3%	\$110	3.7%		1	8.3%	5.4%	\$110	11.6%	17.5%	0	0.0%	5.8%	\$0	0.0%	16.1%	
	\$250,001 - \$1 Million	4	9.1%	\$1,438	48.8%		1	8.3%	6.3%	\$450	47.6%	61.4%	2	8.7%	6.5%	\$734	53.4%	60.4%	
	<i>Total</i>	<i>44</i>	<i>100.0%</i>	<i>\$2,948</i>	<i>100.0%</i>		<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$945</i>	<i>100.0%</i>	<i>100.0%</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,375</i>	<i>100.0%</i>	<i>100.0%</i>	
	Small Farm Revenue	Total Farms																	
		\$1 Million or Less	1	100.0%	\$12	100.0%	99.2%	0	0.0%	70.8%	\$0	0.0%	60.3%	1	100.0%	70.7%	\$12	100.0%	73.6%
Over \$1 Million		0	0.0%	\$0	0.0%	0.8%	0	0.0%					0	0.0%					
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
<i>Total</i>		<i>1</i>	<i>100.0%</i>	<i>\$12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>					<i>1</i>	<i>100.0%</i>					
Small Farm Loan Size		\$100,000 or Less	1	100.0%	\$12	100.0%		0	0.0%	60.0%	\$0	0.0%	22.2%	1	100.0%	61.7%	\$12	100.0%	21.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	26.2%	\$0	0.0%	34.7%	0	0.0%	27.1%	\$0	0.0%	37.8%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	13.8%	\$0	0.0%	43.1%	0	0.0%	11.3%	\$0	0.0%	40.6%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$12</i>	<i>100.0%</i>		<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: OH Northwest OH

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	%	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	74	9.5%	\$5,508	5.5%	9.1%	25	7.6%	8.6%	\$1,850	4.7%	5.9%	31	10.3%	8.7%	\$2,115	5.2%	5.9%
	Middle	399	51.1%	\$44,484	44.7%	58.9%	194	59.0%	56.6%	\$20,912	52.8%	52.5%	131	43.7%	54.6%	\$15,186	37.5%	50.2%
	Upper	308	39.4%	\$49,544	49.8%	31.7%	110	33.4%	34.6%	\$16,862	42.6%	41.5%	138	46.0%	36.5%	\$23,231	57.3%	43.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	781	100.0%	\$99,536	100.0%	100.0%	329	100.0%	100.0%	\$39,624	100.0%	100.0%	300	100.0%	100.0%	\$40,532	100.0%	100.0%
REFINANCE	Low	1	0.1%	\$58	0.1%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	87	10.1%	\$6,206	7.3%	9.1%	35	10.5%	7.6%	\$2,431	7.6%	5.5%	30	8.9%	7.3%	\$2,213	6.3%	4.9%
	Middle	453	52.5%	\$40,325	47.6%	58.9%	180	54.1%	56.7%	\$15,853	49.7%	52.3%	181	53.7%	53.8%	\$16,708	47.5%	49.5%
	Upper	322	37.3%	\$38,204	45.1%	31.7%	118	35.4%	35.4%	\$13,601	42.7%	42.0%	126	37.4%	38.7%	\$16,278	46.2%	45.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	863	100.0%	\$84,793	100.0%	100.0%	333	100.0%	100.0%	\$31,885	100.0%	100.0%	337	100.0%	100.0%	\$35,199	100.0%	100.0%
HOME IMPROVEMENT	Low	1	0.7%	\$7	0.1%	0.3%	1	1.9%	0.1%	\$7	0.3%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	13	9.5%	\$415	6.2%	9.1%	5	9.6%	8.6%	\$194	7.7%	5.5%	3	5.8%	8.6%	\$99	3.6%	5.7%
	Middle	85	62.0%	\$3,864	57.6%	58.9%	36	69.2%	56.5%	\$1,726	68.3%	54.9%	32	61.5%	56.4%	\$1,365	49.5%	48.8%
	Upper	38	27.7%	\$2,422	36.1%	31.7%	10	19.2%	34.8%	\$601	23.8%	39.6%	17	32.7%	34.9%	\$1,291	46.9%	45.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	137	100.0%	\$6,708	100.0%	100.0%	52	100.0%	100.0%	\$2,528	100.0%	100.0%	52	100.0%	100.0%	\$2,755	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.8%	0	0.0%	45.0%	\$0	0.0%	25.5%	0	0.0%	16.3%	\$0	0.0%	32.3%
	Middle	0	0.0%	\$0	0.0%	51.6%	0	0.0%	45.0%	\$0	0.0%	58.1%	0	0.0%	53.5%	\$0	0.0%	26.0%
	Upper	0	0.0%	\$0	0.0%	24.8%	0	0.0%	10.0%	\$0	0.0%	16.4%	0	0.0%	30.2%	\$0	0.0%	41.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	0.1%	\$65	0.0%	0.3%	1	0.1%	0.2%	\$7	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	174	9.8%	\$12,129	6.3%	9.1%	65	9.1%	8.3%	\$4,475	6.0%	5.8%	64	9.3%	8.2%	\$4,427	5.6%	6.4%
	Middle	937	52.6%	\$88,673	46.4%	58.9%	410	57.4%	56.6%	\$38,491	52.0%	52.5%	344	49.9%	54.4%	\$33,259	42.4%	49.1%
	Upper	668	37.5%	\$90,170	47.2%	31.7%	238	33.3%	34.9%	\$31,064	42.0%	41.5%	281	40.8%	37.2%	\$40,800	52.0%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,781	100.0%	\$191,037	100.0%	100.0%	714	100.0%	100.0%	\$74,037	100.0%	100.0%	689	100.0%	100.0%	\$78,486	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	1	0.2%	\$6	0.0%	0.4%	0	0.0%	0.3%	\$0	0.0%	0.1%	1	0.5%	0.3%	\$6	0.0%	0.4%
	Moderate	72	16.5%	\$14,053	19.5%	12.6%	27	15.0%	11.2%	\$5,905	20.3%	15.0%	33	17.7%	11.5%	\$6,216	19.3%	15.4%
	Middle	221	50.7%	\$33,175	46.1%	56.5%	92	51.1%	54.3%	\$14,534	49.9%	53.9%	98	52.7%	53.8%	\$15,578	48.3%	49.2%
	Upper	142	32.6%	\$24,707	34.3%	30.5%	61	33.9%	31.9%	\$8,687	29.8%	30.3%	54	29.0%	31.9%	\$10,449	32.4%	34.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	0.6%	0	0.0%	2.4%	\$0	0.0%	1.0%
Total	436	100.0%	\$71,941	100.0%	100.0%	180	100.0%	100.0%	\$29,126	100.0%	100.0%	186	100.0%	100.0%	\$32,249	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.5%	0	0.0%	0.6%	\$0	0.0%	0.7%	0	0.0%	1.2%	\$0	0.0%	1.4%
	Middle	10	55.6%	\$1,242	73.8%	59.9%	1	25.0%	64.5%	\$13	6.0%	65.0%	7	70.0%	59.1%	\$954	87.1%	59.8%
	Upper	8	44.4%	\$441	26.2%	38.5%	3	75.0%	34.5%	\$205	94.0%	33.1%	3	30.0%	39.2%	\$141	12.9%	38.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.5%	\$0	0.0%	1.2%	0	0.0%	0.6%	\$0	0.0%	0.3%
Total	18	100.0%	\$1,683	100.0%	100.0%	4	100.0%	100.0%	\$218	100.0%	100.0%	10	100.0%	100.0%	\$1,095	100.0%	100.0%	

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: OH Northwest OH

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014						2015					
		Bank		Families by Family Income			Count		Dollar				Count		Dollar			
		Count	Dollar		%	%	Bank	Agg	Bank	Agg	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	64	8.2%	\$4,102	4.1%	16.8%	27	8.2%	6.3%	\$1,660	4.2%	3.4%	23	7.7%	7.4%	\$1,387	3.4%	4.2%
	Moderate	197	25.2%	\$16,873	17.0%	17.3%	90	27.4%	23.9%	\$7,707	19.5%	17.5%	66	22.0%	22.7%	\$5,545	13.7%	16.6%
	Middle	209	26.8%	\$23,560	23.7%	22.1%	82	24.9%	22.7%	\$8,968	22.6%	21.1%	89	29.7%	22.8%	\$10,383	25.6%	21.2%
	Upper	292	37.4%	\$52,722	53.0%	43.8%	123	37.4%	31.0%	\$20,635	52.1%	43.7%	113	37.7%	30.7%	\$22,086	54.5%	43.7%
	Unknown	19	2.4%	\$2,279	2.3%	0.0%	7	2.1%	16.1%	\$654	1.7%	14.3%	9	3.0%	16.5%	\$1,131	2.8%	14.3%
	Total	781	100.0%	\$99,536	100.0%	100.0%	329	100.0%	100.0%	\$39,624	100.0%	100.0%	300	100.0%	100.0%	\$40,532	100.0%	100.0%
REFINANCE	Low	68	7.9%	\$4,175	4.9%	16.8%	27	8.1%	7.4%	\$1,464	4.6%	4.4%	26	7.7%	5.7%	\$1,857	5.3%	3.0%
	Moderate	177	20.5%	\$12,605	14.9%	17.3%	73	21.9%	18.7%	\$5,026	15.8%	13.2%	68	20.2%	16.3%	\$5,188	14.7%	11.0%
	Middle	235	27.2%	\$19,663	23.2%	22.1%	97	29.1%	24.2%	\$7,384	23.2%	20.6%	89	26.4%	22.7%	\$8,233	23.4%	18.8%
	Upper	362	41.9%	\$46,105	54.4%	43.8%	128	38.4%	36.6%	\$17,303	54.3%	47.5%	148	43.9%	38.2%	\$19,128	54.3%	48.7%
	Unknown	21	2.4%	\$2,245	2.6%	0.0%	8	2.4%	13.1%	\$708	2.2%	14.3%	6	1.8%	17.1%	\$793	2.3%	18.5%
	Total	863	100.0%	\$84,793	100.0%	100.0%	333	100.0%	100.0%	\$31,885	100.0%	100.0%	337	100.0%	100.0%	\$35,199	100.0%	100.0%
HOME IMPROVEMENT	Low	20	14.6%	\$465	6.9%	16.8%	7	13.5%	7.8%	\$161	6.4%	4.9%	9	17.3%	8.6%	\$225	8.2%	3.4%
	Moderate	28	20.4%	\$1,466	21.9%	17.3%	10	19.2%	20.4%	\$595	23.5%	14.3%	10	19.2%	20.6%	\$546	19.8%	13.0%
	Middle	47	34.3%	\$1,893	28.2%	22.1%	20	38.5%	27.9%	\$793	31.4%	22.4%	17	32.7%	25.6%	\$596	21.6%	20.7%
	Upper	42	30.7%	\$2,884	43.0%	43.8%	15	28.8%	39.0%	\$979	38.7%	52.4%	16	30.8%	40.5%	\$1,388	50.4%	56.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.9%	\$0	0.0%	6.0%	0	0.0%	4.6%	\$0	0.0%	5.9%
	Total	137	100.0%	\$6,708	100.0%	100.0%	52	100.0%	100.0%	\$2,528	100.0%	100.0%	52	100.0%	100.0%	\$2,755	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	152	8.5%	\$8,742	4.6%	16.8%	61	8.5%	6.8%	\$3,285	4.4%	3.8%	58	8.4%	6.8%	\$3,469	4.4%	3.6%
	Moderate	402	22.6%	\$30,944	16.2%	17.3%	173	24.2%	21.7%	\$13,328	18.0%	15.7%	144	20.9%	20.1%	\$11,279	14.4%	13.9%
	Middle	491	27.6%	\$45,116	23.6%	22.1%	199	27.9%	23.6%	\$17,145	23.2%	20.9%	195	28.3%	22.9%	\$19,212	24.5%	19.6%
	Upper	696	39.1%	\$101,711	53.2%	43.8%	266	37.3%	33.6%	\$38,917	52.6%	45.2%	277	40.2%	34.1%	\$42,602	54.3%	44.6%
	Unknown	40	2.2%	\$4,524	2.4%	0.0%	15	2.1%	14.4%	\$1,362	1.8%	14.5%	15	2.2%	16.1%	\$1,924	2.5%	18.4%
	Total	1,781	100.0%	\$191,037	100.0%	100.0%	714	100.0%	100.0%	\$74,037	100.0%	100.0%	689	100.0%	100.0%	\$78,486	100.0%	100.0%
Small Business Revenue	Total Businesses					86	47.8%	40.5%	\$5,199	17.9%	32.1%	95	51.1%	42.7%	\$8,358	25.9%	32.5%	
	\$1 Million or Less	223	51.1%	\$16,606	23.1%	88.7%	86	47.8%				95	51.1%					
	Over \$1 Million	120	27.5%	\$44,230	61.5%	9.4%	49	27.2%				53	28.5%					
	Total Rev. available	343	78.6%	\$60,836	84.6%	98.1%	135	75.0%				148	79.6%					
	Rev. Not Known	93	21.3%	\$11,105	15.4%	1.9%	45	25.0%				38	20.4%					
	Total	436	100.0%	\$71,941	100.0%	100.0%	180	100.0%				186	100.0%					
Small Business Loan Size	\$100,000 or Less	290	66.5%	\$9,099	12.6%		118	65.6%	91.2%	\$3,995	13.7%	30.7%	123	66.1%	91.8%	\$3,673	11.4%	31.3%
	\$100,001 - \$250,000	68	15.6%	\$11,948	16.6%		31	17.2%	4.5%	\$5,352	18.4%	17.7%	27	14.5%	4.0%	\$4,865	15.1%	15.5%
	\$250,001 - \$1 Million	78	17.9%	\$50,894	70.7%		31	17.2%	4.2%	\$19,779	67.9%	51.6%	36	19.4%	4.3%	\$23,711	73.5%	53.2%
	Total	436	100.0%	\$71,941	100.0%		180	100.0%	100.0%	\$29,126	100.0%	100.0%	186	100.0%	100.0%	\$32,249	100.0%	100.0%
	Total Farms					4	100.0%	64.8%	\$218	100.0%	69.2%	5	50.0%	67.4%	\$119	10.9%	74.5%	
Small Farm Revenue	\$1 Million or Less	12	66.7%	\$462	27.5%	98.8%	4	100.0%				5	50.0%					
	Over \$1 Million	2	11.1%	\$560	33.3%	1.2%	0	0.0%				2	20.0%					
	Not Known	4	22.2%	\$661	39.3%	0.0%	0	0.0%				3	30.0%					
	Total	18	100.0%	\$1,683	100.0%	100.0%	4	100.0%				10	100.0%					
	Total Farms					4	100.0%	100.0%	\$218	100.0%	69.2%	10	100.0%	100.0%	\$1,095	100.0%	100.0%	
Small Farm Loan Size	\$100,000 or Less	12	66.7%	\$427	25.4%		3	75.0%	71.7%	\$108	49.5%	25.6%	6	60.0%	73.8%	\$194	17.7%	27.8%
	\$100,001 - \$250,000	5	27.8%	\$941	55.9%		1	25.0%	18.3%	\$110	50.5%	33.8%	3	30.0%	17.8%	\$586	53.5%	36.2%
	\$250,001 - \$500,000	1	5.6%	\$315	18.7%		0	0.0%	10.0%	\$0	0.0%	40.6%	1	10.0%	8.5%	\$315	28.8%	36.0%
	Total	18	100.0%	\$1,683	100.0%		4	100.0%	100.0%	\$218	100.0%	100.0%	10	100.0%	100.0%	\$1,095	100.0%	100.0%
	Total Farms					4	100.0%	100.0%	\$218	100.0%	100.0%	10	100.0%	100.0%	\$1,095	100.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: OH Southwest OH

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
							2014					2015						
		Bank		Owner Occupied Units			Count		Dollar			Count		Dollar				
		Count	Dollar	%	#	%	#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
#	\$ (000s)	%	Bank															Agg
HOME PURCHASE	Low	3	0.5%	\$159	0.2%	1.6%	2	0.8%	0.7%	\$99	0.4%	0.5%	1	0.4%	1.1%	\$60	0.2%	0.6%
	Moderate	112	18.2%	\$9,291	14.5%	17.6%	50	19.3%	12.6%	\$3,883	15.0%	9.9%	40	16.9%	14.5%	\$3,469	13.3%	11.7%
	Middle	455	74.0%	\$48,327	75.3%	72.1%	187	72.2%	73.8%	\$19,588	75.5%	73.6%	180	75.9%	72.6%	\$19,457	74.6%	73.0%
	Upper	45	7.3%	\$6,401	10.0%	8.7%	20	7.7%	12.9%	\$2,383	9.2%	16.0%	16	6.8%	11.8%	\$3,109	11.9%	14.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	615	100.0%	\$64,178	100.0%	100.0%	259	100.0%	100.0%	\$25,953	100.0%	100.0%	237	100.0%	100.0%	\$26,095	100.0%	100.0%
REFINANCE	Low	2	0.3%	\$102	0.1%	1.6%	0	0.0%	1.0%	\$0	0.0%	0.9%	2	0.7%	0.6%	\$102	0.4%	0.3%
	Moderate	127	17.5%	\$9,495	13.7%	17.6%	53	20.7%	13.2%	\$4,170	17.8%	10.5%	37	12.3%	13.2%	\$2,708	9.3%	10.7%
	Middle	528	72.7%	\$51,986	75.1%	72.1%	179	69.9%	75.3%	\$16,850	72.0%	76.0%	235	78.3%	75.9%	\$23,334	80.2%	76.4%
	Upper	69	9.5%	\$7,624	11.0%	8.7%	24	9.4%	10.5%	\$2,383	10.2%	12.6%	26	8.7%	10.2%	\$2,945	10.1%	12.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	726	100.0%	\$69,207	100.0%	100.0%	256	100.0%	100.0%	\$23,403	100.0%	100.0%	300	100.0%	100.0%	\$29,089	100.0%	100.0%
HOME IMPROVEMENT	Low	1	0.6%	\$21	0.3%	1.6%	0	0.0%	1.0%	\$0	0.0%	0.2%	1	1.4%	1.9%	\$21	0.6%	0.6%
	Moderate	45	28.7%	\$1,859	28.0%	17.6%	14	28.0%	16.4%	\$694	32.4%	16.2%	19	26.4%	15.5%	\$874	26.9%	13.1%
	Middle	102	65.0%	\$4,317	65.1%	72.1%	33	66.0%	74.2%	\$1,313	61.2%	70.9%	48	66.7%	73.5%	\$2,082	64.1%	75.8%
	Upper	9	5.7%	\$435	6.6%	8.7%	3	6.0%	8.4%	\$137	6.4%	12.7%	4	5.6%	9.0%	\$273	8.4%	10.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	157	100.0%	\$6,632	100.0%	100.0%	50	100.0%	100.0%	\$2,144	100.0%	100.0%	72	100.0%	100.0%	\$3,250	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	7.1%
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	60.0%	\$0	0.0%	31.2%	0	0.0%	31.3%	\$0	0.0%	21.5%
	Middle	0	0.0%	\$0	0.0%	55.7%	0	0.0%	40.0%	\$0	0.0%	68.8%	0	0.0%	43.8%	\$0	0.0%	49.7%
	Upper	0	0.0%	\$0	0.0%	9.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	6.3%	\$0	0.0%	21.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	0.4%	\$282	0.2%	1.6%	2	0.4%	0.8%	\$99	0.2%	0.6%	4	0.7%	1.0%	\$183	0.3%	0.6%
	Moderate	284	19.0%	\$20,645	14.7%	17.6%	117	20.7%	13.1%	\$8,747	17.0%	10.5%	96	15.8%	14.1%	\$7,051	12.1%	11.5%
	Middle	1,085	72.4%	\$104,630	74.7%	72.1%	399	70.6%	74.4%	\$37,751	73.3%	74.4%	463	76.0%	73.8%	\$44,873	76.8%	74.1%
	Upper	123	8.2%	\$14,460	10.3%	8.7%	47	8.3%	11.7%	\$4,903	9.5%	14.4%	46	7.6%	11.0%	\$6,327	10.8%	13.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	1,498	100.0%	\$140,017	100.0%	100.0%	565	100.0%	100.0%	\$51,500	100.0%	100.0%	609	100.0%	100.0%	\$58,434	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	7	2.6%	\$256	0.9%	4.9%	3	2.6%	5.2%	\$85	0.7%	5.9%	3	3.9%	5.0%	\$96	1.1%	7.5%
	Moderate	47	17.6%	\$6,632	23.9%	20.9%	18	15.4%	16.9%	\$3,262	28.4%	19.4%	19	24.7%	17.4%	\$2,553	28.3%	23.1%
	Middle	199	74.5%	\$20,370	73.4%	65.7%	90	76.9%	66.6%	\$7,922	68.9%	67.1%	51	66.2%	64.7%	\$6,224	69.0%	60.7%
	Upper	14	5.2%	\$512	1.8%	8.5%	6	5.1%	8.4%	\$225	2.0%	6.5%	4	5.2%	9.0%	\$146	1.6%	7.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	1.2%	0	0.0%	3.9%	\$0	0.0%	1.6%
Total	267	100.0%	\$27,770	100.0%	100.0%	117	100.0%	100.0%	\$11,494	100.0%	100.0%	77	100.0%	100.0%	\$9,019	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Moderate	3	7.9%	\$74	2.4%	11.4%	0	0.0%	5.5%	\$0	0.0%	2.2%	2	14.3%	7.2%	\$47	3.5%	4.0%
	Middle	33	86.8%	\$2,991	95.9%	79.8%	15	100.0%	85.6%	\$1,214	100.0%	88.1%	10	71.4%	82.9%	\$1,251	92.5%	87.2%
	Upper	2	5.3%	\$54	1.7%	8.6%	0	0.0%	8.6%	\$0	0.0%	9.7%	2	14.3%	9.3%	\$54	4.0%	8.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%
Total	38	100.0%	\$3,119	100.0%	100.0%	15	100.0%	100.0%	\$1,214	100.0%	100.0%	14	100.0%	100.0%	\$1,352	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: OH Southwest OH

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		1/1/2014-6/30/2016					2014					2015						
		Bank		Families by Family Income		%	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	66	10.7%	\$4,043	6.3%	24.2%	30	11.6%	7.3%	\$1,848	7.1%	4.1%	22	9.3%	8.2%	\$1,145	4.4%	4.5%
	Moderate	228	37.1%	\$18,976	29.6%	18.3%	92	35.5%	23.1%	\$7,523	29.0%	16.9%	97	40.9%	23.7%	\$8,499	32.6%	18.0%
	Middle	144	23.4%	\$15,541	24.2%	21.1%	55	21.2%	22.9%	\$5,324	20.5%	21.7%	50	21.1%	24.0%	\$5,670	21.7%	23.2%
	Upper	164	26.7%	\$24,308	37.9%	36.4%	75	29.0%	31.6%	\$10,548	40.6%	43.2%	63	26.6%	27.6%	\$10,270	39.4%	39.2%
	Unknown	13	2.1%	\$1,310	2.0%	0.0%	7	2.7%	15.1%	\$710	2.7%	14.2%	5	2.1%	16.5%	\$511	2.0%	15.1%
	Total	615	100.0%	\$64,178	100.0%	100.0%	259	100.0%	100.0%	\$25,953	100.0%	100.0%	237	100.0%	100.0%	\$26,095	100.0%	100.0%
REFINANCE	Low	80	11.0%	\$5,074	7.3%	24.2%	31	12.1%	9.0%	\$1,786	7.6%	5.5%	36	12.0%	7.6%	\$2,430	8.4%	4.4%
	Moderate	160	22.0%	\$11,905	17.2%	18.3%	59	23.0%	17.7%	\$4,010	17.1%	13.2%	61	20.3%	17.4%	\$4,913	16.9%	12.3%
	Middle	211	29.1%	\$19,426	28.1%	21.1%	64	25.0%	22.9%	\$5,856	25.0%	19.9%	96	32.0%	22.1%	\$9,106	31.3%	19.2%
	Upper	257	35.4%	\$30,735	44.4%	36.4%	97	37.9%	37.0%	\$11,121	47.5%	46.5%	102	34.0%	35.3%	\$12,035	41.4%	44.1%
	Unknown	18	2.5%	\$2,067	3.0%	0.0%	5	2.0%	13.4%	\$630	2.7%	14.9%	5	1.7%	17.6%	\$605	2.1%	20.0%
	Total	726	100.0%	\$69,207	100.0%	100.0%	256	100.0%	100.0%	\$23,403	100.0%	100.0%	300	100.0%	100.0%	\$29,089	100.0%	100.0%
HOME IMPROVEMENT	Low	31	19.7%	\$747	11.3%	24.2%	11	22.0%	13.4%	\$274	12.8%	5.3%	13	18.1%	13.5%	\$267	8.2%	4.1%
	Moderate	25	15.9%	\$596	9.0%	18.3%	9	18.0%	21.6%	\$366	17.1%	14.6%	12	16.7%	20.6%	\$149	4.6%	11.1%
	Middle	46	29.3%	\$2,554	38.5%	21.1%	14	28.0%	22.6%	\$931	43.4%	23.5%	19	26.4%	24.2%	\$1,068	32.9%	26.6%
	Upper	55	35.0%	\$2,735	41.2%	36.4%	16	32.0%	37.9%	\$573	26.7%	50.9%	28	38.9%	38.4%	\$1,766	54.3%	53.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	5.7%	0	0.0%	3.2%	\$0	0.0%	4.9%
	Total	157	100.0%	\$6,632	100.0%	100.0%	50	100.0%	100.0%	\$2,144	100.0%	100.0%	72	100.0%	100.0%	\$3,250	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	177	11.8%	\$9,864	7.0%	24.2%	72	12.7%	8.4%	\$3,908	7.6%	4.6%	71	11.7%	8.4%	\$3,842	6.6%	4.4%
	Moderate	413	27.6%	\$31,477	22.5%	18.3%	160	28.3%	20.9%	\$11,899	23.1%	15.2%	170	27.9%	21.1%	\$13,561	23.2%	15.3%
	Middle	401	26.8%	\$37,521	26.8%	21.1%	133	23.5%	22.8%	\$12,111	23.5%	20.9%	165	27.1%	23.2%	\$15,844	27.1%	21.4%
	Upper	476	31.8%	\$57,778	41.3%	36.4%	188	33.3%	34.1%	\$22,242	43.2%	44.3%	193	31.7%	31.3%	\$24,071	41.2%	41.0%
	Unknown	31	2.1%	\$3,377	2.4%	0.0%	12	2.1%	13.8%	\$1,340	2.6%	15.0%	10	1.6%	16.0%	\$1,116	1.9%	18.0%
	Total	1,498	100.0%	\$140,017	100.0%	100.0%	565	100.0%	100.0%	\$51,500	100.0%	100.0%	609	100.0%	100.0%	\$58,434	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	164	61.4%	\$7,579	27.3%	90.2%	69	59.0%	43.3%	\$3,088	26.9%	33.4%	45	58.4%	41.5%	\$2,063	22.9%	33.8%
	Over \$1 Million	51	19.1%	\$14,846	53.5%	7.5%	21	17.9%				13	16.9%					
	Total Rev. available	215	80.5%	\$22,425	80.8%	97.7%	90	76.9%				58	75.3%					
	Rev. Not Known	52	19.5%	\$5,345	19.2%	2.3%	27	23.1%				19	24.7%					
	Total	267	100.0%	\$27,770	100.0%	100.0%	117	100.0%				77	100.0%					
Small Business Loan Size	\$100,000 or Less	218	81.6%	\$7,155	25.8%		97	82.9%	94.0%	\$3,010	26.2%	34.1%	60	77.9%	94.8%	\$1,998	22.2%	39.8%
	\$100,001 - \$250,000	14	5.2%	\$2,482	8.9%		6	5.1%	2.6%	\$1,098	9.6%	13.6%	5	6.5%	2.6%	\$954	10.6%	14.8%
	\$250,001 - \$1 Million	35	13.1%	\$18,133	65.3%		14	12.0%	3.4%	\$7,386	64.3%	52.3%	12	15.6%	2.6%	\$6,067	67.3%	45.4%
	Total	267	100.0%	\$27,770	100.0%		117	100.0%	100.0%	\$11,494	100.0%	100.0%	77	100.0%	100.0%	\$9,019	100.0%	100.0%
	Total Farms																	
Small Farm Revenue	\$1 Million or Less	18	47.4%	\$1,058	33.9%	99.3%	6	40.0%	51.1%	\$433	35.7%	64.8%	3	21.4%	54.9%	\$72	5.3%	69.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.7%	0	0.0%				0	0.0%					
	Not Known	20	52.6%	\$2,061	66.1%	0.0%	9	60.0%				11	78.6%					
	Total	38	100.0%	\$3,119	100.0%	100.0%	15	100.0%				14	100.0%					
	Total Farms																	
Small Farm Loan Size	\$100,000 or Less	27	71.1%	\$1,010	32.4%		10	66.7%	76.6%	\$345	28.4%	24.0%	10	71.4%	81.3%	\$362	26.8%	33.8%
	\$100,001 - \$250,000	8	21.1%	\$1,079	34.6%		4	26.7%	13.9%	\$579	47.7%	31.0%	2	14.3%	12.8%	\$250	18.5%	35.4%
	\$250,001 - \$500,000	3	7.9%	\$1,030	33.0%		1	6.7%	9.6%	\$290	23.9%	45.0%	2	14.3%	5.9%	\$740	54.7%	30.7%
	Total	38	100.0%	\$3,119	100.0%		15	100.0%	100.0%	\$1,214	100.0%	100.0%	14	100.0%	100.0%	\$1,352	100.0%	100.0%
	Total Farms																	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: OH Toledo

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	37	3.0%	\$3,012	1.8%	5.8%	7	1.4%	0.9%	\$242	0.4%	0.4%	23	4.7%	1.4%	\$1,946	2.9%	1.0%
	Moderate	130	10.5%	\$9,191	5.5%	12.9%	27	5.3%	6.1%	\$1,654	2.5%	3.3%	67	13.7%	7.4%	\$4,798	7.3%	3.9%
	Middle	537	43.4%	\$54,074	32.6%	49.0%	241	47.4%	48.8%	\$24,183	35.9%	38.4%	194	39.7%	47.3%	\$19,548	29.6%	37.5%
	Upper	534	43.1%	\$99,651	60.1%	32.4%	233	45.9%	44.2%	\$41,330	61.3%	58.0%	205	41.9%	43.8%	\$39,782	60.2%	57.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,238	100.0%	\$165,928	100.0%	100.0%	508	100.0%	100.0%	\$67,409	100.0%	100.0%	489	100.0%	100.0%	\$66,074	100.0%	100.0%
REFINANCE	Low	33	2.9%	\$1,526	1.2%	5.8%	7	1.6%	1.6%	\$316	0.7%	0.9%	21	4.2%	1.5%	\$817	1.4%	0.7%
	Moderate	134	11.7%	\$8,217	6.5%	12.9%	46	10.6%	8.8%	\$2,634	5.7%	5.8%	60	12.0%	7.2%	\$3,702	6.5%	4.4%
	Middle	486	42.4%	\$44,597	35.4%	49.0%	192	44.0%	50.7%	\$16,769	36.1%	43.0%	199	39.8%	46.3%	\$19,148	33.9%	38.4%
	Upper	494	43.1%	\$71,779	56.9%	32.4%	191	43.8%	38.8%	\$26,716	57.5%	50.3%	220	44.0%	44.9%	\$32,875	58.1%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,147	100.0%	\$126,119	100.0%	100.0%	436	100.0%	100.0%	\$46,435	100.0%	100.0%	500	100.0%	100.0%	\$56,542	100.0%	100.0%
HOME IMPROVEMENT	Low	6	3.7%	\$76	1.1%	5.8%	3	6.8%	4.4%	\$50	2.6%	1.1%	1	1.3%	5.0%	\$10	0.3%	1.5%
	Moderate	23	14.1%	\$481	6.7%	12.9%	3	6.8%	11.9%	\$37	1.9%	4.6%	14	17.5%	10.4%	\$255	7.6%	4.3%
	Middle	84	51.5%	\$3,265	45.5%	49.0%	28	63.6%	52.3%	\$1,014	52.0%	43.5%	36	45.0%	49.9%	\$1,498	44.6%	46.0%
	Upper	50	30.7%	\$3,355	46.7%	32.4%	10	22.7%	31.4%	\$850	43.6%	50.8%	29	36.3%	34.7%	\$1,599	47.6%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	163	100.0%	\$7,177	100.0%	100.0%	44	100.0%	100.0%	\$1,951	100.0%	100.0%	80	100.0%	100.0%	\$3,362	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	2	40.0%	\$34	0.2%	12.5%	0	0.0%	7.3%	\$0	0.0%	10.4%	2	100.0%	13.8%	\$34	100.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	26.9%	0	0.0%	21.8%	\$0	0.0%	18.1%	0	0.0%	27.5%	\$0	0.0%	19.5%
	Middle	2	40.0%	\$9,005	64.1%	44.0%	0	0.0%	32.7%	\$0	0.0%	16.0%	0	0.0%	43.8%	\$0	0.0%	45.6%
	Upper	1	20.0%	\$5,000	35.6%	16.4%	1	100.0%	38.2%	\$5,000	100.0%	55.5%	0	0.0%	15.0%	\$0	0.0%	32.0%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	5	100.0%	\$14,039	100.0%	100.0%	1	100.0%	100.0%	\$5,000	100.0%	100.0%	2	100.0%	100.0%	\$34	100.0%	100.0%	
HMDA TOTALS	Low	78	3.1%	\$4,648	1.5%	5.8%	17	1.7%	1.5%	\$608	0.5%	1.2%	47	4.4%	1.7%	\$2,807	2.2%	1.0%
	Moderate	287	11.2%	\$17,889	5.7%	12.9%	76	7.7%	7.6%	\$4,325	3.6%	5.1%	141	13.2%	7.6%	\$8,755	6.9%	5.1%
	Middle	1,109	43.4%	\$110,941	35.4%	49.0%	461	46.6%	49.7%	\$41,966	34.7%	38.6%	429	40.1%	47.1%	\$40,194	31.9%	38.5%
	Upper	1,079	42.3%	\$179,785	57.4%	32.4%	435	44.0%	41.3%	\$73,896	61.2%	55.1%	454	42.4%	43.5%	\$74,256	58.9%	55.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2,553	100.0%	\$313,263	100.0%	100.0%	989	100.0%	100.0%	\$120,795	100.0%	100.0%	1,071	100.0%	100.0%	\$126,012	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	99	8.4%	\$22,889	11.2%	6.1%	42	8.0%	4.4%	\$8,537	9.6%	6.0%	37	8.4%	4.0%	\$10,640	12.3%	6.6%
	Moderate	163	13.8%	\$31,884	15.6%	13.4%	71	13.5%	10.9%	\$14,037	15.8%	12.0%	60	13.7%	10.5%	\$11,309	13.1%	10.0%
	Middle	457	38.7%	\$85,358	41.7%	45.2%	203	38.5%	45.5%	\$34,871	39.3%	50.6%	166	37.8%	44.9%	\$37,874	43.8%	48.6%
	Upper	461	39.1%	\$64,414	31.5%	35.2%	211	40.0%	37.9%	\$31,316	35.3%	31.1%	176	40.1%	39.4%	\$26,598	30.8%	34.5%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	0.3%	0	0.0%	1.2%	\$0	0.0%	0.4%
Total	1,180	100.0%	\$204,545	100.0%	100.0%	527	100.0%	100.0%	\$88,761	100.0%	100.0%	439	100.0%	100.0%	\$86,421	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.2%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.4%
	Middle	2	33.3%	\$108	78.8%	69.2%	0	0.0%	78.0%	\$0	0.0%	78.8%	2	50.0%	80.8%	\$108	93.1%	82.8%
	Upper	4	66.7%	\$29	21.2%	29.4%	1	100.0%	21.6%	\$15	100.0%	20.8%	2	50.0%	19.0%	\$8	6.9%	16.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.2%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	6	100.0%	\$137	100.0%	100.0%	1	100.0%	100.0%	\$15	100.0%	100.0%	4	100.0%	100.0%	\$116	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: OH Toledo

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income %	2014			2015									
		Count		Dollar			Bank	Agg	Agg	Count		Dollar							
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %			
HOME PURCHASE	Low	202	16.3%	\$13,220	8.0%	21.9%	66	13.0%	7.8%	\$3,809	5.7%	3.8%	82	16.8%	8.4%	\$5,406	8.2%	4.2%	
	Moderate	278	22.5%	\$25,257	15.2%	17.0%	130	25.6%	21.3%	\$11,722	17.4%	14.2%	107	21.9%	22.4%	\$9,840	14.9%	15.4%	
	Middle	277	22.4%	\$32,621	19.7%	20.5%	120	23.6%	22.7%	\$14,415	21.4%	20.5%	102	20.9%	23.6%	\$11,564	17.5%	21.2%	
	Upper	449	36.3%	\$89,161	53.7%	40.6%	181	35.6%	34.5%	\$35,485	52.6%	48.9%	182	37.2%	32.8%	\$36,403	55.1%	47.8%	
	Unknown	32	2.6%	\$5,669	3.4%	0.0%	11	2.2%	13.7%	\$1,978	2.9%	12.6%	16	3.3%	12.8%	\$2,861	4.3%	11.4%	
	<i>Total</i>	<i>1,238</i>	<i>100.0%</i>	<i>\$165,928</i>	<i>100.0%</i>	<i>100.0%</i>	<i>508</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$67,409</i>	<i>100.0%</i>	<i>100.0%</i>	<i>489</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$66,074</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	130	11.3%	\$7,735	6.1%	21.9%	41	9.4%	7.7%	\$2,237	4.8%	4.4%	64	12.8%	6.1%	\$3,951	7.0%	3.3%	
	Moderate	229	20.0%	\$17,868	14.2%	17.0%	82	18.8%	17.6%	\$6,413	13.8%	12.4%	107	21.4%	16.1%	\$8,265	14.6%	10.5%	
	Middle	271	23.6%	\$25,447	20.2%	20.5%	119	27.3%	23.7%	\$10,722	23.1%	20.4%	105	21.0%	21.4%	\$10,575	18.7%	18.3%	
	Upper	486	42.4%	\$70,381	55.8%	40.6%	183	42.0%	38.0%	\$25,674	55.3%	48.2%	210	42.0%	40.1%	\$31,474	55.7%	50.4%	
	Unknown	31	2.7%	\$4,688	3.7%	0.0%	11	2.5%	13.0%	\$1,389	3.0%	14.6%	14	2.8%	16.3%	\$2,277	4.0%	17.4%	
	<i>Total</i>	<i>1,147</i>	<i>100.0%</i>	<i>\$126,119</i>	<i>100.0%</i>	<i>100.0%</i>	<i>436</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$46,435</i>	<i>100.0%</i>	<i>100.0%</i>	<i>500</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$56,542</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	23	14.1%	\$703	9.8%	21.9%	8	18.2%	13.5%	\$272	13.9%	7.1%	9	11.3%	10.2%	\$239	7.1%	3.5%	
	Moderate	46	28.2%	\$1,653	23.0%	17.0%	9	20.5%	21.6%	\$321	16.5%	13.5%	22	27.5%	24.3%	\$779	23.2%	15.2%	
	Middle	45	27.6%	\$1,554	21.7%	20.5%	16	36.4%	26.7%	\$638	32.7%	21.0%	22	27.5%	25.6%	\$756	22.5%	21.8%	
	Upper	49	30.1%	\$3,267	45.5%	40.6%	11	25.0%	33.8%	\$720	36.9%	54.4%	27	33.8%	35.9%	\$1,588	47.2%	54.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	4.0%	0	0.0%	4.1%	\$0	0.0%	4.6%	
	<i>Total</i>	<i>163</i>	<i>100.0%</i>	<i>\$7,177</i>	<i>100.0%</i>	<i>100.0%</i>	<i>44</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,951</i>	<i>100.0%</i>	<i>100.0%</i>	<i>80</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,362</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	5	100.0%	\$14,039	100.0%	0.0%	1	100.0%	100.0%	\$5,000	100.0%	100.0%	2	100.0%	100.0%	\$34	100.0%	100.0%	
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$14,039</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34</i>	<i>100.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	355	13.9%	\$21,658	6.9%	21.9%	115	11.6%	8.1%	\$6,318	5.2%	3.8%	155	14.5%	7.6%	\$9,596	7.6%	3.6%	
	Moderate	553	21.7%	\$44,778	14.3%	17.0%	221	22.3%	19.8%	\$18,456	15.3%	12.7%	236	22.0%	20.0%	\$18,884	15.0%	12.7%	
	Middle	593	23.2%	\$59,622	19.0%	20.5%	255	25.8%	23.2%	\$25,775	21.3%	19.2%	229	21.4%	22.7%	\$22,895	18.2%	18.8%	
	Upper	984	38.5%	\$162,809	52.0%	40.6%	375	37.9%	35.6%	\$61,879	51.2%	45.8%	419	39.1%	35.5%	\$69,465	55.1%	45.6%	
	Unknown	68	2.7%	\$24,396	7.8%	0.0%	23	2.3%	13.2%	\$8,367	6.9%	18.4%	32	3.0%	14.1%	\$5,172	4.1%	19.3%	
	<i>Total</i>	<i>2,553</i>	<i>100.0%</i>	<i>\$313,263</i>	<i>100.0%</i>	<i>100.0%</i>	<i>989</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$120,795</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,071</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$126,012</i>	<i>100.0%</i>	<i>100.0%</i>	
Small Business Revenue		Total Businesses																	
	\$1 Million or Less	582	49.3%	\$49,513	24.2%	88.0%	252	47.8%	44.2%	\$24,693	27.8%	31.5%	207	47.2%	48.3%	\$17,184	19.9%	30.8%	
	Over \$1 Million	381	32.3%	\$129,074	63.1%	11.0%	163	30.9%					151	34.4%					
	<i>Total Rev. available</i>	<i>963</i>	<i>81.6%</i>	<i>\$178,587</i>	<i>87.3%</i>	<i>99.0%</i>	<i>415</i>	<i>78.7%</i>					<i>358</i>	<i>81.6%</i>					
	Rev. Not Known	217	18.4%	\$25,958	12.7%	1.0%	112	21.3%					81	18.5%					
	<i>Total</i>	<i>1,180</i>	<i>100.0%</i>	<i>\$204,545</i>	<i>100.0%</i>	<i>100.0%</i>	<i>527</i>	<i>100.0%</i>					<i>439</i>	<i>100.0%</i>					
Small Business Loan Size	\$100,000 or Less	706	59.8%	\$23,295	11.4%		320	60.7%	88.2%	\$10,396	11.7%	26.0%	244	55.6%	88.8%	\$8,106	9.4%	26.3%	
	\$100,001 - \$250,000	226	19.2%	\$43,388	21.2%		95	18.0%	5.5%	\$18,066	20.4%	16.7%	89	20.3%	5.3%	\$17,507	20.3%	16.7%	
	\$250,001 - \$1 Million	248	21.0%	\$137,862	67.4%		112	21.3%	6.3%	\$60,299	67.9%	57.3%	106	24.1%	5.8%	\$60,808	70.4%	57.0%	
	<i>Total</i>	<i>1,180</i>	<i>100.0%</i>	<i>\$204,545</i>	<i>100.0%</i>	<i>100.0%</i>	<i>527</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$88,761</i>	<i>100.0%</i>	<i>100.0%</i>	<i>439</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$86,421</i>	<i>100.0%</i>	<i>100.0%</i>	
		Total Farms																	
	\$1 Million or Less	6	100.0%	\$137	100.0%	97.6%	1	100.0%	82.0%	\$15	100.0%	79.8%	4	100.0%	79.2%	\$116	100.0%	78.0%	
Over \$1 Million	0	0.0%	\$0	0.0%	2.4%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$137</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>					<i>4</i>	<i>100.0%</i>						
Small Farm Loan Size	\$100,000 or Less	6	100.0%	\$137	100.0%		1	100.0%	64.7%	\$15	100.0%	24.8%	4	100.0%	67.3%	\$116	100.0%	25.9%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	23.4%	\$0	0.0%	37.3%	0	0.0%	21.0%	\$0	0.0%	35.0%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.8%	\$0	0.0%	38.0%	0	0.0%	11.6%	\$0	0.0%	39.1%	
	<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$137</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$116</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		Count		Dollar			Bank	Agg	Dollar			Count		Dollar				
		#	%	\$ (000s)	%	%			%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.2%	0	0.0%	2.0%	\$0	0.0%	1.2%	0	0.0%	1.8%	\$0	0.0%	1.1%
	Moderate	1	1.6%	\$47	0.3%	11.3%	0	0.0%	7.5%	\$0	0.0%	4.9%	1	3.8%	8.2%	\$47	0.7%	5.3%
	Middle	15	24.6%	\$2,312	15.0%	45.2%	4	20.0%	43.3%	\$493	9.6%	33.2%	5	19.2%	45.1%	\$679	10.4%	35.9%
	Upper	45	73.8%	\$13,104	84.7%	40.3%	16	80.0%	47.2%	\$4,667	90.4%	60.7%	20	76.9%	45.0%	\$5,795	88.9%	57.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	61	100.0%	\$15,463	100.0%	100.0%	20	100.0%	100.0%	\$5,160	100.0%	100.0%	26	100.0%	100.0%	\$6,521	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.2%	0	0.0%	2.8%	\$0	0.0%	1.5%	0	0.0%	1.8%	\$0	0.0%	0.9%
	Moderate	9	15.3%	\$790	5.7%	11.3%	3	14.3%	9.1%	\$281	6.6%	5.6%	4	19.0%	8.6%	\$373	10.0%	5.7%
	Middle	17	28.8%	\$2,360	17.0%	45.2%	5	23.8%	41.9%	\$666	15.6%	33.2%	8	38.1%	39.9%	\$1,215	32.5%	31.9%
	Upper	33	55.9%	\$10,741	77.3%	40.3%	13	61.9%	46.1%	\$3,323	77.8%	59.7%	9	42.9%	49.6%	\$2,153	57.6%	61.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	59	100.0%	\$13,891	100.0%	100.0%	21	100.0%	100.0%	\$4,270	100.0%	100.0%	21	100.0%	100.0%	\$3,741	100.0%	100.0%
HOME IMPROVEMENT	Low	1	12.5%	\$5	0.8%	3.2%	0	0.0%	2.9%	\$0	0.0%	1.0%	1	25.0%	2.7%	\$5	1.6%	1.5%
	Moderate	1	12.5%	\$20	3.4%	11.3%	0	0.0%	8.8%	\$0	0.0%	4.4%	0	0.0%	12.6%	\$0	0.0%	8.5%
	Middle	1	12.5%	\$132	22.4%	45.2%	0	0.0%	44.8%	\$0	0.0%	34.1%	1	25.0%	45.7%	\$132	42.4%	36.7%
	Upper	5	62.5%	\$432	73.3%	40.3%	3	100.0%	43.5%	\$258	100.0%	60.5%	2	50.0%	38.9%	\$174	55.9%	53.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$589	100.0%	100.0%	3	100.0%	100.0%	\$258	100.0%	100.0%	4	100.0%	100.0%	\$311	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	24.5%	0	0.0%	23.3%	\$0	0.0%	25.0%	0	0.0%	24.6%	\$0	0.0%	15.8%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	25.6%	\$0	0.0%	30.3%	0	0.0%	14.0%	\$0	0.0%	7.0%
	Middle	0	0.0%	\$0	0.0%	36.0%	0	0.0%	39.5%	\$0	0.0%	42.5%	0	0.0%	43.9%	\$0	0.0%	36.4%
	Upper	0	0.0%	\$0	0.0%	18.1%	0	0.0%	11.6%	\$0	0.0%	2.1%	0	0.0%	17.5%	\$0	0.0%	40.8%
	Unknown	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	0.8%	\$5	0.0%	3.2%	0	0.0%	2.4%	\$0	0.0%	2.4%	1	2.0%	1.9%	\$5	0.0%	2.1%
	Moderate	11	8.6%	\$857	2.9%	11.3%	3	6.8%	8.2%	\$281	2.9%	6.3%	5	9.8%	8.6%	\$420	4.0%	5.6%
	Middle	33	25.8%	\$4,804	16.0%	45.2%	9	20.5%	42.9%	\$1,159	12.0%	33.6%	14	27.5%	43.2%	\$2,026	19.2%	34.6%
	Upper	83	64.8%	\$24,277	81.1%	40.3%	32	72.7%	46.5%	\$8,248	85.1%	57.7%	31	60.8%	46.3%	\$8,122	76.8%	57.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	128	100.0%	\$29,943	100.0%	100.0%	44	100.0%	100.0%	\$9,688	100.0%	100.0%	51	100.0%	100.0%	\$10,573	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	3.9%	\$75	1.4%	6.0%	1	3.1%	5.9%	\$25	1.2%	6.5%	1	3.1%	5.5%	\$25	1.2%	6.4%
	Moderate	18	23.4%	\$1,083	20.3%	15.1%	8	25.0%	16.0%	\$473	21.8%	17.5%	8	25.0%	14.7%	\$557	26.8%	17.2%
	Middle	24	31.2%	\$2,396	44.9%	33.8%	9	28.1%	30.3%	\$1,269	58.5%	30.1%	9	28.1%	31.9%	\$352	16.9%	30.6%
	Upper	32	41.6%	\$1,785	33.4%	44.8%	14	43.8%	46.3%	\$402	18.5%	45.5%	14	43.8%	46.5%	\$1,148	55.1%	45.4%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.3%	0	0.0%	1.2%	\$0	0.0%	0.3%
Total	77	100.0%	\$5,339	100.0%	100.0%	32	100.0%	100.0%	\$2,169	100.0%	100.0%	32	100.0%	100.0%	\$2,082	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.9%	0	0.0%	8.3%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$13	100.0%	52.3%	0	0.0%	50.0%	\$0	0.0%	46.8%	1	100.0%	61.5%	\$13	100.0%	72.5%
	Upper	0	0.0%	\$0	0.0%	36.9%	0	0.0%	41.7%	\$0	0.0%	52.2%	0	0.0%	38.5%	\$0	0.0%	27.5%
	Unknown	0	0.0%	\$0	0.0%	1.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$13	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$13	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 1/1/2014-6/30/2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2014					2015						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	%	\$ (000s)	\$ %	\$ %	Bank	Agg	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	3	4.9%	\$331	2.1%	18.5%	1	5.0%	6.2%	\$87	1.7%	2.9%	1	3.8%	6.9%	\$120	1.8%	3.4%
	Moderate	8	13.1%	\$751	4.9%	15.4%	2	10.0%	17.4%	\$119	2.3%	11.4%	3	11.5%	18.0%	\$232	3.6%	12.3%
	Middle	7	11.5%	\$1,281	8.3%	20.1%	2	10.0%	19.1%	\$319	6.2%	15.8%	4	15.4%	19.6%	\$702	10.8%	17.2%
	Upper	33	54.1%	\$11,147	72.1%	46.0%	13	65.0%	38.2%	\$4,253	82.4%	53.1%	11	42.3%	36.4%	\$4,147	63.6%	49.7%
	Unknown	10	16.4%	\$1,953	12.6%	0.0%	2	10.0%	19.1%	\$382	7.4%	16.8%	7	26.9%	19.1%	\$1,320	20.2%	17.4%
	Total	61	100.0%	\$15,463	100.0%	100.0%	20	100.0%	100.0%	\$5,160	100.0%	100.0%	26	100.0%	100.0%	\$6,521	100.0%	100.0%
REFINANCE	Low	2	3.4%	\$174	1.3%	18.5%	1	4.8%	7.0%	\$57	1.3%	3.5%	0	0.0%	6.1%	\$0	0.0%	3.1%
	Moderate	11	18.6%	\$1,005	7.2%	15.4%	6	28.6%	15.6%	\$622	14.6%	10.3%	4	19.0%	13.5%	\$298	8.0%	8.7%
	Middle	11	18.6%	\$1,798	12.9%	20.1%	5	23.8%	19.0%	\$731	17.1%	15.9%	3	14.3%	17.9%	\$470	12.6%	14.5%
	Upper	29	49.2%	\$9,690	69.8%	46.0%	8	38.1%	38.1%	\$2,703	63.3%	50.8%	9	42.9%	37.1%	\$1,906	50.9%	48.6%
	Unknown	6	10.2%	\$1,224	8.8%	0.0%	1	4.8%	20.2%	\$157	3.7%	19.4%	5	23.8%	25.3%	\$1,067	28.5%	25.1%
	Total	59	100.0%	\$13,891	100.0%	100.0%	21	100.0%	100.0%	\$4,270	100.0%	100.0%	21	100.0%	100.0%	\$3,741	100.0%	100.0%
HOME IMPROVEMENT	Low	1	12.5%	\$5	0.8%	18.5%	0	0.0%	11.8%	\$0	0.0%	4.3%	1	25.0%	9.0%	\$5	1.6%	3.2%
	Moderate	2	25.0%	\$252	42.8%	15.4%	1	33.3%	18.0%	\$120	46.5%	10.7%	1	25.0%	17.9%	\$132	42.4%	10.0%
	Middle	2	25.0%	\$134	22.8%	20.1%	0	0.0%	21.6%	\$0	0.0%	17.5%	1	25.0%	22.6%	\$114	36.7%	23.2%
	Upper	2	25.0%	\$68	11.5%	46.0%	1	33.3%	41.4%	\$8	3.1%	60.1%	1	25.0%	43.0%	\$60	19.3%	59.4%
	Unknown	1	12.5%	\$130	22.1%	0.0%	1	33.3%	7.2%	\$130	50.4%	7.3%	0	0.0%	7.5%	\$0	0.0%	4.3%
	Total	8	100.0%	\$589	100.0%	100.0%	3	100.0%	100.0%	\$258	100.0%	100.0%	4	100.0%	100.0%	\$311	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	46.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	6	4.7%	\$510	1.7%	18.5%	2	4.5%	6.8%	\$144	1.5%	3.0%	2	3.9%	6.7%	\$125	1.2%	3.0%
	Moderate	21	16.4%	\$2,008	6.7%	15.4%	9	20.5%	16.8%	\$861	8.9%	10.6%	8	15.7%	16.3%	\$662	6.3%	10.2%
	Middle	20	15.6%	\$3,213	10.7%	20.1%	7	15.9%	19.1%	\$1,050	10.8%	15.1%	8	15.7%	19.1%	\$1,286	12.2%	15.2%
	Upper	64	50.0%	\$20,905	69.8%	46.0%	22	50.0%	38.2%	\$6,964	71.9%	50.1%	21	41.2%	36.8%	\$6,113	57.8%	45.8%
	Unknown	17	13.3%	\$3,307	11.0%	0.0%	4	9.1%	19.0%	\$669	6.9%	21.2%	12	23.5%	21.2%	\$2,387	22.6%	25.8%
	Total	128	100.0%	\$29,943	100.0%	100.0%	44	100.0%	100.0%	\$9,688	100.0%	100.0%	51	100.0%	100.0%	\$10,573	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	40	51.9%	\$1,168	21.9%	88.6%	19	59.4%	43.3%	\$526	24.3%	29.9%	14	43.8%	48.3%	\$333	16.0%	32.6%
	Over \$1 Million	20	26.0%	\$3,561	66.7%	11.0%	8	25.0%					7	21.9%				
	Total Rev. available	60	77.9%	\$4,729	88.6%	99.6%	27	84.4%					21	65.7%				
	Rev. Not Known	17	22.1%	\$610	11.4%	0.5%	5	15.6%					11	34.4%				
	Total	77	100.0%	\$5,339	100.0%	100.0%	32	100.0%					32	100.0%				
Small Business Loan Size	\$100,000 or Less	66	85.7%	\$2,103	39.4%		27	84.4%	87.6%	\$749	34.5%	21.1%	28	87.5%	88.4%	\$907	43.6%	21.8%
	\$100,001 - \$250,000	7	9.1%	\$1,001	18.7%		3	9.4%	5.6%	\$420	19.4%	16.9%	3	9.4%	5.0%	\$440	21.1%	15.2%
	\$250,001 - \$1 Million	4	5.2%	\$2,235	41.9%		2	6.3%	6.8%	\$1,000	46.1%	61.9%	1	3.1%	6.6%	\$735	35.3%	63.0%
	Total	77	100.0%	\$5,339	100.0%		32	100.0%	100.0%	\$2,169	100.0%	100.0%	32	100.0%	100.0%	\$2,082	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	100.0%	\$13	100.0%	97.7%	0	0.0%	50.0%	\$0	0.0%	43.7%	1	100.0%	38.5%	\$13	100.0%	74.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.3%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$13	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$13	100.0%		0	0.0%	83.3%	\$0	0.0%	21.7%	1	100.0%	100.0%	\$13	100.0%	100.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	16.7%	\$0	0.0%	78.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$13	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$13	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

APPENDIX G
LIMITED-SCOPE DEMOGRAPHICS TABLES

Combined Demographics Report

Assessment Area: FL Cape Coral

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	3	4,411	2.7	1,344	30.5	30,892	19
Moderate-income	32	19.2	27,458	16.9	4,214	15.3	30,886	19
Middle-income	80	47.9	86,515	53.1	5,796	6.7	34,898	21.4
Upper-income	48	28.7	44,541	27.3	1,390	3.1	66,249	40.7
Unknown-income	2	1.2	0	0	0	0	0	0
Total Assessment Area	167	100.0	162,925	100.0	12,744	7.8	162,925	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,760	2,430	1.3	22.6	5,440	50.6	2,890	26.9
Moderate-income	61,029	26,066	14.2	42.7	16,593	27.2	18,370	30.1
Middle-income	185,990	102,292	55.6	55	29,224	15.7	54,474	29.3
Upper-income	106,113	53,140	28.9	50.1	10,566	10	42,407	40
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	363,892	183,928	100.0	50.5	61,823	17.0	118,141	32.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,628	3.3	1,453	3.1	168	7.5	7	8
Moderate-income	7,301	14.7	6,923	14.6	359	16	19	21.6
Middle-income	26,017	52.4	24,997	52.8	983	43.9	37	42
Upper-income	14,661	29.5	13,913	29.4	724	32.3	24	27.3
Unknown-income	50	0.1	44	0.1	5	0.2	1	1.1
Total Assessment Area	49,657	100.0	47,330	100.0	2,239	100.0	88	100.0
Percentage of Total Businesses:			95.3		4.5		.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	1.5	4	1.2	1	7.1	0	0
Moderate-income	50	14.6	48	14.6	2	14.3	0	0
Middle-income	149	43.4	144	43.9	5	35.7	0	0
Upper-income	139	40.5	132	40.2	6	42.9	1	100
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	343	100.0	328	100.0	14	100.0	1	100.0
Percentage of Total Farms:			95.6		4.1		.3	

Combined Demographics Report

Assessment Area: FL Jacksonville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	17	6.9	13,392	4.3	4,572	34.1	63,476	20.6
Moderate-income	59	24.1	58,680	19	9,375	16	54,200	17.6
Middle-income	100	40.8	138,333	44.9	10,729	7.8	67,134	21.8
Upper-income	66	26.9	97,882	31.8	3,271	3.3	123,477	40.1
Unknown-income	3	1.2	0	0	0	0	0	0
Total Assessment Area	245	100.0	308,287	100.0	27,947	9.1	308,287	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	29,546	9,912	3.1	33.5	13,742	46.5	5,892	19.9
Moderate-income	118,250	52,104	16.5	44.1	46,828	39.6	19,318	16.3
Middle-income	235,074	143,531	45.5	61.1	60,242	25.6	31,301	13.3
Upper-income	161,162	109,891	34.8	68.2	31,843	19.8	19,428	12.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	544,032	315,438	100.0	58.0	152,655	28.1	75,939	14.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3,172	3.7	2,821	3.5	341	7.2	10	8.5
Moderate-income	17,014	19.8	15,665	19.3	1,318	27.7	31	26.5
Middle-income	35,878	41.8	34,131	42.1	1,698	35.6	49	41.9
Upper-income	29,868	34.8	28,432	35.1	1,409	29.6	27	23.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	85,932	100.0	81,049	100.0	4,766	100.0	117	100.0
	Percentage of Total Businesses:			94.3		5.5		.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	4	0.9	3	0.7	1	5.3	0	0
Moderate-income	57	12.6	51	11.8	6	31.6	0	0
Middle-income	216	47.8	211	48.7	5	26.3	0	0
Upper-income	175	38.7	168	38.8	7	36.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	452	100.0	433	100.0	19	100.0	0	.0
	Percentage of Total Farms:			95.8		4.2		.0

Combined Demographics Report

Assessment Area: FL Lakeland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	3.2	2,767	1.8	904	32.7	31,848	20.3
Moderate-income	36	23.4	34,777	22.1	6,874	19.8	29,313	18.6
Middle-income	76	49.4	83,287	53	8,566	10.3	32,628	20.8
Upper-income	36	23.4	36,391	23.1	1,765	4.9	63,433	40.3
Unknown-income	1	0.6	0	0	0	0	0	0
Total Assessment Area	154	100.0	157,222	100.0	18,109	11.5	157,222	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,981	2,045	1.3	29.3	3,592	51.5	1,344	19.3
Moderate-income	62,254	30,950	19.2	49.7	19,029	30.6	12,275	19.7
Middle-income	153,613	88,103	54.7	57.4	32,057	20.9	33,453	21.8
Upper-income	54,699	40,110	24.9	73.3	7,803	14.3	6,786	12.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	277,547	161,208	100.0	58.1	62,481	22.5	53,858	19.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,312	4.1	1,193	4	114	7.5	5	6.4
Moderate-income	6,262	19.8	5,851	19.4	391	25.8	20	25.6
Middle-income	15,762	49.7	14,981	49.8	736	48.6	45	57.7
Upper-income	8,365	26.4	8,084	26.8	273	18	8	10.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	31,701	100.0	30,109	100.0	1,514	100.0	78	100.0
Percentage of Total Businesses:			95.0		4.8		.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	17	2.9	14	2.6	3	6.1	0	0
Moderate-income	138	23.3	125	23	13	26.5	0	0
Middle-income	295	49.8	270	49.7	25	51	0	0
Upper-income	142	24	134	24.7	8	16.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	592	100.0	543	100.0	49	100.0	0	.0
Percentage of Total Farms:			91.7		8.3		.0	

Combined Demographics Report

Assessment Area: FL Miami

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	71	5.8	56,768	4.3	19,503	34.4	295,368	22.4
Moderate-income	315	25.8	343,146	26	60,590	17.7	228,539	17.3
Middle-income	405	33.2	457,175	34.7	43,085	9.4	249,347	18.9
Upper-income	399	32.7	460,185	34.9	21,483	4.7	544,123	41.3
Unknown-income	29	2.4	103	0	33	32	0	0
Total Assessment Area	1,219	100.0	1,317,377	100.0	144,694	11.0	1,317,37	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	121,285	27,437	2.1	22.6	69,923	57.7	23,925	19.7
Moderate-income	671,220	307,102	23.1	45.8	253,344	37.7	110,774	16.5
Middle-income	858,247	481,946	36.3	56.2	231,044	26.9	145,257	16.9
Upper-income	793,243	512,499	38.6	64.6	136,062	17.2	144,682	18.2
Unknown-income	549	54	0	9.8	193	35.2	302	55
Total Assessment Area	2,444,544	1,329,038	100.0	54.4	690,566	28.2	424,940	17.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	16,295	3.4	14,937	3.3	1,316	5	42	6.5
Moderate-income	107,044	22.3	99,557	22	7,357	27.9	130	20
Middle-income	146,441	30.5	139,573	30.8	6,678	25.3	190	29.2
Upper-income	207,089	43.1	196,576	43.3	10,249	38.8	264	40.6
Unknown-income	3,681	0.8	2,857	0.6	799	3	25	3.8
Total Assessment Area	480,550	100.0	453,500	100.0	26,399	100.0	651	100.0
	Percentage of Total Businesses:			94.4		5.5		.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	66	3.2	58	3	8	6.4	0	0
Moderate-income	277	13.5	256	13.3	21	16.8	0	0
Middle-income	484	23.6	462	24	21	16.8	1	100
Upper-income	1,220	59.4	1,145	59.4	75	60	0	0
Unknown-income	7	0.3	7	0.4	0	0	0	0
Total Assessment Area	2,054	100.0	1,928	100.0	125	100.0	1	100.0
	Percentage of Total Farms:			93.9		6.1		.0

Combined Demographics Report

Assessment Area: FL Naples

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	8.1	4,181	5.2	1,603	38.3	17,150	21.1
Moderate-income	15	20.3	15,305	18.9	1,780	11.6	14,862	18.3
Middle-income	28	37.8	35,999	44.4	1,934	5.4	15,449	19
Upper-income	24	32.4	25,650	31.6	1,070	4.2	33,674	41.5
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	74	100.0	81,135	100.0	6,387	7.9	81,135	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	8,154	2,191	2.4	26.9	3,532	43.3	2,431	29.8
Moderate-income	33,145	15,007	16.4	45.3	7,875	23.8	10,263	31
Middle-income	84,139	42,071	46	50	10,889	12.9	31,179	37.1
Upper-income	69,091	32,128	35.2	46.5	5,824	8.4	31,139	45.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	194,529	91,397	100.0	47.0	28,120	14.5	75,012	38.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	876	3	836	3	36	2.5	4	6.9
Moderate-income	3,895	13.3	3,751	13.4	129	9.1	15	25.9
Middle-income	12,705	43.2	12,128	43.5	552	39	25	43.1
Upper-income	11,902	40.5	11,189	40.1	699	49.4	14	24.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	29,378	100.0	27,904	100.0	1,416	100.0	58	100.0
	Percentage of Total Businesses:			95.0		4.8		.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	25	11.6	17	8.7	8	40	0	0
Moderate-income	35	16.3	30	15.4	5	25	0	0
Middle-income	105	48.8	100	51.3	5	25	0	0
Upper-income	50	23.3	48	24.6	2	10	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	215	100.0	195	100.0	20	100.0	0	.0
	Percentage of Total Farms:			90.7		9.3		.0

Combined Demographics Report

Assessment Area: FL North Port

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	1.9	4,053	1.7	1,275	31.5	44,705	18.9
Moderate-income	45	21.1	41,877	17.7	6,076	14.5	45,274	19.2
Middle-income	105	49.3	127,260	53.9	8,390	6.6	51,549	21.8
Upper-income	56	26.3	63,083	26.7	2,280	3.6	94,745	40.1
Unknown-income	3	1.4	0	0	0	0	0	0
Total Assessment Area	213	100.0	236,273	100.0	18,021	7.6	236,273	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,714	2,871	1	37.2	3,716	48.2	1,127	14.6
Moderate-income	97,415	49,425	17.3	50.7	24,481	25.1	23,509	24.1
Middle-income	256,734	156,376	54.6	60.9	42,361	16.5	57,997	22.6
Upper-income	134,191	77,755	27.1	57.9	15,215	11.3	41,221	30.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	496,054	286,427	100.0	57.7	85,773	17.3	123,854	25.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	914	1.3	847	1.2	65	2.1	2	2.1
Moderate-income	12,851	17.6	12,069	17.3	764	24.9	18	19.1
Middle-income	36,425	49.9	35,116	50.3	1,261	41.1	48	51.1
Upper-income	22,836	31.3	21,835	31.3	975	31.8	26	27.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	73,026	100.0	69,867	100.0	3,065	100.0	94	100.0
	Percentage of Total Businesses:			95.7		4.2		.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	50	8.7	45	8.4	5	13.5	0	0
Middle-income	253	44	235	43.7	18	48.6	0	0
Upper-income	272	47.3	258	48	14	37.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	575	100.0	538	100.0	37	100.0	0	.0
	Percentage of Total Farms:			93.6		6.4		.0

Combined Demographics Report

Assessment Area: GA Augusta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	11.9	5,822	7.3	2,514	43.2	18,048	22.8
Moderate-income	16	23.9	16,218	20.4	3,791	23.4	12,741	16.1
Middle-income	22	32.8	27,138	34.2	3,031	11.2	14,762	18.6
Upper-income	21	31.3	30,150	38	1,482	4.9	33,777	42.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	67	100.0	79,328	100.0	10,818	13.6	79,328	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,553	3,869	5.1	30.8	6,094	48.5	2,590	20.6
Moderate-income	30,225	13,899	18.3	46	11,723	38.8	4,603	15.2
Middle-income	44,183	26,076	34.3	59	13,823	31.3	4,284	9.7
Upper-income	45,450	32,191	42.3	70.8	8,246	18.1	5,013	11
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	132,411	76,035	100.0	57.4	39,886	30.1	16,490	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,086	7.8	968	7.4	116	12.9	2	4.5
Moderate-income	2,240	16	2,119	16.2	111	12.4	10	22.7
Middle-income	4,624	33	4,296	32.9	318	35.5	10	22.7
Upper-income	6,061	43.3	5,688	43.5	351	39.2	22	50
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	14,011	100.0	13,071	100.0	896	100.0	44	100.0
Percentage of Total Businesses:			93.3		6.4		.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	6.5	6	6.5	0	0	0	0
Moderate-income	12	12.9	12	12.9	0	0	0	0
Middle-income	24	25.8	24	25.8	0	0	0	0
Upper-income	51	54.8	51	54.8	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	93	100.0	93	100.0	0	.0	0	.0
Percentage of Total Farms:			100.0		.0		.0	

Combined Demographics Report

Assessment Area: IL Carbondale

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	3,653	21
Moderate-income	3	20	2,652	15.2	582	21.9	3,093	17.8
Middle-income	8	53.3	10,030	57.7	1,375	13.7	3,499	20.1
Upper-income	4	26.7	4,710	27.1	364	7.7	7,147	41.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	15	100.0	17,392	100.0	2,321	13.3	17,392	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6,327	2,768	14.3	43.7	2,484	39.3	1,075	17
Middle-income	16,140	11,403	58.9	70.7	2,882	17.9	1,855	11.5
Upper-income	7,603	5,194	26.8	68.3	1,593	21	816	10.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	30,070	19,365	100.0	64.4	6,959	23.1	3,746	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	983	36.1	864	34.8	112	52.3	7	28
Middle-income	1,121	41.2	1,046	42.1	62	29	13	52
Upper-income	620	22.8	575	23.1	40	18.7	5	20
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,724	100.0	2,485	100.0	214	100.0	25	100.0
	Percentage of Total Businesses:		91.2		7.9		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	3	3.2	3	3.2	0	0	0	0
Middle-income	64	68.1	64	68.1	0	0	0	0
Upper-income	27	28.7	27	28.7	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	94	100.0	94	100.0	0	.0	0	.0
	Percentage of Total Farms:		100.0		.0		.0	

Combined Demographics Report

Assessment Area: IL Northern IL

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.5	471	1.2	179	38	7,067	18.5
Moderate-income	6	15	4,787	12.5	961	20.1	7,026	18.4
Middle-income	23	57.5	23,447	61.5	2,036	8.7	8,413	22.1
Upper-income	10	25	9,447	24.8	433	4.6	15,646	41
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	40	100.0	38,152	100.0	3,609	9.5	38,152	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	991	451	1.1	45.5	331	33.4	209	21.1
Moderate-income	9,190	4,995	11.8	54.4	3,233	35.2	962	10.5
Middle-income	38,273	25,882	61.2	67.6	8,808	23	3,583	9.4
Upper-income	14,357	10,979	26	76.5	2,296	16	1,082	7.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	62,811	42,307	100.0	67.4	14,668	23.4	5,836	9.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	66	1.2	55	1.1	10	2.5	1	1.1
Moderate-income	867	15.6	784	15.5	78	19.7	5	5.3
Middle-income	3,263	58.8	2,993	59.1	214	54.2	56	59.6
Upper-income	1,355	24.4	1,230	24.3	93	23.5	32	34
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5,551	100.0	5,062	100.0	395	100.0	94	100.0
	Percentage of Total Businesses:			91.2		7.1		1.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1	0.1	1	0.1	0	0	0	0
Moderate-income	8	0.9	8	0.9	0	0	0	0
Middle-income	553	64.9	548	64.9	5	71.4	0	0
Upper-income	290	34	288	34.1	2	28.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	852	100.0	845	100.0	7	100.0	0	.0
	Percentage of Total Farms:			99.2		.8		.0

Combined Demographics Report

Assessment Area: IL Rockford

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	11.9	6,057	6.8	2,713	44.8	19,206	21.6
Moderate-income	23	27.4	18,388	20.7	3,375	18.4	15,530	17.5
Middle-income	32	38.1	38,590	43.4	2,825	7.3	19,397	21.8
Upper-income	18	21.4	25,789	29	822	3.2	34,691	39.1
Unknown-income	1	1.2	0	0	0	0	0	0
Total Assessment Area	84	100.0	88,824	100.0	9,735	11.0	88,824	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,757	3,748	4	29.4	6,142	48.1	2,867	22.5
Moderate-income	35,596	18,010	19.2	50.6	12,830	36	4,756	13.4
Middle-income	60,267	42,700	45.6	70.9	12,909	21.4	4,658	7.7
Upper-income	36,262	29,171	31.2	80.4	4,864	13.4	2,227	6.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	144,882	93,629	100.0	64.6	36,745	25.4	14,508	10.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	836	6.5	719	6.2	110	9.2	7	9.7
Moderate-income	2,589	20	2,287	19.6	285	23.8	17	23.6
Middle-income	5,893	45.6	5,328	45.7	535	44.6	30	41.7
Upper-income	3,562	27.6	3,298	28.3	246	20.5	18	25
Unknown-income	47	0.4	23	0.2	24	2	0	0
Total Assessment Area	12,927	100.0	11,655	100.0	1,200	100.0	72	100.0
Percentage of Total Businesses:			90.2		9.3		.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.5	2	0.5	0	0	0	0
Moderate-income	14	3.5	14	3.5	0	0	0	0
Middle-income	239	59.6	237	59.5	2	66.7	0	0
Upper-income	146	36.4	145	36.4	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	401	100.0	398	100.0	3	100.0	0	.0
Percentage of Total Farms:			99.3		.7		.0	

Combined Demographics Report

Assessment Area: IN Bloomington

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	11.1	1,013	3.1	406	40.1	6,796	20.8
Moderate-income	6	16.7	4,701	14.4	959	20.4	5,697	17.5
Middle-income	18	50	18,461	56.6	1,480	8	6,946	21.3
Upper-income	8	22.2	8,432	25.9	522	6.2	13,168	40.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	36	100.0	32,607	100.0	3,367	10.3	32,607	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,105	699	2	13.7	3,600	70.5	806	15.8
Moderate-income	12,077	4,684	13.3	38.8	5,733	47.5	1,660	13.7
Middle-income	34,468	20,242	57.4	58.7	9,830	28.5	4,396	12.8
Upper-income	16,708	9,610	27.3	57.5	5,361	32.1	1,737	10.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	68,358	35,235	100.0	51.5	24,524	35.9	8,599	12.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	421	6.3	384	6.3	37	8.1	0	0
Moderate-income	862	13	770	12.5	92	20.3	0	0
Middle-income	3,738	56.3	3,458	56.3	242	53.3	38	86.4
Upper-income	1,615	24.3	1,526	24.9	83	18.3	6	13.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	6,636	100.0	6,138	100.0	454	100.0	44	100.0
Percentage of Total Businesses:			92.5		6.8		.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.4	1	0.4	0	0	0	0
Moderate-income	12	5.1	12	5.1	0	0	0	0
Middle-income	198	83.9	196	83.8	2	100	0	0
Upper-income	25	10.6	25	10.7	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	236	100.0	234	100.0	2	100.0	0	.0
Percentage of Total Farms:			99.2		.8		.0	

Combined Demographics Report

Assessment Area: IN Fort Wayne

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	13.5	7,141	7.9	2,499	35	17,575	19.5
Moderate-income	28	29.2	21,707	24.1	3,335	15.4	16,622	18.5
Middle-income	31	32.3	31,172	34.7	1,755	5.6	20,342	22.6
Upper-income	23	24	29,906	33.3	608	2	35,387	39.4
Unknown-income	1	1	0	0	0	0	0	0
Total Assessment Area	96	100.0	89,926	100.0	8,197	9.1	89,926	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	15,659	5,298	5.5	33.8	6,678	42.6	3,683	23.5
Moderate-income	45,540	21,023	21.9	46.2	18,527	40.7	5,990	13.2
Middle-income	50,296	35,743	37.3	71.1	10,436	20.7	4,117	8.2
Upper-income	39,987	33,844	35.3	84.6	4,183	10.5	1,960	4.9
Unknown-income	75	0	0	0	75	100	0	0
Total Assessment Area	151,557	95,908	100.0	63.3	39,899	26.3	15,750	10.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,448	10.1	1,175	9.3	266	16.6	7	5.6
Moderate-income	3,437	24	2,928	23.2	473	29.6	36	28.8
Middle-income	4,705	32.8	4,132	32.8	541	33.8	32	25.6
Upper-income	4,698	32.8	4,335	34.4	313	19.6	50	40
Unknown-income	47	0.3	40	0.3	7	0.4	0	0
Total Assessment Area	14,335	100.0	12,610	100.0	1,600	100.0	125	100.0
Percentage of Total Businesses:			88.0		11.2		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.3	1	0.3	0	0	0	0
Moderate-income	18	4.8	18	4.9	0	0	0	0
Middle-income	202	54	199	53.6	3	100	0	0
Upper-income	153	40.9	153	41.2	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	374	100.0	371	100.0	3	100.0	0	.0
Percentage of Total Farms:			99.2		.8		.0	

Combined Demographics Report

Assessment Area: IN Lafayette

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	7.5	1,351	3.4	467	34.6	8,478	21.5
Moderate-income	12	30	10,013	25.4	1,877	18.7	6,957	17.6
Middle-income	17	42.5	20,007	50.7	1,349	6.7	8,446	21.4
Upper-income	6	15	8,115	20.6	308	3.8	15,605	39.5
Unknown-income	2	5	0	0	0	0	0	0
Total Assessment Area	40	100.0	39,486	100.0	4,001	10.1	39,486	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,454	313	0.8	5.7	4,271	78.3	870	16
Moderate-income	22,220	8,432	21.9	37.9	11,820	53.2	1,968	8.9
Middle-income	32,073	21,071	54.6	65.7	8,597	26.8	2,405	7.5
Upper-income	13,621	8,735	22.7	64.1	4,240	31.1	646	4.7
Unknown-income	302	6	0	2	166	55	130	43
Total Assessment Area	73,670	38,557	100.0	52.3	29,094	39.5	6,019	8.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	350	6.1	313	6.1	34	7.1	3	4.5
Moderate-income	1,982	34.8	1,719	33.4	253	52.6	10	15.2
Middle-income	2,350	41.3	2,157	41.9	151	31.4	42	63.6
Upper-income	990	17.4	937	18.2	43	8.9	10	15.2
Unknown-income	21	0.4	20	0.4	0	0	1	1.5
Total Assessment Area	5,693	100.0	5,146	100.0	481	100.0	66	100.0
	Percentage of Total Businesses:		90.4		8.4		1.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	15	3.6	14	3.4	1	20	0	0
Middle-income	376	89.7	372	89.9	4	80	0	0
Upper-income	28	6.7	28	6.8	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	419	100.0	414	100.0	5	100.0	0	.0
	Percentage of Total Farms:		98.8		1.2		.0	

Combined Demographics Report

Assessment Area: IN Northern IN

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	3,149	16.8
Moderate-income	1	6.3	1,026	5.5	163	15.9	3,550	18.9
Middle-income	12	75	14,584	77.6	1,498	10.3	4,441	23.6
Upper-income	3	18.8	3,176	16.9	151	4.8	7,646	40.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	16	100.0	18,786	100.0	1,812	9.6	18,786	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,484	899	4.4	60.6	530	35.7	55	3.7
Middle-income	25,262	15,987	77.6	63.3	4,604	18.2	4,671	18.5
Upper-income	5,499	3,716	18	67.6	451	8.2	1,332	24.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	32,245	20,602	100.0	63.9	5,585	17.3	6,058	18.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	199	7.2	169	6.9	28	11.4	2	4.3
Middle-income	2,122	77.2	1,887	76.8	193	78.5	42	89.4
Upper-income	429	15.6	401	16.3	25	10.2	3	6.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,750	100.0	2,457	100.0	246	100.0	47	100.0
	Percentage of Total Businesses:		89.3		8.9		1.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	5	1.5	4	1.2	1	20	0	0
Middle-income	233	68.3	229	68.2	4	80	0	0
Upper-income	103	30.2	103	30.7	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	341	100.0	336	100.0	5	100.0	0	.0
	Percentage of Total Farms:		98.5		1.5		.0	

Combined Demographics Report

Assessment Area: IN Terre Haute

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	13.6	2,956	7	1,221	41.3	8,747	20.7
Moderate-income	7	15.9	5,268	12.4	968	18.4	7,817	18.5
Middle-income	24	54.5	24,327	57.4	2,389	9.8	8,605	20.3
Upper-income	7	15.9	9,801	23.1	401	4.1	17,183	40.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	44	100.0	42,352	100.0	4,979	11.8	42,352	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,768	2,164	4.7	27.9	3,925	50.5	1,679	21.6
Moderate-income	10,079	5,633	12.2	55.9	3,074	30.5	1,372	13.6
Middle-income	40,970	27,393	59.3	66.9	8,959	21.9	4,618	11.3
Upper-income	15,568	10,986	23.8	70.6	3,290	21.1	1,292	8.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	74,385	46,176	100.0	62.1	19,248	25.9	8,961	12.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	779	14.6	639	13.5	132	25.3	8	7.3
Moderate-income	587	11	498	10.6	74	14.2	15	13.6
Middle-income	2,888	54	2,580	54.7	239	45.8	69	62.7
Upper-income	1,095	20.5	1,000	21.2	77	14.8	18	16.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5,349	100.0	4,717	100.0	522	100.0	110	100.0
Percentage of Total Businesses:			88.2		9.8		2.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.2	1	0.2	0	0	0	0
Moderate-income	2	0.5	2	0.5	0	0	0	0
Middle-income	327	79.6	325	79.5	2	100	0	0
Upper-income	81	19.7	81	19.8	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	411	100.0	409	100.0	2	100.0	0	.0
Percentage of Total Farms:			99.5		.5		.0	

Combined Demographics Report

Assessment Area: KY Eastern KY

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.2	113	0.2	57	50.4	7,357	14.8
Moderate-income	2	4.4	1,088	2.2	321	29.5	6,548	13.2
Middle-income	14	31.1	14,677	29.5	2,353	16	8,538	17.2
Upper-income	28	62.2	33,811	68	2,952	8.7	27,246	54.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	45	100.0	49,689	100.0	5,683	11.4	49,689	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	353	6	0	1.7	290	82.2	57	16.1
Moderate-income	2,298	977	1.9	42.5	1,029	44.8	292	12.7
Middle-income	26,329	14,050	28	53.4	9,096	34.5	3,183	12.1
Upper-income	55,380	35,168	70.1	63.5	15,076	27.2	5,136	9.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	84,360	50,201	100.0	59.5	25,491	30.2	8,668	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	18	0.2	14	0.2	3	0.6	1	0.6
Moderate-income	228	3.1	192	2.9	19	4.1	17	10.4
Middle-income	2,362	32.4	2,133	32	165	35.6	64	39
Upper-income	4,682	64.2	4,324	64.9	276	59.6	82	50
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	7,290	100.0	6,663	100.0	463	100.0	164	100.0
	Percentage of Total Businesses:			91.4		6.4		2.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1	0.3	1	0.3	0	0	0	0
Middle-income	84	24.3	84	24.6	0	0	0	0
Upper-income	260	75.4	257	75.1	3	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	345	100.0	342	100.0	3	100.0	0	.0
	Percentage of Total Farms:			99.1		.9		.0

Combined Demographics Report

Assessment Area: KY Western KY

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	3,724	17.3
Moderate-income	3	13	2,206	10.2	576	26.1	3,292	15.3
Middle-income	11	47.8	11,745	54.4	1,468	12.5	4,455	20.7
Upper-income	8	34.8	7,622	35.3	576	7.6	10,102	46.8
Unknown-income	1	4.3	0	0	0	0	0	0
Total Assessment Area	23	100.0	21,573	100.0	2,620	12.1	21,573	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	4,580	1,917	8.2	41.9	1,764	38.5	899	19.6
Middle-income	19,599	12,816	55	65.4	3,690	18.8	3,093	15.8
Upper-income	12,465	8,569	36.8	68.7	2,305	18.5	1,591	12.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	36,644	23,302	100.0	63.6	7,759	21.2	5,583	15.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	442	16.5	394	16.4	38	18	10	17.2
Middle-income	1,363	51	1,208	50.3	119	56.4	36	62.1
Upper-income	866	32.4	800	33.3	54	25.6	12	20.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,671	100.0	2,402	100.0	211	100.0	58	100.0
	Percentage of Total Businesses:		89.9		7.9		2.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6	2.4	6	2.5	0	0	0	0
Middle-income	123	50.2	121	50	2	66.7	0	0
Upper-income	116	47.3	115	47.5	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	245	100.0	242	100.0	3	100.0	0	.0
	Percentage of Total Farms:		98.8		1.2		.0	

Combined Demographics Report

Assessment Area: KY Owensboro

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	8.7	1,031	4.1	376	36.5	5,122	20.3
Moderate-income	2	8.7	2,507	9.9	688	27.4	4,066	16.1
Middle-income	14	60.9	16,253	64.5	1,398	8.6	6,054	24
Upper-income	5	21.7	5,414	21.5	283	5.2	9,963	39.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	23	100.0	25,205	100.0	2,745	10.9	25,205	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,552	685	2.6	26.8	1,395	54.7	472	18.5
Moderate-income	4,500	2,147	8.2	47.7	1,817	40.4	536	11.9
Middle-income	26,219	17,096	65.3	65.2	6,990	26.7	2,133	8.1
Upper-income	8,178	6,272	23.9	76.7	1,242	15.2	664	8.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	41,449	26,200	100.0	63.2	11,444	27.6	3,805	9.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	367	10.3	306	9.7	54	14.6	7	19.4
Moderate-income	400	11.2	337	10.7	61	16.5	2	5.6
Middle-income	1,935	54.2	1,728	54.7	186	50.3	21	58.3
Upper-income	865	24.3	790	25	69	18.6	6	16.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3,567	100.0	3,161	100.0	370	100.0	36	100.0
Percentage of Total Businesses:			88.6		10.4		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.4	1	0.4	0	0	0	0
Moderate-income	1	0.4	1	0.4	0	0	0	0
Middle-income	168	74.3	166	74.1	2	100	0	0
Upper-income	56	24.8	56	25	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	226	100.0	224	100.0	2	100.0	0	.0
Percentage of Total Farms:			99.1		.9		.0	

Combined Demographics Report

Assessment Area: MI Battle Creek

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	10.3	2,231	6.2	950	42.6	7,528	21
Moderate-income	11	28.2	8,557	23.9	1,780	20.8	6,475	18.1
Middle-income	15	38.5	13,975	39	1,308	9.4	7,362	20.5
Upper-income	9	23.1	11,096	30.9	403	3.6	14,494	40.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	39	100.0	35,859	100.0	4,441	12.4	35,859	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,442	1,908	4.9	43	1,766	39.8	768	17.3
Moderate-income	16,141	8,720	22.4	54	5,161	32	2,260	14
Middle-income	24,036	15,138	38.9	63	6,033	25.1	2,865	11.9
Upper-income	16,483	13,125	33.7	79.6	2,074	12.6	1,284	7.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	61,102	38,891	100.0	63.6	15,034	24.6	7,177	11.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	400	8.6	331	8	66	14.1	3	4.9
Moderate-income	1,048	22.6	859	20.9	167	35.8	22	36.1
Middle-income	1,770	38.1	1,620	39.3	124	26.6	26	42.6
Upper-income	1,427	30.7	1,307	31.7	110	23.6	10	16.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	4,645	100.0	4,117	100.0	467	100.0	61	100.0
	Percentage of Total Businesses:			88.6		10.1		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	20	9.3	20	9.7	0	0	0	0
Middle-income	134	62.6	128	62.1	6	75	0	0
Upper-income	59	27.6	57	27.7	2	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	214	100.0	206	100.0	8	100.0	0	.0
	Percentage of Total Farms:			96.3		3.7		.0

Combined Demographics Report

Assessment Area: MI Jackson

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	18.4	3,595	8.7	1,179	32.8	8,584	20.7
Moderate-income	5	13.2	4,507	10.9	815	18.1	7,592	18.3
Middle-income	16	42.1	22,242	53.6	2,058	9.3	8,846	21.3
Upper-income	9	23.7	11,164	26.9	525	4.7	16,486	39.7
Unknown-income	1	2.6	0	0	0	0	0	0
Total Assessment Area	38	100.0	41,508	100.0	4,577	11.0	41,508	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,776	2,933	6.4	37.7	3,740	48.1	1,103	14.2
Moderate-income	8,910	4,625	10	51.9	2,930	32.9	1,355	15.2
Middle-income	35,507	25,197	54.7	71	6,044	17	4,266	12
Upper-income	16,903	13,294	28.9	78.6	1,849	10.9	1,760	10.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	69,096	46,049	100.0	66.6	14,563	21.1	8,484	12.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	814	14.9	652	13.5	153	26.5	9	16.7
Moderate-income	764	14	634	13.1	128	22.1	2	3.7
Middle-income	2,497	45.7	2,265	46.8	202	34.9	30	55.6
Upper-income	1,391	25.4	1,285	26.6	93	16.1	13	24.1
Unknown-income	2	0	0	0	2	0.3	0	0
Total Assessment Area	5,468	100.0	4,836	100.0	578	100.0	54	100.0
	Percentage of Total Businesses:			88.4		10.6		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	2	0.9	2	0.9	0	0	0	0
Middle-income	132	61.4	129	60.8	3	100	0	0
Upper-income	80	37.2	80	37.7	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	215	100.0	212	100.0	3	100.0	0	.0
	Percentage of Total Farms:			98.6		1.4		.0

Combined Demographics Report

Assessment Area: MI Kalamazoo

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	9.6	4,086	5.1	1,657	40.6	18,243	22.7
Moderate-income	15	20.5	11,507	14.3	2,064	17.9	13,205	16.4
Middle-income	35	47.9	44,470	55.3	4,429	10	16,485	20.5
Upper-income	15	20.5	20,362	25.3	1,000	4.9	32,492	40.4
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	73	100.0	80,425	100.0	9,150	11.4	80,425	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	9,471	3,192	3.6	33.7	4,941	52.2	1,338	14.1
Moderate-income	26,881	11,923	13.5	44.4	10,914	40.6	4,044	15
Middle-income	78,506	49,538	56.2	63.1	19,686	25.1	9,282	11.8
Upper-income	31,132	23,498	26.7	75.5	4,860	15.6	2,774	8.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	145,990	88,151	100.0	60.4	40,401	27.7	17,438	11.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	684	5.5	557	5	122	10	5	4.2
Moderate-income	2,158	17.3	1,849	16.6	283	23.2	26	21.7
Middle-income	6,707	53.7	6,000	53.8	648	53.1	59	49.2
Upper-income	2,940	23.5	2,742	24.6	168	13.8	30	25
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	12,489	100.0	11,148	100.0	1,221	100.0	120	100.0
Percentage of Total Businesses:			89.3		9.8		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.2	1	0.2	0	0	0	0
Moderate-income	94	20.3	81	19.1	13	35.1	0	0
Middle-income	304	65.8	284	66.8	20	54.1	0	0
Upper-income	63	13.6	59	13.9	4	10.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	462	100.0	425	100.0	37	100.0	0	.0
Percentage of Total Farms:			92.0		8.0		.0	

Combined Demographics Report

Assessment Area: MI Lansing

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	6.1	5,794	5.1	1,782	30.8	23,205	20.6
Moderate-income	28	21.4	18,575	16.5	3,478	18.7	20,063	17.8
Middle-income	57	43.5	57,489	50.9	4,343	7.6	24,731	21.9
Upper-income	28	21.4	31,036	27.5	1,321	4.3	44,895	39.8
Unknown-income	10	7.6	0	0	0	0	0	0
Total Assessment Area	131	100.0	112,894	100.0	10,924	9.7	112,894	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	11,204	4,384	3.6	39.1	5,360	47.8	1,460	13
Moderate-income	41,429	18,507	15	44.7	17,194	41.5	5,728	13.8
Middle-income	97,061	65,073	52.9	67	24,125	24.9	7,863	8.1
Upper-income	47,591	35,062	28.5	73.7	9,762	20.5	2,767	5.8
Unknown-income	1,223	31	0	2.5	904	73.9	288	23.5
Total Assessment Area	198,508	123,057	100.0	62.0	57,345	28.9	18,106	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	667	3.8	579	3.7	84	5.1	4	2.1
Moderate-income	4,008	22.8	3,409	21.6	544	32.8	55	28.4
Middle-income	7,647	43.4	6,981	44.3	573	34.5	93	47.9
Upper-income	5,034	28.6	4,580	29.1	419	25.2	35	18
Unknown-income	251	1.4	203	1.3	41	2.5	7	3.6
Total Assessment Area	17,607	100.0	15,752	100.0	1,661	100.0	194	100.0
	Percentage of Total Businesses:			89.5		9.4		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2	0.3	2	0.3	0	0	0	0
Moderate-income	20	2.6	20	2.7	0	0	0	0
Middle-income	553	73.1	542	73.3	11	64.7	0	0
Upper-income	177	23.4	173	23.4	4	23.5	0	0
Unknown-income	4	0.5	2	0.3	2	11.8	0	0
Total Assessment Area	756	100.0	739	100.0	17	100.0	0	.0
	Percentage of Total Farms:			97.8		2.2		.0

Combined Demographics Report

Assessment Area: MI Northern MI

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	0.6	351	0.2	217	61.8	30,966	19.2
Moderate-income	25	14.5	19,855	12.3	3,633	18.3	29,821	18.5
Middle-income	109	63	107,752	66.9	11,538	10.7	35,764	22.2
Upper-income	29	16.8	33,023	20.5	1,713	5.2	64,430	40
Unknown-income	9	5.2	0	0	0	0	0	0
Total Assessment Area	173	100.0	160,981	100.0	17,101	10.6	160,981	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,187	20	0	0.9	1,930	88.2	237	10.8
Moderate-income	62,831	24,194	12.7	38.5	7,801	12.4	30,836	49.1
Middle-income	236,906	126,694	66.6	53.5	33,609	14.2	76,603	32.3
Upper-income	65,337	39,459	20.7	60.4	8,948	13.7	16,930	25.9
Unknown-income	31	0	0	0	0	0	31	100
Total Assessment Area	367,292	190,367	100.0	51.8	52,288	14.2	124,637	33.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	107	0.4	94	0.4	13	0.6	0	0
Moderate-income	3,123	11.4	2,746	11.1	285	13.2	92	18.3
Middle-income	17,847	65.1	16,071	64.9	1,436	66.3	340	67.5
Upper-income	6,331	23.1	5,828	23.6	431	19.9	72	14.3
Unknown-income	10	0	8	0	2	0.1	0	0
Total Assessment Area	27,418	100.0	24,747	100.0	2,167	100.0	504	100.0
	Percentage of Total Businesses:		90.3		7.9		1.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2	0.1	2	0.1	0	0	0	0
Moderate-income	123	7.9	122	8.1	1	2.1	0	0
Middle-income	1,095	70.7	1,062	70.8	33	70.2	0	0
Upper-income	328	21.2	315	21	13	27.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,548	100.0	1,501	100.0	47	100.0	0	.0
	Percentage of Total Farms:		97.0		3.0		.0	

Combined Demographics Report

Assessment Area: MI Southern MI

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.2	466	0.5	127	27.3	16,089	16.9
Moderate-income	8	9.5	5,734	6	1,281	22.3	16,579	17.4
Middle-income	55	65.5	64,275	67.4	7,119	11.1	22,165	23.2
Upper-income	18	21.4	24,926	26.1	1,352	5.4	40,568	42.5
Unknown-income	2	2.4	0	0	0	0	0	0
Total Assessment Area	84	100.0	95,401	100.0	9,879	10.4	95,401	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	987	292	0.3	29.6	529	53.6	166	16.8
Moderate-income	9,930	5,717	5.4	57.6	2,691	27.1	1,522	15.3
Middle-income	105,157	72,110	67.6	68.6	18,203	17.3	14,844	14.1
Upper-income	37,591	28,484	26.7	75.8	4,320	11.5	4,787	12.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	153,665	106,603	100.0	69.4	25,743	16.8	21,319	13.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	235	1.9	209	1.9	24	2.4	2	1.1
Moderate-income	784	6.4	620	5.6	154	15.6	10	5.5
Middle-income	7,963	64.9	7,238	65.2	605	61.4	120	66.3
Upper-income	3,292	26.8	3,041	27.4	202	20.5	49	27.1
Unknown-income	1	0	1	0	0	0	0	0
Total Assessment Area	12,275	100.0	11,109	100.0	985	100.0	181	100.0
Percentage of Total Businesses:			90.5		8.0		1.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	28	2.4	26	2.2	2	5.7	0	0
Middle-income	864	72.5	843	72.9	21	60	0	0
Upper-income	299	25.1	287	24.8	12	34.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,191	100.0	1,156	100.0	35	100.0	0	.0
Percentage of Total Farms:			97.1		2.9		.0	

Combined Demographics Report

Assessment Area: MI Saginaw

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	8.8	4,968	4.8	2,246	45.2	21,368	20.6
Moderate-income	21	20.6	15,091	14.5	3,214	21.3	18,273	17.6
Middle-income	50	49	52,426	50.4	4,818	9.2	22,174	21.3
Upper-income	21	20.6	31,494	30.3	1,285	4.1	42,164	40.6
Unknown-income	1	1	0	0	0	0	0	0
Total Assessment Area	102	100.0	103,979	100.0	11,563	11.1	103,979	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,281	3,999	3.4	38.9	4,012	39	2,270	22.1
Moderate-income	31,043	15,626	13.2	50.3	10,700	34.5	4,717	15.2
Middle-income	82,690	62,294	52.7	75.3	13,458	16.3	6,938	8.4
Upper-income	47,359	36,362	30.7	76.8	8,220	17.4	2,777	5.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	171,373	118,281	100.0	69.0	36,390	21.2	16,702	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	639	4.7	510	4.2	122	9.1	7	5
Moderate-income	2,174	15.8	1,881	15.3	274	20.5	19	13.6
Middle-income	6,472	47.1	5,846	47.7	540	40.4	86	61.4
Upper-income	4,451	32.4	4,023	32.8	400	29.9	28	20
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	13,736	100.0	12,260	100.0	1,336	100.0	140	100.0
Percentage of Total Businesses:			89.3		9.7		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.1	1	0.1	0	0	0	0
Moderate-income	23	3.3	23	3.3	0	0	0	0
Middle-income	488	69.6	483	69.4	5	100	0	0
Upper-income	189	27	189	27.2	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	701	100.0	696	100.0	5	100.0	0	.0
Percentage of Total Farms:			99.3		.7		.0	

Combined Demographics Report

Assessment Area: NC Asheville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	3.6	858	1.4	388	45.2	12,085	19.8
Moderate-income	8	14.3	8,676	14.2	1,555	17.9	11,260	18.5
Middle-income	33	58.9	37,618	61.8	2,970	7.9	13,045	21.4
Upper-income	13	23.2	13,734	22.6	851	6.2	24,496	40.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	56	100.0	60,886	100.0	5,764	9.5	60,886	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	2,403	750	1.1	31.2	1,492	62.1	161	6.7
Moderate-income	16,861	8,598	12.8	51	6,343	37.6	1,920	11.4
Middle-income	66,490	42,753	63.7	64.3	16,716	25.1	7,021	10.6
Upper-income	25,125	15,025	22.4	59.8	7,632	30.4	2,468	9.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	110,879	67,126	100.0	60.5	32,183	29.0	11,570	10.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	591	4	489	3.6	100	10.3	2	2.4
Moderate-income	2,275	15.4	2,065	15.1	202	20.8	8	9.4
Middle-income	7,457	50.6	7,021	51.4	389	40	47	55.3
Upper-income	4,402	29.9	4,093	29.9	281	28.9	28	32.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	14,725	100.0	13,668	100.0	972	100.0	85	100.0
	Percentage of Total Businesses:			92.8		6.6		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	30	13	30	13.2	0	0	0	0
Middle-income	146	63.2	143	63	3	75	0	0
Upper-income	55	23.8	54	23.8	1	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	231	100.0	227	100.0	4	100.0	0	.0
	Percentage of Total Farms:			98.3		1.7		.0

Combined Demographics Report

Assessment Area: NC Hickory

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	7,151	17.8
Moderate-income	4	12.9	2,931	7.3	718	24.5	7,027	17.5
Middle-income	18	58.1	25,670	64	2,423	9.4	8,548	21.3
Upper-income	9	29	11,485	28.7	580	5.1	17,360	43.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	31	100.0	40,086	100.0	3,721	9.3	40,086	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6,339	2,358	5.5	37.2	3,052	48.1	929	14.7
Middle-income	42,774	27,253	64.1	63.7	10,754	25.1	4,767	11.1
Upper-income	18,326	12,936	30.4	70.6	2,898	15.8	2,492	13.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	67,439	42,547	100.0	63.1	16,704	24.8	8,188	12.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,015	15.6	789	13.8	218	30	8	13.3
Middle-income	3,358	51.5	3,005	52.4	329	45.3	24	40
Upper-income	2,145	32.9	1,937	33.8	180	24.8	28	46.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	6,518	100.0	5,731	100.0	727	100.0	60	100.0
	Percentage of Total Businesses:		87.9		11.2		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	56	60.9	54	61.4	2	50	0	0
Upper-income	36	39.1	34	38.6	2	50	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	92	100.0	88	100.0	4	100.0	0	.0
	Percentage of Total Farms:		95.7		4.3		.0	

Combined Demographics Report

Assessment Area: NC Western NC

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.3	1,144	1.2	494	43.2	20,056	21.7
Moderate-income	9	11.4	7,346	7.9	1,665	22.7	16,050	17.3
Middle-income	54	68.4	69,872	75.5	9,469	13.6	18,992	20.5
Upper-income	15	19	14,176	15.3	981	6.9	37,440	40.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	79	100.0	92,538	100.0	12,609	13.6	92,538	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	2,663	969	1	36.4	1,326	49.8	368	13.8
Moderate-income	16,623	8,099	8.2	48.7	4,432	26.7	4,092	24.6
Middle-income	127,672	73,621	74.5	57.7	29,587	23.2	24,464	19.2
Upper-income	37,715	16,091	16.3	42.7	7,585	20.1	14,039	37.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	184,673	98,780	100.0	53.5	42,930	23.2	42,963	23.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	265	2	233	1.9	31	3.2	1	0.5
Moderate-income	1,238	9.4	1,088	9	128	13.3	22	10.9
Middle-income	9,146	69.2	8,389	69.6	623	65	134	66.7
Upper-income	2,562	19.4	2,341	19.4	177	18.5	44	21.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	13,211	100.0	12,051	100.0	959	100.0	201	100.0
	Percentage of Total Businesses:			91.2		7.3		1.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	48	9.7	45	9.3	3	33.3	0	0
Middle-income	386	78.1	380	78.5	5	55.6	1	100
Upper-income	60	12.1	59	12.2	1	11.1	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	494	100.0	484	100.0	9	100.0	1	100.0
	Percentage of Total Farms:			98.0		1.8		.2

Combined Demographics Report

Assessment Area: NC Raleigh

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	7	9,359	4.4	2,642	28.2	41,774	19.5
Moderate-income	31	16.6	38,232	17.9	4,967	13	33,734	15.8
Middle-income	64	34.2	79,569	37.2	4,469	5.6	41,937	19.6
Upper-income	76	40.6	86,648	40.5	2,240	2.6	96,377	45.1
Unknown-income	3	1.6	14	0	0	0	0	0
Total Assessment Area	187	100.0	213,822	100.0	14,318	6.7	213,822	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	20,908	4,237	2	20.3	13,964	66.8	2,707	12.9
Moderate-income	72,857	36,537	17	50.1	29,294	40.2	7,026	9.6
Middle-income	129,418	82,231	38.2	63.5	36,694	28.4	10,493	8.1
Upper-income	132,035	92,466	42.9	70	30,003	22.7	9,566	7.2
Unknown-income	60	14	0	23.3	46	76.7	0	0
Total Assessment Area	355,278	215,485	100.0	60.7	110,001	31.0	29,792	8.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1,838	3.8	1,597	3.6	226	5.9	15	3.4
Moderate-income	8,219	16.8	7,227	16.2	905	23.5	87	19.8
Middle-income	16,395	33.6	15,079	33.9	1,228	31.9	88	20
Upper-income	22,286	45.7	20,557	46.2	1,479	38.4	250	56.8
Unknown-income	48	0.1	34	0.1	14	0.4	0	0
Total Assessment Area	48,786	100.0	44,494	100.0	3,852	100.0	440	100.0
	Percentage of Total Businesses:		91.2		7.9		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	6	1.5	6	1.5	0	0	0	0
Moderate-income	51	12.8	48	12.2	3	50	0	0
Middle-income	194	48.6	192	48.9	2	33.3	0	0
Upper-income	148	37.1	147	37.4	1	16.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	399	100.0	393	100.0	6	100.0	0	.0
	Percentage of Total Farms:		98.5		1.5		.0	

Combined Demographics Report

Assessment Area: OH Dayton

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	26	10.3	16,030	6.5	6,277	39.2	51,071	20.8
Moderate-income	60	23.7	48,365	19.7	8,513	17.6	44,326	18.1
Middle-income	103	40.7	105,071	42.8	7,877	7.5	51,442	21
Upper-income	63	24.9	75,972	31	2,800	3.7	98,599	40.2
Unknown-income	1	0.4	0	0	0	0	0	0
Total Assessment Area	253	100.0	245,438	100.0	25,467	10.4	245,438	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	37,561	11,502	4.5	30.6	16,766	44.6	9,293	24.7
Moderate-income	98,335	44,751	17.6	45.5	39,402	40.1	14,182	14.4
Middle-income	178,166	112,632	44.2	63.2	49,683	27.9	15,851	8.9
Upper-income	113,532	85,878	33.7	75.6	21,240	18.7	6,414	5.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	427,594	254,763	100.0	59.6	127,091	29.7	45,740	10.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2,346	7.1	1,972	6.7	366	10.9	8	2.8
Moderate-income	6,004	18.2	5,148	17.5	814	24.3	42	14.7
Middle-income	13,693	41.5	12,271	41.8	1,271	38	151	53
Upper-income	10,954	33.2	9,977	34	893	26.7	84	29.5
Unknown-income	6	0	5	0	1	0	0	0
Total Assessment Area	33,003	100.0	29,373	100.0	3,345	100.0	285	100.0
	Percentage of Total Businesses:			89.0		10.1		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	6	0.8	6	0.8	0	0	0	0
Moderate-income	47	5.9	44	5.6	3	16.7	0	0
Middle-income	462	57.8	453	57.9	9	50	0	0
Upper-income	285	35.6	279	35.7	6	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	800	100.0	782	100.0	18	100.0	0	.0
	Percentage of Total Farms:			97.8		2.3		.0

Combined Demographics Report

Assessment Area: OH Lima

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	15.2	2,373	8.5	923	38.9	5,960	21.5
Moderate-income	6	18.2	3,434	12.4	882	25.7	4,848	17.5
Middle-income	16	48.5	13,728	49.4	1,270	9.3	6,217	22.4
Upper-income	6	18.2	8,234	29.7	269	3.3	10,744	38.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	33	100.0	27,769	100.0	3,344	12.0	27,769	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,765	1,622	5.6	34	2,151	45.1	992	20.8
Moderate-income	6,812	3,024	10.4	44.4	2,634	38.7	1,154	16.9
Middle-income	22,008	14,870	51.3	67.6	5,283	24	1,855	8.4
Upper-income	11,504	9,470	32.7	82.3	1,665	14.5	369	3.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	45,089	28,986	100.0	64.3	11,733	26.0	4,370	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	571	14.9	481	14.2	86	21.1	4	10.3
Moderate-income	422	11	351	10.4	68	16.7	3	7.7
Middle-income	1,828	47.8	1,633	48.4	169	41.4	26	66.7
Upper-income	1,003	26.2	912	27	85	20.8	6	15.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3,824	100.0	3,377	100.0	408	100.0	39	100.0
	Percentage of Total Businesses:		88.3		10.7		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1	0.4	1	0.4	0	0	0	0
Middle-income	205	83.3	203	83.2	2	100	0	0
Upper-income	40	16.3	40	16.4	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	246	100.0	244	100.0	2	100.0	0	.0
	Percentage of Total Farms:		99.2		.8		.0	

Combined Demographics Report

Assessment Area: OH Northwest OH

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	0.6	1,063	0.5	378	35.6	34,674	16.8
Moderate-income	22	12.4	21,982	10.7	4,349	19.8	35,562	17.3
Middle-income	102	57.6	119,970	58.2	10,467	8.7	45,556	22.1
Upper-income	50	28.2	63,025	30.6	3,448	5.5	90,248	43.8
Unknown-income	2	1.1	0	0	0	0	0	0
Total Assessment Area	177	100.0	206,040	100.0	18,642	9.0	206,040	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,071	749	0.3	36.2	859	41.5	463	22.4
Moderate-income	41,546	20,221	9.1	48.7	15,471	37.2	5,854	14.1
Middle-income	194,757	130,746	58.9	67.1	41,766	21.4	22,245	11.4
Upper-income	98,856	70,286	31.7	71.1	15,614	15.8	12,956	13.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	337,230	222,002	100.0	65.8	73,710	21.9	41,518	12.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	109	0.4	94	0.4	13	0.5	2	0.4
Moderate-income	3,440	13	2,962	12.6	428	17.1	50	9.9
Middle-income	14,948	56.4	13,275	56.5	1,379	55.2	294	58.4
Upper-income	8,017	30.2	7,181	30.5	679	27.2	157	31.2
Unknown-income	2	0	2	0	0	0	0	0
Total Assessment Area	26,516	100.0	23,514	100.0	2,499	100.0	503	100.0
	Percentage of Total Businesses:			88.7		9.4		1.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2	0.1	2	0.1	0	0	0	0
Moderate-income	47	1.6	45	1.5	2	5.6	0	0
Middle-income	1,797	60	1,773	59.9	24	66.7	0	0
Upper-income	1,149	38.4	1,139	38.5	10	27.8	0	0
Unknown-income	1	0	1	0	0	0	0	0
Total Assessment Area	2,996	100.0	2,960	100.0	36	100.0	0	.0
	Percentage of Total Farms:			98.8		1.2		.0

Combined Demographics Report

Assessment Area: OH Southwest OH

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	5.9	2,280	2.1	806	35.4	26,722	24.2
Moderate-income	20	19.8	20,322	18.4	4,347	21.4	20,184	18.3
Middle-income	66	65.3	79,212	71.8	9,621	12.1	23,341	21.1
Upper-income	9	8.9	8,584	7.8	463	5.4	40,151	36.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	101	100.0	110,398	100.0	15,237	13.8	110,398	100.0
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,126	1,808	1.6	25.4	4,214	59.1	1,104	15.5
Moderate-income	37,396	20,113	17.6	53.8	11,126	29.8	6,157	16.5
Middle-income	126,394	82,293	72.1	65.1	30,169	23.9	13,932	11
Upper-income	14,520	9,906	8.7	68.2	3,270	22.5	1,344	9.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	185,436	114,120	100.0	61.5	48,779	26.3	22,537	12.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	667	5.1	577	4.9	79	8.1	11	3.7
Moderate-income	2,777	21.3	2,460	20.9	258	26.4	59	19.7
Middle-income	8,516	65.2	7,742	65.7	558	57	216	72
Upper-income	1,095	8.4	997	8.5	84	8.6	14	4.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	13,055	100.0	11,776	100.0	979	100.0	300	100.0
	Percentage of Total Businesses:			90.2		7.5		2.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2	0.1	2	0.2	0	0	0	0
Moderate-income	153	11.4	152	11.4	1	11.1	0	0
Middle-income	1,067	79.8	1,060	79.8	7	77.8	0	0
Upper-income	115	8.6	114	8.6	1	11.1	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,337	100.0	1,328	100.0	9	100.0	0	.0
	Percentage of Total Farms:			99.3		.7		.0

Combined Demographics Report

Assessment Area: OH Toledo

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	27	16.4	13,612	8.8	5,839	42.9	33,679	21.9
Moderate-income	30	18.2	22,795	14.8	4,869	21.4	26,141	17
Middle-income	70	42.4	71,136	46.2	5,970	8.4	31,518	20.5
Upper-income	36	21.8	46,344	30.1	1,800	3.9	62,558	40.6
Unknown-income	2	1.2	9	0	9	100	0	0
Total Assessment Area	165	100.0	153,896	100.0	18,487	12.0	153,896	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	29,729	9,428	5.8	31.7	14,002	47.1	6,299	21.2
Moderate-income	50,186	20,988	12.9	41.8	21,748	43.3	7,450	14.8
Middle-income	123,686	79,951	49	64.6	32,924	26.6	10,811	8.7
Upper-income	69,199	52,928	32.4	76.5	11,902	17.2	4,369	6.3
Unknown-income	129	0	0	0	110	85.3	19	14.7
Total Assessment Area	272,929	163,295	100.0	59.8	80,686	29.6	28,948	10.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,423	6.4	1,206	6.1	211	8.6	6	2.8
Moderate-income	3,050	13.7	2,631	13.4	399	16.3	20	9.2
Middle-income	10,088	45.2	8,884	45.2	1,087	44.3	117	53.9
Upper-income	7,732	34.7	6,907	35.2	752	30.7	73	33.6
Unknown-income	21	0.1	17	0.1	3	0.1	1	0.5
Total Assessment Area	22,314	100.0	19,645	100.0	2,452	100.0	217	100.0
Percentage of Total Businesses:			88.0		11.0		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.3	1	0.2	1	6.7	0	0
Moderate-income	9	1.4	7	1.2	2	13.3	0	0
Middle-income	430	69	421	69.2	9	60	0	0
Upper-income	182	29.2	179	29.4	3	20	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	623	100.0	608	100.0	15	100.0	0	.0
Percentage of Total Farms:			97.6		2.4		.0	

Combined Demographics Report

Assessment Area: TN Knoxville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	8	5,871	5.4	2,820	48	20,076	18.5
Moderate-income	17	15.2	12,941	11.9	2,089	16.1	16,784	15.4
Middle-income	46	41.1	47,624	43.8	3,530	7.4	21,859	20.1
Upper-income	38	33.9	42,295	38.9	1,501	3.5	50,012	46
Unknown-income	2	1.8	0	0	0	0	0	0
Total Assessment Area	112	100.0	108,731	100.0	9,940	9.1	108,731	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	17,639	3,846	3.2	21.8	11,483	65.1	2,310	13.1
Moderate-income	28,481	13,518	11.3	47.5	12,505	43.9	2,458	8.6
Middle-income	83,290	54,082	45.2	64.9	23,456	28.2	5,752	6.9
Upper-income	62,759	48,161	40.3	76.7	10,515	16.8	4,083	6.5
Unknown-income	307	0	0	0	289	94.1	18	5.9
Total Assessment Area	192,476	119,607	100.0	62.1	58,248	30.3	14,621	7.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,174	6.6	944	6	228	11.6	2	2.4
Moderate-income	2,815	15.7	2,396	15.1	397	20.2	22	26.8
Middle-income	5,932	33.2	5,352	33.8	558	28.4	22	26.8
Upper-income	7,909	44.2	7,097	44.8	776	39.5	36	43.9
Unknown-income	50	0.3	46	0.3	4	0.2	0	0
Total Assessment Area	17,880	100.0	15,835	100.0	1,963	100.0	82	100.0
Percentage of Total Businesses:			88.6		11.0			.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	2.3	3	2.3	0	0	0	0
Moderate-income	9	6.8	9	6.9	0	0	0	0
Middle-income	70	52.6	68	52.3	2	66.7	0	0
Upper-income	49	36.8	48	36.9	1	33.3	0	0
Unknown-income	2	1.5	2	1.5	0	0	0	0
Total Assessment Area	133	100.0	130	100.0	3	100.0	0	.0
Percentage of Total Farms:			97.7		2.3			.0

APPENDIX H

GLOSSARY OF TERMS

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 metropolitan area/assessment area.

Census tract: 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and 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: All Agencies have adopted the following language. 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved Non-metropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.