



## PUBLIC DISCLOSURE

October 2, 2023

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Touchmark National Bank  
Charter Number 24789

3651 Old Milton Parkway  
Alpharetta, GA 30005

Office of the Comptroller of the Currency

Three Ravinia Drive  
Suite 400  
Atlanta, GA 30346

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

The major factors that support this rating include:

- The lending test rating is based on ratings in the state of Georgia.
- The bank's loan to deposit (LTD) ratio is more than reasonable considering the bank's size, financial condition, and credit needs in its assessment area (AA).
- The bank exhibits excellent geographic distribution of loans in the bank's AA.
- The bank exhibits reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.
- The Community Development (CD) Test rating is based on the bank's responsiveness to the CD needs of its AA demonstrated through CD activities in Georgia.
- The bank exhibits adequate responsiveness to CD needs in the AA through CD loans, qualified investments, grants and donations, and CD services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of its AA, the bank's LTD ratio is more than reasonable. The bank's average quarterly LTD ratio averaged 96.8 percent over the past twelve consecutive quarters from January 1, 2020, to December 31, 2022. The bank's quarterly LTD ratio ranged from a quarterly high of 108.6 percent as of June 30, 2020, to a quarterly low of 78.5 percent as of December 31, 2021.

Competitor financial institutions had an average LTD ratio of 63.1 percent during the twelve quarters since the last CRA PE. The competitor financial institutions include state of Georgia headquartered banks with assets both lower than and greater than TNB, which ranged from \$306 million to \$535 million. The quarterly average LTD ratio for the similar situated institutions over the same twelve consecutive quarters ranged from a quarterly low of 34.2 percent to a quarterly high of 96.2 percent.

### Lending in Assessment Area

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

Touchmark National Bank (TNB) originated and purchased 39.5 percent of its total loans inside the bank's AA during the evaluation period. TNB has a strategic focus on originating and purchasing commercial, Small Business Administration (SBA), United States Department of Agriculture (USDA), and commercial and industrial loans. Due to competition in the AA, TNB offers its products nationwide which results in a majority of lending activity occurring outside of the bank's AA.

This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	17	39.5	26	60.5	43	7,296	37.5	12,152	62.5	19,448
Total	17	39.5	26	60.5	43	7,296	37.5	12,152	62.5	19,448

## Description of Institution

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

### Selection of Areas for Full-Scope Review

TNB is a federally chartered national bank and a Minority Depository Institution (MDI) headquartered in Alpharetta, GA. Established in 2008, TNB is a single state, traditional community bank that accepts local retail and commercial deposits and primarily originates commercial loans. It is wholly owned by Touchmark Bancshares, Inc., a one bank holding company. The holding company is publicly traded on the over-the-counter market under ticker symbol TMAK. The commercial loan products the bank originates are commercial lines of credit, commercial real estate loans, various commercial and industrial loans, standby letters of credit, equipment financing, and SBA and USDA loans. The bank operates as an SBA Preferred Lender. The bank's only full-service branch and deposit taking automated teller machine (ATM) is located at its headquarters in Alpharetta, GA. The ATM allows customers to make inquiries and access their account balances, make deposits, and withdraw funds.

As of December 31, 2022, total assets were \$341.2 million and gross loans totaled \$294 million, and total deposits were \$288.6. The bank reported tier one capital of \$50.5 million. Gross loans represented 86.1 percent of total assets. As of December 31, 2022, the bank's loan portfolio was comprised of commercial loans totaling \$290.2 million or 98.7 percent of gross loans and loans secured by residential real estate, which totaled approximately \$2.3 million or 0.79 percent of net loans.

The bank offers a variety of credit and deposit services to consumers and businesses. Lending products include commercial real estate, various commercial and industrial loans, commercial construction loans, farm loans, and a few mortgage loans. Deposit products offered include certificates of deposit, money market, and various checking and savings accounts for individuals and businesses. Additionally, TNB offers remote deposit capture, on-line banking, telephone banking and mobile banking services for both deposit and loan transactions.

There are no legal or financial impediments to the bank's ability to meet the needs of its AA. The counties in the bank's AA are contiguous and meet the requirements of the regulation by not arbitrarily excluding low- or moderate-income census tracts (CTs). The bank's performance under the CRA was rated "Satisfactory" on its previous performance evaluation dated March 23, 2020.

## **Scope of the Evaluation**

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

The Office of the Comptroller of the Currency (OCC) evaluated the bank's performance under the Intermediate Small Bank CRA examination procedures due to the bank's asset size. Based on loan originations between January 1, 2020, through December 31, 2022, the bank's primary lending product was commercial loans. The Community Development loans, investments, and services activities review period for the evaluation is January 1, 2020, through December 31, 2022.

Based on both the number and dollar volume of loan origination data supplied by the bank, TNB's primary lending product is commercial loans. Examiners reviewed the entire population of 43 small business loans for the evaluation period to evaluate the accuracy of loan data to complete the analysis.

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

TNB is a single-state institution. Examiners conducted a full-scope review of the Atlanta-Sandy Springs-Alpharetta, Georgia MSA, which includes eleven counties in the MSA. There are no limited-scope areas. For more information regarding the scope of this examination, Refer to appendix A, Scope of Examination.

TNB is exempt from the Home Mortgage Disclosure Act (HMDA), which requires the collection and reporting of application data concerning home purchase, home refinance, and home improvement loans. During the evaluation period, the bank did not originate any HMDA reportable loans. Due to no activity, further analysis was not conducted on home mortgage lending.

### **Ratings**

The bank's overall rating is based on the state of Georgia as the bank has one AA in the state, with eleven counties in the Atlanta-Sandy Springs-Alpharetta MSA. The bank's primary loan product was determined to be small business loans, as the bank has a limited volume of home mortgage and small farm loans. The bank does not originate consumer loans. Our lending test assessment focused on small business loans originated and purchased in the bank's AA. Refer to the "Scope" section under the state section for details regarding how the state rating was determined for the evaluation.

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

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

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

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

## State Rating

### State of Georgia

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

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans in its AA.
- The bank exhibits reasonable distribution of loans to businesses of different sizes.
- The bank exhibits adequate responsiveness to CD needs in its AA through CD activities.

### Description of Institution's Operations in State of Georgia

As of December 31, 2022, TNB delineated Carroll, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, and Gwinnett counties in the Atlanta-Sandy Springs-Alpharetta MSA Georgia as its AA. The bank includes all 1150 CTs in the counties as its AA.

TNB operates one full-service branch located in Alpharetta, Fulton County Georgia. According to the June 30, 2022, FDIC Summary of Deposit information, deposit market share information, TNB's deposits in Georgia totaled \$269.4 million, and represent a 12.0 percent market share. In addition to TNB, there are 70 financial institutions with 890 branches operating in the eleven county AA. Leading competitors in the market are Truist Bank, Bank of America, N.A., Wells Fargo Bank, N.A., JP Morgan Chase Bank, N.A and Synovus Bank. Due to the number of banks operating in the AA, competition is very strong for lending and deposits. As a preferred SBA lender in the AA, the bank can compete and originate SBA loans with large and regional banks inside of the AA.

According to the 2020 Census and Dun and Bradstreet data at the end of the evaluation period in 2022 the population of the eleven county AA was 4.6 million with 1.1 million families. Approximately 20.1 percent of the families in the AA are low-income and 15.8 percent are moderate-income. Approximately 7.8 percent of the families live below the poverty level. The median family income in the AA is \$84,791 for the evaluation period.

According to the Georgia Department of Labor the December 2022, unemployment rate in the State of Georgia was 3.1 percent, while Atlanta-Sandy Springs-Roswell MSA the unemployment rate was 2.6

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

percent. During the evaluation period, the MSA’s unemployment rate ranged from a low of 2.5 in April 2022, to a high of 12.3 percent in April 2020.

According to Moody’s Analytics data, the primary industries in the AA include leisure and hospitality, professional and business, transportation, and financial services. The economy in the MSA is shifting as payroll growth has slowed after an extended period of outperformance. Job creation across industries has narrowed sharply. The healthcare industry has the highest level of job growth in the MSA. The five largest employers in the AA include Delta Airlines, Emory University and Emory Healthcare, The Home Depot, Northside Hospital and Piedmont Healthcare. The economy in the MSA is expected to remain above average in the near term.

The evaluation considers the input of four recent community contacts. The community contacts are from one affordable housing organization, one local government, and two economic development organizations. The identified credit needs include funding for affordable housing land acquisition, land development, and construction. The organization also identified the need for rehabilitation of housing for homeownership, rental properties, and transitional housing. There is also a need for down payment and closing costs assistance for affordable homeownership. A local government organization identified the need for investments in public infrastructure, such as rehabilitation of local sewer systems. Economic development organizations identified the need to access capital for new entrepreneurs and small businesses, as well as funding for workforce development.

### Atlanta-Sandy Springs-Alpharetta Georgia

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	730	11.5	22.6	25.5	39.5	1.0
Population by Geography	4,191,967	7.9	22.6	29.3	39.8	0.4
Housing Units by Geography	1,680,947	8.9	23.3	28.1	39.5	0.2
Owner-Occupied Units by Geography	935,794	3.3	16.8	30.9	49.0	0.0
Occupied Rental Units by Geography	570,085	15.5	31.9	24.7	27.6	0.4
Vacant Units by Geography	175,068	17.3	29.6	24.7	28.1	0.2
Businesses by Geography	844,241	6.2	20.8	27.4	45.1	0.5
Farms by Geography	12,672	4.6	19.5	32.5	43.3	0.1
Family Distribution by Income Level	994,636	21.8	15.7	17.1	45.4	0.0
Household Distribution by Income Level	1,505,879	22.8	15.8	16.8	44.5	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$203,648
<i>Source: 2015 ACS and 2021 D&amp;B Data Due to rounding, totals may not equal 100.0%</i> (*) The NA category consists of geographies that have not been assigned an income classification.			Median Gross Rent			\$1,023
			Families Below Poverty Level			11.4%

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Atlanta MSA 2022</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,150	7.7	20.2	27.7	40.3	4.1
Population by Geography	4,600,943	6.1	20.8	29.3	41.2	2.7
Housing Units by Geography	1,785,511	7.0	21.0	28.3	40.8	3.0
Owner-Occupied Units by Geography	1,040,953	2.8	15.3	30.8	49.5	1.5
Occupied Rental Units by Geography	609,838	12.6	29.7	25.2	27.3	5.2
Vacant Units by Geography	134,720	13.8	25.0	22.7	33.7	4.8
Businesses by Geography	1,021,230	5.2	20.4	26.2	44.8	3.4
Farms by Geography	14,548	4.0	19.7	33.3	41.3	1.7
Family Distribution by Income Level	1,079,834	20.1	15.8	18.7	45.3	0.0
Household Distribution by Income Level	1,650,791	22.5	15.4	17.4	44.7	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$84,791	Median Housing Value			\$277,144
			Median Gross Rent			\$1,262
			Families Below Poverty Level			7.8%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Georgia

This analysis reflects a full-scope review of the bank's AA encompassing the eleven counties of Carroll, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, and Gwinnett counties in the Atlanta-Sandy Springs-Alpharetta, Georgia MSA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Georgia

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Georgia is reasonable. There are no limited-scope review areas.

### Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state of Georgia.



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

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

The geographic distribution of small loans to businesses in CTs of different income levels in the bank's AA is excellent. In 2020-2021, in low-income CTs the percentage of bank loans exceeds both the percentage of businesses and the aggregate lending. The percentage of loans originated in moderate-income CTs exceeds both the percentage of businesses and the aggregate lending. To ensure there were enough accounts to conduct a meaningful lending analysis some Paycheck Protecting Program (PPP) loans were added to the analysis. In 2022, TNB did not originate any loans in the low- and moderate -income census tracts in its AA.

### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of TNB's small business loans during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

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

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

Please refer to Table R in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses of different sizes in the bank's AA is reasonable. In 2020-2021, the percentage of small loans to businesses is below the percentage of businesses but exceeds the aggregate data. To ensure there were enough accounts to conduct a meaningful lending analysis some PPP loans were added to the analysis. In 2022 aggregate data was not available to compare small business loans to aggregate data.

### **Responses to Complaints**

TNB nor the OCC received any CRA related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development (CD) Test in the state of Georgia is rated Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full scope review the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development

services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Atlanta-Sandy Springs-Alpharetta, GA MSA	324	66.8	35,072	63.4
Broader Statewide or Regional Area (BSRA)	161	33.2	20,228	36.6
Total	485	100	55,300	100

The bank's community development loans demonstrate adequate responsiveness to community development needs in the AA given the bank's size, capacity to provide such loans, and other performance context factors. CD loans are comprised entirely of PPP loans, which addressed the needs of AA businesses and provided flexible financing in response to the COVID-19 pandemic. During the evaluation period, the bank originated 324 CD loans in the AA totaling \$35.0 million. The bank also originated 161 PPP loans totaling \$20.2 million to businesses in the Georgia broader statewide or regional area (BSRA). The BSRA loans originated in adjacent regional states of Alabama, Florida, North Carolina, and South Carolina. In addition, TNB originated 306 PPP loans totaling \$34.2 million to businesses nationwide, outside of its AA and outside of the BSRA.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Atlanta-Sandy Springs-Alpharetta, GA MSA	0	0.0	4	\$2,944	4	100	\$2,944	100	0	0.0
Total	0	0.0	4	\$2,944	4	100	\$2,944	100	0	0.0

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The Qualified Investment Table, shown above sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

Community development investments demonstrate adequate responsiveness to community development needs in the AA, given the bank's size and the capacity to provide such investments. During the evaluation period, the bank made four investments totaling \$2.9 million. TNB purchased two mortgage-backed security pools totaling \$2.9 million, where the underlying home mortgages were made to LMI families in the AA. The bank also made two donations totaling \$2,000 to two community organizations.

### **Extent to Which the Bank Provides Community Development Services**

CD services demonstrate adequate responsiveness to community development needs in the AA, given the bank's size and the capacity to provide such services. During the evaluation period, one bank employee conducted eight activities, providing 16 hours of CD services to two community organizations, which support financial literacy for LMI youth in the AA.

The bank's CD service performance takes into consideration the impact of the COVID-19 pandemic. During the evaluation period, government mandates limited in-person activities with AA residents and businesses, which impacted the bank's ability to perform CD services.

### **Conclusions for Areas Receiving a Limited Scope Reviews**

There are no limited-scope review areas.

# Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	January 1, 2020, to December 31, 2022	
<b>Bank Products Reviewed:</b>	Small Business Loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	None	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State</b>		
Georgia	Full-Scope	Atlanta-Sandy Springs-Alpharetta, GA MSA

## Appendix B: Summary of State Ratings

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RATINGS Touchmark National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State
	Satisfactory	Satisfactory	Satisfactory
State:			
Georgia	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

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

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

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

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

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.



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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2020-21</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Atlanta MSA	20	7,842	100.0	206,480	6.2	10.0	5.5	20.8	30.0	20.0	27.4	30.0	27.8	45.1	30.0	46.4	0.5	0.0	0.3	
<b>Total</b>	<b>20</b>	<b>7,842</b>	<b>100.0</b>	<b>206,480</b>	<b>6.2</b>	<b>10.0</b>	<b>5.5</b>	<b>20.8</b>	<b>30.0</b>	<b>20.0</b>	<b>27.4</b>	<b>30.0</b>	<b>27.8</b>	<b>45.1</b>	<b>30.0</b>	<b>46.4</b>	<b>0.5</b>	<b>0.0</b>	<b>0.3</b>	

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Atlanta MSA	0	0.0	0.0	5.2	0.0	20.4	0.0	26.2	0.0	44.8	0.0	3.4	0.00	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.2</b>	<b>0.0</b>	<b>20.4</b>	<b>0.0</b>	<b>26.2</b>	<b>0.0</b>	<b>44.8</b>	<b>0.0</b>	<b>3.4</b>	<b>0.00</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>														

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2020-21</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Atlanta MSA	20	7,842	100.0	206,480	92.9	78.9	42.6	2.2	21.1	4.8	0.0	
<b>Total</b>	<b>20</b>	<b>7,842</b>	<b>100.0</b>	<b>206,480</b>	<b>92.9</b>	<b>78.9</b>	<b>42.6</b>	<b>2.2</b>	<b>21.1</b>	<b>4.8</b>	<b>0.0</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Atlanta MSA	0	0.0	0.0	0.0	93.9	0.0	0.0	1.8	0.0	4.3	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>93.9</b>	<b>0.0</b>	<b>0.0</b>	<b>1.8</b>	<b>0.0</b>	<b>4.3</b>	<b>0.0</b>
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.