



CRA Public File



PERFORMANCE RELATED WRITTEN COMMENTS AND  
BANK'S WRITTEN ANSWERS  
RELATED TO BANK'S PERFORMANCE  
(FOR CURRENT YEAR AND PAST 2 YEARS)

2022 - 2023

PUBLIC COMMENTS

Between the calendar years of 2021 and 2022, FirstBank did not receive any comments relating to the bank's performance in helping meet community needs.

Any comments received or replies by the bank during the current calendar year, 2024, will be available upon request.



www.habitatnashville.org

April 5, 2023

[Redacted]  
FirstBank  
[Redacted]

Dear [Redacted]

Thank you for partnering with us to empower hardworking individuals and families to experience more stability and self-reliance in their lives through homeownership. FirstBank's generous donation of \$30,000.00 Habitat for Humanity of Greater Nashville, received on 3/30/2023, on behalf of your "Chip In & Change Lives Charity Golf Tournament", held on September 26, 2022, helps us build better lives and stronger communities.

Thank you for helping to make homeownership a reality for others in our community. As one of our future homeowners recently said, *"Rents are very high these days making it difficult to take good care of my family and their futures. Home is one of the biggest advances to a good future. After I secure a home, I can start steps toward other goals in my life."*

The need for affordable homes continues to be a challenge. Partners like you create pathways of hope and stability. Thank you for partnering with us to bring people together to build homes, communities, and hope. We are grateful for your support.

With much appreciation,

[Redacted signature block]

*Thank you so much for this incredible support!*

Habitat for Humanity of Greater Nashville is a tax-exempt organization as described in Section 501(c)(3) of the Internal Revenue Code. No goods or services were received in exchange for the contribution listed. This letter serves as your official document for tax purposes.

**"I have a dream of owning my own home and being able to provide for myself without working two jobs."**  
- Homeowner Erica





Our goals would be unattainable without the partners that share our commitment to keeping seniors safe and secure. Our partners embrace the spirit of the Community Reinvestment Act and use our program to create positive change for the under-served and vulnerable in their community.

FirstBank has been with us from the beginning. As one of our very first sponsors, they have been supporting area seniors for over 20 years! They've provided funding that allows for our flagship program, Senior Crimestoppers, to remain installed in five different senior living facilities.

**St. Mary Manor** - Jackson , TN

**Smyrna Care Center** - Smyrna, TN

**Mountain Woods Apartments** - Dalton, GA

**Life Care Center** - Jefferson City, TN

**Creekview Health & Rehab** - Knoxville, TN

This year, Creekview Health & Rehab used their Wish Comes True grant to provide a fun carnival for their residents to enjoy, with face painting, balloon art, cotton candy, funnel cakes, and even a dunk tank! The residents had a great time and are still talking about all of the fun they had.



From: [REDACTED]

Sent: Friday, August 4, 2023 9:08 AM

To: [REDACTED]

Complaint Forum:Agency

CFPB Complaint accusations of mishandling multiple business loans and discrimination allegations. Consumer requesting investigation, transferring to Legal for response.

**FirstBank Provided a Response.**

**From:** [REDACTED]  
**Sent:** Wednesday, November 15, 2023 5:12 PM  
**To:** [REDACTED]  
**Subject:** Carothers Parkway branch

**CAUTION - EXTERNAL EMAIL**

[REDACTED]

I visited my local FirstBank branch today at Carothers Parkway in Franklin, TN & found out that it is closing in January. I wanted to voice my opinion about the closing & let you know why we're not happy about this decision.

After many years of being "just another number" at Bank of America, we moved to FirstBank. We love banking with FirstBank because of the personal experience we have. It reminds us of what "hometown banking" used to feel like. Our only beef has been that it wasn't convenient for us to get to any of the local branches. When the Carothers branch opened, we were so excited & we visit this branch weekly. Although the other nearby branches are not terribly far away, they all require getting through a lot of traffic. I don't know if you've ever been to this area of Franklin, but coming from east of Franklin & getting anywhere that requires crossing I-65 takes a lot of time due to the increase in the number of businesses & the traffic that comes with that.

If you're closing this branch due to numbers, I think you're making a serious mistake. This area has grown exponentially in the last couple of years and it's not slowing down. We've lived on our property 5 miles east of Franklin since 1995. Our area was the last vestige of "country," but in the last 5 years, property has been re-zoned & many subdivisions have gone up where farms used to be. We have so many people moving to this area from other states that we hardly recognize it. We know it won't be long till the homes around us will sell & all these 5-acre+ properties will be re-zoned for subdivisions. If you don't have a presence in this area, I believe you will regret it.

The area right around the Carothers branch has dozens of new restaurants, and several new apartment communities. All these things, plus a huge fitness complex, and the Columbia State Community College Franklin campus are within one minute of this branch. Fifth Third just built a branch right across the street from FirstBank. These are the only 2 banks in the area. If you close this branch, you'll be handing over any new clients in the area to Fifth Third.

We really hope you'll reconsider this decision. Having a branch on our side of Franklin has been a huge help to us & to our businesses.

Thank you,

[REDACTED]

**FirstBank Provided a Response.**

From:

[REDACTED]

Sent: Wednesday, February 7, 2024 9:51 AM

To:

[REDACTED]

Complaint Forum: Social Media

"But you closed the only FirstBank on my side of town ..now I have to drive an extra 20mins on top of my 40 min drive that it took to get to the now closed bank"

**FirstBank Provided a Response.**

# **PUBLIC DISCLOSURE**

June 6, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

FirstBank  
Certificate Number: 8663

211 Commerce Street  
Nashville, Tennessee 37201

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Regional Office

600 North Pearl Street, Suite 700  
Dallas, Texas 75201

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, 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.

## TABLE OF CONTENTS

INSTITUTION RATING .....	1
DESCRIPTION OF INSTITUTION .....	2
DESCRIPTION OF ASSESSMENT AREAS.....	3
SCOPE OF EVALUATION.....	3
CONCLUSIONS ON PERFORMANCE CRITERIA.....	5
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....	16
CHATTANOOGA MULTI-STATE MSA.....	17
DESCRIPTION OF INSTITUTION’S OPERATIONS IN .....	17
CHATTANOOGA MULTI-STATE MSA.....	17
SCOPE OF EVALUATION – CHATTANOOGA MULTI-STATE MSA .....	18
CONCLUSIONS ON PERFORMANCE CRITERIA IN .....	19
CHATTANOOGA MULTI-STATE MSA.....	19
STATE OF ALABAMA.....	27
DESCRIPTION OF INSTITUTION’S OPERATIONS IN ALABAMA .....	27
SCOPE OF EVALUATION – ALABAMA.....	27
CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA .....	28
HUNTSVILLE MSA – Full-Scope Review .....	34
FLORENCE MSA – Full-Scope Review .....	42
OTHER ASSESSMENT AREAS – Limited-Scope Review .....	51
STATE OF GEORGIA.....	53
DESCRIPTION OF INSTITUTION’S OPERATIONS IN GEORGIA .....	53
SCOPE OF EVALUATION – GEORGIA.....	55
CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA .....	55
STATE OF KENTUCKY.....	63
DESCRIPTION OF INSTITUTION’S OPERATIONS IN KENTUCKY .....	63
SCOPE OF EVALUATION – KENTUCKY.....	65
CONCLUSIONS ON PERFORMANCE CRITERIA IN KENTUCKY .....	65
STATE OF TENNESSEE .....	75
DESCRIPTION OF INSTITUTION’S OPERATIONS IN TENNESSEE .....	75
SCOPE OF EVALUATION – TENNESSEE .....	75
CONCLUSIONS ON PERFORMANCE CRITERIA IN TENNESSEE.....	76

NASHVILLE MSA – Full-Scope Review .....	84
KNOXVILLE MSA – Full-Scope Review.....	92
OTHER ASSESSMENT AREAS – Limited-Scope Review .....	101
APPENDICES .....	105
LARGE BANK PERFORMANCE CRITERIA.....	105
SUMMARY OF RATINGS FOR RATED AREAS .....	107
DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS .....	108
GLOSSARY .....	112

## INSTITUTION RATING

**INSTITUTION’S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

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

- Lending levels reflect excellent responsiveness to assessment areas’ credit needs.
- The institution originated a small percentage of loans inside its assessment areas.
- The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The institution makes extensive use of innovative and/or flexible lending practices in order to serve assessment area credit needs.
- The bank is a leader in originating community development (CD) loans.

**The Investment Test is rated High Satisfactory.**

- The bank has an excellent level of qualified investments.
- The institution exhibits adequate responsiveness to credit and community economic development needs.
- The institution makes occasional use of innovative and/or complex investments to support CD needs.



**The Service Test is rated Low Satisfactory.**

- Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment areas.
- To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its retail delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals.
- Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the assessment areas, particularly low- or moderate-income geographies or individuals.
- The institution provides an adequate level of CD services.

## **DESCRIPTION OF INSTITUTION**

FirstBank operates as a state-chartered retail commercial bank headquartered in Nashville, Tennessee. FirstBank Financial Corporation, Nashville, Tennessee a one-bank holding company, wholly owns the subject bank, as well as additional subsidiaries and affiliates that provide investment and financial services. During the evaluation period, FirstBank merged with Franklin Synergy Bank, Franklin, Tennessee in August 2020. FirstBank entered new markets through opening new branches Birmingham, Alabama. The bank received a “Satisfactory” rating at its previous FDIC CRA Evaluation dated April 6, 2020, using Large Bank Examination Procedures.

The bank operates 82 full-service offices and 75 automated teller machines (ATMs) in the AAs located throughout Chattanooga Multi-State MSA, Alabama, Georgia, Kentucky, and Tennessee. FirstBank offers a full line of loan products, deposit accounts, and other financial services. It also offers hours and days of service consistent with area and industry norms.

As of March 31, 2022, assets totaled \$12.7 billion, consisting primarily of Net Loans & Leases of \$8.3 billion (65.4 percent of the total) and Securities of \$1.7 billion (13.4 percent of the total). Total deposits equaled \$11.0 billion as of the same date.

As reflected in the following table, the mix of outstanding loans of the bank’s major loan products shows commercial loans (Commercial and Industrial Loans and Secured by Nonfarm and Nonresidential Properties) at 48.6 percent and home mortgage loans (Secured by 1-4 Family and Multifamily Residential Properties) as the second largest at 29.3 percent.

<b>Loan Portfolio Distribution as of 3/31/2022</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	1,468,811	17.5
Secured by Farmland	48,629	0.6
Secured by 1-4 Family Residential Properties	2,057,638	24.5
Secured by Multifamily (5 or more) Residential Properties	400,501	4.8
Secured by Nonfarm Nonresidential Properties	2,636,353	31.4
<b>Total Real Estate Loans</b>	<b>6,611,932</b>	<b>78.7</b>
Commercial and Industrial Loans	1,443,351	17.2
Agricultural Production and Other Loans to Farmers	13,755	0.2
Consumer Loans	278,652	3.3
Obligations of State and Political Subdivisions in the U.S.	36,969	0.4
Other Loans	17,045	0.2
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>8,401,704</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

Based on the information discussed in this section as well as other regulatory data, the institution's financial condition, size, product offerings, prior performance, and status of any legal impediments did not affect its ability to meet the assessment areas' credit needs.

## **DESCRIPTION OF ASSESSMENT AREAS**

As more fully described under Description of Institution for each rated area, FirstBank operates in five rated areas – the Chattanooga Multi-State MSA and the States of Alabama, Georgia, Kentucky, and Tennessee. The bank currently has one assessment area (AA) in the Chattanooga Multi-State MSA, three in Alabama, one in Georgia, one in Kentucky, and six in Tennessee. Please refer to the rated areas and individual AAs for additional information.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the time period from the previous evaluation dated April 6, 2020, to the current evaluation dated June 6, 2022. To assess performance, examiners applied the Federal Financial Institutions Examination Council (FFIEC) Large Institution CRA Examination Procedures, which include the Lending, Investment, and Service Tests. Appendix A lists the applicable tests' criteria.

Examiners applied full-scope procedures to the following AAs: Chattanooga Multi-State Metropolitan Statistical Area (MSA), Alabama – Florence and Huntsville MSA, Georgia – Dalton MSA, Kentucky – Bowling Green MSA, and Tennessee – Nashville and Knoxville MSAs.

Examiners applied limited-scope procedures to the remaining AAs. Please refer to the rated area sections for additional details.

The following table shows that the bank originated a majority of its loans, deposits, and branches in the State of Tennessee. Consequently, examiners weighed records in the State of Tennessee heaviest when arriving at applicable conclusions and ratings.

<b>Rated Area Breakdown of Loans, Deposits, and Branches</b>						
<b>Rated Area</b>	<b>Loans</b>		<b>Deposits</b>		<b>Branches</b>	
	<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Chattanooga Multi-State MSA	361,720	6.2	785,051	7.7	8	9.8
Alabama	961,313	16.5	117,241	1.2	3	3.7
Georgia	55,593	1.0	198,902	1.9	3	3.7
Kentucky	87,911	1.5	245,933	2.4	4	4.9
Tennessee	4,362,232	74.8	8,886,009	86.8	64	78.0
<b>Total</b>	<b>5,828,769</b>	<b>100.0</b>	<b>10,233,136</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>

*Source: HMDA & CRA Data (2020-2021); FDIC Summary of Deposits (06/30/2021)  
Due to rounding, totals may not equal 100.0 percent*

## **Activities Reviewed**

### ***Lending Test***

For the Lending Test, CRA Large Bank procedures require examiners to consider a bank’s reported home mortgage, small business, and small farm loans since the previous evaluation, as well as all reported CD loans originated since the previous evaluation. Consequently, this evaluation considers total loans reported (inside and outside of the AAs) either according to the Home Mortgage Disclosure Act (HMDA) or CRA data collection reporting requirements:

#### **Home Mortgage Loans (Total loans reported inside and outside of the AAs)**

- 2020 – 25,987 loans totaling \$7,595,528,000
- 2021 – 24,377 loans totaling \$7,278,191,000

#### **Small Business Loans (Total loans reported inside and outside of the AAs)**

- 2020 – 2,788 loans totaling \$478,675,000
- 2021 – 2,737 loans totaling \$535,623,000

#### **Small Farm Loans (Total loans reported inside and outside of the AAs)**

- 2020 – 362 loans totaling \$28,053,000
- 2021 – 218 loans totaling \$20,624,000

#### **CD Loans:**

April 6, 2020 - June 6, 2022: 138 loans totaling \$615,492,000

This evaluation does not consider any affiliate lending.

Since no trends exist between the different years’ data that materially affect applicable conclusions

or ratings, unless otherwise noted, this evaluation only presents the 2020 HMDA and 2020 CRA data, the most recent year for which aggregate data exists as of this evaluation date. However, examiners included 2020-2021 HMDA data and 2020-2021 CRA data in the Assessment Area Concentration discussion. Examiners will compare the bank's HMDA lending to aggregate data in 2020, as well as 2015 American Community Survey (ACS) data.

Examiners will compare the bank's small business and small farm lending to aggregate data in 2020 and D&B data in 2021.

The weightings for the specific loan categories varies for each of the AAs. As suggested by the above figures, examiners generally weighed home mortgage loans heavier when arriving at applicable conclusions.

### ***Investment and Service Tests***

The scopes for the Investment and Service Tests consider applicable current period CD activities, including qualified investments and CD services. Current period activities, including CD loans considered under the Lending Test, involve those generated since the previous evaluation. The Investment Test's scope further encompasses prior period, qualified investments. Prior period qualified investments involve those purchased prior to the previous evaluation but still outstanding as of this evaluation's date. Examiners use the book value as of the current evaluation date for all prior period, qualified investments.

For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings/closings during the evaluation period. The review evaluated retail banking products and services targeted toward low- and moderate-income individuals or small businesses and/or tailored to meet specific needs within the AAs.

Given the institution's method and compilation of CD data, examiners reviewed all CD loans, qualified investments, and CD services from the previous evaluation to June 6, 2022.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

FirstBank demonstrated a low satisfactory record for the bank as a whole regarding the Lending Test. Excellent lending levels and a leader in making community development loans all support excellent performance records. This was offset by adequate performance records regarding geographic loan distribution, borrower profile loan distribution, the use of innovative and flexible lending practices and a small percentage of loans in the AAs. Conclusions regarding the institution's overall lending performance were generally consistent in each rated area. The appendices list the Lending Test's criteria.

For the CRA Large Bank Lending Test, typically, examiners will first determine whether the presence of any weaker lending activity or Assessment Area Concentration performance warrants

downgrading the overall Lending Test rating. Absent any such warranted downgrading, examiners will then place more weight on the bank's borrower profile and geographic loan distributions as well as on its CD loans when arriving at the overall Lending Test rating.

### **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs. Excellent records regarding both home mortgage and small business lending supports this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the AAs' credit needs when arriving at this conclusion.

#### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs. Excellent performance in the Chattanooga Multi-State MSA, Alabama, Georgia, Kentucky, and Tennessee support this conclusion. For 2020, the bank originated 9,268 total reportable home mortgage loans totaling approximately \$2.4 billion in its AAs. FirstBank captured a 3.0 percent market share of the total number of home mortgage loans and a 3.1 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank fourth out of 1,134 total lenders in the bank's AAs. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in the bank's AAs. The ranking considers the total number and dollar amount of loans made by each institution.

#### ***Small Business Loans***

Small business lending levels reflect excellent responsiveness to AA credit needs. Excellent performance in the Chattanooga Multi-State MSA, Alabama, Georgia, Kentucky, and Tennessee support this conclusion. For 2020, the bank originated 2,488 total reportable small business loans totaling nearly \$404.8 million inside its AAs. FirstBank captured a 2.0 percent market share of the total number of small business loans and a 4.6 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 16<sup>th</sup> out of 325 total lenders in the bank's AAs. This ranking lands the bank in the top 5.0 percent of lenders reporting such loans in the bank's AAs. The ranking considers the total number and dollar amount of loans made by each institution.

#### ***Small Farm Loans***

Small farm lending levels reflect excellent responsiveness to AA credit needs. Excellent performance in Kentucky and Mississippi support this conclusion. No other areas originated enough small farm loans to make a meaningful conclusion. For 2020, the bank originated 346 total reportable small farm loans totaling nearly \$26.2 million inside its AAs. FirstBank captured a 22.6 percent market share of the total number of small farm loans and a 29.6 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank first of 56 total lenders in the bank's AAs. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in the bank's AAs. The ranking considers the total number and dollar amount of loans made by each institution.

**Assessment Area Concentration**

The institution originated a small percentage of loans inside its AAs. A small percentage of home mortgage loans in the AAs outweighed the high percentage of small business loans and the substantial majority of small farm loans in the AAs to support this conclusion. Examiners considered the bank’s asset size and office structure as well as the loan categories reviewed relative to the areas’ combined size and economy when arriving at this conclusion.

***Home Mortgage Loans***

The institution originated a small percentage of home mortgage loans inside its AAs. FirstBank has a significant home mortgage lending division that provides for nationwide lending and this is the primary reason for such a small percentage of home mortgage loans inside the AAs. The home mortgage lending level has increased since the prior evaluation, when only 17.9 percent of home mortgage lending was inside the AAs by number.

***Small Business Loans***

The institution originated a high percentage of its small business loans inside its AAs. The following table shows that, for small business loans by both measures, the percentages of the number and dollar volume, the bank originated a high percentage inside its AAs.

***Small Farm Loans***

The institution originated a substantial majority of its small farm loans inside its AAs. The following table shows that, for small farm loans by both measures, the percentages of the number and dollar volume, the bank originated a substantial majority of its small farm loans inside its AAs for 2020 and 2021 combined.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans					Dollar Amount of Loans \$(000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2020	9,424	36.3	16,563	63.7	25,987	2,486,997	32.7	5,108,532	67.3	7,595,528
2021	8,774	36.0	15,603	64.0	24,377	2,450,221	33.7	4,827,970	66.3	7,278,191
<b>Subtotal</b>	<b>18,198</b>	<b>36.1</b>	<b>32,166</b>	<b>63.9</b>	<b>50,364</b>	<b>4,937,218</b>	<b>33.2</b>	<b>9,936,502</b>	<b>66.8</b>	<b>14,873,719</b>
Small Business										
2020	2,488	89.2	300	10.8	2,788	404,808	84.6	73,868	15.4	478,675
2021	2,396	87.5	341	12.5	2,737	442,720	82.7	92,903	17.3	535,623
<b>Subtotal</b>	<b>4,884</b>	<b>88.4</b>	<b>641</b>	<b>11.6</b>	<b>5,525</b>	<b>847,528</b>	<b>83.6</b>	<b>166,770</b>	<b>16.4</b>	<b>1,014,298</b>
Small Farm										
2020	346	95.6	16	4.4	362	26,162	93.3	1,891	6.7	28,053
2021	197	90.4	21	9.6	218	17,861	86.6	2,763	13.4	20,624
<b>Subtotal</b>	<b>543</b>	<b>93.6</b>	<b>37</b>	<b>6.4</b>	<b>580</b>	<b>44,023</b>	<b>90.4</b>	<b>4,653</b>	<b>9.6</b>	<b>48,676</b>
<b>Total</b>	<b>23,625</b>	<b>41.8</b>	<b>32,844</b>	<b>58.2</b>	<b>56,469</b>	<b>5,828,769</b>	<b>36.6</b>	<b>10,107,925</b>	<b>63.4</b>	<b>15,936,694</b>

Source: Bank Data. Due to rounding, totals may not equal 100.0 percent.

Consequently, considering the loan categories' relative overall performances and weightings, the institution originated a small percentage of its loans inside its AAs.

### **Geographic Distribution**

FirstBank's geographic distribution of loans reflects adequate penetration throughout its AAs for the bank as a whole. Adequate performance regarding home mortgage, small business, and small farm loans supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts when arriving at conclusions for this performance factor. Home mortgage and small business lending performance proved consistent throughout the rated areas.

#### ***Home Mortgage Loans***

FirstBank's geographic distribution of home mortgage loans reflects adequate penetration throughout the AAs. Adequate records in all rated areas support this conclusion.

#### ***Small Business Loans***

FirstBank's geographic distribution of small business loans reflects adequate penetration throughout the AAs. Adequate records in all rated areas support this conclusion.

#### ***Small Farm Loans***

FirstBank's only originated small farm loans in Kentucky and Tennessee. The geographic distribution of small farm loans reflects adequate penetration throughout the AAs. Adequate records in both rated areas support this conclusion.

Each rated area includes a more detailed discussion of the bank's geographic loan distribution for home mortgage and small business loans.

### **Borrower Profile**

FirstBank's distribution of borrowers reflects good penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes for the bank as a whole. Excellent performance regarding small business and small farm loans uplifted adequate performance regarding home mortgage loans to support this conclusion. Examiners focused on the percentage by number of loans to low- and moderate-income individuals and to businesses with gross annual revenue of \$1 million or less when arriving at conclusions for this performance factor. FirstBank's home mortgage, small business, and small farm lending performance proved generally consistent throughout the rated areas.

#### ***Home Mortgage Loans***

FirstBank's borrower profile distribution of home mortgage loans reflects adequate penetration throughout the AAs. Adequate records in all rated areas support this conclusion.

#### ***Small Business Loans***



FirstBank’s borrower profile distribution of small business loans reflects excellent penetration throughout the AAs. Excellent performance in the Chattanooga Multi-State MSA, Alabama, Kentucky, and Tennessee outweighed the good record in Georgia to support this conclusion.

***Small Farm Loans***

FirstBank’s borrower profile distribution of home mortgage loans reflects excellent penetration throughout the AAs. Excellent records in Kentucky and Tennessee support this conclusion.

Each rated area includes a more detailed discussion of the bank’s borrower profile distribution for home mortgage and small business loans.

**Innovative or Flexible Lending Practices**

The institution extensively uses innovative or flexible lending practices for the bank as a whole in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution’s capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The tables below show that, since the previous evaluation, the bank originated 12,829 innovative or flexible loans totaling over \$3.5 billion. This dollar figure equates to 32.2 percent of average total assets of \$10,769,899,000 since the previous evaluation and 47.4 percent of average net loans of \$7,327,302,000 for the same period, thereby reflecting excellent levels.

A majority of these loans provide flexible lending terms for home mortgages through little or no down payment requirements. Most of the bank’s flexible loan products consist of loans granted through other government programs, such as through the Tennessee Housing Development Agency (THDA), the Alabama Housing Finance Authority (AHFA), Georgia Department of Consumer Affairs (GDCA), U.S. Department of Agriculture’s (USDA) home mortgage program, Veterans Administration (VA), and Federal Housing Administration (FHA). The bank’s flexible loan products also include programs through Fannie Mae (FNMA) and Freddie Mac (FMCC).

Furthermore, FirstBank also offers a portfolio affordable housing loan program that assists low- and moderate-income homebuyers who cannot qualify for traditional financing. The program offers a fixed-rate 30-year loan with 100.0 percent loan-to-value and requires a 620 minimum credit score and pre-purchase homeownership education.

Given the bank’s capacity and the needs in its AAs, the level of innovative and flexible loans reflects excellent responsiveness to the credit needs of its AAs. The table below displays the bank’s innovative or flexible loans by rated area.

<b>Innovative or Flexible Loans Institution</b>										
<b>Rated Area</b>	<b>FMCC/ FNMA/State Housing</b>		<b>USDA/FHA/ VA</b>		<b>Portfolio Loan Program</b>		<b>First Time Homebuyers</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>

Chattanooga Multi-State MSA	715	179,116	99	23,034	13	3,219	134	31,158	961	236,527
Alabama	2,044	529,325	701	227,699	174	33,282	435	100,906	3,354	891,212
Georgia	151	29,377	50	8,841	11	1,790	33	5,445	245	45,453
Kentucky	130	29,997	16	3,178	1	226	33	4,962	180	38,363
Tennessee	5,816	1,668,318	823	219,775	301	58,071	1,149	315,547	8,089	2,261,711
<b>Total</b>	<b>8,856</b>	<b>2,436,133</b>	<b>1,689</b>	<b>482,527</b>	<b>500</b>	<b>96,588</b>	<b>1,784</b>	<b>458,018</b>	<b>12,829</b>	<b>3,473,266</b>

Source: Bank records.

Examiners also included below details regarding additional innovative or flexible lending activities.

- **Down Payment Assistance Programs** – FirstBank provides down payment assistance on first-time homebuyer residential loans. During the evaluation period, the bank provided \$1.5 million in down payment assistance on 205 residential loans.

As expected due to the bank’s growth in asset size, all segments of the innovative and flexible loan programs increased since the previous evaluation. Growth occurred in all categories, with 8,384 innovative or flexible loans totaling \$1.5 billion noted at the previous evaluation.

### Community Development Loans

The institution is a leader in making CD loans for the bank as a whole. FirstBank’s leadership in originating an excellent level of CD loans and its good responsiveness to CD needs support this conclusion. The bank’s performance was generally consistent throughout the rated areas. Examiners weighed the State of Tennessee heaviest when forming conclusions. The appendices define CD and list the criteria considered under this performance factor.

Regarding the overall level of CD loans, the following table shows that, since the previous evaluation the bank granted 138 CD loans totaling over \$615.5 million. This level equates to 5.7 percent of average total assets of \$10,769,899,000 since the last previous evaluation and 8.4 percent of average net loans of \$7,327,302,000 for the same period, thereby reflecting excellent levels. These levels reflect increases from the 1.2 percent of average assets and 1.6 percent of average net loans reported at the previous evaluation.

Community Development Lending Institution										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020 (4/6 - 12/31)	6	61,880	1	1,100	36	65,995	22	63,160	65	192,135
2021	9	56,822	7	8,163	2	8,582	47	309,828	65	383,395
2022 (1/1 – 6/6)	3	10,972	0	0	0	0	5	28,990	8	39,962
<b>Total</b>	<b>18</b>	<b>129,674</b>	<b>8</b>	<b>9,263</b>	<b>38</b>	<b>74,577</b>	<b>74</b>	<b>401,978</b>	<b>138</b>	<b>615,492</b>

Source: Bank Data.

In addition to reflecting an excellent level of loans, the CD loans reflect good responsiveness to the AAs' CD needs. As seen in the previous table, 65.3 percent of the dollar volume of all CD loans help to revitalize or stabilize low- and moderate-income geographies. Additionally, 21.1 percent helps to provide affordable housing to low- and moderate-income families. Furthermore, another 12.1 percent promotes economic development, and 1.5 percent benefits community services for low- and moderate-income individuals.

As noted under the applicable Description of Assessment Areas sections, activities that revitalize or stabilize qualifying geographies reflect a primary CD need in the AAs. In addition, activities that support community services for low- and moderate-income individuals also represent a CD need. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its AAs, the bank exhibits an excellent level in originating CD loans.

<b>Community Development Loans by Rated Area Institution</b>										
<b>Rated Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Chattanooga Multi-State MSA	2	18,488	2	3,386	1	2,139	5	21,897	<b>10</b>	<b>45,910</b>
Alabama	3	8,319	1	250	0	0	5	11,655	<b>9</b>	<b>20,224</b>
Georgia	0	0	0	0	1	2,073	0	0	<b>1</b>	<b>2,073</b>
Kentucky	1	12,120	0	0	1	5,290	1	1,496	<b>3</b>	<b>18,906</b>
Tennessee	9	62,205	5	5,627	29	56,193	54	335,017	<b>97</b>	<b>459,042</b>
Nationwide	1	15,000	0	0	0	0	0	0	<b>1</b>	<b>15,000</b>
Regional	2	13,541	0	0	6	8,883	9	31,913	<b>17</b>	<b>54,337</b>
<b>Total</b>	<b>18</b>	<b>129,673</b>	<b>8</b>	<b>9,263</b>	<b>38</b>	<b>74,578</b>	<b>74</b>	<b>401,978</b>	<b>138</b>	<b>615,492</b>

*Source: Bank records.*

## **INVESTMENT TEST**

FirstBank demonstrated a high satisfactory record for the bank as a whole regarding the Investment Test. The significant level of qualified investments (QIs) outweighed the adequate responsiveness to CD needs, and occasional use of complex QIs supports this conclusion. Conclusions regarding the institution's overall Investment Test performance were generally inconsistent in each rated area. The appendices list the criteria considered under this test.

### **Investment and Grant Activity**

The investment activity for the bank as a whole reflects significant level. As seen in the following table, the bank made use of 93 QIs totaling \$84,493,000, which includes donations of \$126,000 and prior period investments of \$28,838,000. The total dollar amount equates to 1.1 percent of average total assets of \$10,769,899,000 since the previous evaluation and 9.2 percent of average securities of \$1,266,935,000 for the same period, thereby reflecting a good level. The bank's investments for the current evaluation period compare at a good level compared to similarly situated institutions. These levels reflect a slight increase over the 0.7 percent of average total assets and the 6.3 percent of average securities reported in the previous evaluation.

Qualified Investments by Rated Area Institution										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Chattanooga Multi-State MSA	5	20,289	0	0	0	0	3	4	8	20,293
Alabama	6	5,768	0	0	0	0	0	0	6	5,768
Georgia	0	0	0	0	1	945	1	3,000	2	3,945
Kentucky	0	0	3	2	0	0	5	2,235	8	2,237
Tennessee	51	58,193	20	7,073	11	11,923	11	7,304	93	84,493
Nationwide Activities	0	0	2	23	0	0	0	0	2	23
<b>Total</b>	<b>62</b>	<b>84,250</b>	<b>25</b>	<b>7,098</b>	<b>12</b>	<b>12,868</b>	<b>20</b>	<b>12,543</b>	<b>119</b>	<b>116,759</b>

Source: Bank records

Qualified Investments by Year Institution										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	21	21,503	0	0	4	3,535	3	3,800	28	28,838
2020 (4/6 - 12/31)	30	49,835	0	0	0	0	4	1,865	34	51,700
2021	9	10,610	4	6,980	6	8,083	9	6,870	28	32,543
2022 (1/1 – 6/6)	2	2,302	0	0	1	1,250	0	0	3	3,552
<b>Subtotal</b>	<b>62</b>	<b>84,250</b>	<b>4</b>	<b>6,980</b>	<b>11</b>	<b>12,868</b>	<b>16</b>	<b>12,535</b>	<b>93</b>	<b>116,633</b>
Qualified Grants & Donations	0	0	21	118	1	0	4	8	26	126
<b>Total</b>	<b>62</b>	<b>84,250</b>	<b>25</b>	<b>7,098</b>	<b>12</b>	<b>12,868</b>	<b>20</b>	<b>12,543</b>	<b>119</b>	<b>116,759</b>

Source: Bank Records.

### **Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities show adequate responsiveness using QIs that directly address identified needs in the states where the bank operated. Although the majority of the CD loans were for affordable housing, the bank also had CD loans in all other categories. Community services to low- and moderate-income individuals and activities that help revitalize or stabilize low- and moderate-income geographies are the primary needs in the AAs.

FirstBank’s QIs addressed the following needs throughout various AAs:

- Affordable housing needs with approximately \$32.5 million in the purchase of mortgage-backed securities with underlying loans to low- and moderate-income individuals.
- Community Service needs with investments of approximately \$1.2 million funded a program providing community service needs to seniors living in apartments or nursing facilities. The percentage of low- and moderate-income seniors at these locations varies

from 54.0 percent to 100.0 percent.

- Economic development needs by financing small businesses with approximately \$3.8 million through the Tennessee Small Business Job Opportunity Fund. The funds promote economic development by helping to lower the cost of capital for businesses in Tennessee.
- Revitalizing and stabilizing low-income, moderate-income, and distressed middle-income tracts with approximately \$1.9 million through general obligation bonds to fund revitalization improvements.

### **Community Development Initiatives**

FirstBank made occasional use of complex investments given the size of the institution and opportunities available. The bank did not have any innovative investments during the evaluation period.

FirstBank's \$17.3 million in a Low-Income Housing Tax Credit (LIHTC) addressed affordable housing needs in the Chattanooga Multi-State MSA. Refer to the complex and innovative QIs sections in the rated area to augment the consideration given to the institution's performance under the qualitative criteria in the CRA regulation.

The LIHTC program incentivizes CD by issuing tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to low-income households. Investments through this program have varying degrees of complexity. For FirstBank, complexity through this program involved special expertise needed by staff and a significant amount of time to coordinate the financing process.

### **SERVICE TEST**

FirstBank demonstrated a low satisfactory record for the bank as a whole regarding the Service Test. The adequate levels regarding the institution's CD services, reasonableness of accessibility of delivery systems, its changes in branch locations, and its reasonableness of business hours and services to support this conclusion. The Service Test performance is relatively consistent in each of the rated areas. The appendices list the criteria considered under this test.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the bank's AAs for the bank as a whole. Reasonably accessible branch distribution and alternative delivery systems support this conclusion.

#### ***Branch Distribution***

The bank makes its full-service offices reasonably accessible to essentially all portions of the institution's AAs for the bank as a whole. Adequate accessibility of branches in moderate-income geographies outweighed near poor performance in low-income geographies to support this conclusion.

The bank’s level of branch distribution in low-income tracts falls 7.7 percentage points below the population in low-income census tracts, reflecting a near poor level. The bank’s level falls 5.8 percentage points below the population percentage in moderate-income tracts, reflecting an adequate level. More weight is given to the branch distribution in moderate-income tracts given the higher population.

<b>Branch and ATM Distribution Institution</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	166	13.9	524,147	10.1	2	2.4	5	7.5	1	16.7	1	14.3
Moderate	255	21.4	1,064,763	20.4	12	14.6	7	10.4	1	16.7	1	14.3
Middle	409	34.3	1,848,682	35.5	35	42.7	32	47.8	2	33.3	1	14.3
Upper	342	28.7	1,747,833	33.5	28	34.1	20	29.8	2	33.3	4	57.1
NA	19	1.6	24,719	0.5	5	6.1	3	4.5	0	0.0	0	0.0
<b>Totals</b>	<b>1,191</b>	<b>100.0</b>	<b>5,210,144</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	<b>67</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.*

### ***Alternative Delivery Systems***

The bank makes its alternative delivery systems reasonably accessible to essentially all portions of the bank’s AAs for the bank as a whole. Reasonably accessible ATMs and alternative delivery systems to low- and moderate-income individuals support this conclusion.

The preceding table shows that the bank’s ATMs in low-income tracts falls 2.6 percentage points below the population in low-income census tracts, thereby reflecting an adequate level. The bank’s ATMs in moderate-income tracts falls 10.0 percentage points below the population in moderate-income tracts, also reflecting a poor level.

FirstBank offers other alternative delivery systems for remote access to banking services at any location and any time. These systems include online banking, mobile banking, mobile deposit, mobile payment, telephone banking, and digital mortgage delivery channels.

- Online banking through the bank’s website and mobile banking allows customers to review account statements, set up customized account notifications, and perform transactional capabilities such as bill pay and fund transfers within accounts.
- The mobile banking application accessible on smartphones and tablets affords customers the ability to deposit checks remotely.
- The bank offers free customer access to accounts via a toll-free telephone number that is available in English and Spanish.
- Digital mortgage channels expedite the mortgage process through an online mortgage application.

### **Changes in Branch Locations**

The institution's record of opening and closing of branches has generally not adversely affected low- and moderate-income geographies or individuals for the bank as a whole. Greater percentage changes in middle- and upper-income census tracts as compared to changes in low- and moderate-income tracts supports this conclusion.

Excluding branches acquired during the evaluation, the bank decreased its total full-service branch presence by a net of six offices, with seven branches closed and one branch opened. Excluding acquired branches, the bank opened one branch in an upper-income tract. Of the branch closings excluding acquired branches, one occurred in a low-income tract, one occurred in a moderate-income tract, one occurred in a middle-income tract, and four occurred in upper-income tracts. The bank acquired five branches, one in a low-income tract, one in a moderate-income tract, two in middle-income tracts, and one in an upper-income tract.

### **Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the AAs, particularly low- or moderate-income geographies or individuals. The branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly based on the AA needs.

### **Community Development Services**

The institution provides an adequate level of CD services for the bank as a whole. Adequate performances regarding the extent of CD services and good responsiveness of CD services to available opportunities support this conclusion.

The following table shows that the bank provided 191 CD services since the previous evaluation. This is a slight decline from the 202 CD services recorded at the previous evaluation. The current level reflects adequate performance regarding the extent, or number, of CD services provided.

The services primarily involve bank personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. In addition to their extent, CD services reflect good responsiveness to available opportunities as illustrated by their level of addressing identified CD needs in the bank's AAs.

Services include Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals. The table below shows adequate distribution across the four major CD service categories. More specifically, 75.9 percent of the bank's CD services benefitted projects or organizations that provide community services targeted to low- and moderate-income individuals. As noted in the rated area sections of this evaluation, such services represent CD needs for many of the bank's AAs.

<b>Community Development Services by Rated Area Institution</b>
---



Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Chattanooga Multi-State MSA	0	7	1	0	8
Alabama	0	5	1	0	6
Georgia	0	8	0	0	8
Kentucky	0	23	0	0	23
Tennessee	33	94	2	4	133
Statewide/Regional	5	8	0	0	13
<b>Total</b>	<b>38</b>	<b>145</b>	<b>4</b>	<b>4</b>	<b>191</b>

*Source: Bank records.*

Community Development Services by Year					
Institution					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020 (4/6 - 12/31)	5	13	1	0	19
2021	4	44	3	1	52
2022 (1/1 – 6/6)	29	88	0	3	120
<b>Total</b>	<b>38</b>	<b>145</b>	<b>4</b>	<b>4</b>	<b>191</b>

*Source: Bank Data.*

## DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs. Therefore, this consideration did not affect the institution's overall CRA rating.

## CHATTANOOGA MULTI-STATE MSA

**CRA RATING FOR CHATTANOOGA MULTI-STATE MSA: SATISFACTORY**

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

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: Low Satisfactory**

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN CHATTANOOGA MULTI-STATE MSA

The Chattanooga Multi-State MSA AA includes all 93 census tracts that make up Hamilton County in the State of Tennessee and Catoosa County in the State of Georgia.

#### **Economic and Demographic Data**

The AA’s census tracts reflect the following income designations based on 2015 ACS data: 10 low-, 14 moderate-, 37 middle-, 30 upper-income tracts, and 2 tracts with no income designation. The Federal Emergency Management Agency (FEMA) declared this AA as a major disaster area due to severe storms and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Chattanooga Multi-State MSA</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)	93	10.8	15.1	39.8	32.3	2.2
Population by Geography	413,496	7.4	14.2	39.1	39.3	0.0
Housing Units by Geography	180,465	8.0	15.3	40.1	36.6	0.0
Owner-Occupied Units by Geography	105,884	3.5	12.8	39.9	43.8	0.0
Occupied Rental Units by Geography	54,378	14.5	19.6	41.0	24.9	0.0
Vacant Units by Geography	20,203	13.8	16.9	39.2	30.1	0.0
Businesses by Geography	44,148	7.2	14.2	38.5	39.8	0.2
Farms by Geography	1,001	4.7	11.2	40.6	43.6	0.0
Family Distribution by Income Level	105,839	19.8	16.9	19.8	43.5	0.0
Household Distribution by Income Level	160,262	23.6	15.6	17.3	43.5	0.0
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA		\$58,694	Median Housing Value			\$154,857
			Median Gross Rent			\$764
			Families Below Poverty Level			11.0%
<small>Source: 2015 ACS Data and 2021 D&amp;B Data                      Due to rounding, totals may not equal 100.0 percent                      (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

Currently, major employers in the Chattanooga Multi-State MSA consist of the Erlanger Health System, Blue Cross Blue Shield of Tennessee, Tennessee Valley Authority, and CHI Memorial.<sup>1</sup> Unemployment rates increased substantially in most areas across the nation starting in April 2020 from the COVID-19 pandemic and some local government orders closed nonessential businesses. The Chattanooga Multi-State MSA’s unemployment rate of 3.8 percent in 2021 is below the U.S. rate of 5.3 percent.<sup>2</sup>

### **Competition**

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 111 offices from its 20 institutions serving about 3,725 people on average. FirstBank ranks 6<sup>th</sup> in market share by capturing 6.4 percent of the area’s deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

### **Credit and Community Development Needs and Opportunities**

Consistent with other metropolitan areas, the Chattanooga Multi-State MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data indicates that 36.7 percent of the AA’s families receive a designation of low- or moderate-income, with 11.0 percent below the poverty level. This signifies a continued need for CD services. The national COVID-19 major disaster area, and the AA’s designation as a federal disaster area for other reasons supports the need for revitalization and stabilization efforts.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower’s ability to work through the immediate impact of the virus. Lastly, a variety of reasons from the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

## **SCOPE OF EVALUATION – CHATTANOOGA MULTI-STATE MSA**

### **Lending Test**

#### ***Loan Categories Reviewed***

---

<sup>1</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

<sup>2</sup>Source: U. S. Bureau of Labor Statistics

Examiners considered the following loans granted inside the bank's Chattanooga Multi-State MSA AA:

Home Mortgage Loans:

- 2020: 510 loans totaling \$115,182,000
- 2021: 683 loans totaling \$165,437,000

Small Business Loans:

- 2020: 180 loans totaling \$39,119,000
- 2021: 161 loans totaling \$41,382,000

Examiners did not analyze small farm loans since no loans were originated in 2020, and only two were originated in 2021. Based on the above figures, home mortgage loans received the heaviest weighting for this rated area.

**Investment and Service Tests**

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN  
CHATTANOOGA MULTI-STATE MSA**

**LENDING TEST**

FirstBank demonstrated a low satisfactory record in the Chattanooga Multi-State MSA regarding the Lending Test. Excellent lending levels, adequate performance records regarding geographic loan distribution, borrower profile, and CD loans primarily support this conclusion. The bank further made use of innovative and flexible lending levels in this rated area.

**Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs in the Chattanooga Multi-State MSA. Excellent performance regarding home mortgage loans outweighed good performance regarding small business loans to support this conclusion. Examiners placed more weight on the bank's home mortgage loans than small business loans based on the loan volumes. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Chattanooga Multi-State MSA. For 2020, the bank originated 510 total reportable home mortgage loans totaling approximately \$115.8 million in its Chattanooga Multi-State MSA AA. FirstBank captured a 2.2 percent market share of the total number of home mortgage loans and 2.2 percent market share of the total dollar volume of home mortgage loans in the Chattanooga Multi-State

MSA AAs.

This volume of activity ranks the bank 13<sup>th</sup> out of 480 total lenders in the bank’s Chattanooga Multi-State MSA AA. This ranking lands the bank in the top 2.7 percent of lenders reporting such loans in the bank’s Chattanooga Multi-State MSA AA. The ranking considers the total number and dollar amount of loans made by each institution.

***Small Business Loans***

Small business lending levels reflect good responsiveness to AA credit needs in the Chattanooga Multi-State MSA. For 2020, the bank originated 180 total reportable small business loans totaling approximately \$39.1 million inside its Chattanooga Multi-State MSA AAs. FirstBank captured a 1.8 percent market share of the total number of small business loans and a 4.9 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 15<sup>th</sup> out of 115 total lenders in the bank’s Chattanooga Multi-State MSA AA. This ranking lands the bank in the top 13.0 percent of lenders reporting such loans in the bank’s Chattanooga Multi-State MSA AAs. The ranking considers the total number and dollar amount of loans made by each institution.

**Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Chattanooga Multi-State MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Chattanooga Multi-State MSA AA.

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate performance in the Chattanooga Multi-State MSA AA. Adequate performances in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is slightly higher than the aggregate data by 0.2 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank’s lending level falls 2.1 percentage points below the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Home Mortgage Loans Chattanooga Multi-State MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	3.5	2.3	13	2.5	3,392	2.9
Moderate	12.8	9.4	37	7.3	5,843	5.1
Middle	39.9	37.5	206	40.4	40,154	34.9
Upper	43.8	50.7	254	49.8	65,793	57.1
Not Available	0.0	0.0	0	0.0	0	0.0

<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>510</b>	<b>100.0</b>	<b>115,182</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; 2020 HMDA Data; 2020 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0 percent</i>						

***Small Business Loans***

The geographic distribution of small business loans reflects adequate performance in the Chattanooga Multi-State MSA AA. Adequate performance in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is higher than the aggregate data by 1.0 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank’s lending level falls 2.5 percentage points below the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Small Business Loans Chattanooga Multi-State MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	7.0	9.0	18	10.0	3,220	8.2
Moderate	14.4	13.6	20	11.1	3,523	9.0
Middle	38.7	36.8	72	40.0	16,375	41.9
Upper	39.6	40.5	70	38.9	16,002	40.9
Not Available	0.3	0.1	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>180</b>	<b>100.0</b>	<b>39,120</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; 2020 CRA Data; 2020 CRA Aggregate Data Due to rounding, totals may not equal 100.0 percent.</i>						

**Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent performance regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Chattanooga Multi-State MSA AA.

***Home Mortgage Loans***

The distribution of home mortgage loans based on the borrowers’ profiles reflects adequate performance in the Chattanooga Multi-State MSA AA. Adequate performances to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank’s lending to low-income borrowers is lower than the aggregate data by 1.2 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank’s lending level falls 1.0 percentage point below the aggregate data, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Chattanooga Multi-State MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	19.8	5.7	23	4.5	2,156	1.9
Moderate	16.9	16.7	80	15.7	12,827	11.1
Middle	19.8	19.8	123	24.1	22,960	19.9
Upper	43.5	39.1	262	51.4	69,127	60.0
Not Available	0.0	18.6	22	4.3	8,112	7.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>510</b>	<b>100.0</b>	<b>115,182</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data; 2020 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent.*

### ***Small Business Loans***

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Chattanooga Multi-State MSA AA. Excellent performance to businesses with gross annual revenues of \$1 million or less supports this conclusion.

As shown in the table below, the bank's level of lending to small businesses with gross annual revenues of \$1 million or less is 23.0 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Chattanooga Multi-State MSA.

Distribution of Small Business Loans by Gross Annual Revenue Category Chattanooga Multi-State MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	85.9	37.6	109	60.6	19,991	51.1
>\$1,000,000	4.4	--	70	38.9	19,102	48.8
Revenue Not Available	9.7	--	1	0.6	26	0.1
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>180</b>	<b>100.0</b>	<b>39,119</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent*

### **Innovative or Flexible Lending Practices**

The institution made use of innovative or flexible lending practices in the Chattanooga Multi-State MSA. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 961 innovative or flexible loans totaling \$236.5 million in the Chattanooga Multi-State MSA. This dollar figure

equates to 6.8 percent of the bank’s total innovative or flexible loans. Given the bank’s capacity and the needs in the rated area, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the Chattanooga Multi-State MSA.

<b>Innovative or Flexible Loans Chattanooga Multi-State MSA</b>										
<b>Assessment Area</b>	<b>FHLMC/ FNMA/State Housing</b>		<b>USDA/FHA/VA</b>		<b>Portfolio Loan Program</b>		<b>First Time Hombuyers</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Chattanooga Multi-State MSA	715	179,116	99	23,034	13	3,219	134	31,158	<b>961</b>	<b>236,527</b>
<i>Source: Bank Data (04/16/2020 – 6/6/2022)</i>										

### **Community Development Loans**

The institution has made an adequate level of CD loans in the Chattanooga Multi-State MSA. Its extent, or dollar volume, of CD loans and the CD loans’ responsiveness support this conclusion.

The following table shows that, since the previous evaluation, the bank granted 10 CD loans totaling approximately \$45.9 million in this assessment area. The dollar amount equates to 7.5 percent of the bank’s overall level of CD loans as compared to the 6.2 percent of overall HMDA and CRA loans in this AA.

<b>Community Development Loans Chattanooga Multi-State MSA</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Chattanooga Multi-State MSA	2	18,488	2	3,386	1	2,139	5	21,897	<b>10</b>	<b>45,910</b>
<i>Source: Bank Data (04/06/2020 – 06/06/2022)</i>										

Besides their extent, the CD loans reflect adequate responsiveness to the state’s CD needs. As seen in the table above, 47.7 percent of the dollar volume of CD loans help revitalize or stabilize low- and moderate-income geographies, while 7.4 percent benefits community services.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank’s AAs. Therefore, relative to the bank’s capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

### **INVESTMENT TEST**

FirstBank demonstrated a high satisfactory record in the Chattanooga Multi-State MSA regarding the Investment Test. The significant level of QIs outweighed the adequate responsiveness to CD needs and the occasional use of complex QIs to support this conclusion.



**Investment and Grant Activity**

The bank has a significant level of QIs in the Chattanooga Multi-State MSA.

The table below shows that FirstBank made eight QIs totaling approximately \$20.3 million in the Chattanooga Multi-State MSA. By dollar volume, this equates to 17.4 percent of the bank’s total QIs as compared to 7.7 percent of total deposits in this rated area.

<b>Qualified Investments Chattanooga Multi-State MSA</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Chattanooga Multi-State MSA	5	20,289	0	0	0	0	3	4	8	20,293
<i>Source: Bank Data (04/06/2020 – 06/06/2022)</i>										

**Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities show adequate responsiveness through use of investments that directly address identified needs in the Chattanooga Multi-State MSA. The previous table shows responsiveness by the dollar amount to two of four CD purpose categories, including a significant dollar volume to affordable housing for low- and moderate-income.

FirstBank’s major investments addressed the following needs throughout the Chattanooga Multi-State MSA:

- Affordable housing needs with approximately \$1.3 million in the purchase of mortgage-backed securities with underlying loans to low- and moderate-income individuals.

**Community Development Initiatives**

FirstBank made occasional use of complex or innovative investments, given the size of the institution and opportunities available in the Chattanooga Multi-State MSA. One new investment in a LIHTC totaled approximately \$17.3 million.

**SERVICE TEST**

FirstBank demonstrated a low satisfactory record for the Chattanooga Multi-State MSA regarding the Service Test. The adequate level regarding the bank’s CD services and reasonable accessibility of its delivery systems, its changes in branch locations, and its reasonableness of business hours and services to support this conclusion.

**Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to portions of the Chattanooga Multi-State MSA.

Limited accessible branch distribution was lifted by reasonable accessibility to alternative delivery systems to support this conclusion.

***Branch Distribution***

The bank makes its full-service offices accessible to limited portions of the Chattanooga Multi-State MSA.

The bank does not operate any branches in low- and moderate-income tracts, falling 7.4 percentage points below the population in low-income tracts and 20.8 percentage points below the population in moderate-income tracts. This level of distribution reflects poor performance.

<b>Branch and ATM Distribution by Geography Income Level Chattanooga Multi-State MSA</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	10	10.8	30,488	7.4	0	0.0	3	12.5	0	0.0	0	0.0
Moderate	14	15.1	58,914	14.2	0	0.0	5	20.8	0	0.0	0	0.0
Middle	37	39.8	161,598	39.1	3	37.5	11	45.58	0	0.0	0	0.0
Upper	30	32.3	162,496	39.3	5	62.5	5	20.8	0	0.0	0	0.0
NA	2	2.2	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>93</b>	<b>100.0</b>	<b>413,496</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent*

***Alternative Delivery Systems***

The bank makes its alternative delivery systems reasonably accessible in the Chattanooga Multi-State MSA.

The preceding table shows that the bank’s ATMs in low-income tracts rises 5.1 percentage points above the population in low-income census tracts, thereby reflecting an adequate level. The bank’s ATMs in moderate-income tracts rises 6.6 percentage points above the population in moderate-income tracts, reflecting adequate performance. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

**Changes in Branch Locations**

The institution’s record of opening and closing of branches in Chattanooga Multi-State MSA has generally not adversely affected low- and moderate-income geographies or individuals of geographies. No branch changes occurred in the Chattanooga Multi-State MSA.

**Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Chattanooga Multi-State MSA, particularly low- or moderate-income geographies or individuals. The Chattanooga Multi-State MSA reflects product offerings, services, and branch hours consistent with discussion at the institution level.

The branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly according to area needs. Branch and drive-thru hours are primarily from Monday to Friday.

**Community Development Services**

The institution provides an adequate level of CD services for the Chattanooga Multi-State MSA. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities support this conclusion. The appendices list the criteria considered under this performance factor.

The following table shows that the bank provided eight CD services since the previous evaluation.

<b>Community Development Services Chattanooga Multi-State MSA</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Chattanooga Multi-State MSA	0	7	1	0	<b>8</b>
<i>Source: Bank Data (04/06/2020 – 06/06/2022)</i>					

## STATE OF ALABAMA

### CRA RATING FOR ALABAMA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

FirstBank designated four AAs in Alabama as noted in the table below. All of the bank's AAs in Alabama conform to the CRA regulatory requirements.

Description of Alabama Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Birmingham MSA	Jefferson	163	1
Florence MSA	Lauderdale	22	1
Huntsville MSA	Madison	73	1

*Source: Bank Records; 2015 ACS.*

### SCOPE OF EVALUATION – ALABAMA

#### ***Full-Scope Assessment Area***

Of the three AAs in Alabama, examiners applied full-scope procedures to the Huntsville MSA assessment area since it generated the largest percentage of the bank's loans and deposits in this rated area. In addition, in accordance with outstanding procedures, examiners also randomly selected the Florence MSA AA for review since this area had not been reviewed using full-scope procedures during the previous two evaluations. Examiners applied limited-scope procedures to the other Alabama AA.

#### **Lending Test**

#### ***Loan Categories Reviewed***

Examiners considered the following loans granted inside the bank's Alabama AAs as reported according to either the HMDA or CRA data collection reporting requirements:

#### **Home Mortgage Loans:**

- 2020: 1,768 loans totaling \$454,708,000
- 2021: 1,744 loans totaling \$476,557,000

#### **Small Business Loans:**

- 2020: 39 loans totaling \$8,172,000
- 2021: 85 loans totaling \$21,495,000

Examiners did not analyze small farm loans since less than four loans were made each year in this

rated area and examiners would not be able to draw meaningful conclusions. As suggested by the above figures, home mortgage loans generally received the heaviest weighting.

***Assessment Area Weighting***

The following table shows that the Huntsville MSA AA generated the largest percentage of the bank’s Alabama loans and deposits. Consequently, examiners weighed records in the Huntsville MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners weighed performance in each reviewed area consistent with that area’s lending level as reflected in the following table.

<b>Assessment Area Distribution – State of Alabama</b>						
<b>Assessment Area</b>	<b>Loans</b>		<b>Deposits</b>		<b>Branches</b>	
	<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Birmingham MSA	280,577	29.2	173	0.2	1	33.3
Florence MSA	27,254	2.8	43,739	37.3	1	33.3
Huntsville MSA	653,482	68.0	73,329	62.5	1	33.3
<b>Total</b>	<b>961,313</b>	<b>100.0</b>	<b>117,241</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
<i>Source: HMDA &amp; CRA Data (2020-2021); FDIC Summary of Deposits (06/30/2021) Due to rounding, totals may not equal 100.0 percent</i>						

**Investment and Service Tests**

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA**

**LENDING TEST**

FirstBank demonstrated a low satisfactory record in the State of Alabama regarding the Lending Test. Excellent lending levels and adequate performance records regarding geographic distribution loan distribution, borrower profile, and community development loans primarily support this conclusion. The bank further made use of innovative and flexible lending levels in this rated area. Conclusions regarding the institution’s performance in the State of Alabama were generally consistent with the conclusions for each AA within the rated area, unless otherwise noted.

**Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs in the State of Alabama. Excellent performance regarding home mortgage loans outweighed adequate performance regarding small business loans to support this conclusion. Examiners considered the bank’s size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the State of Alabama. For 2020, the bank originated 1,769 total reportable home mortgage loans totaling

approximately \$455.5 million in its Alabama AAs. FirstBank captured a 2.8 percent market share of the total number of home mortgage loans and 3.1 percent market share of the total dollar volume of home mortgage loans in the Alabama AAs.

This volume of activity ranks the bank sixth out of 567 total lenders in the bank's Alabama AAs. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in the bank's Alabama AAs. The ranking considers the total number and dollar amount of loans made by each institution.

### ***Small Business Loans***

Small business lending levels reflect adequate responsiveness to AA credit needs in the State of Alabama. For 2020, the bank originated 39 total reportable small business loans totaling approximately \$8.2 million inside its Alabama AAs. FirstBank captured a 0.1 percent market share of the total number of small business loans and a 0.4 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 49<sup>th</sup> out of 170 total lenders in the bank's Alabama AAs. This ranking lands the bank in the top 28.8 percent of lenders reporting such loans in the bank's Alabama AAs. The ranking considers the total number and dollar amount of loans made by each institution.

### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the State of Alabama. Adequate records regarding both home mortgage and small business loans support this conclusion. The bank's performance is generally consistent throughout the AAs within the rated area, unless otherwise noted. Examiners placed the most weight on the bank's Huntsville MSA AA.

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate penetration throughout the State of Alabama. Adequate performances in all AAs support this conclusion.

### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate penetration throughout the State of Alabama. Adequate performances in the Birmingham MSA and Florence-Muscle Shoals MSA AAs outweighed poor performance in the Huntsville MSA AA to support this conclusion.

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent records regarding small business loans to support this conclusion. The bank's performance is generally consistent throughout the AAs within the rated area, unless otherwise noted. Examiners placed the most weight on the bank's Huntsville MSA AA.

### ***Home Mortgage Loans***

The distribution of borrowers reflects adequate penetration among retail customers of different income levels. Adequate performances in all AAs support this conclusion.

### ***Small Business Loans***

The distribution of borrowers reflects excellent penetration among business customers of different sizes. Excellent performance in the Huntsville MSA and Florence MSA AAs outweighed the adequate performance in the Birmingham MSA AA to support this conclusion.

### **Innovative or Flexible Lending Practices**

The institution made use of innovative or flexible lending practices in the State of Alabama. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 3,354 innovative or flexible loans totaling \$891.2 million in the State of Alabama. This dollar figure equates to 25.7 percent of the bank's total innovative or flexible loans. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the State of Alabama.

<b>Innovative or Flexible Loans State of Alabama</b>										
<b>Assessment Area</b>	<b>FHLMC/ FNMA/State Housing</b>		<b>USDA/FHA/VA</b>		<b>Portfolio Loan Program</b>		<b>First Time Homebuyers</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Birmingham MSA	630	160,313	135	34,489	149	27,080	149	34,869	<b>1,063</b>	<b>256,751</b>
Florence MSA	24	6,210	4	765	0	0	3	900	<b>31</b>	<b>7,875</b>
Huntsville MSA	1,390	362,802	562	192,445	25	6,202	283	65,137	<b>2,260</b>	<b>626,586</b>
<b>Total</b>	<b>2,044</b>	<b>529,325</b>	<b>701</b>	<b>227,699</b>	<b>174</b>	<b>33,282</b>	<b>435</b>	<b>100,906</b>	<b>3,354</b>	<b>891,212</b>

*Source: Bank Data*

### **Community Development Loans**

The institution has made an adequate level of CD loans in the State of Alabama. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion. The bank's performance is generally consistent throughout the AAs, with the exception of the Birmingham MSA AA, where the bank only made one CD loans. Examiners placed the most weight on the bank's Huntsville MSA AA.

The following table shows that, since the previous evaluation, the bank granted 10 CD loans totaling approximately \$29.4 million in this state. The dollar amount equates to 3.3 percent of the bank's overall level of CD loans as compared to the 16.5 percent of overall HMDA and CRA loans in this state.

Community Development Loans State of Alabama										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Birmingham MSA	0	0	0	0	0	0	1	1,300	1	1,300
Florence MSA	0	0	0	0	0	0	3	6,992	3	6,992
Huntsville MSA	3	8,319	1	250	0	0	1	3,363	5	11,932
Statewide or Regional	1	9,206	0	0	0	0	0	0	1	9,206
<b>Total</b>	<b>4</b>	<b>17,525</b>	<b>1</b>	<b>250</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>11,655</b>	<b>10</b>	<b>29,430</b>

*Source: Bank Data*

Besides their extent, the CD loans reflect adequate responsiveness to the state’s CD needs. As seen in the table above, 59.5 percent of the dollar volume of the state’s CD loans help to provide affordable housing, while 39.6 help revitalize or stabilize low- and moderate-income geographies.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank’s AAs. Therefore, relative to the bank’s capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

The following point is an example of the bank’s CD lending activities in the broader statewide area of Alabama:

- **Affordable Housing** – The bank originated one loan totaling \$9.2 million to an organization who provides affordable housing for low- and moderate-income individuals.

## INVESTMENT TEST

FirstBank demonstrated a low satisfactory record in the State of Alabama regarding the Investment Test. The adequate level of QIs outweighed the poor responsiveness to CD needs and the rare use of complex QIs to support this conclusion. The assessment areas in this state generally reflect consistent performance in the Investment Test, with the exception of the Huntsville MSA AA that was below performance for the state.

### Investment and Grant Activity

The bank has an adequate level of QIs in the State of Alabama.

The table below shows that FirstBank made six QIs totaling approximately \$5.8 million in the State of Alabama. By dollar volume, this equates to 4.9 percent of the bank’s total QIs as compared to 1.2 percent of total deposits in this rated area. The dollar amount includes QIs in the statewide area.

<b>Qualified Investments</b>
------------------------------



State of Alabama										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Birmingham-Hoover MSA	3	3,001	0	0	0	0	0	0	3	3,001
Florence-Muscle Shoals MSA	0	0	0	0	0	0	0	0	0	0
Huntsville MSA	2	2,267	0	0	0	0	0	0	2	2,267
Statewide Activities	1	500	0	0	0	0	0	0	1	500
<b>Total</b>	<b>6</b>	<b>5,768</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>5,768</b>

*Source: Bank Data*

Since FirstBank’s QIs addressed community credit needs inside the bank’s AAs within the State of Alabama, statewide activities include investments in different areas outside of the bank’s AAs within the State of Alabama.

**Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities show poor responsiveness through use of investments that directly address identified needs in the State of Alabama. All of the bank’s QIs were to provide affordable housing for low- and moderate-income families. Community services to low- and moderate-income individuals and activities that help revitalize or stabilize low- and moderate-income geographies are the primary needs in the area.

**Community Development Initiatives**

FirstBank made rare use of complex or innovative investments, given the size of the institution and opportunities available in the State of Alabama.

**SERVICE TEST**

FirstBank demonstrated a low satisfactory record for the State of Alabama regarding the Service Test. The adequate level regarding the bank’s CD services, its changes in branch locations, and its reasonableness of business hours and services lifted the limited accessibility of its delivery systems, to support this conclusion. The AAs in this state generally reflect consistent performance in the Service Test. The appendices list the criteria considered under this test.

**Accessibility of Delivery Systems**

Delivery systems are accessible to limited portions of the bank’s AAs in the State of Alabama. Limited accessible branch distribution and alternative delivery systems support this conclusion. The State of Alabama reflects consistent conclusions to the institution’s Accessibility of Delivery System performance.

***Branch Distribution***

The distribution of branches is accessible to limited portions of the AAs in the State of Alabama.

The bank’s level of branch distribution in low-income tracts rises 20.8 percentage points above the population in low-income census tracts, reflecting an excellent level. The bank’s level falls 23.5 percentage points below the population percentage in the moderate-income census tracts, reflecting a poor level. Given the consideration of the greater population within moderate-income geographies, the poor performance for moderate-income geographies outweighed the excellent performance in the low-income geographies.

<b>Branch and ATM Distribution by Geography Income Level State of Alabama</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	46	17.8	137,648	12.5	1	33.3	0	0.0	0	0.0	1	100.0
Moderate	71	27.5	257,986	23.5	0	0.0	0	0.0	0	0.0	0	0.0
Middle	75	29.1	339,692	30.9	0	0.0	0	0.0	0	0.0	0	0.0
Upper	65	25.2	358,127	32.6	2	66.7	0	0.0	1	100.0	0	0.0
NA	1	0.4	4,748	0.4	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>258</b>	<b>100.0</b>	<b>1,098,201</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent*

***Alternative Delivery Systems***

The alternative delivery systems are accessible to limited portions of the area. The bank does not operate any ATMs in low- or moderate-income tracts, falling 12.5 percentage points below the population in low-income tracts and 23.5 percentage points below the population in moderate-income tracts. This level of distribution reflects a poor performance.

**Changes in Branch Locations**

The institution’s record of opening and closing of branches in State of Alabama has generally not adversely affected low- and moderate-income geographies or individuals of geographies. The bank closed one branch in a low-income tract in the State of Alabama. One branch opened in an upper-income tract.

**Reasonableness of Business Hours and Services**

Services, including, where appropriate, business hours, do not vary in a way that inconveniences portions of the State of Alabama, particularly low- and moderate-income geographies or individuals. The State of Alabama reflects product offerings, services, and branch hours consistent with those discussed at the institution level. Branch hours are from Monday to Friday.

**Community Development Services**

The institution provides an adequate level of CD services for the State of Alabama. Adequate

performances regarding the extent of CD services and the responsiveness of CD services to available opportunities support this conclusion. The appendices list the criteria considered under this performance factor.

The following table shows that the bank provided six CD services since the previous evaluation.

<b>Community Development Services State of Alabama</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Birmingham MSA	0	0	1	0	<b>1</b>
Florence-Muscle Shoals MSA	0	2	0	0	<b>2</b>
Huntsville MSA	0	3	0	0	<b>3</b>
<b>Total</b>	<b>0</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>6</b>
<i>Source: Bank Data</i>					

## **HUNTSVILLE MSA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN HUNTSVILLE MSA**

The Huntsville MSA AA includes all 73 census tracts that make up Madison County, one of two counties that make up the Huntsville, AL MSA, located in northern Alabama.

#### **Economic and Demographic Data**

The AA’s census tracts reflect the following income designations based on 2015 ACS data: 12 low-, 19 moderate-, 21 middle-, and 21 upper-income census tracts. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Huntsville MSA</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)	73	16.4	26.0	28.8	28.8	0.0
Population by Geography	346,438	10.8	20.8	31.2	37.2	0.0
Housing Units by Geography	152,720	12.3	21.9	32.1	33.7	0.0
Owner-Occupied Units by Geography	93,319	5.1	18.3	33.0	43.6	0.0
Occupied Rental Units by Geography	44,448	23.9	28.3	30.9	16.9	0.0
Vacant Units by Geography	14,953	22.7	25.3	30.2	21.8	0.0
Businesses by Geography	27,224	12.4	21.6	28.7	37.3	0.0
Farms by Geography	809	7.7	20.1	37.0	35.2	0.0

Family Distribution by Income Level	89,551	22.9	16.0	17.4	43.8	0.0
Household Distribution by Income Level	137,767	24.5	15.6	15.6	44.3	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA	\$72,576		Median Housing Value			\$164,667
			Median Gross Rent			\$800
			Families Below Poverty Level			10.0%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Huntsville’s economy is strong. Jobs in manufacturing and professional services are continuing to grow. The housing market is strong and house price appreciation is beating the state and regional averages. Population growth has significantly outpaced that of the region. This above-average population growth will most likely boost housing demand.<sup>3</sup>

Currently, major employers in the Huntsville MSA consist of the U.S. Army/Redstone Arsenal, Huntsville Hospital, and NASA/Marshall Space Flight Center.<sup>4</sup> Unemployment rates increased substantially in most areas across the nation starting in April 2020 from the COVID-19 pandemic and some local government orders closing nonessential businesses. The Huntsville MSA’s unemployment rate of 2.6 percent in 2021 is below the 3.4 percent rate for the State of Alabama but below the U.S. rate of 5.3 percent.

### **Competition**

The area contains a high level of competition from other chartered banks based on its population, with each of the 99 offices from its 30 institutions serving about 3,499 people on average. FirstBank ranks 18<sup>th</sup> in market share by capturing 0.7 percent of the area’s deposits based on the June 30, 2021 FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

### **Credit and Community Development Needs and Opportunities**

Consistent with other metropolitan areas, the Huntsville MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data indicates that 38.9 percent of the AA’s families receive a designation of low- or moderate-income, with 10.0 percent below the poverty level. This signifies a continued need for community development services. The high percentage (42.4 percent) of low- and moderate-

<sup>3</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

<sup>4</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

income census tracts and the national COVID-19 major disaster area designation supports the need for revitalization and stabilization efforts.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, a variety of reasons from the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN HUNTSVILLE MSA**

### **LENDING TEST**

FirstBank demonstrated a low satisfactory record in the Huntsville MSA AA regarding the Lending Test. Excellent lending levels and adequate performance records regarding geographic distribution of loans, borrower profile, and community development loans primarily support this conclusion. The bank further made extensive use of innovative and flexible lending levels in this AA.

#### **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs in the Huntsville MSA AA. Excellent performance regarding home mortgage loans outweighed adequate performance regarding small business loans supports this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Huntsville MSA AA.

#### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Huntsville MSA AA. For 2020, the bank originated 1,189 total reportable home mortgage loans totaling approximately \$313 million. FirstBank captured a 4.4 percent market share of the total number and a 4.9 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it fourth out of 425 total lenders in the Huntsville MSA AA. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

#### ***Small Business Loans***

Small business lending levels reflect adequate responsiveness to AA credit needs in the Huntsville MSA AA. For 2020, the bank originated 12 total reportable small business loans totaling approximately \$4.0 million. FirstBank captured a 0.2 percent market share of the total number of loans and a 0.6 percent market share of the total dollar volume of loans.

The bank’s activity by number of loans ranks it 45<sup>th</sup> out of 117 total lenders in the Huntsville MSA AA. This ranking lands the bank in the top 38.5 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects adequate performance for small business loans.

**Geographic Distribution**

The geographic distribution of loans reflects adequate penetration in the Huntsville MSA AA. An adequate record regarding home mortgage loans outweighs a poor record regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Huntsville MSA AA.

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate performance in the Huntsville MSA AA. Adequate performances in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is slightly lower than the aggregate data by 0.5 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank’s lending level falls 3.9 percentage points below the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Home Mortgage Loans Huntsville MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	5.1	2.1	19	1.6	3,259	1.0
Moderate	18.3	11.8	94	7.9	16,153	5.2
Middle	33.0	34.8	450	37.9	113,314	36.3
Upper	43.6	51.3	625	52.6	179,724	57.5
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>1,188</b>	<b>100.0</b>	<b>312,450</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data; 2020 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent*

***Small Business Loans***

The geographic distribution of small business loans reflects poor performance in the Huntsville MSA AA. Adequate performance in low-income geographies and very poor performance in moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is higher than the aggregate data by 2.2 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank did not originate any loans. The bank lending level falls 18.5 percent point below aggregate data, reflecting a very poor level.

<b>Geographic Distribution of Small Business Loans Huntsville MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	12.1	14.5	2	16.7	710	17.6
Moderate	21.6	18.5	0	0.0	0	0.0
Middle	28.6	29.0	2	16.7	611	15.1
Upper	37.7	37.9	8	66.7	2,724	67.3
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>4,045</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent performance regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Huntsville MSA AA.

### ***Home Mortgage Loans***

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Huntsville MSA AA. Adequate performances to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is slightly higher than the aggregate data by 0.2 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank's lending level is higher than aggregate data by 3.0 percent, also reflective of adequate performance.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Huntsville MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	22.9	6.2	76	6.4	9,787	3.1
Moderate	16.0	14.1	203	17.1	36,812	11.8
Middle	17.4	18.6	267	22.5	60,741	19.4
Upper	43.8	36.0	545	45.9	171,896	55.0
Not Available	0.0	25.1	97	8.2	33,213	10.6
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>1,188</b>	<b>100.0</b>	<b>312,449</b>	<b>100.0</b>

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

### ***Small Business Loans***

The distribution of small business loans based on the borrowers’ profiles reflects excellent performance in the Huntsville MSA AA. Excellent performance to businesses with gross annual revenues of \$1 million or less supports this conclusion.

As shown in the table below, the bank’s level of lending to small businesses with gross annual revenues of \$1 million or less is 16.9 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Huntsville MSA AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Huntsville MSA AA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	83.4	41.4	7	58.3	1,862	46.0
>\$1,000,000	5.0	--	5	41.7	2,183	54.0
Revenue Not Available	11.7	--	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>4,045</b>	<b>100.0</b>

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent

### **Innovative or Flexible Lending Practices**

The institution made extensive use of innovative or flexible lending practices in the Huntsville MSA AA. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution’s capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 2,260 innovative or flexible loans totaling \$626.6 million in the Huntsville MSA AA. This dollar figure equates to 70.3 percent of the total innovative or flexible loans in the State of Alabama. Given the bank’s capacity and the needs in the rated area, the level of innovative and flexible loans reflects excellent responsiveness to the credit needs of the Huntsville MSA AA.

<b>Innovative or Flexible Loans Huntsville MSA AA</b>										
<b>Assessment Area</b>	<b>FHLMC/FNMA/ State Housing</b>		<b>USDA/FHA/VA</b>		<b>Portfolio Loan Program</b>		<b>First Time Homebuyers</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Huntsville MSA	1,390	362,802	562	192,445	25	6,202	283	65,137	<b>2,260</b>	<b>626,586</b>

Source: Bank Data (04/16/2020 – 06/06/2022)



## **Community Development Loans**

The institution made an adequate level of CD loans in the Huntsville MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated five CDLs totaling approximately \$11.9 million in the Huntsville MSA AA. By dollar volume, this equates to 40.5 percent of the bank's CDLs in the State of Alabama as compared to the 68.0 percent of the bank's HMDA- and CRA-reportable loans in this AA. However, a significant percentage of the bank's CDLs in the State of Alabama are in the broader statewide area. Without considering the statewide CDLs, the bank would have had 59.0 percent of their Alabama CDLs in the Huntsville MSA AA. The bank's CDL lending level is also significantly higher than its level at the last evaluation (\$3.3 million).

The following point provides an example of the bank's CDLs in the Huntsville MSA AA:

- ***Affordable Housing*** – The bank originated a \$4.0 million loan to purchase and renovate an 88-unit rent restricted apartment complex in a low-income area.

In addition, the CD loans reflect good responsiveness to the CD needs of the AA. Approximately 69.7 percent of the dollar volume of the AA's CD loans provide affordable housing for low- or moderate-income individuals. As noted under the applicable Description of Assessment Areas, activities that provide community services for low- or moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AA.

## **INVESTMENT TEST**

FirstBank demonstrated an adequate record in the Huntsville MSA AA regarding the Investment Test. The adequate level of QIs outweighed the good responsiveness to CD needs and the rare use of complex and innovative QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

## **Investment and Grant Activity**

The bank has an adequate level of QIs in the Huntsville MSA AA. The table for the State of Alabama shows that FirstBank made two QIs totaling approximately \$2.3 million in the Huntsville MSA AA. By dollar volume, this equates to 39.3 percent of the total QIs in Alabama as compared to 62.5 percent of total deposits in this AA.

The following is an example of key investments in the Huntsville MSA AA:

- ***Affordable Housing*** – The bank maintained approximately \$2.2 million in mortgage-backed securities in the Huntsville MSA AA with the underlying loans to finance single-family and multi-family housing for low- and moderate-income individuals.

## **Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities show adequate responsiveness through use of QIs that directly address identified needs in the Huntsville MSA AA. The QIs table for the State of Alabama shows responsiveness in the Huntsville MSA AA by providing affordable housing for low- or moderate-income individuals.

**Community Development Initiatives**

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Huntsville MSA AA.

**SERVICE TEST**

FirstBank demonstrated a low satisfactory record in the Huntsville MSA AA regarding the Service Test. The adequate level regarding the bank’s CD services outweighed the reasonableness of accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

**Accessibility of Delivery Systems**

The institution’s delivery systems are accessible to limited portions of the area. The branch distribution and alternative delivery systems is consistent with the institution level performance.

***Branch Distribution***

The distribution of branches is accessible to limited portions of the AA.

The bank’s level of branch distribution in low-income tracts falls 10.8 percentage points below the population in low-income census tracts, reflecting a poor level. The bank’s level falls 20.8 percentage points below the population percentage, reflecting a very poor level.

<b>Branch and ATM Distribution by Geography Income Level Huntsville MSA AA</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	12	16.4	37,362	10.8	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	19	26.0	72,090	20.8	0	0.0	0	0.0	0	0.0	0	0.0
Middle	21	28.8	108,084	31.2	0	0.0	0	0.0	0	0.0	0	0.0
Upper	21	28.8	128,902	37.2	1	100.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>73</b>	<b>100.0</b>	<b>346,438</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent*

***Alternative Delivery Systems***

The alternative delivery systems are accessible to limited portions of the area. The bank does not

operate any ATMs in low- or moderate-income tracts, falling 10.8 percentage points below the population in low-income tracts and 20.8 percentage points below the population in moderate-income tracts. This level of distribution reflects a poor performance.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

### **Changes in Branch Locations**

The institution did not have any changes to branch locations since the last evaluation in the Huntsville MSA AA. Therefore, this criterion did not affect the overall Service Test rating for the Mobile MSA AA.

### **Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Huntsville MSA AA, particularly low- or moderate-income geographies or individuals. The Huntsville MSA AA reflects product offerings, services, and branch hours consistent with the State of Alabama. Branch hours are from Monday to Friday.

### **Community Development Services**

The institution provides an adequate level of CD services in the Huntsville MSA AA. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Alabama section shows that the bank provided three CD services since the previous evaluation in the Huntsville MSA AA. This number equates to 50 percent of CD services, thereby reflecting an adequate level.

Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the Huntsville MSA AA:

- ***Community Services*** – An employee serves on the Board of Directors for a non-profit organization that provides school supplies to low- and moderate-income students. Thus, the activity benefits an organization that provides community services primarily to low- and moderate-income individuals.

## **FLORENCE MSA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN FLORENCE MSA**

The Florence MSA AA includes all 22 census tracts that make up Lauderdale County, one of the two counties that make up the Florence-Muscle Shoals, AL MSA, located in northwest Alabama.

### **Economic and Demographic Data**

The AA’s census tracts reflect the following income designations based on 2015 ACS data: 3 low-, 4 moderate-, 11 middle-, and 4 upper-income tracts. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Florence MSA</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)	22	13.6	18.2	50.0	18.2	0.0
Population by Geography	92,737	5.6	15.2	56.4	22.9	0.0
Housing Units by Geography	44,158	5.4	15.7	56.7	22.2	0.0
Owner-Occupied Units by Geography	26,757	2.4	10.4	62.0	25.3	0.0
Occupied Rental Units by Geography	11,855	10.0	27.5	45.2	17.3	0.0
Vacant Units by Geography	5,546	10.1	16.5	55.7	17.7	0.0
Businesses by Geography	5,514	15.4	14.9	47.5	22.2	0.0
Farms by Geography	194	6.7	6.7	65.5	21.1	0.0
Family Distribution by Income Level	25,104	20.0	16.1	21.7	42.1	0.0
Household Distribution by Income Level	38,612	25.1	15.0	17.3	42.7	0.0
Median Family Income MSA - 22520 Florence-Muscle Shoals, AL MSA		\$54,339	Median Housing Value			\$118,763
			Median Gross Rent			\$595
			Families Below Poverty Level			13.0%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Florence’s economy is recovering. Manufacturing and government jobs have been growing. The labor force overall has also made a turn for the better. The housing market is good, and single-family construction is rising. Travel demand is growing and will remain high, providing a boost to the southern economy.<sup>5</sup>

Currently, major employers in the Florence MSA consist of North American Lighting, Constellium (Wise Alloys LLC), and Walgreens Call Center.<sup>6</sup> The Florence MSA’s unemployment rate of 3.5 percent for 2021 is slightly above the 3.4 percent rate for the State of Alabama and below the U.S.

<sup>5</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

<sup>6</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

rate of 5.3 percent.

### **Competition**

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 34 offices from its 13 institutions serving about 2,728 people on average. FirstBank ranks 11<sup>th</sup> in market share by capturing 1.8 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

### **Credit and Community Development Needs and Opportunities**

Consistent with other metropolitan areas, the Florence MSA AA created varied loan demand for small business and residential real estate loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 36.1 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. In addition, 31.8 percent of the area's census tracts received low- and moderate-income designations and the national COVID-19 major disaster area designation suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORENCE MSA**

### **LENDING TEST**

FirstBank demonstrated a low satisfactory record in the Florence MSA AA area regarding the Lending Test. Good lending activity and adequate performance records regarding borrower profile loan distribution, geographic loan distribution, and CD lending and the use of innovative and flexible lending practices support this conclusion.

### **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs in the Florence MSA AA. Good performance regarding both home mortgage and small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Florence MSA AA.

### ***Home Mortgage Loans***

Home mortgage lending levels reflect good responsiveness to AA credit needs in the Florence MSA AA. For 2020, the bank originated 22 total reportable home mortgage loans totaling approximately \$4.7 million. FirstBank captured a 0.5 percent market share of the total number and a 0.6 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 35<sup>th</sup> out of 194 total lenders in the Florence MSA AA. This ranking lands the bank in the top 18.0 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for home mortgage loans.

### ***Small Business Loans***

Small business lending levels reflect good responsiveness to AA credit needs in the Florence MSA AA. For 2020, the bank originated 24 total reportable small business loans totaling approximately \$2.8 million. FirstBank captured a 1.4 percent market share of the total number of loans and a 2.8 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 15<sup>th</sup> out of 68 total lenders in the Florence MSA AA. This ranking lands the bank in the top 22.1 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for small business loans.

### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Florence MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Florence MSA AA.

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate performance in the Florence MSA AA. Adequate performances in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank did not make any loans in low-income tracts in the AA. However, the lending level is 1.0 percentage point below aggregate data, reflecting an adequate level. The table further shows that in moderate-income census tracts the bank's lending level rises 3.9 percentage points above the aggregate data, reflecting an adequate level.

<b>Geographic Distribution of Home Mortgage Loans Florence MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	2.4	1.0	0	0.0	0	0.0
Moderate	10.4	9.7	3	13.6	882	18.8
Middle	62.0	57.8	12	54.5	2,427	51.7
Upper	25.3	31.6	7	31.8	1,387	29.5
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>4,696</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data; and 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate performance in the Florence MSA AA. Adequate performance in low-income geographies outweighs poor performance in moderate-income geographies to support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is higher than the aggregate data by 4.8 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank’s lending level falls 7.9 percentage points below the aggregate data, reflecting a poor level.

<b>Geographic Distribution of Small Business Loans Florence MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	15.6	16.0	5	20.8	798	28.6
Moderate	14.5	12.1	1	4.2	100	3.6
Middle	47.7	45.7	11	45.8	1,105	39.5
Upper	22.3	26.2	7	29.2	792	28.3
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>2,795</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; and 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage lending and excellent small business lending support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Florence MSA AA.

### **Home Mortgage Loans**

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Florence MSA AA. Adequate performance to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is higher than the aggregate data by 2.0 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank's lending level falls 6.7 percentage points below the aggregate data, also reflecting an adequate level.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Florence MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	20.0	7.1	2	9.1	230	4.9
Moderate	16.1	15.8	2	9.1	340	7.2
Middle	21.7	19.5	3	13.6	619	13.2
Upper	42.1	36.1	11	50.0	1,850	39.4
Not Available	0.0	21.5	4	18.2	1,657	35.3
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>4,696</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data; and 2020 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Small Business Loans**

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Florence MSA AA. Good performance to businesses with gross annual revenues of \$1 million or less supports this conclusion.

As shown in the table below, the bank's level of lending to small businesses with gross annual revenues of \$1 million or less is 41.1 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Florence MSA AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Florence MSA AA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	82.3	46.4	21	87.5	2,095	75.0
>\$1,000,000	4.9	--	2	8.3	450	16.1
Revenue Not Available	12.7	--	1	4.2	250	8.9
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>2,795</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent*



### **Innovative or Flexible Lending Practices**

The institution makes use of innovative or flexible lending practices in the Florence MSA AA in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion. Please refer to the discussion under the State of Alabama for additional details regarding the innovative or flexible lending practices in the Florence MSA AA.

### **Community Development Loans**

The institution made a relatively high level of CD loans in the Florence MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated three CD loans totaling approximately \$6.9 million in the Florence MSA AA. By dollar volume, this equates to 23.8 percent of the bank's CD loans in the State of Alabama as compared to the 2.8 percent of the bank's home mortgage and small business loans in this AA. The following points discuss the bank's CD loans in the Florence MSA AA:

- ***Revitalize and Stabilize*** – The bank granted a \$1.9 million loan to purchase an apartment complex in a low-income census tract. The loan helps to retain residents in a low-income census tract. Thus, the activity revitalizes and stabilizes a qualifying geography by helping to attract new, or retain existing businesses or residents.

In addition, the CD loans reflect adequate responsiveness to the CD needs of the AA. All of the bank's CD loans in the Florence MSA AA were for revitalization or stabilization efforts in this AA.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AAs. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

### **INVESTMENT TEST**

FirstBank demonstrated a substantial noncompliant record in the Florence MSA AA regarding the Investment Test. The few, if any QIs, very poor responsiveness to CD needs, and no use of complex and innovative QIs support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

### **Investment and Grant Activity**

The bank made few, if any QIs in the Florence MSA AA.

### **Responsiveness to Credit and Community Development Needs**

FirstBank shows very poor responsiveness through use of investments that directly address identified needs in the Florence MSA AA.

**Community Development Initiatives**

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Florence MSA AA.

**SERVICE TEST**

FirstBank demonstrated a low satisfactory record in the Florence MSA AA regarding the Service Test. The adequate level regarding the bank’s CD services and the limited accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

Delivery systems are accessible to limited portions of the Florence MSA AA. Limited branch distribution accessibility and alternative delivery systems support this conclusion. The Florence MSA AA reflects a consistent conclusion to the State of Alabama’s Accessibility of Delivery System performance.

***Branch Distribution***

The bank makes its full-service offices accessible to limited portions of the Florence MSA AA.

The bank’s level of branch distribution in low-income tracts rises 94.4 percentage points above the population in low-income census tracts, reflecting an excellent level. The bank maintains no branches in moderate-income tracts. The bank’s level falls 15.2 percentage points below the population percentage, reflecting a poor record. Given the consideration of the greater population within moderate-income geographies, the poor performance for moderate-income geographies outweighed the excellent performance in the low-income geographies.

<b>Branch and ATM Distribution by Geography Income Level Florence MSA AA</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	3	13.6	5,184	5.6	1	100.0	0	0.0	0	0.0	1	100.0
Moderate	4	18.2	14,050	15.2	0	0.0	0	0.0	0	0.0	0	0.0
Middle	11	50.0	52,310	56.4	0	0.0	0	0.0	0	0.0	0	0.0
Upper	4	18.2	21,193	22.9	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>22</b>	<b>100.0</b>	<b>92,737</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.*

### ***Alternative Delivery Systems***

The alternative delivery systems are accessible to limited portions of the area. The bank does not operate any ATMs in low- or moderate-income tracts, falling 5.6 percentage points below the population in low-income tracts and 15.2 percentage points below the population in moderate-income tracts. This level of distribution reflects a poor performance.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

### **Changes in Branch Locations**

The institution's record of opening and closing of branches in the Florence MSA AA has generally not adversely affected low- and in moderate- income geographies or individuals of geographies. One branch closed in a low-income tract the Florence MSA AA. No other changes occurred.

### **Reasonableness of Business Hours and Services**

Services, including, where appropriate, business hours, do not vary in a way that inconveniences portions of the Florence MSA AA, particularly low- and moderate-income geographies or individuals. The Florence MSA AA reflects product offerings, services, and branch hours consistent with those discussed at the institution level. Branch hours are from Monday to Friday.

### **Community Development Services**

The institution provides an adequate level of CD services in the Florence MSA AA. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Alabama section shows that the bank provided two CD services since the previous evaluation in the Florence MSA AA. This number equates to 33.3 percent of CD services in the State of Alabama, thereby reflecting an adequate level.

Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the Florence MSA AA:

- ***Community Services*** –Bank employees assisted with a fundraiser to help raise money for an organization that provides mentoring to low- and moderate-income children.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area’s AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Birmingham MSA	Below	Exceeds	Below

Facts and data supporting conclusions for each limited-scope AA follow, including a summary of FirstBank’s operations and activities. The demographic data for the limited-scope AAs is in Appendix C.

#### **Birmingham MSA AA**

The bank’s Birmingham MSA AA consists of all of Jefferson County. FirstBank operates one branch in an upper-income tract. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	558	137,563
Small Business Loans	3	1,332
Small Farm Loans	0	0
Community Development Loans	1	1,300
Investments	3	3,001
Community Development Services	1	-

### Geographic Distribution

#### *Home Mortgage Loans*

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020
Assessment Area	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Birmingham MSA	558	137,563	5.9	31,065	8.8	2.2	2.1	23.0	10.2	10.7	30.7	28.0	27.2	37.4	59.5	59.9	0.1	0.2	0.1

*Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

#### *Small Business Loans*

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography	2020
---	------

Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Birmingham MSA	3	1,332	0.1	17,676	10.7	0.0	10.7	24.8	33.3	21.4	22.7	0.0	20.6	39.7	66.7	45.7	2.0	0.0	1.6

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

## **Borrower Profile**

### ***Home Mortgage Loans***

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020
Assessment Area	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Birmingham MSA	558	137,563	5.9	31,065	26.3	6.8	4.5	15.9	22.4	14.1	17.4	24.2	18.1	40.4	44.6	45.0	0.0	2.0	18.2

Source: 2015 ACS Data; 2020 HMDA Data; 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

### ***Small Business Loans***

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020
Assessment Area	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Birmingham MSA	3	1,332	0.1	17,676	81.9	33.3	37.7	6.3	66.7	11.8	0.0	

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

## STATE OF GEORGIA

### CRA RATING FOR GEORGIA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN GEORGIA

FirstBank designated one AA in Georgia. The Dalton MSA AA includes all 18 CTs in all of Whitfield County, one of the two counties that make up the Dalton, Georgia MSA. The bank operates three full-service offices and one ATM in this area. There have not been any offices opened or closed since the prior evaluation.

#### Economic and Demographic Data

The assessment area’s census tracts reflect the following income designations based on 2015 ACS data: 4 moderate-, 8 middle-, and 6 upper-income tracts. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dalton MSA</b>						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	22.2	44.4	33.3	0.0
Population by Geography	103,456	0.0	21.1	42.1	36.9	0.0
Housing Units by Geography	39,731	0.0	20.2	42.5	37.3	0.0
Owner-Occupied Units by Geography	22,242	0.0	16.5	40.9	42.7	0.0
Occupied Rental Units by Geography	12,333	0.0	25.6	43.9	30.5	0.0
Vacant Units by Geography	5,156	0.0	23.2	46.6	30.2	0.0
Businesses by Geography	8,075	0.0	18.4	51.2	30.4	0.0
Farms by Geography	238	0.0	5.9	51.7	42.4	0.0
Family Distribution by Income Level	25,402	19.4	19.2	20.5	40.9	0.0
Household Distribution by Income Level	34,575	20.3	17.9	18.5	43.3	0.0
Median Family Income MSA - 19140 Dalton, GA MSA		\$47,062	Median Housing Value			\$120,921
			Median Gross Rent			\$676
			Families Below Poverty Level			14.5%

*Source: 2015 ACS Data and 2021 D&B Data*

*Due to rounding, totals may not equal 100.0 percent*

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

Currently, major employers in the Dalton MSA consist of Shaw Industries Inc., Mohawk Industries, and Engineered Floors/J&J Industries.<sup>7</sup> The Dalton MSA's unemployment rate of 4.0 percent for 2021 is consistent with the 3.9 percent rate for the State of Georgia and below the U.S. rate of 5.3 percent.

### **Competition**

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 22 offices from its 9 institutions serving about 4,702 people on average. FirstBank ranks 6<sup>th</sup> in market share by capturing 7.1 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

### **Community Contact**

Examiners reviewed a contact with a community member knowledgeable about the area's socio-economic conditions to help assess community credit needs and potential opportunities for bank involvement in the AA. The contact indicated that the community is in need of support for the economy and housing development. The contact stated that opportunities exist for financial institutions to provide credit for single- and multi-family housing.

### **Credit and Community Development Needs and Opportunities**

Consistent with other metropolitan areas, the Dalton MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 38.6 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. The high percentage (22.0 percent) of moderate-income census tracts and the national COVID-19 major disaster area designation suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

---

<sup>7</sup>Source: Moody's Analytics, Precis U.S. Metro, April 2022

## SCOPE OF EVALUATION – GEORGIA

### Lending Test

#### *Loan Categories Reviewed*

Examiners considered the following loans granted inside the bank's Dalton MSA AA:

#### Home Mortgage Loans:

- 2020: 111 loans totaling \$19,257,000
- 2021: 147 loans totaling \$26,181,000

#### Small Business Loans:

- 2020: 19 loans totaling \$4,878,000
- 2021: 23 loans totaling \$5,277,000

As suggested by the above figures, home mortgage loans generally received the heaviest weighting followed by small business loans.

### Investment and Service Tests

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

### LENDING TEST

FirstBank demonstrated a low satisfactory record in the State of Georgia regarding the Lending Test. Adequate performance regarding geographic distribution, borrower profile and CD loans, outweighed excellent lending levels to support this conclusion. Examiners also noted that the bank makes limited use of innovative or flexible loans in this AA.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Dalton MSA AA. Excellent performance regarding home mortgage loans outweighs adequate performance regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Dalton MSA AA.

#### *Home Mortgage Loans*

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Dalton MSA AA. For 2020, the bank originated 111 total reportable home mortgage loans totaling approximately \$19.3 million. FirstBank captured a 4.0 percent market share of the total number and a 4.2 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it sixth out of 193 total lenders in the Dalton MSA



AA. This ranking lands the bank in the top 3.1 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

***Small Business Loans***

Small business lending levels reflect adequate responsiveness to AA credit needs in the Dalton MSA AA. For 2020, the bank originated 19 total reportable small business loans totaling approximately \$4.9 million. FirstBank captured a 1.3 percent market share of the total number of loans and a 4.0 percent market share of the total dollar volume of loans.

The bank’s activity by number of loans ranks it 17<sup>th</sup> out of 64 total lenders in the Dalton MSA AA. This ranking lands the bank in the top 26.6 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects adequate performance for small business loans.

**Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Dalton MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Dalton MSA AA.

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate performance in the Dalton MSA AA. Adequate performances in moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in moderate-income tracts exceeds aggregate data by 4.1 percentage points, reflective of adequate performance.

<b>Geographic Distribution of Home Mortgage Loans Dalton MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0.0	0	0.0	0	0.0
Moderate	16.5	9.4	15	13.5	1,625	8.4
Middle	40.9	41.1	33	29.7	5,139	26.7
Upper	42.7	49.6	63	56.8	12,494	64.9
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>111</b>	<b>100.0</b>	<b>19,258</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent*

***Small Business Loans***

The geographic distribution of small business loans reflects adequate performance in the Dalton MSA AA. Adequate performance in moderate-income geographies supports this conclusion.

As seen in the table below, the bank’s lending in moderate-income tracts falls below aggregate data by 2.5 percentage points, reflective of adequate performance.

<b>Geographic Distribution of Small Business Loans Dalton MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0.0	0	0.0	0	0.0
Moderate	17.9	18.3	3	15.8	1,245	25.5
Middle	51.8	52.6	9	47.4	2,406	49.3
Upper	30.3	29.1	7	36.8	1,227	25.2
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>4,878</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent records regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Dalton MSA AA.

### ***Home Mortgage Loans***

The distribution of home mortgage loans based on the borrowers’ profiles reflects adequate performance in the Dalton MSA AA. Adequate performance to both low- and moderate-income borrowers supports this conclusion.

As seen in the table below, the bank’s lending to low-income borrowers is higher than the aggregate data by 1.8 percent, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank’s lending level is higher than aggregate data by 1.5 percentage points, also reflecting an adequate level.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Dalton MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	19.4	3.6	6	5.4	339	1.8
Moderate	19.2	17.4	21	18.9	2,708	14.1
Middle	20.5	20.8	21	18.9	2,698	14.0
Upper	40.9	41.6	61	55.0	13,243	68.8
Not Available	0.0	16.6	2	1.8	269	1.4

<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>111</b>	<b>100.0</b>	<b>19,257</b>	<b>100.0</b>
---------------	--------------	--------------	------------	--------------	---------------	--------------

*Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

***Small Business Loans***

The distribution of small business loans based on the borrowers’ profiles reflects good performance in the Dalton MSA AA. Good performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Dalton MSA AA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	81.8	37.9	9	47.4	1,008	20.7
>\$1,000,000	6.3	--	9	47.4	3,800	77.9
Revenue Not Available	11.9	--	1	5.3	70	1.4
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>4,878</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent*

As shown in the table above, the bank’s level of lending to small businesses with gross annual revenues of \$1 million or less is 9.5 percent higher than the aggregate level. As a result, this reflects a good level of small business lending in the Dalton MSA AA.

**Innovative or Flexible Lending Practices**

The institution makes limited use of innovative or flexible lending practices in the State of Georgia in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution’s capacity and the credit needs of the AA when arriving at this conclusion.

**Community Development Loans**

The institution made an adequate level of CD loans in the State of Georgia. Its extent, or dollar volume outweighed the CD loans’ poor responsiveness support this conclusion.

FirstBank originated one CD loan totaling approximately \$2.1 million in the State of Georgia. The dollar amount equates to 0.3 percent of the bank’s overall level of CD loans as compared to the 1.0 percent of overall HMDA and CRA loans in this AA.

<b>Community Development Lending State of Georgia</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>

Dalton MSA	0	0	0	0	1	2,073	0	0	1	2,073
<i>Source: Bank data</i>										

The following is a notable example of CD loans in the State of Georgia:

- **Economic Development** – The bank granted a \$2.0 million loan that helped promote economic development by financing a loan to a small business that provides primarily low- and moderate-income jobs.

In addition, the CD loans reflect poor responsiveness to the CD needs of the AA. As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank’s AA.

### INVESTMENT TEST

FirstBank demonstrated a low satisfactory record in the State of Georgia regarding the Investment Test. The adequate level of QIs and responsiveness outweighed the rare occasional use of complex and innovative QIs support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

### Investment and Grant Activity

The bank has an adequate level of QIs in the State of Georgia. The table shows that FirstBank made two QIs totaling approximately \$3.9 million in the State of Georgia. By dollar volume, this equates to 3.4 percent of the total QIs in State of Georgia as compared to 1.9 percent of total deposits in this rated area.

Qualified Investments State of Georgia										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Dalton MSA	0	0	0	0	1	945	1	3,000	2	3,945
<i>Source: Bank data</i>										

The following is an example of a key investment in the State of Georgia:

- **Economic Development** – The bank allocated approximately \$945,000 in a mortgage-backed security in the Dalton MSA AA with the underlying loans to finance small businesses.

### Responsiveness to Credit and Community Development Needs

FirstBank’s CD activities show adequate responsiveness through use of QIs that directly address identified needs in the State of Georgia. The QIs table shows responsiveness to CD needs in two of four CD purpose categories.

FirstBank’s major QIs addressed revitalization and stabilization needs with \$3.0 million in an

investment fund to help provide safe residences for low- and moderate-income seniors.

**Community Development Initiatives**

FirstBank made rare use of complex or innovative investments, given the size of the institution and opportunities available in the State of Georgia.

**SERVICE TEST**

FirstBank demonstrated a low satisfactory record in the State of Georgia regarding the Service Test. The relatively adequate level regarding the bank’s CD services outweighed the reasonableness of accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

**Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to limited portions of the State of Georgia. Reasonably accessible branch distribution and alternative delivery systems support this conclusion.

***Branch Distribution***

The bank makes its full-service offices accessible to limited portions of the State of Georgia.

The bank does not have any branches in moderate-income tracts. The bank’s level of branch distribution in moderate-income tracts falls 21.1 percentage points below the population in moderate-income census tracts, reflecting a poor level.

<b>Branch and ATM Distribution by Geography Income Level State of Georgia</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0	0	0.0	0.0
Moderate	4	22.2	21,779	21.1	0	0.0	0	0.0	0.0	0	0.0	0.0
Middle	8	44.4	43,551	42.1	2	66.7	0	0.0	0.0	0	0.0	0.0
Upper	6	33.3	38,126	36.9	1	33.3	1	100.0	0.0	0	0.0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0.0	0	0.0	0.0
<b>Totals</b>	<b>18</b>	<b>100.0</b>	<b>103,456</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0.0</b>	<b>100.0</b>	<b>0.0</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.*

***Alternative Delivery Systems***

The alternative delivery systems are accessible to limited portions of the AA. As the preceding table illustrates, the bank does not operate any ATMs in moderate-income tracts, which falls 21.1 percentage points below the population in moderate-income CTs, reflecting poor performance.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

**Changes in Branch Locations**

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or low- or moderate-income individuals. Since the prior evaluation, the bank has not opened or closed branches in the State of Georgia.

**Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences certain portions of the State of Georgia, particularly low- or moderate-income geographies or individuals. The State of Georgia reflects product offerings, services, and branch hours consistent with discussion at the institution level.

The branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly according to individual area needs. Branch hours are from Monday to Friday.

**Community Development Services**

The institution provides an adequate level of CD services in the State of Georgia. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities primarily support this conclusion. The appendices list the criteria considered under this performance factor.

The table shows that the bank provided eight CD services in the State of Georgia since the previous evaluation. This number equates to 4.2 percent of the bank’s CD services, thereby reflecting an adequate level.

<b>Community Development Services State of Georgia</b>					
<b>Rated Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Dalton MSA	0	8	0	0	<b>8</b>
<i>Source: Bank records.</i>					

Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the State of Georgia:

- ***Community Service*** –Bank employees participated in a fundraiser with an organization that provides human needs for the homeless and families struggling with poverty.
- ***Community Services*** –Bank employees worked with a non-profit organization to teach financial literacy classes to low- and moderate-income kids. The organization’s volunteers serve as role models helping to impact young people’s lives by teaching lessons that promote financial capability, work and career readiness, and business ownership.

## STATE OF KENTUCKY

### CRA RATING FOR KENTUCKY: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN KENTUCKY

FirstBank designated one AA in Kentucky. The Bowling Green MSA AA includes all 30 CTs in Allen and Warren Counties, two of the four counties that make up the Bowling Green, Kentucky MSA. The bank operates four full-service offices and one ATM in this area. All three offices are new since the previous evaluation and opened as a part of the February 2020 acquisition of The Farmers National Bank of Scottsville. The acquisition required that the bank expand their AA into the State of Kentucky creating a separate rated area and the Bowling Green MSA AA.

#### Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2015 ACS data: 2 low-, 6 moderate-, 11 middle-, 10 upper-income tracts, and 1 tract with no income designation. FEMA declared this AA as a major disaster area due to flooding, tornadoes, and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area						
Assessment Area: Bowling Green MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	6.7	20.0	36.7	33.3	3.3
Population by Geography	139,305	5.8	18.8	33.6	40.1	1.8
Housing Units by Geography	58,456	5.6	19.5	36.3	36.7	1.9
Owner-Occupied Units by Geography	31,800	2.3	12.4	39.2	45.9	0.3
Occupied Rental Units by Geography	21,361	10.7	29.5	31.3	24.3	4.1
Vacant Units by Geography	5,295	4.5	22.0	39.4	32.1	2.1
Businesses by Geography	12,967	5.7	17.0	33.9	39.5	4.0
Farms by Geography	608	1.5	8.4	40.0	48.7	1.5
Family Distribution by Income Level	35,020	19.9	17.2	19.8	43.1	0.0
Household Distribution by Income Level	53,161	24.4	14.0	17.6	43.9	0.0
Median Family Income MSA - 14540 Bowling Green, KY MSA		\$55,109	Median Housing Value			\$135,071
			Median Gross Rent			\$687
			Families Below Poverty Level			13.1%



*Source: 2015 ACS Data and 2021 D&B Data  
Due to rounding, totals may not equal 100.0 percent  
(\* ) The NA category consists of geographies that have not been assigned an income classification.*

Bowling Green’s economy is backpedaling. Total employment has shrunk in the last couple of months. Employment in manufacturing and government is steady while services payrolls have fallen. The labor market has encouraged additional workers to leave the labor force, which remains well below its pre-pandemic peak. Bowling Green’s recovery will pick up later this year but remain a step behind the national average.<sup>8</sup>

Currently, major employers in the Bowling Green MSA consist of Houchens Industries, The Medical Center at BG, and Western Kentucky University.<sup>9</sup> The Bowling Green MSA’s unemployment rate of 6.3 percent for 2020 is consistent with the 6.4 percent rate for the State of Kentucky and below the U.S. rate of 8.1 percent.

### **Competition**

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 63 offices from its 20 institutions serving about 2,211 people on average. FirstBank ranks 7<sup>th</sup> in market share by capturing 6.4 percent of the area’s deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

### **Credit and Community Development Needs and Opportunities**

Consistent with other metropolitan areas, the Bowling Green MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 37.1 percent of the area’s families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. The national COVID-19 major disaster area, and the assessment area’s designation as federal disaster areas for other reasons suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower’s ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact

---

<sup>8</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

<sup>9</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

## **SCOPE OF EVALUATION – KENTUCKY**

### **Lending Test**

#### ***Loan Categories Reviewed***

Examiners considered the following loans granted inside the bank’s Bowling Green MSA AA:

#### **Home Mortgage Loans:**

- 2020: 154 loans totaling \$25,161,000
- 2021: 165 loans totaling \$42,821,000

#### **Small Business Loans:**

- 2020: 69 loans totaling \$10,333,000
- 2021: 51 loans totaling \$6,801,000

#### **Small Farm Loans:**

- 2020: 24 loans totaling \$2,336,000
- 2021: 7 loans totaling \$459,000

As suggested by the above figures, home mortgage loans generally received the heaviest weighting followed by small business loans.

### **Investment and Service Tests**

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN KENTUCKY**

### **LENDING TEST**

FirstBank demonstrated a low satisfactory record in the State of Kentucky regarding the Lending Test. The adequate performance records regarding geographic distribution and borrower profile distribution, as well as the adequate level of CD loans, limited use of innovative and flexible lending practices, and excellent lending levels, support this conclusion.

#### **Lending Activity**

Lending levels reflect excellent responsiveness to the credit needs in the Bowling Green MSA AA. Excellent performance regarding home mortgage loans and good performance regarding both small business and small farm loans support this conclusion. Examiners weighed home mortgage loans heavier than small business and small farm loans in the Bowling Green MSA AA.

### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to the credit needs in the Bowling Green MSA AA. For 2020, the bank originated 154 total reportable home mortgage loans totaling approximately \$25.3 million. FirstBank captured a 2.0 percent market share of the total number and a 1.5 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 15<sup>th</sup> out of 259 total lenders in the Bowling Green MSA AA. This ranking lands the bank in the top 5.8 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

### ***Small Business Loans***

Small business lending levels reflect good responsiveness to the credit needs in the Bowling Green MSA AA. For 2020, the bank originated 69 total reportable small business loans totaling approximately \$10.3 million. FirstBank captured a 2.5 percent market share of the total number of loans and a 5.7 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 13<sup>th</sup> out of 83 total lenders in the Bowling Green MSA AA. This ranking lands the bank in the top 15.7 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for small business loans.

### ***Small Farm Loans***

Small farm lending levels reflect good responsiveness to the credit needs in the Bowling Green MSA AA. For 2020, the bank originated 24 total reportable small farm loans totaling approximately \$2.3 million. FirstBank captured a 17.0 percent market share of the total number of loans and a 22.3 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 2<sup>nd</sup> out of 15 total lenders in the Bowling Green MSA AA. This ranking lands the bank in the top 13.3 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for small farm loans.

### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Bowling Green MSA AA. Adequate records regarding home mortgage, small business and small farm loans support this conclusion. Examiners weighed home mortgage loans heavier than small business and small farm loans in the Bowling Green MSA AA.

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate performance in the Bowling Green MSA AA. Adequate performances in low- and moderate-income geographies

support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is higher than aggregate data by 3.4 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank’s lending level rises 1.2 percentage points above the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Home Mortgage Loans Bowling Green MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	2.3	1.8	8	5.2	746	3.0
Moderate	12.4	10.5	18	11.7	2,015	8.0
Middle	39.2	31.5	45	29.2	7,301	29.0
Upper	45.9	55.9	82	53.2	13,603	54.1
Not Available	0.3	0.4	1	0.6	1,496	5.9
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>154</b>	<b>100.0</b>	<b>25,161</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

***Small Business Loans***

The geographic distribution of small business loans reflects adequate performance in the Bowling Green MSA AA. Adequate performance in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank did not lend in low-income tracts; however, this falls below aggregate data by only 5.6 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank’s lending level falls 6.2 percentage points below the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Small Business Loans Bowling Green MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	5.9	5.6	0	0.0	0	0.0
Moderate	18.0	19.2	9	13.0	425	4.1
Middle	33.5	30.2	30	43.5	4,349	42.1
Upper	38.2	41.9	30	43.5	5,559	53.8
Not Available	4.4	3.1	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>69</b>	<b>100</b>	<b>10,333</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

***Small Farm Loans***

The geographic distribution of small farm loans reflects adequate performance in the Bowling

Green MSA AA. Adequate performance in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is consistent with aggregate data, reflecting adequate performance. The table further shows that in moderate-income census tracts the bank’s lending level falls 2.9 percentage points below the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Small Farm Loans Bowling Green MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	1.3	0.0	0	0.0	0	0.0
Moderate	8.8	7.1	1	4.2	344	14.7
Middle	38.9	48.2	19	79.2	1,412	60.4
Upper	49.2	44.7	4	16.7	580	24.8
Not Available	1.7	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>2,336</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans was lifted by excellent records regarding small business and small farm loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business and small farm loans in the Bowling Green MSA AA.

### ***Home Mortgage Loans***

The distribution of home mortgage loans based on the borrowers’ profiles reflects adequate performance in the Bowling Green MSA AA. Adequate performance to both low- and moderate-income borrowers supports this conclusion.

As seen in the table below, the bank’s lending to low-income borrowers is higher than the aggregate data by 5.8 percent, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank’s lending level is 0.5 percentage points below the aggregate data, reflecting an adequate level.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Bowling Green MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	19.9	5.2	17	11.0	1,284	5.1

Moderate	17.2	16.7	25	16.2	2,719	10.8
Middle	19.8	20.5	25	16.2	3,789	15.1
Upper	43.1	39.1	60	39.0	12,182	48.4
Not Available	0.0	18.5	27	17.5	5,186	20.6
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>154</b>	<b>100.0</b>	<b>25,160</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0% percent.*

### ***Small Business Loans***

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Bowling Green MSA AA. Excellent performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Bowling Green MSA AA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	84.0	43.0	58	84.1	7,215	69.8
>\$1,000,000	4.4	-	10	14.5	3,049	29.5
Revenue Not Available	11.6	-	1	1.4	69	0.7
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>69</b>	<b>100.0</b>	<b>10,333</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0 percent*

As shown in the table above, the bank's level of lending to small businesses with gross annual revenues of \$1 million or less is 41.1 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Bowling Green MSA AA.

### ***Small Farm Loans***

The distribution of small farm loans based on the borrowers' profiles reflects excellent performance in the Bowling Green MSA AA. Excellent performance to farms with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category Bowling Green MSA AA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	97.7	57.4	23	95.8	2,285	97.8
>\$1,000,000	0.2	-	0	0.0	0	0.0
Revenue Not Available	2.1	-	1	4.2	51	2.2
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>2,336</b>	<b>100.0</b>

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.  
 Due to rounding, totals may not equal 100.0 percent

As shown in the table above, the bank’s level of lending to small farms with gross annual revenues of \$1 million or less is 38.4 percent higher than the aggregate level. As a result, this reflects an excellent level of small farm lending in the Bowling Green MSA AA.

**Innovative or Flexible Lending Practices**

The institution makes limited use of innovative or flexible lending practices in the State of Kentucky in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution’s capacity and the credit needs of the AA when arriving at this conclusion.

**Community Development Loans**

The institution has made an adequate level of CD loans in the State of Kentucky. Its extent, or dollar volume, of CD loans and the CD loans’ responsiveness support this conclusion.

FirstBank originated three CD loans totaling approximately \$18.9 million in the State of Kentucky. The dollar amount equates to 3.1 percent of the bank’s overall level of CD loans as compared to the 1.5 percent of overall HMDA and CRA loans.

Community Development Lending State of Kentucky										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Bowling Green MSA	1	12,120	0	0	1	5,290	1	1,496	3	18,906
<i>Source: Bank data</i>										

The following points provide examples of the bank’s CD loans in the State of Kentucky:

- **Affordable Housing** – The bank originated a \$12.1 million loan for a multi-family apartment complex, where the rents are targeted to individuals with low- and moderate-incomes.
- **Economic Development** – The bank granted a \$5.3 million loan that helped to promote economic development in the assessment area.

FirstBank’s CD loans reflect adequate responsiveness through use of CD loans that directly address identified needs in the State of Kentucky. CD loans show responsiveness to a variety of CD needs by the dollar amount to three of four CD purpose categories; however, there are no loans for community services in the State of Kentucky. As noted under the applicable Description of Assessment Areas, activities that help revitalize low- and moderate-income geographies and

community services for low- and moderate-income individuals represent CD needs in the bank’s AA.

**INVESTMENT TEST**

FirstBank demonstrated an adequate record in the State of Kentucky regarding the Investment Test. The adequate level of QIs and responsiveness to CD needs outweighed the rare use of complex QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

**Investment and Grant Activity**

The bank has an adequate level of QIs in the State of Kentucky. The table for the State of Kentucky shows that FirstBank made eight QIs totaling approximately \$2.2 million. By dollar volume, this equates to 1.9 percent of the total QIs as compared to 2.4 percent of total deposits in this rated area.

Qualified Investments State of Kentucky										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Bowling Green MSA	0	0	3	2	0	0	5	2,235	8	2,237
<i>Source: Bank data</i>										

The following are examples of key investments in the State of Kentucky:

- ***Revitalize and Stabilize*** – The bank invested approximately \$1.5 million in three municipal bond to construct school facilities.

**Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities show good responsiveness through use of QIs that directly address identified needs in the State of Kentucky. As noted in the investment table, for the State of Kentucky, shows responsiveness to CD needs by the dollar amount to two of four CD purpose categories.

FirstBank’s major investments addressed revitalization and stabilization needs with approximately \$2.2 million in the purchase of municipal bonds. Larger dollar amount donations support an organization providing human needs for low- and moderate-income individuals.

**Community Development Initiatives**

FirstBank made rare use of complex or innovative investments, given the size of the institution and opportunities available in the State of Kentucky.

**SERVICE TEST**



FirstBank demonstrated a low satisfactory record in the State of Kentucky regarding the Service Test. The adequate level regarding the bank’s CD services and the reasonableness of accessibility of its delivery systems support this conclusion. The appendices list the criteria considered under this test.

**Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the State of Kentucky. Accessible branch distribution outweighed unreasonable access to alternative delivery systems to support this conclusion.

***Branch Distribution***

The bank makes its full-service offices accessible to essentially all portions of the Bowling Green MSA AA.

The bank’s level of branch distribution in low-income tracts rises 19.2 percentage points above the population in low-income census tracts, reflecting an excellent level. The bank’s level rises 6.2 percentage points above the population percentage in the moderate-income census tracts, reflecting a good level.

<b>Branch and ATM Distribution by Geography Income Level Bowling Green MSA AA</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	2	6.7	8,078	5.8	1	25.0	0	0.0	1	20.0	0	0.0
Moderate	6	20.0	26,127	18.8	1	25.0	0	0.0	1	20.0	0	0.0
Middle	11	36.7	46,866	33.6	1	25.0	1	100.0	2	40.0	0	0.0
Upper	10	33.3	55,795	40.1	1	25.0	0	0.0	1	20.0	0	0.0
NA	1	3.3	2,439	1.8	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>30</b>	<b>100.0</b>	<b>139,305</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.*

***Alternative Delivery Systems***

The bank makes its alternative delivery systems unreasonably inaccessible to significant portions of the State of Kentucky.

The preceding table shows that the bank maintains no ATMs in low- and moderate-income tracts. The bank’s level falls 5.8 percentage points below the population in low-income census tracts, reflecting an adequate level. The bank’s ATMs in moderate-income tracts falls 18.8 percentage points below the population in moderate-income tracts, reflecting very poor performance. Given the consideration of the greater population within moderate-income geographies, the very poor performance for moderate-income geographies outweighed the adequate performance in the low-income geographies. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through

alternative delivery systems.

### **Changes in Branch Locations**

The institution’s record of opening and closing of branches in the State of Kentucky improved branch accessibility to low- and moderate-income geographies or individuals. The bank opened five branches, one in a low-income tract, one in a moderate-income tract, two in middle-income tracts, and one in an upper-income tract. No branches opened or closed in low- or moderate-income tracts.

### **Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Bowling Green MSA AA, particularly low- or moderate-income geographies or individuals. The Bowling Green MSA AA reflects product offerings, services, and branch hours consistent with discussion for the State of Kentucky.

The bank’s branches have the same product offerings and services, and branch locations have the same hours.

### **Community Development Services**

The institution provides an adequate level of CD services in the State of Kentucky. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities primarily support this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that the bank provided 23 CD services since the previous evaluation in the State of Kentucky. This number equates to 12 percent of the bank’s CD services, thereby reflecting an adequate level.

<b>Community Development Services State of Kentucky</b>					
<b>Rated Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Kentucky	0	23	0	0	<b>23</b>

*Source: Bank records.*

Leadership is evident through Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs by providing community services to low- and moderate-income individuals.

The following are examples of CD services specific to the State of Kentucky:

- **Community Service** – A bank employee taught elementary classes about bank accounts and

budgeting. The classes were taught at a school where the majority of the students receive free and reduced lunch.

- ***Community Services*** –Bank employees worked with a non-profit organization to teach financial literacy classes to low- and moderate-income kids. The organization’s volunteers serve as role models helping to impact young people’s lives by teaching lessons that promote financial capability, work and career readiness, and business ownership.

## STATE OF TENNESSEE

### CRA RATING FOR TENNESSEE: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

FirstBank designated six AAs in Tennessee as noted in the table below. All AAs in Tennessee conform to the CRA regulatory requirements.

Description of Tennessee Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Jackson MSA	Chester, Crockett, and Madison	35	5
Knoxville MSA	Knox and Union	116	6
Memphis MSA	Fayette and Shelby	232	4
Morristown MSA	Jefferson	9	2
Nashville MSA	Cannon, Davidson, Dickson, Rutherford, Williamson, and Wilson	281	24
Tennessee Non-MSA	Bedford, Benton, Carroll, Coffee, Cumberland, Decatur, DeKalb, Franklin, Henderson, Henry, Humphreys, Lincoln, Moore, Perry, Putnam, and Rhea	119	23

*Source: Bank Records; 2015 ACS Data.*

### SCOPE OF EVALUATION – TENNESSEE

#### ***Full-Scope Assessment Area***

Of the six AAs in Tennessee, examiners applied full-scope procedures to the Nashville MSA AA since this AA includes the highest percentage of the bank's loans, deposits, and branches in the State of Tennessee. In addition, in accordance with outstanding procedures, examiners also randomly selected the Knoxville MSA AA for review since this area had not been reviewed using full-scope procedures during the previous two evaluations. Examiners applied limited-scope procedures to the other Tennessee AAs.

#### **Lending Test**

#### ***Loan Categories Reviewed***

Examiners considered the following loans granted inside the bank's Tennessee AAs as reported according to either the HMDA or CRA data collection reporting requirements:

#### **Home Mortgage Loans:**

- 2020: 6,881 loans totaling \$1,872,689,000

- 2021: 6,035 loans totaling \$1,739,226,000

Small Business Loans:

- 2020: 2,181 loans totaling \$342,305,000
- 2021: 2,076 loans totaling \$367,766,000

Small Farm Loans:

- 2020: 321 loans totaling \$23,725,000
- 2021: 185 loans totaling \$16,522,000

As suggested by the above figures, home mortgage loans generally received the heaviest weighting followed by small business and small farm loans, respectively.

***Assessment Area Weighting***

The following table shows that the Nashville MSA AA generated the largest percentage of the bank’s Tennessee loans, deposits, and branches. Consequently, examiners weighed records in the Nashville MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners weighed performance in each reviewed area consistent with that area’s lending level as reflected in the following table.

<b>Assessment Area Distribution – State of Tennessee</b>						
<b>Assessment Area</b>	<b>Loans</b>		<b>Deposits</b>		<b>Branches</b>	
	<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Jackson MSA	119,866	2.8	534,371	6.0	5	7.8
Knoxville MSA	206,561	4.7	998,295	11.2	6	9.4
Memphis MSA	211,174	4.8	237,758	2.7	4	6.2
Morristown MSA	36,000	0.8	208,749	2.3	2	3.1
Nashville MSA	3,028,467	69.4	4,868,662	54.8	24	37.5
Tennessee Non-MSA	760,164	17.4	2,038,174	23.0	23	36.0
<b>Total</b>	<b>4,362,232</b>	<b>100.0</b>	<b>8,886,009</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>

*Source: HMDA & CRA Data (2020-2021); FDIC Summary of Deposits (06/30/2021)  
Due to rounding, totals may not equal 100.0 percent*

**Investment and Service Tests**

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Examination section.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN TENNESSEE**

**LENDING TEST**

FirstBank demonstrated a low satisfactory record in the State of Tennessee regarding the Lending Test. Excellent lending levels, combined with adequate performance records regarding borrower profile distribution, geographic distribution loan distribution, and community development loans

primarily support this conclusion. The bank further exhibited extensive use of innovative and flexible lending levels in this rated area. Conclusions regarding the institution's performance in the State of Tennessee were generally consistent with the conclusions for each AA within the rated area, unless otherwise noted.

### **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. Excellent performance regarding home mortgage, small business, and small farm loans support this conclusion. Examiners placed more weight on the bank's home mortgage loans based on the loan volumes. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

#### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. For 2020, the bank originated 6,724 total reportable home mortgage loans totaling approximately \$1.8 billion in its Tennessee AAs. FirstBank captured a 3.2 percent market share of the total number of home mortgage loans and a 3.2 percent market share of the total dollar volume of home mortgage loans in the Tennessee AAs.

This volume of activity ranks the bank 3<sup>rd</sup> out of 1,003 total lenders in the bank's Tennessee AAs. This ranking lands the bank in the top 0.3 percent of lenders reporting such loans in the bank's Tennessee AAs. The ranking considers the total number and dollar amount of loans made by each institution.

#### ***Small Business Loans***

Small business lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. For 2020, the bank originated 2,181 total reportable small business loans totaling approximately \$342.3 million inside its Tennessee AAs. FirstBank captured a 2.5 percent market share of the total number of small business loans and a 6.1 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 12<sup>th</sup> out of 299 total lenders in the bank's Tennessee AAs. This ranking lands the bank in the top 4.0 percent of lenders reporting such loans in the bank's Tennessee AAs. The ranking considers the total number and dollar amount of loans made by each institution.

#### ***Small Farm Loans***

Small farm lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. For 2020, the bank originated 321 total reportable small farm loans totaling approximately \$23.7 million inside its Tennessee AAs. FirstBank captured a 27.3 percent market share of the total number of small farm loans and a 35.9 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 1<sup>st</sup> out of 44 total lenders in the bank's Tennessee AAs. This ranking lands the bank in the top 2.3 percent of lenders reporting such loans in the bank's

Tennessee AAs. The ranking considers the total number and dollar amount of loans made by each institution.

### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the State of Tennessee. Adequate records regarding home mortgage, small business, and small farm loans support this conclusion. The bank's performance was consistent throughout the AAs within the rated area, except where noted below. Examiners placed the most weight on the bank's Nashville MSA AA.

#### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate penetration throughout the State of Tennessee. Adequate performances in all AAs support this conclusion.

#### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate penetration throughout the State of Tennessee. Adequate performances in all AAs support this conclusion.

#### ***Small Farm Loans***

The geographic distribution of small farm loans reflects adequate penetration throughout the State of Tennessee. Adequate performances in the Tennessee Non-MSA AA supports this conclusion. The other AAs did not make enough small farm loans to perform a meaningful analysis.

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage and small farm loans outweighed excellent records regarding small business loans to support this conclusion. The bank's performance was generally consistent throughout the AAs, unless otherwise noted below. Examiners placed the most weight on the bank's Nashville MSA AA.

#### ***Home Mortgage Loans***

The distribution of borrowers reflects adequate penetration among retail customers of different income levels. Adequate performances in all AAs support this conclusion.

#### ***Small Business Loans***

The distribution of borrowers reflects excellent penetration among business customers of different sizes. Excellent performances in all AAs support this conclusion.

#### ***Small Farm Loans***

The distribution of borrowers reflects adequate penetration among business customers of different sizes. Adequate performances in the Tennessee Non-MSA AA supports this conclusion. The other AAs did not make enough small farm loans to perform a meaningful analysis.

**Innovative or Flexible Lending Practices**

The institution makes extensive use of innovative or flexible lending practices in the State of Tennessee. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution’s capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 8,089 innovative or flexible loans totaling approximately \$2.3 billion in the State of Tennessee. This dollar figure equates to 65.1 percent of the bank’s total innovative or flexible loans. Given the bank’s capacity and the needs in the rated area, the level of innovative and flexible loans reflects excellent responsiveness to the credit needs of the State of Tennessee.

<b>Innovative or Flexible Loans State of Tennessee</b>										
<b>Assessment Area</b>	<b>FHLMC/ FNMA/State Housing</b>		<b>USDA/FHA/VA</b>		<b>Portfolio Loan Program</b>		<b>First Time Homebuyers</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Jackson MSA	166	35,065	36	7,436	1	151	16	2,839	<b>219</b>	<b>45,491</b>
Knoxville MSA	291	77,799	24	7,304	2	328	51	15,273	<b>368</b>	<b>100,704</b>
Memphis MSA	252	73,665	54	15,036	238	42,599	74	13,383	<b>618</b>	<b>144,683</b>
Morristown MSA	53	11,822	17	3,352	0	0	3	882	<b>73</b>	<b>16,056</b>
Nashville MSA	3,981	1,253,167	370	126,221	56	14,099	855	258,355	<b>5,262</b>	<b>1,651,842</b>
Tennessee Non-MSA	1,073	216,800	322	60,425	4	894	150	24,816	<b>1,549</b>	<b>302,935</b>
<b>Total</b>	<b>5,816</b>	<b>1,668,318</b>	<b>823</b>	<b>219,774</b>	<b>301</b>	<b>58,071</b>	<b>1,149</b>	<b>315,548</b>	<b>8,089</b>	<b>2,261,711</b>

*Source: Bank records.*

**Community Development Loans**

The institution made an adequate level of community development loans in the State of Tennessee. Its extent, or dollar volume, of CD loans and the CD loans’ responsiveness support this conclusion. The bank’s performance is relatively consistent throughout the AAs. Examiners placed the most weight on the bank’s Nashville MSA AA.

The following table shows that, since the previous evaluation, the bank granted 113 CD loans totaling approximately \$504.2 million in this state. The dollar amount equates to 81.9 percent of the bank’s overall level of CD loans as compared to the 74.8 percent of overall HMDA and CRA loans in this state.

<b>Community Development Loans State of Tennessee</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Jackson MSA	1	1,962	0	0	2	2,656	1	8,925	<b>4</b>	<b>13,543</b>



Knoxville MSA	0	0	2	1,831	2	3,062	3	7,747	7	12,640
Memphis MSA	1	12,185	0	0	3	7,168	4	58,791	8	78,144
Morristown MSA	0	0	1	25	0	0	0	0	1	25
Nashville MSA	7	48,059	1	2,671	16	34,020	44	257,098	68	341,848
Tennessee Non-MSA	0	0	1	1,100	6	9,286	2	2,456	9	12,842
Statewide	1	4,335	0	0	6	8,883	9	31,913	16	45,131
<b>Total</b>	<b>10</b>	<b>66,541</b>	<b>5</b>	<b>5,627</b>	<b>35</b>	<b>65,075</b>	<b>63</b>	<b>366,930</b>	<b>113</b>	<b>504,173</b>
<i>Source: Bank records.</i>										

Besides their extent, the CD loans reflect good responsiveness to the state’s CD needs. As seen in the table above, 72.8 percent of the dollar volume of the state’s CD loans help revitalize or stabilize low- and moderate-income geographies, while 1.1 percent benefit community services for low- and moderate-income individuals.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank’s AAs. Therefore, relative to the bank’s capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

The following point discusses the bank’s CD lending activities in the broader statewide area of Tennessee:

- ***Revitalize or Stabilize*** – The bank originated a loan totaling approximately \$6.2 million to purchase a business in a moderate-income area. This loan revitalized a qualifying geography and provided stabilizing effects by retaining a business in the area.
- ***Economic Development*** – The bank originated a loan totaling approximately \$2.5 million that helped promote economic development by retaining jobs in a moderate-income area.

## **INVESTMENT TEST**

FirstBank demonstrated a high satisfactory record in the State of Tennessee regarding the Investment Test. The AAs in this state generally reflect consistent performance in the Investment Test for the state. The significant level of QIs outweighed the adequate responsiveness to CD needs and no use of complex and innovative QIs to support this conclusion.

### **Investment and Grant Activity**

The bank has a significant level of QIs in the State of Tennessee.

The table below shows that FirstBank made 93 QIs totaling approximately \$84.5 million in the State of Tennessee. By dollar volume, this equates to 72.4 percent of the bank’s total QIs as compared to 74.8 percent of total deposits in this rated area. The dollar amount includes QIs in the

statewide area within the State of Tennessee when the dollar amount of QIs is readily available within the State of Tennessee.

<b>Qualified Investments State of Tennessee</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Jackson MSA	1	500	1	1,160	2	1,285	0	0	4	2,945
Knoxville MSA	1	500	4	1,201	1	1,250	0	0	6	2,951
Memphis MSA	6	11,184	0	0	0	0	2	2,000	8	13,184
Morristown MSA	1	500	1	3,000	0	0	0	0	2	3,500
Nashville MSA	33	37,181	8	1,204	2	1,000	2	254	45	39,639
Tennessee Non-MSA	0	0	6	8	0	0	6	4,800	12	4,808
Statewide Activities	9	8,828	0	0	6	8,388	1	250	16	17,466
<b>Total</b>	<b>51</b>	<b>58,693</b>	<b>20</b>	<b>6,573</b>	<b>11</b>	<b>11,923</b>	<b>11</b>	<b>7,304</b>	<b>93</b>	<b>84,493</b>
<i>Source: Bank records</i>										

Since FirstBank’s investments addressed community credit needs inside the bank’s AAs within the State of Tennessee, statewide Tennessee activities includes investments in different areas outside of the bank’s AAs within the State of Tennessee.

**Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities shows adequate responsiveness through use of QIs that directly address identified needs in the State of Tennessee. Although the majority of the CD loans in the State of Tennessee were for affordable housing (69.5 percent by dollar volume), the bank also had CD loans in all other categories. Community services to low- and moderate-income individuals and activities that help revitalize or stabilize low- and moderate-income geographies are the primary needs in the area.

FirstBank’s major QIs addressed the following needs throughout various AAs in the State of Tennessee:

- Affordable housing needs with approximately \$25.5 million in the purchase of mortgage-backed securities with underlying loans to low- and moderate-income individuals.
- Affordable housing needs with approximately \$2.5 million in three Community Development Financial Institutions (CDFI) for permanent financing to developers of Low-Income Housing Tax Credit properties that construct or rehabilitate affordable or mixed-income multifamily housing.
- Economic Development needs with approximately \$3.8 million in four CDFIs for financing to small businesses for permanent job creation and business expansion.

**Community Development Initiatives**

FirstBank does not use innovative or complex investments to support CD initiatives in the State of Tennessee.

## SERVICE TEST

FirstBank demonstrated a high satisfactory record for the State of Tennessee regarding the Service Test. The relatively high level regarding the bank’s CD services lifted the limited accessibility of its delivery systems, its changes in branch locations, and its reasonableness of business hours and services to support this conclusion. The Jackson MSA, Memphis MSA, Morristown MSA, and Tennessee Non-MSA assessment areas reflect performances, regarding the Service Test, below that of the state level. The appendices list the criteria considered under this test.

### Accessibility of Delivery Systems

Delivery systems reasonably accessible to portions of the bank’s AAs in the State of Tennessee. Reasonable accessible branch distribution and alternative delivery systems’ accessibility to limited portions of bank’s AAs support this conclusion. The State of Tennessee reflects consistent conclusions to the institution’s Accessibility of Delivery System performance.

### ***Branch Distribution***

The bank makes its full-service offices reasonably accessible to portions of the institution’s AAs in the State of Tennessee.

The bank’s level of branch distribution in low-income tracts falls 10.1 percentage points below the population in low-income census tracts, reflecting a poor level. The bank’s level rises 3.1 percentage points above the population percentage in the moderate-income census tracts, reflecting an adequate level. Given the consideration of the greater population within moderate-income geographies, the adequate performance for moderate-income geographies outweighed the poor performance in the low-income geographies.

<b>Branch and ATM Distribution by Geography Income Level State of Tennessee</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	108	13.6	347,933	10.1	0	0.0	2	4.9	0	0.0	0	0.0
Moderate	160	20.2	699,957	20.3	11	17.2	2	4.9	0	0.0	1	16.7
Middle	278	35.1	1,256,975	36.4	29	45.3	20	48.8	0	0.0	1	16.7
Upper	231	29.2	1,133,289	32.8	19	29.7	14	34.1	0	0.0	4	66.7
NA	15	1.9	17,532	0.5	5	7.8	3	7.3	0	0.0	0	0.0
<b>Totals</b>	<b>792</b>	<b>100.0</b>	<b>3,455,686</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.*

### ***Alternative Delivery Systems***

The bank makes its alternative delivery systems accessible to limited portions of the bank’s AAs in the State of Tennessee.

The preceding table shows that the bank’s ATMs in low-income tracts falls 5.2 percentage points below the population in low-income census tracts, thereby reflecting an adequate level. The bank’s ATMs in moderate-income tracts falls 15.4 percentage points below the population in moderate-income tracts, reflecting a poor performance. Examiners placed more weight on moderate-income tracts given the significantly higher population in those geographies.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

### **Changes in Branch Locations**

The institution’s record of opening and closing of branches in State of Tennessee has generally not adversely affected low- and moderate- income geographies or individuals of geographies. No branch changes occurred in low-income tracts in the State of Tennessee. Six branches closed, one in a moderate-income tract, one in a middle-income tract, and four in upper-income tracts.

### **Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the State of Tennessee, particularly low- or moderate-income geographies or individuals. The State of Tennessee reflects product offerings, services, and branch hours that are generally consistent with discussion at the institution level.

The bank’s branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly according to individual AA’s needs.

### **Community Development Services**

The institution provides a relatively high level of CD services for the State of Tennessee. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The following table shows that the bank provided 133 CD services since the previous evaluation. This number equates to 69.6 percent of total CD services, thereby reflecting a good level.

<b>Community Development Services State of Tennessee</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Jackson MSA	0	1	1	0	2

<b>Community Development Services State of Tennessee</b>					
Knoxville MSA	21	23	0	3	<b>47</b>
Memphis MSA	0	0	0	0	<b>0</b>
Morristown MSA	0	0	0	0	<b>0</b>
Nashville MSA	11	61	0	1	<b>73</b>
Tennessee Non-MSA	1	9	1	0	<b>11</b>
<b>Total</b>	<b>33</b>	<b>94</b>	<b>2</b>	<b>4</b>	<b>133</b>
<i>Source: Bank Data</i>					

Leadership is evident through Board or committee participation in a number of those activities. FirstBank had no regional or statewide CD services in this rated area, so please reference the full-scope AA sections for examples of the bank’s CD services in the State of Tennessee.

## **NASHVILLE MSA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN NASHVILLE MSA**

The Nashville MSA AA includes all 281 census tracts that make up Canon, Davidson, Dickson, Rutherford, Williamson, and Wilson Counties, six of 13 total counties that make up the Nashville-Davidson-Murfreesboro-Franklin, Tennessee MSA, located in middle Tennessee.

#### **Economic and Demographic Data**

The AA’s census tracts reflect the following income designations based on 2015 ACS data: 31 low-, 69 moderate-, 92 middle-, 85 upper-income tracts, and four tracts with no income designation. FEMA declared this AA as a major disaster area due to flooding, severe storms, tornadoes, and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Nashville MSA</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)	281	11.0	24.6	32.7	30.2	1.4
Population by Geography	1,327,224	7.9	23.6	35.7	32.5	0.3
Housing Units by Geography	545,551	8.3	24.5	35.8	31.4	0.0
Owner-Occupied Units by Geography	318,124	3.8	17.5	38.8	39.8	0.0
Occupied Rental Units by Geography	184,698	14.7	35.3	31.1	18.8	0.0
Vacant Units by Geography	42,729	13.5	29.7	32.9	23.8	0.0
Businesses by Geography	162,723	8.1	18.9	27.5	44.7	0.9
Farms by Geography	3,388	4.4	17.0	37.0	41.3	0.4

Family Distribution by Income Level	322,056	20.5	16.8	19.6	43.1	0.0
Household Distribution by Income Level	502,822	22.6	16.4	17.8	43.2	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreestboro-- Franklin, TN MSA		\$66,441	Median Housing Value			\$211,181
			Median Gross Rent			\$906
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Nashville’s economy is soaring above its in-state peers. Non-farm employment has fully recovered from the COVID-19 pandemic. Professional services are leading growth with new jobs, higher than the national average. However, the manufacturing sector is not showing job growth. House prices are rising at a chart-topping pace and are among the top fastest growing nationally. Strong price gains are attracting investors. Meanwhile, price affordability is rapidly falling, and dropping below the U.S. level by a large margin. Strong net migration should keep a floor under demand, but given highly inflated housing valuations, elevated speculation, and quickly growing debt burdens, the risk of a correction is high.<sup>10</sup>

Currently, major employers in the Nashville MSA consist of Vanderbilt University Medical Center, Nissan North America Inc., and HCA Inc.<sup>11</sup> The Nashville MSA’s unemployment rate of 7.0 percent for 2020 is lower than the 7.4 percent rate for the State of Tennessee but below the U.S. rate of 8.1 percent.

**Competition**

The area contains a high level of competition from other chartered banks based on its population, with each of the 444 offices from its 56 institutions serving about 2,989 people on average. FirstBank ranks 6<sup>th</sup> in market share by capturing 6.2 percent of the area’s deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

**Credit and Community Development Needs and Opportunities**

Consistent with other metropolitan areas, the Nashville MSA AA created varied loan demand for small business and residential real estate and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

<sup>10</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

<sup>11</sup>Source: Moody’s Analytics, Precis U.S. Metro, April 2022

Demographic data showing that 37.3 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. In addition, 35.6 percent of the area's census tracts received low- or moderate-income designations, the national COVID-19 major disaster area, and the AA's designation as federal disaster areas for other reasons, suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN NASHVILLE MSA**

### **LENDING TEST**

FirstBank demonstrated a high satisfactory record in the Nashville MSA AA regarding the Lending Test. Excellent performance regarding lending activity and a relatively high level of CD lending lifted adequate performance records regarding the borrower profile loan distribution and geographic loan distribution to support this conclusion. The bank further exhibited extensive use of innovative and flexible lending levels in this rated area.

#### **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. Excellent performance regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Nashville MSA AA.

#### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. For 2020, the bank originated 4,477 total reportable home mortgage loans totaling approximately \$1.4 billion. FirstBank captured a 3.9 percent market share of the total number and a 4.0 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 3<sup>rd</sup> out of 835 total lenders in the Nashville MSA AA. This ranking lands the bank in the top 0.4 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

#### ***Small Business Loans***

Small business lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. For 2020, the bank originated 483 total reportable small business loans totaling approximately \$115.9 million. FirstBank captured a 1.1 percent market share of the total number of loans and a 4.0 percent market share of the total dollar volume of loans.

The bank’s activity by number of loans ranks it 19<sup>th</sup> out of 250 total lenders in the Nashville MSA AA. This ranking lands the bank in the top 7.6 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for small business loans.

**Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Nashville MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Nashville MSA AA.

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate performance in Nashville MSA AA. Adequate performances in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is slightly lower than the aggregate data by 0.4 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank’s lending level falls 2.1 percentage points below the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Home Mortgage Loans Nashville MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	3.8	4.9	208	4.5	74,570	5.0
Moderate	17.5	13.1	507	11.0	130,800	8.8
Middle	38.8	36.9	1,579	34.1	406,007	27.4
Upper	39.8	45.1	2,333	50.4	869,163	58.7
Not Available	0.0	0.0	2	0.0	490	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>4,629</b>	<b>100.0</b>	<b>1,481,030</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

***Small Business Loans***

The geographic distribution of small business loans reflects adequate performance in the Nashville MSA AA. Adequate performances in both low- and moderate-income geographies support this conclusion.



As seen in the table below, the bank’s lending in low-income tracts is slightly higher than the aggregate data by 0.4 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank’s lending level rises 1.8 percentage points above the aggregate data, reflecting an adequate level.

<b>Geographic Distribution of Small Business Loans Nashville MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	8.0	8.7	44	9.1	13,684	11.8
Moderate	19.0	18.1	96	19.9	22,619	19.5
Middle	27.1	26.0	147	30.4	30,081	26.0
Upper	45.0	46.4	193	40.0	48,845	42.2
Not Available	1.0	0.9	3	0.6	650	0.6
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>483</b>	<b>100.0</b>	<b>115,879</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed and excellent records regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Nashville MSA AA.

### ***Home Mortgage Loans***

The distribution of home mortgage loans based on the borrowers’ profiles reflects adequate performance in the Nashville MSA AA. Adequate performance to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank’s lending to low-income borrowers is slightly lower than the aggregate data by 0.8 percent, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank’s lending level falls 0.4 percentage points below the aggregate data, reflecting an adequate level.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Nashville MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	20.5	4.1	155	3.3	23,841	1.6
Moderate	16.8	15.0	712	15.4	142,709	9.6
Middle	19.6	19.2	926	20.0	244,373	16.5
Upper	43.1	44.8	2,603	56.2	945,991	63.9

Not Available	0.0	16.8	233	5.0	124,115	8.4
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>4,629</b>	<b>100.0</b>	<b>1,481,029</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.</i>						

### ***Small Business Loans***

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Nashville MSA AA. Excellent performance to businesses with gross annual revenues of \$1 million or less supports this conclusion.

As shown in the table above, the bank's level of lending to small businesses with gross annual revenues of \$1 million or less is 30.4 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Nashville MSA AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Nashville MSA AA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	86.5	41.7	348	72.1	76,457	66.0
>\$1,000,000	4.4	-	131	27.1	38,101	32.9
Revenue Not Available	9.1	-	4	0.8	1,320	1.1
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>483</b>	<b>100.0</b>	<b>115,878</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent</i>						

### **Innovative or Flexible Lending Practices**

The institution makes extensive use of innovative or flexible lending practices in the Nashville MSA AA in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion. Please refer to the discussion under the State of Tennessee for additional details regarding the innovative or flexible lending practices in the Nashville MSA AA.

### **Community Development Loans**

The institution made a relatively high level of CD loans in the Nashville MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated 68 CD loans totaling approximately \$504.2 million in the Nashville MSA AA. By dollar volume, this equates to 67.8 percent of the bank's CD loans in the State of Tennessee as compared to the 69.4 percent of the bank's home mortgage and small business loans in this AA. The following points discuss examples of the bank's CD loans in the Nashville MSA AA:

- ***Revitalize or Stabilize*** – The bank originated a \$32.5 million loan to purchase a student housing complex in a moderate-income area. The loan revitalized the area and provided a stabilizing effect by attracting businesses and residents to the area.
- ***Revitalize or Stabilize*** – The bank granted a \$2.2 million loan to purchase a retail store located in a moderate-income census tract. The loan revitalized the area and provided a stabilizing effect by attracting businesses and residents to the area.

In addition, the CD loan reflects excellent responsiveness to the CD needs of the AA. The institution’s CD lending activities in the Nashville MSA AA are dispersed among the various categories and are responsive to the two CD needs in the Nashville MSA AA.

## **INVESTMENT TEST**

FirstBank demonstrated a low satisfactory record in the Nashville MSA AA regarding the Investment Test. The adequate level of QIs and responsiveness to CD needs outweighed no use of complex and innovative QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

### **Investment and Grant Activity**

The bank has an adequate level of QIs in the Nashville MSA AA. The table for the State of Tennessee shows that FirstBank made 45 QIs totaling approximately \$39.6 million in the Nashville MSA AA. By dollar volume, this equates to 46.9 percent of the total QIs in the State of Tennessee as compared to 54.8 percent of total deposits in this area.

The following is an example of a key investment in the Nashville MSA AA:

- ***Affordable Housing*** - The bank allocated approximately \$33.0 million in mortgage-backed securities in the Nashville MSA AA with the underlying loans to finance affordable housing for low- and moderate-income individuals.

### **Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities show adequate responsiveness through use of investments that directly address identified needs in the Nashville MSA AA. The QIs table for the State of Tennessee shows responsiveness in the Nashville MSA AA to CD needs by the dollar amount for all CD purpose categories.

FirstBank’s major investments addressed affordable housing needs with approximately \$37.1 million in the purchase of mortgage-backed securities and municipal bonds with underlying loans to low- and moderate-income individuals.

Additional CD investment opportunities for larger dollar amounts and donations were made for economic development to small businesses, community services for low- and moderate-income individuals, and revitalization and stabilization efforts within the Nashville MSA AA.

**Community Development Initiatives**

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Nashville MSA AA.

**SERVICE TEST**

FirstBank demonstrated a high satisfactory record in the Nashville MSA AA regarding the Service Test. The relatively high level regarding the bank’s CD services outweighed the reasonableness of accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

**Accessibility of Delivery Systems**

Delivery systems are accessible to limited portions of the Nashville MSA AA. Accessibility to limited portions of the AA outweighed unreasonable access to alternative delivery systems to support this conclusion.

***Branch Distribution***

The bank makes its full-service offices accessible to limited portions of the Nashville MSA AA.

The bank’s level of branch distribution in low-income tracts falls 7.9 percentage points below the population in low-income census tracts, reflecting a poor level. The bank’s level falls 11.1 percentage points below the population percentage in the moderate-income census tracts, reflecting a poor level.

<b>Branch and ATM Distribution by Geography Income Level Nashville MSA AA</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	31	11.0	104,688	7.9	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	69	24.6	313,200	23.6	3	12.5	0	0.0	0	0.0	1	16.7
Middle	92	32.7	473,161	35.7	6	25.0	0	0.0	0	0.0	1	16.7
Upper	85	30.2	431,978	32.5	10	41.7	0	0.0	0	0.0	4	66.7
NA	4	1.4	4,197	0.3	5	20.8	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>281</b>	<b>100.0</b>	<b>1,327,224</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>

*Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.*

***Alternative Delivery Systems***

The bank makes its alternative delivery systems unreasonably accessible to significant portions of the Nashville MSA AA.

The preceding table shows that the bank does not have ATMs in low- and moderate-income tracts, thereby reflecting a very poor level. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

### **Changes in Branch Locations**

The institution's record of opening and closing of branches in the Nashville MSA AA has generally not adversely affected low- and in moderate- income geographies or individuals of geographies. One branch closed in a moderate-income tract in the Nashville MSA AA. No branches opened in this AA.

### **Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Nashville MSA AA, particularly low- or moderate-income geographies or individuals. The Nashville MSA AA reflects product offerings, services, and branch hours consistent with discussion for the State of Tennessee.

The bank's branches generally have the same product offerings and services, and branch locations have the same hours.

### **Community Development Services**

The institution provides a relatively high level of CD services in the Nashville MSA AA. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Tennessee section shows that the bank provided 73 CD services since the previous evaluation in the Nashville MSA AA. This number equates to 54.9 percent of CD services for the State of Tennessee.

Leadership is evident through Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the Nashville MSA AA:

- ***Affordable Housing*** – A bank employee provided financial education on the process of purchasing a home to low- and moderate-income homebuyers.
- ***Community Services*** – A bank employee teaches personal finance classes at a non-profit organization that assists men as they transition from prison to the community.

## KNOXVILLE MSA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN KNOXVILLE MSA

The Knoxville MSA AA includes all 116 census tracts that make up Knox and Union Counties, two of the eight counties that make up the Knoxville, Tennessee MSA, located in east Tennessee.

#### Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2015 ACS data: 9 low-, 23 moderate-, 43 middle-, 39 upper-income tracts, and 2 tracts with no income designation. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Knoxville MSA</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)	116	7.8	19.8	37.1	33.6	1.7
Population by Geography	463,444	6.2	19.4	38.1	35.0	1.2
Housing Units by Geography	207,180	6.8	21.7	38.7	32.7	0.1
Owner-Occupied Units by Geography	121,304	3.1	15.5	41.4	40.1	0.0
Occupied Rental Units by Geography	66,727	13.3	30.7	34.2	21.6	0.1
Vacant Units by Geography	19,149	8.1	29.2	37.4	24.9	0.3
Businesses by Geography	43,217	4.6	15.4	31.6	47.9	0.5
Farms by Geography	1,004	2.8	15.8	37.0	43.9	0.5
Family Distribution by Income Level	115,735	20.6	15.7	19.0	44.7	0.0
Household Distribution by Income Level	188,031	23.3	15.8	16.1	44.7	0.0
Median Family Income MSA - 28940 Knoxville, TN MSA		\$59,829	Median Housing Value			\$165,132
			Median Gross Rent			\$787
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data                      Due to rounding, totals may not equal 100.0 percent                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

#### Competition

The area contains a high level of competition from other chartered banks based on its population, with each of the 143 offices from its 30 institutions serving about 3,240 people on average. FirstBank ranks 6<sup>th</sup> in market share by capturing 5.7 percent of the area’s deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks

include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

### **Credit and Community Development Needs and Opportunities**

Consistent with other metropolitan areas, the Knoxville MSA AA created varied loan demand for residential real estate and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 36.3 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. In addition, 27.6 percent of the area's census tracts received low- and moderate-income designations and the national COVID-19 major disaster area suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN KNOXVILLE MSA**

### **LENDING TEST**

FirstBank demonstrated a low satisfactory record in the Knoxville MSA AA regarding the Lending Test. Adequate performance records regarding borrower profile loan distribution, geographic loan distribution, and CD lending and the limited use of innovative and flexible lending practices outweighed excellent performance regarding lending activity to support this conclusion.

### **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs in the Knoxville MSA AA. Excellent performance regarding both home mortgage and small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Knoxville MSA AA.

### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Knoxville MSA AA. For 2020, the bank originated 273 total reportable home mortgage loans totaling approximately \$70.3 million. FirstBank captured a 1.0 percent market share of the total number and a 1.0 percent market share of the total dollar volume of home mortgage loans.

The bank’s activity by number of loans ranks it 26<sup>th</sup> out of 534 total lenders in the Knoxville MSA AA. This ranking lands the bank in the top 4.9 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

***Small Business Loans***

Small business lending levels reflect excellent responsiveness to AA credit needs in the Knoxville MSA AA. For 2020, the bank originated 151 total reportable small business loans totaling approximately \$38.9 million. FirstBank captured a 1.3 percent market share of the total number of loans and a 4.5 percent market share of the total dollar volume of loans.

The bank’s activity by number of loans ranks it 15<sup>th</sup> out of 142 total lenders in the Knoxville MSA AA. This ranking lands the bank in the top 10.6 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for small business loans.

**Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Knoxville MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Knoxville MSA AA.

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects adequate performance in the Knoxville MSA AA. Adequate performance in both low- and moderate-income geographies supports this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is slightly higher than the aggregate data by 0.4 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank’s lending level rises 0.5 percentage points higher than the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Home Mortgage Loans Knoxville MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	3.1	1.9	7	2.6	629	0.9
Moderate	15.5	10.9	31	11.4	4,211	6.0
Middle	41.4	36.3	68	24.9	11,483	16.4
Upper	40.1	50.8	166	60.8	53,500	76.4
Not Available	0.0	0.0	1	0.4	191	0.3



<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>273</b>	<b>100.0</b>	<b>70,014</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.</i>						

### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate performance in the Knoxville MSA AA. Adequate performance in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank’s lending in low-income tracts is higher than the aggregate data by 2.8 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank’s lending level falls 3.6 percentage points lower than the aggregate data, also reflecting an adequate level.

<b>Geographic Distribution of Small Business Loans Knoxville MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	4.5	3.2	9	6.0	1,201	3.1
Moderate	15.6	12.9	14	9.3	2,604	6.7
Middle	31.8	31.3	45	29.8	12,561	32.3
Upper	47.6	52.5	83	55.0	22,525	57.9
Not Available	0.5	0.1	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>151</b>	<b>100.0</b>	<b>38,891</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.</i>						

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed small business loans to support this conclusion. Examiners weighed small business loans heavier than home mortgage loans in the Knoxville MSA AA.

### ***Home Mortgage Loans***

The distribution of home mortgage loans based on the borrowers’ profiles reflects adequate performance in the Knoxville MSA AA. Adequate performance to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank’s lending to low-income borrowers is higher than the aggregate data by 1.4 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank’s lending level falls 2.1 percentage points below the aggregate data, also reflecting an adequate level.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Knoxville MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	20.6	4.8	17	6.2	1,419	2.0
Moderate	15.7	14.9	35	12.8	4,933	7.0
Middle	19.0	18.7	32	11.7	7,230	10.3
Upper	44.7	44.6	165	60.4	49,062	70.1
Not Available	0.0	17.1	24	8.8	7,370	10.5
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>273</b>	<b>100.0</b>	<b>70,014</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2020 CRA Data, 2020HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

### ***Small Business Loans***

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Knoxville MSA AA. Excellent performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

As shown in the table above, the bank's level of lending to small businesses with gross annual revenues of \$1 million or less is 17.8 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Knoxville MSA AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Knoxville MSA AA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	83.0	39.2	86	57.0	20,115	51.7
>\$1,000,000	5.5	-	60	39.7	17,668	45.4
Revenue Not Available	11.4	-	5	3.3	1,107	2.8
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>151</b>	<b>100.0</b>	<b>38,890</b>	<b>100.0</b>

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent*

### **Innovative or Flexible Lending Practices**

The institution makes limited use of innovative or flexible lending practices in the Knoxville MSA AA in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion. Please refer to the discussion under the State of Tennessee for additional details regarding the innovative or flexible lending practices in the Knoxville MSA AA.

### **Community Development Loans**

The institution made an adequate level of CD loans in the Knoxville MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated seven CD loans totaling approximately \$12.6 million in the Knoxville MSA AA. By dollar volume, this equates to 2.5 percent of the bank's CD loans in the State of Tennessee as compared to the 4.7 percent of the bank's home mortgage and small business loans in this AA. The following points discuss the bank's CD loans in the Knoxville MSA AA:

- ***Affordable Housing*** – The bank granted a \$1.7 million loan for the construction of a senior living center for low- and moderate-income seniors.
- ***Revitalize or Stabilize*** – The bank granted a \$5.0 million loan to help expand a business and provide low- and moderate-income employment. The loan helps to support primarily low- and moderate-income jobs.

In addition, the CD loans reflect good responsiveness to the CD needs of the AA. Approximately 61.3 percent of the dollar volume of the AA's CD loans help to revitalize and stabilize low- and moderate-income geographies, while 24.2 percent promote economic development, and 14.5 percent help provide community services for low- and moderate-income individuals. As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AA.

## **INVESTMENT TEST**

FirstBank demonstrated a low satisfactory record in the Knoxville MSA AA regarding the Investment Test. The adequate level of QIs and responsiveness to CD needs outweigh no use of complex and innovative QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

### **Investment and Grant Activity**

The bank has an adequate level of QIs in the Knoxville MSA AA. The table for the State of Tennessee shows that FirstBank made six QIs totaling approximately \$2.9 million in the Knoxville MSA AA. By dollar volume, this equates to 3.5 percent of the total QIs in the State of Tennessee as compared to 11.2 percent of total deposits in this rated area.

The following is an example of a key investment in the Knoxville MSA AA:

- ***Affordable Housing*** – The bank allocated approximately \$1.3 million in a mortgage-backed security in the Knoxville MSA AA with the underlying loans to finance multi-family housing for low- and moderate-income individuals.

### **Responsiveness to Credit and Community Development Needs**

FirstBank’s CD activities show adequate responsiveness through use of investments that directly address identified needs in the Knoxville MSA AA. The QIs table for the State of Tennessee shows responsiveness in the Knoxville MSA AA to CD needs by the dollar amount for three of the four CD purpose categories.

**Community Development Initiatives**

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Knoxville MSA AA.

**SERVICE TEST**

FirstBank demonstrated a low satisfactory record in the Knoxville MSA AA regarding the Service Test. The adequate level regarding the bank’s CD services and reasonable accessibility of its delivery systems support this conclusion. The appendices list the criteria considered under this test.

**Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to portions of the Knoxville MSA AA. Reasonable branch distribution outweighed limited accessibility to alternative delivery systems to support this conclusion. The Knoxville MSA AA area reflects a consistent conclusion to the State of Tennessee’s Accessibility of Delivery System performance.

***Branch Distribution***

The bank makes its full-service offices reasonably accessible to portions of the Knoxville MSA AA.

The bank maintains no branches in low-income tracts. The bank’s level falls 6.2 percentage points below the population percentage, reflecting an adequate level. In moderate-income tracts, the bank’s level rises 13.9 percentage points above the population percentage, reflecting an excellent level. Given the consideration of the greater population within moderate-income geographies, the adequate performance for moderate-income geographies outweighed the poor performance in the low-income geographies.

<b>Branch and ATM Distribution by Geography Income Level Knoxville MSA AA</b>												
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>		<b>Open Branches</b>		<b>Closed Branches</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	9	7.8	28,915	6.2	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	23	19.8	90,077	19.4	2	33.3	0	0.0	0	0.0	0	0.0
Middle	43	37.1	176,528	38.1	1	16.7	0	0.0	0	0.0	0	0.0
Upper	39	33.6	162,249	35.0	3	50.0	2	100.0	0	0.0	0	0.0
NA	2	1.7	5,675	1.2	0	0.0	0	0.0	0	0.0	0	0.0

<b>Totals</b>	<b>116</b>	<b>100.0</b>	<b>463,444</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>
<i>Source: 2015 ACS Data &amp; Bank Data. Due to rounding, totals may not equal 100.0 percent</i>												

***Alternative Delivery Systems***

The bank makes its alternative delivery systems accessible to limited portions of the Knoxville MSA AA.

The preceding table shows that the bank maintains no ATMs in low-income tracts. The bank’s ATMs in low-income tracts falls 6.2 percentage points below the population in low-income tracts, reflecting adequate performance. The preceding table also shows that the bank maintains no ATMs in moderate-income tracts. The bank’s ATMs in moderate-income tracts falls 33.3 percentage points below the population in moderate-income tracts, reflecting poor performance. Examiners also observed the alternative delivery systems such as online and mobile banking provide some services to those in low- and moderate-income tracts or low- and moderate-income population. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

**Changes in Branch Locations**

The institution’s record of opening and closing of branches in the Knoxville MSA AA has generally not adversely affected low- and in moderate- income geographies or individuals of geographies. No branch changes occurred in low- and moderate-income tracts the Knoxville MSA AA.

**Reasonableness of Business Hours and Services**

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Knoxville MSA AA, particularly low- or moderate-income geographies or individuals. The Knoxville MSA AA reflects product offerings, services, and branch hours generally consistent with discussion for the State of Tennessee.

The bank’s branches have the same product offerings and services, and branch locations have similar hours that vary slightly according to area needs.

**Community Development Services**

The institution provides an adequate level of CD services in the Knoxville MSA AA. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Tennessee section shows that the bank provided 47 CD services since the previous evaluation in the Knoxville MSA AA. This number equates to 35.3 percent CD services, in the State of Tennessee, reflecting an adequate level.

Leadership is evident through Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs for community services to

low- and moderate-income individuals.

The following are examples of CD services specific to the Knoxville MSA AA:

- **Community Services** –Bank employees taught financial literacy classes to kids at an organization that provides community services to low- and moderate-income youth. Thus, the activity provides community services primarily to low- and moderate-income individuals.
- **Community Service** – A bank employee serves on the Board of Directors of a local organization that provides affordable and quality health care to low-income individuals.

### **OTHER ASSESSMENT AREAS – Limited-Scope Review**

### **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS**

The following table summarizes the conclusions for this rated area’s AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Jackson MSA	Consistent	Below	Below
Memphis MSA	Consistent	Consistent	Below
Morristown MSA	Consistent	Below	Below
Tennessee Non-MSA	Consistent	Consistent	Below

Facts and data supporting conclusions for each limited-scope AA follow, including a summary of FirstBank’s operations and activities. The demographic data for the limited-scope AAs is in Appendix C.

#### **Jackson MSA AA**

The bank’s Jackson MSA AA consists of all of Chester, Crockett, and Madison Counties. FirstBank operates five branches in this AA, four in middle-income tracts and one in an upper-income tract. The bank originated and engaged in the following activities in the AA during the review period.

<b>Activity</b>	<b>#</b>	<b>\$(000s)</b>
Home Mortgage Loans	189	34,303
Small Business Loans	174	22,608
Small Farm Loans	0	0
Community Development Loans	4	13,543
Investments	4	2,945
CD Services	2	-

### Memphis MSA AA

The bank's Memphis MSA AA consists of all of Fayette and Shelby Counties. FirstBank operates four branches in this AA: one in a middle-income tract and three in upper-income tracts. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	308	66,390
Small Business Loans	93	27,613
Small Farm Loans	0	0
Community Development Loans	8	78,144
Investments	8	13,184
CD Services	0	-

### Morristown MSA AA

The bank's Morristown MSA AA consists of all of Jefferson County. FirstBank operates two branches in this AA in middle-income tracts. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	57	9,733
Small Business Loans	37	5,010
Small Farm Loans	0	0
Community Development Loans	1	25
Investments	2	3,500
CD Services	0	-

### Tennessee Non-MSA AA

The bank's Tennessee Non-MSA AA consists of all of Cannon, Davidson, Dickson, Rutherford, Williamson, and Wilson Counties. FirstBank operates 23 branches in this AA: 6 in moderate-income tracts, 15 in middle-income tracts, and 2 in an upper-income tracts. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	1,425	211,219
Small Business Loans	1,243	132,306
Small Farm Loans	304	21,936
Community Development Loans	9	12,842
Investments	12	4,808
CD Services	11	-

## Geographic Distribution

### *Home Mortgage Loans*

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020
Assessment Area	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate

Jackson MSA	189	34,303	2.0	4,819	2.9	0.0	0.6	14.1	8.5	10.9	47.4	41.3	38.6	35.3	50.3	49.8	0.2	0.0	0.1
Memphis MSA	308	66,390	3.3	40,720	13.1	4.9	3.6	17.6	16.2	8.2	19.2	14.6	15.9	50.0	64.3	72.3	0.2	0.0	0.0
Morristown MSA	57	9,733	0.6	2,302	0.0	0.0	0.0	0.0	0.0	0.0	66.3	73.7	67.6	33.7	26.3	32.4	0.0	0.0	0.0
TN Non-MSA	1,425	211,219	15.1	20,972	0.0	0.0	0.0	8.3	7.6	6.7	71.3	68.4	70.6	20.4	24.0	22.7	0.0	0.0	0.0

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

### Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Jackson MSA	174	22,608	7.0	2,691	2.6	1.7	1.6	22.0	21.3	21.9	40.6	37.9	36.0	28.6	33.9	32.9	6.1	5.2	7.7	
Memphis MSA	93	27,613	3.7	19,976	13.8	3.2	12.1	16.1	14.0	15.5	17.8	15.1	16.9	51.0	64.5	54.4	1.2	3.2	1.2	
Morristown MSA	37	5,010	1.5	710	0.0	0.0	0.0	0.0	0.0	0.0	67.8	67.6	67.3	32.2	32.4	32.7	0.0	0.0	0.0	
TN Non-MSA	1,243	132,306	50.0	7,113	0.0	0.0	0.0	17.7	12.0	15.6	62.4	64.1	63.0	19.9	23.9	21.4	0.1	0.0	0.0	

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

### Small Farm Loans

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2020
Assessment Area	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
TN Non-MSA	304	21,936	87.9	670	0.0	0.0	0.0	6.2	3.3	2.5	73.7	74.3	76.0	20.1	22.4	21.5	0.0	0.0	0.0	

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

### Borrower Profile

#### Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020
Assessment Area	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Jackson MSA	189	34,303	2.0	4,819	22.1	2.1	3.4	17.8	13.8	14.5	18.7	21.2	19.4	41.4	59.3	43.0	0.0	3.7	19.7	
Memphis MSA	308	66,390	3.3	40,720	26.0	5.8	2.3	15.2	17.2	9.7	16.3	21.8	16.5	42.5	47.4	49.7	0.0	7.8	21.8	
Morristown MSA	57	9,733	0.6	2,302	18.0	7.0	3.1	18.2	8.8	13.8	21.1	24.6	18.2	42.7	56.1	42.6	0.0	3.5	22.3	
TN Non-MSA	1,425	211,219	15.1	20,972	19.5	3.9	3.1	17.6	14.7	11.6	20.3	19.4	19.5	42.6	57.5	44.3	0.0	4.4	21.5	

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.



### Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020	
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	
Jackson MSA	174	22,608	7.0	2,691	79.7	89.1	44.1	5.4	9.8	14.8	1.1	
Memphis MSA	93	27,613	3.7	19,976	83.3	51.6	33.4	5.6	48.4	11.1	0.0	
Morristown MSA	37	5,010	1.5	710	85.4	73.0	35.6	3.4	27.0	11.2	0.0	
TN Non-MSA	1,243	132,306	50.0	7,113	82.1	88.2	45.5	4.6	11.1	13.3	0.7	

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

### Small Farm Loans

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
TN Non-MSA	304	21,936	87.9	670	96.1	99.0	70.7	1.8	1.0	2.2	0.0	

*Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.*

## APPENDICES

### LARGE BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
  - i. The proportion of the bank's lending in the bank's assessment area(s);
  - ii. The dispersion of lending in the bank's assessment areas(s); and
  - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
  - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
  - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
  - iii. Small business and small farm loans by loan amount at origination; and
  - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

#### **Investment Test**

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

## Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

## SUMMARY OF RATINGS FOR RATED AREAS

<b>Rated Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>	<b>Rating</b>
Chattanooga Multi-State MSA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Alabama	Low Satisfactory		Low Satisfactory	Satisfactory
Georgia	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Kentucky	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Tennessee	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

## DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

### ALABAMA

#### Birmingham MSA

The Birmingham MSA AA consists of all of Jefferson County. Demographic data for this AA is included in the following table.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Birmingham MSA</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)	163	19.0	29.4	26.4	24.5	0.6
Population by Geography	659,026	14.4	26.1	27.2	31.6	0.7
Housing Units by Geography	303,755	16.1	28.0	26.1	29.3	0.5
Owner-Occupied Units by Geography	164,894	8.8	23.0	30.7	37.4	0.1
Occupied Rental Units by Geography	96,035	24.2	32.6	20.6	21.4	1.2
Vacant Units by Geography	42,826	26.4	36.7	20.6	15.6	0.7
Businesses by Geography	53,296	10.8	25.5	22.7	39.0	2.0
Farms by Geography	951	6.3	18.6	24.4	49.6	1.1
Family Distribution by Income Level	166,460	26.3	15.9	17.4	40.4	0.0
Household Distribution by Income Level	260,929	28.2	15.9	16.0	39.9	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA	\$63,259	Median Housing Value				\$161,491
		Median Gross Rent				\$805
		Families Below Poverty Level				15.0%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 39 institutions operated 191 offices within this AA. Of these institutions, FirstBank ranked 38<sup>th</sup> with less than zero percent of the deposit market share. The top five financial institutions account for 80.7 percent of the total deposit market share.

### TENNESSEE

#### Jackson MSA

The Jackson MSA AA consists of all of Chester, Crockett, and Madison Counties. Demographic data for this AA is included in the following table.

<b>Demographic Information of the Assessment Area</b>
---

Assessment Area: Jackson MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	8.6	20.0	42.9	25.7	2.9
Population by Geography	130,108	5.7	18.7	43.3	31.3	1.1
Housing Units by Geography	55,856	6.2	20.3	42.6	29.6	1.3
Owner-Occupied Units by Geography	31,990	2.9	14.1	47.4	35.3	0.2
Occupied Rental Units by Geography	16,303	10.2	29.1	35.4	22.4	2.8
Vacant Units by Geography	7,563	11.6	27.2	37.4	21.1	2.7
Businesses by Geography	9,570	2.6	21.9	40.2	29.6	5.8
Farms by Geography	381	0.5	17.6	49.1	31.2	1.6
Family Distribution by Income Level	32,623	22.1	17.8	18.7	41.4	0.0
Household Distribution by Income Level	48,293	24.9	15.7	16.5	43.0	0.0
Median Family Income MSA - 27180 Jackson, TN MSA		\$51,510	Median Housing Value			\$113,822
			Median Gross Rent			\$743
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 17 institutions operated 50 offices within this AA. Of these institutions, FirstBank ranked 2<sup>nd</sup> with 17.1 percent deposit market share. The top 5 financial institutions account for 72.0 percent of the total deposit market share.

### Memphis MSA

The Memphis MSA AA consists of all of Fayette and Shelby Counties. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area						
Assessment Area: Memphis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	232	28.0	20.7	17.2	31.5	2.6
Population by Geography	976,564	21.2	21.0	17.4	39.7	0.6
Housing Units by Geography	417,807	23.7	20.7	17.4	37.9	0.3
Owner-Occupied Units by Geography	210,883	13.1	17.6	19.2	50.0	0.2
Occupied Rental Units by Geography	151,187	32.0	24.0	16.0	27.7	0.3
Vacant Units by Geography	55,737	41.0	23.6	14.3	20.0	1.1
Businesses by Geography	85,399	14.2	16.5	17.9	50.4	1.0

Farms by Geography	1,754	8.6	12.3	23.4	54.8	0.9
Family Distribution by Income Level	231,420	26.0	15.2	16.3	42.5	0.0
Household Distribution by Income Level	362,070	26.8	15.5	15.9	41.8	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$58,214	Median Housing Value			\$136,512
			Median Gross Rent			\$865
			Families Below Poverty Level			16.3%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 34 institutions operated 236 offices within this AA. Of these institutions, FirstBank ranked 22<sup>nd</sup> with 1.0 percent deposit market share. The top five financial institutions account for 71.1 percent of the total deposit market share.

#### Morristown MSA

The Morristown MSA AA consists of all of Jefferson County. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area						
Assessment Area: Morristown MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	66.7	33.3	0.0
Population by Geography	52,490	0.0	0.0	69.6	30.4	0.0
Housing Units by Geography	23,592	0.0	0.0	70.7	29.3	0.0
Owner-Occupied Units by Geography	14,439	0.0	0.0	66.3	33.7	0.0
Occupied Rental Units by Geography	5,240	0.0	0.0	78.9	21.1	0.0
Vacant Units by Geography	3,913	0.0	0.0	76.1	23.9	0.0
Businesses by Geography	2,916	0.0	0.0	68.0	32.0	0.0
Farms by Geography	129	0.0	0.0	58.9	41.1	0.0
Family Distribution by Income Level	14,068	18.0	18.2	21.1	42.7	0.0
Household Distribution by Income Level	19,679	22.0	14.6	17.9	45.6	0.0
Median Family Income MSA - 34100 Morristown, TN MSA		\$48,094	Median Housing Value			\$132,645
			Median Gross Rent			\$643
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, nine institutions operated 15 offices within this AA. Of these institutions, FirstBank ranked 1<sup>st</sup> with 25.1 percent deposit market share. The top five financial institutions account for 82.9 percent of the total deposit market share.

### Tennessee Non-MSA

The Tennessee Non-MSA AA consists of all of Bedford, Benton, Carroll, Coffee, Cumberland, Decatur, DeKalb, Franklin, Henderson, Henry, Humphreys, Lincoln, Moore, Perry, Putnam and Rhea Counties. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area						
Assessment Area: Tennessee Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	119	0.0	10.9	68.9	18.5	1.7
Population by Geography	505,856	0.0	13.2	68.1	18.7	0.0
Housing Units by Geography	236,505	0.0	12.6	69.4	18.0	0.0
Owner-Occupied Units by Geography	143,947	0.0	8.3	71.3	20.4	0.0
Occupied Rental Units by Geography	57,269	0.0	24.4	62.0	13.7	0.0
Vacant Units by Geography	35,289	0.0	11.1	73.9	15.0	0.0
Businesses by Geography	31,715	0.0	17.6	62.5	19.9	0.1
Farms by Geography	1,641	0.0	6.3	73.6	20.0	0.0
Family Distribution by Income Level	136,480	19.5	17.6	20.3	42.6	0.0
Household Distribution by Income Level	201,216	22.7	15.6	17.9	43.8	0.0
Median Family Income Non-MSAs - TN		\$46,066	Median Housing Value			\$114,989
			Median Gross Rent			\$619
			Families Below Poverty Level			14.5%
<i>Source: 2015 ACS Data and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 51 institutions operated 184 offices within this AA. Of these institutions, FirstBank ranked 1<sup>st</sup> with 15.6 percent deposit market share. The top five financial institutions account for 41.8 percent of the total deposit market share.



## GLOSSARY

**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.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, 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.

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

**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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.


**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.


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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).


“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

**Branch Locations & Servicing Information**

	 Facility-Based Assessment Area	Branch Name	Branch w/ATM	Address	City	State	Zip	State	County Code	MSA	Census Tract	Tract Income	Tract Minority	Branch Hours	Drive-Thru Hours	Services		
1	13820 Birmingham AL	Birmingham - Hollywood	No	404 Hollywood Blvd	Birmingham	AL	35209	01	073	13820	0108.02	UPP	3.99%	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	N/A	Full Service Branch Instant Issue Debit Card	
2	14540 Bowling Green KY	Bowling Green - Campbell Lane	Yes	1515 Campbell Ln	Bowling Green	KY	42104	21	227	14540	0107.01	MID	34.51%	Monday - Thursday Friday Saturday	8:30 am - 4:30 pm 8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:00 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
3	14540 Bowling Green KY	Bowling Green - Fairview	Yes	948 Fairview	Bowling Green	KY	42101	21	227	14540	0102.00	LOW	57.83%	Monday - Thursday Friday Saturday	8:30 am - 4:30 pm 8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:00 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
4	14540 Bowling Green KY	Bowling Green - Scottsville Road	Yes	5290 Scottsville Rd	Bowling Green	KY	42104	21	227	14540	0108.01	MID	21.86%	Monday - Thursday Friday Saturday	8:30 am - 4:30 pm 8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:00 am - 5:00 pm 8:00 am - 12:00 pm	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
5	14540 Bowling Green KY	Scottsville - Veterans Memorial Hwy	Yes	1595 Veterans Memorial Hwy	Scottsville	KY	42164	21	003	14540	9203.00	MOD	8.65%	Monday - Thursday Friday Saturday	8:30 am - 4:30 pm 8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:00 am - 5:00 pm 8:00 am - 12:00 pm	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
6	16860 Chattanooga TN-GA	Chattanooga - East Ridge	Yes	4227 Ringgold Rd	Chattanooga	TN	37412	47	065	16860	0117.00	MID	27.09%	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM
7	16860 Chattanooga TN-GA	Chattanooga - Northshore	Yes	319 Manufacturer's Rd	Chattanooga	TN	37405	47	065	16860	0008.00	UPP	24.49%	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
8	16860 Chattanooga TN-GA	Chattanooga - Ooltewah	Yes	9217 Lee Hwy	Ooltewah	TN	37363	47	065	16860	0112.06	MID	23.43%	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM
9	16860 Chattanooga TN-GA	Chattanooga - Shallowford	Yes	7442 Shallowford Rd	Chattanooga	TN	37421	47	065	16860	0113.21	UPP	37.83%	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM
10	16860 Chattanooga TN-GA	Fort Oglethorpe	Yes	3610 Battlefield Pkwy	Fort Oglethorpe	GA	30742	13	047	16860	0304.04	MID	14.04%	Monday - Thursday Friday Saturday	9:00 am - 4:00 pm 9:00 am - 5:00 pm Closed	Monday - Friday Saturday	8:00 am - 5:00 pm 9:00 am - 12:00 pm	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
11	16860 Chattanooga TN-GA	Hixson	Yes	1959 Northpoint Blvd	Hixson	TN	37343	47	065	16860	0104.31	MID	22.77%	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Monday - Friday Saturday	8:30 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM
12	16860 Chattanooga TN-GA	Ringgold	Yes	5063 Alabama Hwy	Ringgold	GA	30736	13	047	16860	0302.01	MID	13.68%	Monday - Thursday Friday Saturday	9:00 am - 4:00 pm 9:00 am - 5:00 pm Closed	Monday - Friday Saturday	8:00 am - 5:00 pm 9:00 am - 12:00 pm	Full Service Branch 24-hour Drive Up ATM
13	19140 Dalton GA	Dalton - Thornton Ave	Yes	401 South Thornton Ave	Dalton	GA	30720	13	313	19140	0005.02	MOD	57.73	Monday - Thursday Friday Saturday	9:00 am - 4:00 pm 9:00 am - 5:00 pm Closed	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:30 pm Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
14	19140 Dalton GA	Dalton - Varnell	Yes	3895 Cleveland Hwy	Dalton	GA	30721	13	313	19140	0001.03	UPP	29.77	Monday - Thursday Friday Saturday	9:00 am - 4:00 pm 9:00 am - 5:00 pm Closed	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:30 pm Closed	Full Service Branch 24-hour Drive Up ATM
15	22520 Florence AL	Florence	Yes	123 North Court St	Florence	AL	35630	01	077	22520	0101.00	LOW	38.90	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	Monday - Friday Saturday Sunday	7:00 am - 10:00 pm 9:00 am - 10:00 pm 10:00 am - 6:00 pm	Full Service Branch Walk Up ATM
16	22620 Huntsville AL	Huntsville	Yes	720 Gallatin St SW #150	Huntsville	AL	35801	01	089	26620	0031.00	UPP	30.41	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
17	22620 Huntsville AL	Huntsville-Providence	Yes	1658 Old Monrovia RD NW #110	Huntsville	AL	35806	01	089	26620	0106.26	MID	49.36	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	N/A	N/A	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
18	27180 Jackson TN	Friendship	Yes	650 Main St	Friendship	TN	38034	47	033	27180	9612.00	MID	15.31	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	Full Service Branch Walk Up ATM
19	27180 Jackson TN	Henderson - Main	No	101 East Main St	Henderson	TN	38340	47	023	27180	9702.00	MID	26.24	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	N/A	N/A	Full Service Branch Instant Issue Debit Card
20	27180 Jackson TN	Jackson - Channing Way	Yes	11 Channing Way	Jackson	TN	38305	47	113	27180	0016.04	UPP	29.84	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm Closed	Monday - Thursday Friday Saturday	8:30 am - 4:00 pm 8:30 am - 5:00 pm 9:00 am - 1:00 pm	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card

	 FirstBank Facility-Based Assessment Area	Branch Name	Branch w/ATM	Address	City	State	Zip	State	County Code	MSA	Census Tract	Tract Income	Tract Minority	Branch Hours	Drive-Thru Hours	Services
21	27180 Jackson TN	Jackson - University Pkwy	Yes	15 West University Pkwy	Jackson	TN	38305	47	113	27180	0016.12	MID	48.13	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
22	27180 Jackson TN	Jackson	Yes	2113 S Highland Ave	Jackson	TN	38301	47	113	27180	0013.00	MOD	25.76	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
23	28940 Knoxville TN	Knoxville - Langley	Yes	520 W Summit Hill Dr, Suite B101	Knoxville	TN	37902	47	093	28940	0001.00	UPP	17.72	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	N/A	Full Service Branch 24-hour Walk Up ATM
24	28940 Knoxville TN	Knoxville - West	Yes	10216 Kingston Pike	Knoxville	TN	37922	47	093	28940	0058.07	UPP	22.65	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
25	28940 Knoxville TN	Maynardville	Yes	2905 Maynardville Hwy	Maynardville	TN	37807	47	173	28940	0402.01	MOD	07.53	Monday - Thursday 9:00 am - 4:00 pm Friday 9:00 am - 5:30 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:30 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
26	28940 Knoxville TN	Bearden	Yes	5537 Kingston Pike	Knoxville	TN	37919	47	093	28940	0037.00	UPP	22.60	Monday - Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
27	28940 Knoxville TN	Knoxville - Emory Road	Yes	233 E. Emory Road # 109	Powell	TN	37849	47	093	28940	0061.02	MID	08.78	Monday - Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
28	32820 Memphis TN	Bartlett	Yes	8398 US Hwy 64	Bartlett	TN	38133	47	157	38133	0208.32	UPP	42.57	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
29	32820 Memphis TN	Oakland	Yes	6280 Hwy 64	Oakland	TN	38060	47	047	32820	0604.03	UPP	28.00	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
30	32820 Memphis TN	Poplar	Yes	6482 Poplar Ave	Memphis	TN	38119	47	157	32820	0213.11	UPP	19.38	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
31	32820 Memphis TN	TraVure	Yes	6815 Poplar Ave	Memphis	TN	37138	47	157	32820	0214.30	UPP	20.16	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	N/A	Full Service Branch 24-hour Drive Up ATM
32	34100 Morristown TN	Dandridge	Yes	1013 S Hwy 92	Dandridge	TN	37725	47	089	34100	0707.00	UPP	08.65	Monday - Thursday 9:00 am - 4:00 pm Friday 9:00 am - 5:30 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:30 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
33	34100 Morristown TN	Jefferson City	Yes	167 W Broadway Blvd	Jefferson	TN	37760	47	089	34100	0706.00	MID	07.41	Monday - Thursday 9:00 am - 4:00 pm Friday 9:00 am - 5:30 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:30 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
34	34980 Nashville TN	Cool Springs	Yes	3310 Aspen Grove Dr	Franklin	TN	37067	47	187	34980	0509.05	UPP	26.52	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
35	34980 Nashville TN	Dickson	Yes	345 Hwy 46 S	Dickson	TN	37055	47	043	34980	0606.02	MOD	23.16	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Monday - Thursday 7:30 am - 4:00 pm Friday 7:30 am - 6:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
36	34980 Nashville TN	Fairview	Yes	2202 Fairview Blvd	Fairview	TN	37062	47	187	34980	0505.03	MID	11.84	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:30 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:30 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
37	34980 Nashville TN	Franklin Post Office	Yes	510 Columbia Ave	Franklin	TN	37064	47	187	34980	0508.02	UPP	09.22	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
38	34980 Nashville TN	Berry Farms	Yes	40 Moss Lane, Suite 100	Franklin	TN	37064	47	187	34980	0509.08	UPP	11.23	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
39	34980 Nashville TN	FS- Nolensville Road	Yes	7216 Nolensville Road, Suite 100	Nolensville	TN	37135	47	187	34980	0501.02	Upp	22.00	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card



	 FirstBank Facility-Based Assessment Area	Branch Name	Branch w/ATM	Address	City	State	Zip	State	County Code	MSA	Census Tract	Tract Income	Tract Minority	Branch Hours	Drive-Thru Hours	Services
40	34980 Nashville TN	FS- Pewitt Dr	Yes	134 Pewitt Dr, Suite 100	Brentwood	TN	37027	47	187	34980	0503.04	UPP	12.24	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
41	34980 Nashville TN	FS- Presidents Place	Yes	724 Presidents Place	Smyrna	TN	37167	47	149	34980	0403.11	MID	44.00	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
42	34980 Nashville TN	WestHaven	Yes	1015 Westhaven Blvd, Suite 150	Franklin	TN	37064	47	187	34980	0506.02	UPP	10.94	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
43	34980 Nashville TN	Springhill	Yes	4824 Main Street, Suite A	Spring Hill	TN	37174	47	187	34980	0512.06	UPP	22.09	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
44	34980 Nashville TN	FS-Memorial Blvd	Yes	2415 Memorial Blvd	Murfreesboro	TN	37129	47	149	34980	0413.02	MID	21.65	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
45	34980 Nashville TN	FS-Old Fort	Yes	2610 Old Fort Parkway	Murfreesboro	TN	37128	47	149	34980	0409.06	MID	42.46	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
46	34980 Nashville TN	Goodlettsville	Yes	885 Conference Dr	Goodlettsville	TN	37072	47	037	34980	0103.03	MOD	50.05	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
47	34980 Nashville TN	Mt. Juliet	Yes	4110 N Mt. Juliet Rd	Mt. Juliet	TN	37122	47	189	34980	0303.09	UPP	22.50	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
48	34980 Nashville TN	Murfreesboro - Main	Yes	615 Memorial Blvd	Murfreesboro	TN	37129	47	149	34980	0417.00	MOD	35.36	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 5:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
49	34980 Nashville TN	Murfreesboro - Salem	Yes	2670 New Salem Hwy	Murfreesboro	TN	37128	47	149	34980	0409.08	MID	36.95	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 5:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
50	34980 Nashville TN	Nashville - Green Hills	Yes	2121 Abbott Martin Rd	Nashville	TN	37215	47	037	34980	0179.01	UPP	14.68	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
51	34980 Nashville TN	Nashville - West End	Yes	1817 West End Ave	Nashville	TN	37203	47	037	34980	0195.01	UPP	23.42	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
52	34980 Nashville TN	Smyrna	Yes	417 S Lowry St	Smyrna	TN	37167	47	149	34980	0423.01	MID	55.48	Monday - Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
53	34980 Nashville TN	Woodbury	Yes	101 West Main St	Woodbury	TN	37190	47	015	34980	9602.01	MOD	12.20	Monday - Thursday 8:30 am - 5:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
54	34980 Nashville TN	One22One (Headquarters)	Yes	1221 Broadway #1300	Nashville	TN	37203	47	037	34980	0195.02	UPP	21.70	Monday - Thursday 8:30 am - 5:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	N/A	Full Service Branch Walk Up ATM
55	99999 TN Non MSA	Bruceton - Hollow Rock	Yes	28915 Broad St	Hollow Rock	TN	38342	47	017	99999	9620.00	MID	12.14	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
56	99999 TN Non MSA	Camden North	Yes	126 US-641 N	Camden	TN	38320	47	005	99999	9633.00	MID	13.47	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
57	99999 TN Non MSA	Clarksburg	Yes	3260 Hwy 22 S	Clarksburg	TN	38324	47	017	99999	9625.00	MID	14.94	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
58	99999 TN Non MSA	Crossville	Yes	139 Elmore Rd	Crossville	TN	38555	47	035	99999	9705.02	MOD	12.73	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:30 pm Friday 8:00 am - 5:00 pm Saturday 8:00 am - 12:00 pm	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
59	99999 TN Non MSA	Dayton	Yes	1525 Market St	Dayton	TN	37321	47	143	99999	9754.01	MOD	21.36	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card

FirstBank Facility-Based Assessment Area		Branch Name	Branch w/ATM	Address	City	State	Zip	State	County Code	MSA	Census Tract	Tract Income	Tract Minority	Branch Hours	Drive-Thru Hours	Services
60	99999 TN Non MSA	Decherd	Yes	2200 Decherd Blvd	Decherd	TN	37324	47	051	99999	9604.00	MID	20.36	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:15 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
61	99999 TN Non MSA	Fayetteville	Yes	1927 Wilson Pkwy	Fayetteville	TN	37334	47	103	99999	9753.00	MID	28.70	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
62	99999 TN Non MSA	Huntingdon - Main	No	19685 East Main St	Huntingdon	TN	38344	47	017	99999	9621.00	MID	20.78	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	N/A	Full Service Branch Instant Issue Debit Card
63	99999 TN Non MSA	Lexington - East	Yes	53 East Church St	Lexington	TN	38351	47	077	99999	9753.01	MID	16.83	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
64	99999 TN Non MSA	Lexington - West	No	101 West Church St	Lexington	TN	38351	47	077	99999	9754.00	MOD	26.60	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 5:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch Instant Issue Debit Card
65	99999 TN Non MSA	Linden <b>Located in an Underserved/Distressed Tract</b>	Yes	120 West Main St	Linden	TN	37096	47	135	99999	9302.01	MID	09.87	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Limited Service Branch 24-hour Walk Up ATM Instant Issue Debit Card
66	99999 TN Non MSA	Lynchburg (Farmers Bank of Lynchburg)	Yes	71 Mechanic St South	Lynchburg	TN	37352	47	127	99999	9302.00	UPP	10.06	Monday - Thursday 8:30 am - 4:30 pm Friday 8:15 am - 5:00 pm Saturday Closed	N/A	Full Service Branch 24-hour Drive Up ATM
67	99999 TN Non MSA	Manchester	Yes	1500 Hillsboro Blvd	Manchester	TN	37355	47	031	99999	9705.02	UPP	19.25	Monday - Thursday 8:30 am - 4:30 pm Friday 8:15 am - 5:00 pm Saturday Closed	Monday - Friday 8:15 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
68	99999 TN Non MSA	Paris - Mineral Wells	Yes	1068 Mineral Wells Ave	Paris	TN	38242	47	079	99999	9695.02	MID	17.62	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday 9:00 am - 12:00 pm	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
69	99999 TN Non MSA	Paris - West Wood St	Yes	101 West Wood St	Paris	TN	38242	47	079	99999	9693.00	MOD	39.34	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
70	99999 TN Non MSA	Parsons	Yes	450 Tennessee Ave S	Parsons	TN	38363	47	039	99999	9550.04	MOD	13.17	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday 8:30 am - 12:30 pm	Monday - Friday 8:00 am - 5:00 pm Saturday 8:30 am - 12:30 pm	Limited Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
71	99999 TN Non MSA	Scotts Hill (Farmer's State Bank)	No	20 TN-114	Scotts Hill	TN	38374	47	077	99999	9755.00	MID	06.11	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:30 pm Friday 8:00 am - 5:00 pm Saturday 8:00 am - 12:00 pm	Full Service Branch
72	99999 TN Non MSA	Shelbyville	Yes	508 Madison St	Shelbyville	TN	37160	47	003	99999	9505.00	MID	41.80	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Walk Up ATM
73	99999 TN Non MSA	Smithville	Yes	200 West Main St	Smithville	TN	37166	47	041	99999	9202.01	MOD	17.74	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday 9:00 am - 12:00 pm	Monday - Thursday 8:00 am - 4:30 pm Friday 8:00 am - 5:00 pm Saturday 9:00 am - 12:00 pm	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
74	99999 TN Non MSA	Tullahoma	Yes	340 West Lincoln St	Tullahoma	TN	37388	47	031	99999	9710.02	MID	15.80	Monday - Thursday 8:30 am - 4:30 pm Friday 8:15 am - 5:00 pm Saturday Closed	Monday - Thursday 8:15 am - 5:00 pm Friday 8:15 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
75	99999 TN Non MSA	Waverly	Yes	416 West Main St	Waverly	TN	37185	47	085	99999	1303.00	MID	12.92	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:30 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM Instant Issue Debit Card
76	99999 TN Non MSA	Cookeville	Yes	749 South Willow Avenue	Cookeville	TN	38501	47	141	99999	0006.00	UPP	16.22	Monday - Thursday 8:00 am - 4:00 pm Friday 8:00 am - 5:00 pm Saturday Closed	Monday - Thursday 8:00 am - 4:30 pm Friday 8:00 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
77	14540 Bowling Green KY	Scottsville - White Plains	Yes	1520 Old Gallatin Road	Scottsville	KY	42164	21	003	14540	9204.00	MID	8.92%	Monday - Thursday 8:30 am - 4:30 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Friday 8:30 am - 4:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM
78	27180 Jackson TN	Henderson - North Side	Yes	425 East Main St	Henderson	TN	38340	47	023	27180	9702.00	MID	26.24%	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Full Service Branch 24-hour Drive Up ATM

FirstBank Facility-Based Assessment Area		Branch Name	Branch w/ATM	Address	City	State	Zip	State	County Code	MSA	Census Tract	Tract Income	Tract Minority	Branch Hours	Drive-Thru Hours	Services
79	99999 TN Non MSA	Huntingdon - Northside	No	123 Second Ave	Huntingdon	TN	38344	47	017	99999	9621.02	MID	20.78%	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Limited Service Branch
80	99999 TN Non MSA	Huntingdon - East End	Yes	20340 East Main St	Huntingdon	TN	38344	47	017	99999	9621.02	MID	20.78%	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Limited Service Branch 24-hour Drive Up ATM
81	99999 TN Non MSA	Lexington - Hospital Dr	Yes	164 Hospital Dr	Lexington	TN	38351	47	077	99999	9754.00	MID	26.60%	Monday - Thursday 8:00 am - 5:00 pm Friday 8:00 am - 5:00 pm Saturday 8:00 am - 12:30 pm	Monday - Thursday 8:00 am - 5:00 pm Friday 8:00 am - 5:00 pm Saturday 8:00 am - 12:30 pm	Limited Service Branch 24-hour Drive Up ATM
82	99999 TN Non MSA	Camden	Yes	25 N. Rosemary Ave	Camden	TN	38320	47	005	99999	9633.00	MID	13.47%	N/A	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Limited Service Branch 24-hour Drive Up ATM
83	99999 TN Non MSA	Parkers Crossroads	No	45 Wildersville Rd	Wildersville	TN	38388	47	077	99999	9751.00	MID	16.98%	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Monday - Thursday 8:30 am - 4:00 pm Friday 8:30 am - 5:00 pm Saturday Closed	Limited Service Branch

## Opened/Closed Branches (2022 – 2023)



Opened/ Closed	Notes	Year	Branch Name/Address	MSA	County	Census Tract
Opened	New Branch Opened 9/26/2022	2022	Huntsville - Providence 1658 Old Monrovia Rd NW #110 Huntsville, AL 35806	26620	089 – Madison	0106.26 MID
Opened	New Branch Opened 10/11/2022. Moved from Old Branch Located at 1581 S Highland, Jackson, TN	2022	Jackson 2113 S Highland Ave Jackson, TN 38101	27180	113 - Madison	0013.00 MOD
Opened	New Branch Opened 1/17/2023. Moved from Old Branch Located at 851 South Willow Ave, Cookeville, TN	2023	Cookeville 749 S Willow Ave Cookeville, TN 38501	99999	141 - Putnam	0006.00 UPP
Opened	New Branch & Corporate HQ Opened 6/26/2023. Moved from Old Branch/HQ Located at 211 Commerce St, Nashville, TN	2023	One22One 1221 Broadway #1300 Nashville, TN 37203	34980	037 – Davidson	0195.02 UPP
Opened	New Branch Opened 10/23/2023. Moved from Old Branch Located at 5200 Clinton Hwy, Knoxville, TN	2023	233 E. Emory Rd Suite 109 Powell, TN 37849	28940	093 - Knox	0061.02 MID
Closed	Removed from Branch List to Operations/Support Center List 3/31/2022	2022	Chattanooga – Market St 1110 Market St Chattanooga, TN 37408	16860	065 - Hamilton	0031.00 UPP
Closed	Branch Closed 10/07/2022. Moved to New Branch Located at 2113 S Highland Ave, Jackson, TN	2022	Jackson - South 1581 S Highland Jackson, TN 38301	27180	113 - Madison	0013.00 MOD
Closed	Branch Closed 01/13/2023. Moved to New Branch Located at 749 S Willow Ave, Cookeville, TN	2023	Cookeville 851 South Willow Ave Cookeville, TN 38501	99999	141 - Putnam	0006.00 UPP
Closed	Branch/HQ Closed 6/22/2023. Moved to New Branch/HQ Located at 1221 Broadway #1300, Nashville, TN	2023	Nashville – Commerce 211 Commerce St Nashville, TN 37201	34980	037 – Davidson	0195.00 UPP
Closed	Branch Closed 8/31/2023	2023	Chattanooga – Southside 1301 Cowart St Chattanooga, TN 37402	16860	065 – Hamilton	0031.00 UPP
Closed	Branch Closed 11/2/2023. Moved to New Branch Located at 233 E. Emory Rd #109, Powell, TN	2023	Knoxville – Clinton Hwy 5200 Clinton Hwy Knoxville, TN 37912	28940	093 – Knox	0039.02 MOD






## Opened/Closed Branches (2024)



Opened/ Closed	Notes	Year	Branch Name/Address	MSA	County	Census Tract
Closed	Branch Closed 1/16/2024	2024	Dalton – Cleveland Rd 1237 Glenwood Ave Dalton, GA 30721	19140	313 – Whitfield	0005.02 MOD
Closed	Branch Closed 1/16/2024	2024	Farragut 11820 Kingston Pike Farragut, TN 37934	28940	093 – Knox	0058.13 UPP
Closed	Branch Closed 1/16/2024	2024	Henderson – East End 132 N Washington Ave Henderson, TN 38340	27180	023 – Chester	9702.00 MID
Closed	Branch Closed 1/16/2024	2024	Lexington – Eastgate 595 East Church St Lexington, TN 38351	99999	077 – Henderson	9754.00 MID
Closed	Branch Closed 1/16/2024	2024	FS – Carothers Parkway 5040 Carothers Parkway #100 Franklin, TN 37067	34980	187 – Williamson	0510.01 UPP
Closed	Branch Closed 1/16/2024	2024	FS – South Church 2782 South Church St Murfreesboro, TN 37127	34980	149 – Rutherford	0409.10 MID
Closed	Branch Closed 1/16/2024	2024	Camden – Downtown 21 N Forest Ave Camden, TN 38320	99999	005 – Benton	9633.00 MOD

### CREDIT SERVICES OFFERED

#### Consumer Loans

-  Automobile or Truck
-  Consumer Goods
-  Recreational Vehicles – Boats, RVs, etc.
-  Residential Mortgages
-  Home Improvement Loans
-  Balloon 1<sup>st</sup> and 2<sup>nd</sup> Mortgages
-  Real Estate Loans
-  Construction Loans
-  Mobile Home Loans
-  Home Equity Lines of Credit
-  Overdraft Protection Plan
-  ARM Loans

#### Business Loans

-  Construction Loans on Business & Industrial Properties
-  Mortgage Loans on Business & Industrial Properties
-  Business Lines of Credit
-  Accounts Receivable Loans
-  Business Real Estate Term Loans
-  Business Equipment or Vehicle Term Loan
-  Facility Construction/Expansion Loans
-  Debt Consolidation Loans
-  Inventory Financing
-  Letters of Credit
-  Working Capital Lines
-  Business Term Loan

#### Agriculture Loans

#### Credit Card Applications

#### Overdraft Protection Options

Fees and Charges may include: *(These fees vary depending on the type and amount of loan.)*






-  Finance Charges
-  Loan Fees
-  Attorney Fees
-  Credit Report Charges
-  Appraisal Fees
-  Miscellaneous Real Estate Closing Fees

### CREDIT SERVICES OFFERED





FirstBank Mortgage offers:

-  Conventional Fixed Rate Loans
-  FHA and VA Fixed Rate Loans
-  VA Interest Rate Reduction Loans
-  USDA Rural Housing and Acreage Loans
-  Jumbo Mortgage Loans
-  Adjustable Rate First Mortgages (ARMs)
-  Balloon – 1<sup>st</sup> & 2<sup>nd</sup> Mortgages
-  First Time Homebuyer Programs
-  TN Housing Development Agency loans
-  Additional Approved Down Payment Assistance Programs:  
100% Affordable Housing Mortgage, The Housing Fund-Nashville, TN

### DEPOSIT SERVICES OFFERED

- |  |  |
|--|--|
|  ACH Services/Direct Deposit  |  Commercial Cash Management Services          |
|  Personal Checking Accounts   |  Commercial Checking Accounts                 |
|  First Rewards Checking       |  FirstBusiness Checking                       |
|  Online Banking/Bill Payment |  FirstCommercial Checking                    |
|  Mobile Banking/Mobile App  |  Public Funds Interest Checking             |
|  Christmas Savings Accounts |  Commercial Money Market Tiered             |
|  Free Checking Accounts     |  First Lottery Deposit Accounts             |
|  Safe Deposit Boxes         |  FirstBank Image Statements                 |
|  Certificates of Deposit    |  Wire Transfers                             |
|  IRAs                       |  FirstRate Money Market Savings             |
|  ATM/Debit Cards            |  Cashier checks                             |
|  Senior Checking Accounts   |  Commercial Fed Funds Money Market          |
|  24-Hour Telephone Banking  |  Non-Profit First Business Deposit Accounts |
|  24-Hour ATM Service        |  UTMA Minor Savings Accounts                |
|  Cashier Checks             |  Health Savings Accounts                    |
|  Basic Savings Accounts     |  Overdraft Protection                       |

### MISCELLANEOUS SERVICES OFFERED

-  Internet banking
-  Time and temperature services telephone line (731-968-8181)
-  Check imaging of monthly statements
-  Online business and consumer credit card applications

## MISCELLANEOUS SERVICES OFFERED


-  No charge for use of FirstBank ATMs at office/branch locations

## TREASURY MANAGEMENT SERVICES




### Receivables

-  ACH Collections and Cash Concentration
-  Remote Deposit Capture
-  Lockbox Services
-  Merchant Services
-  Remove Cash Capture Vault
-  Cash services
-  Wire Services and Notifications





### Cash Management

-  Balance and Transaction Reporting
-  Zero Balance Accounts
-  Reconciliation
-  Line of Credit Sweep
-  Overnight Repurchase Sweep
-  Insured Cash Sweep

### Payables

-  ACH for Direct Deposit and Vendor Payments
-  Commercial OneCard
-  Business Credit Card







### Fraud Protection Services

-  Positive Pay
-  ACH Filter and Blocks
-  Online Banking Controls
-  Alerts and Notifications

## PRODUCTS AND SERVICES FIRSTBANK INVESTMENT PARTNERS OFFER

All FirstBank branches offer the following types of investment products, by appointment only with FirstBank investment partners




### Types of Accounts

-  Custodial Brokerage Accounts
-  Individual Retail Brokerage Accounts
-  Joint Accounts
-  Transfer on Death (TOD)
-  Trust Brokerage Accounts
-  Uniform Transfer to Minor (UTMA)

### Individual Retirement Accounts

-  401k Rollover IRAs
-  Roth IRAs
-  SEP IRAs
-  Simple IRAs
-  Traditional IRAs

### Employer Retirement Accounts

-  401k plans
-  Defined benefit plans
-  Profit sharing plans

### Bonds & Fixed Income

-  Brokered CDs
-  Corporate bonds
-  Government bonds
-  Mortgage-backed bonds
-  Municipal bonds
-  Treasuries

### General Securities

-  Equities (Stock)

### Annuities

-  1035 Exchange











## Products and Services

### PRODUCTS AND SERVICES FIRSTBANK INVESTMENT PARTNERS OFFER

All FirstBank branches offer the following types of investment products, by appointment only with FirstBank investment partners





-  ETFs
-  Mutual funds
-  Unit investment trusts

-  Fixed annuities
-  Fixed indexed annuities
-  Variable annuities

#### Alternative Investment

-  Business development companies
-  Real estate investment trusts
-  Single stock risk management
-  Structured products

#### Annuities

-  1035 Exchange
-  Fixed annuities
-  Fixed indexed annuities
-  Variable annuities



# BUSINESS SCHEDULE OF FEES

Effective 07.20.2023

## BUSINESS ACCOUNTS

### FIRSTBUSINESS CHECKING

Up to 500 FREE transactions each statement cycle.  
\$0.30 per item over 500.

### FIRSTCOMMERCIAL CHECKING

\$20 Monthly Account Maintenance Fee  
\$0.16 Checks Paid and Other Debits  
\$0.70 Deposit and Other Credits  
\$0.09 On US (FirstBank) items Deposited  
\$0.10 Not on US (FirstBank) Items Deposited  
\$0.11 ACH Items Received  
\$8 Return Items Deposited  
\$50.00 Online Banking Current Day Reporting  
\$40.00 Online Banking Previous Day Reporting  
\$1 Foreign ATM Fee

### NON-PROFIT FIRSTBUSINESS CHECKING

Up to 50 FREE items each statement cycle  
\$0.20 Debit and Credit over 50  
\$0.15 Deposited item over 50  
\$1 Foreign ATM Fee

### COMMERCIAL MONEY MARKET TIERED

\$10 Monthly Account Maintenance Fee if current balance falls below \$5,000.  
\$10 will be assessed for each withdrawal over six per statement cycle.

### COMMERCIAL FED FUNDS MONEY MARKET

\$10 Monthly Account Maintenance Fee if current balance falls below \$100,000.  
\$10 will be assessed for each withdrawal over six per statement cycle.

### FIRST LOTTERY

\$0 Monthly Account Maintenance Fee.

### FIRST IOLTA

\$0 Monthly Account Maintenance Fee.

## PUBLIC FUNDS ACCOUNTS

### Regular Checking

Up to 100 FREE transactions per statement cycle  
\$0.16 Debit Transactions  
\$0.16 Credit Transactions  
\$0.10 Not on US (FirstBank) Items Deposited  
\$0.07 On US (FirstBank) Items Deposited  
\$0.11 ACH Debit and Credit Items

### Interest Checking

\$10 Monthly Account Maintenance Fee if balance falls below \$5,000.  
Interest will be forfeited if balance falls below \$5,000.  
\$0.16 Debit Transactions  
\$0.16 Credit Transactions  
\$0.10 Not on US (FirstBank) Items Deposited  
\$0.07 On US (FirstBank) Items Deposited  
\$0.11 ACH Debit and Credit Items

## ADDITIONAL MISCELLANEOUS FEES

**Wire Transfer** - \$15 for incoming domestic and international, \$20 for outgoing domestic, \$50 for outgoing international.

**Account Research** - \$20 an hour with a \$25 minimum

**Dormant Accounts** - \$5 service charge per account cycle on balances below \$1,000 and no transaction activity for 18 months.

**Account Closing Fee** - \$15 for accounts closing within six months of opening date.

**Escheatment Fee** - \$100

**ATM Debit Card Replacement Fee** - \$5 (First two cards free)

**Statement Reprints** - \$5 without images - \$10 with images

**Treasury/Cash Management Services** - Custom Pricing

**Returned Deposited Item Fee** - \$5

**Overdraft Item Fee** (may be created)\* - \$35

**Continuous Daily Overdraft Fee** - \$5 (daily fee applied on all business accounts after 5 consecutive business days overdrawn).

**Nonsufficient (NSF) Funds Fee** - \$35

**Night Depository Bag** - \$20 (First bag free)

**Sweep Transaction Charge** - \$5

**Stop Payment Charge** - \$32

**Account Activity Printouts** - \$5

**Account Verification** - \$25

**Garnishments/Levies** - \$125 (or the maximum allowed by applicable law)

**Money Orders** - \$7.50

**Cashier's Checks** - \$5

**Photocopies** - \$0.25 per page

**Money Services Business Fees** - Up to \$150  
See additional MSB fee information.

## ATM TRANSACTIONS

No charge for use of ATMs at office/branch locations or ATMs displaying the FirstBank logo.

Non-ATM provider may charge additional fee.

\*Overdrafts may be created by check, in-person withdrawals, ATM withdrawals or other electronic means.

# PERSONAL PRODUCTS - Checking and Savings Options

	FirstRewards Checking	Essential Checking	Swipe Smart Checking	USA Checking	Interest Checking	FirstRate Money Market	Money Market	Basic Savings	Minor Savings	Christmas Savings	HSA Savings
MINIMUM OPENING BALANCE	\$0	\$0	\$25	\$100	\$1,000	\$5,000	\$2,500	\$50	\$25	\$25	\$0
MONTHLY MAINTENANCE FEE	\$0	\$0	\$0	\$0	\$8 if balance falls below \$1,000	\$10 if balance falls below \$5,000	\$10 if balance falls below \$2,500	\$5 a month if balance falls below \$50	\$0	\$0	\$0
INTEREST	YES	NO	NO	NO	YES	YES	YES	YES	YES	YES	YES
INTEREST TIERS	\$0 - \$25,000 Over \$25,000	NO	NO	NO	\$1,000 - \$9,999.99 \$10,000 - \$24,999.99 \$25,000 - \$49,999.99 \$50,000 >	\$0 - \$250,000 > \$250,000 >	\$2,500 - \$10,000 \$10,000.01 - \$100,000 \$100,000.01 - \$250,000 \$250,000.01 >	\$25 >	\$25 >	NO	NO
FREE DEBIT/ATM CARD*	YES	YES	YES	YES	YES	NO	NO	ATM ONLY	ATM ONLY	NO	YES
DAILY BALANCE REQUIREMENTS TO AVOID FEE	NONE	NONE	NONE	NONE	\$1,000	\$5,000	\$2,500	\$50	NONE	NONE	NONE
FREE OR DISCOUNTED CHECKS	NO	NO	NOT AVAILABLE	YES Some restrictions may apply	NO	NO	NO	NO	NO	NO	NO
FREE ONLINE & MOBILE BANKING WITH BILL PAY**	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
FREE ONLINE E-STATEMENTS	REQUIRED	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
ADDITIONAL FEATURES/REQUIREMENTS	Limit 2 accounts per primary account holder social security number Non-FirstBank ATM are refunded each month Higher interest earned when these qualifications are met: • 10 settled debit card point of sale (POS) transactions per statement cycle • One (1) automated clearing house (ACH) debit or ACH Credit per statement cycle	Paper statements \$2.50 Per month	Paper statements \$2.50 per month	For those 62 years of age and older	Interest paid on \$1,000 or greater	Interest paid monthly \$2 per withdrawal over six Meet FirstRewards requirements to qualify for Reward rates	Interest paid monthly \$2 per withdrawal over six	Interest paid monthly \$2 per withdrawal over six	Interest paid monthly \$2 per withdrawal over six 21 years and under	Interest paid monthly \$2 per withdrawal over six	Must follow IRS guidelines

See Schedule of Fees, Terms and Conditions or Truth-in-Savings Disclosure Addendum for further account information. All FirstBank accounts are subject to opening requirements. Some restrictions may apply.  
\*Overdraft fees may apply. \*\*Third party rates may apply. See your account disclosure for full details.

# CONSUMER SCHEDULE OF FEES

## PERSONAL ACCOUNTS

### FIRSTREWARDS CHECKING

\$0 per monthly statement cycle. Electronic statements are required.

### INTEREST CHECKING

\$8 per monthly statement cycle if account balance falls below \$1,000 any day of the monthly statement cycle.

### ESSENTIAL CHECKING

Free electronic statements.

### SWIPE SMART

Free electronic statements.

### USA CHECKING

\$0 per monthly statement cycle.

### FIRSTRATE MONEY MARKET

\$10 per month will be imposed if the account balance falls below \$5,000 any day of the statement cycle.

\$2 will be assessed for each withdrawal over six per statement cycle.

### FED FUNDS MONEY MARKET

\$10 per month will be imposed if the account balance falls below \$100,000 any day of the statement cycle.

\$2 will be assessed for each withdrawal over six per statement cycle.

### MONEY MARKET TIERED

\$10 per month will be imposed if the account balance falls below \$2,500 any day of the statement cycle.

\$2 will be assessed for each withdrawal over six per statement cycle.

### HEALTH SAVINGS ACCOUNT

\$0 per monthly statement cycle.

### BASIC SAVINGS

\$5 per statement cycle if account balance falls below \$50 any day of the statement cycle.

\$2 per each withdrawal over six per month.

### CHRISTMAS SAVINGS

\$2 per withdrawal over six per month.

### UTMA (Uniform Transfers to Minor Act)

\$2 per withdrawal over six per month.

## ADDITIONAL MISCELLANEOUS FEES

Wire Transfer - \$15 for incoming domestic and international, \$20 for outgoing domestic, \$50 for outgoing international.

Account Research - \$20 an hour with a \$25 minimum.

Dormant Accounts - \$5 service charge per account cycle on balances below \$1,000 and no transaction activity for 18 months.

Account Closing Fee - \$15 for accounts closing within six months of opening date.

Escheatment Fee - \$100

ATM Debit Card Replacement Fee - \$5 (First two cards free)

Statement Reprints - \$5 without images - \$10 with images

Returned Deposited Item Fee - \$5

Overdraft Item Fee\* - \$35

Night Depository Bag - \$20 (First bag free)

Sweep Transaction Charge - \$5

Stop Payment Charge - \$32

Account Activity Printouts - \$5

Account Verification - \$25

Garnishments/Levys - \$125 (or the maximum allowed by applicable law)

Money Orders - \$7.50

Cashier's Checks - \$5

Photocopies - \$0.25 per page

## ATM TRANSACTIONS

No charge for use of ATMs at office/branch locations or ATMs displaying the FirstBank logo.

Non-ATM provider may charge additional fee.

\*Overdrafts may be created by check, in-person withdrawals, ATM withdrawals or other electronic means.



**Facility-Based Assessment Areas  
Maps & Geographical Information**

## List of Facility-Based Assessment Areas

Facility-Based Assessment Areas	Description of Counties
<b>Chattanooga Multi-State MSA</b>	
16860-Chattanooga, TN-GA	Hamilton (065), Catoosa (047)
<b>Alabama</b>	
13820 - Birmingham-Hoover, AL	Jefferson (073), Shelby (117)
22520-Florence-Muscle Shoals, AL	Lauderdale (077)
26620-Huntsville, AL	Madison (089)
<b>Georgia</b>	
19140-Dalton, GA	Whitfield (313)
<b>Kentucky</b>	
14540-Bowling Green, KY	Allen (003), Warren (227)
<b>Tennessee</b>	
99999-TN Non-MSA	Bedford (003), Benton (005), Carroll (017), Coffee (031), Cumberland (035), Franklin (051), Decatur (039), DeKalb (041), Henderson (077), Henry (079), Humphreys (085), Lincoln (103), Moore (127), Perry (135), Putnam (141), Rhea (143)
27180-Jackson, TN	Chester (023), Crockett (033), Madison (113)
32820-Memphis, TN-AR-MS	Fayette (047); Shelby (157)
34100-Morristown, TN	Jefferson(089)
28940-Knoxville, TN	Knox (093), Union (173)
34980-Nashville--Davidson--Murfreesboro--Franklin, TN	Cannon (015), Davidson (037), Dickson (043), Rutherford (149), Williamson (187), Wilson (189)

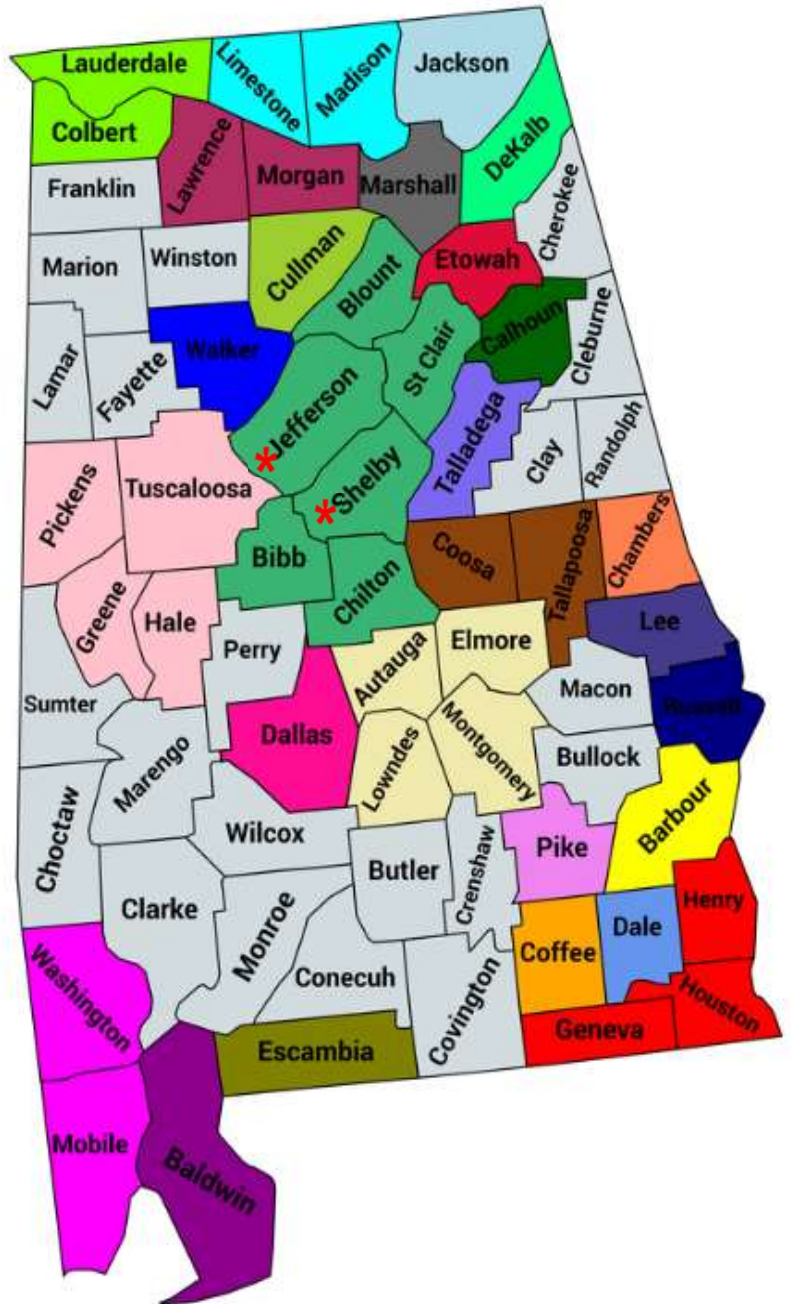


# State of Alabama

## 13820 Birmingham-Hoover, AL

Counties: Jefferson (073), Shelby (117)

- Albertville, AL  $\mu$ SA
- Alexander City, AL  $\mu$ SA
- Anniston-Oxford, AL MSA
- Atmore, AL  $\mu$ SA
- Auburn-Opelika, AL MSA
-  Birmingham-Hoover, AL MSA
- Columbus, GA-AL MSA
- Cullman, AL  $\mu$ SA
- Daphne-Fairhope-Foley, AL MSA
- Decatur, AL MSA
- Dothan, AL MSA
- Enterprise, AL  $\mu$ SA
- Eufaula, AL-GA  $\mu$ SA
- Florence-Muscle Shoals, AL MSA
- Fort Payne, AL  $\mu$ SA
- Gadsden, AL MSA
- Huntsville, AL MSA
- Jasper, AL  $\mu$ SA
- LaGrange, GA-AL  $\mu$ SA
- Mobile, AL MSA
- Montgomery, AL MSA
- Ozark, AL  $\mu$ SA
- Scottsboro, AL  $\mu$ SA
- Selma, AL  $\mu$ SA
- Talladega-Sylacauga, AL  $\mu$ SA
- Troy, AL  $\mu$ SA
- Tuscaloosa, AL MSA





**MSA: 13820 - Birmingham-Hoover, AL****Facility-Based Assessment Area****Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Jefferson	01	0001.00	Low	88.29
Jefferson	01	0003.00	Low	88.96
Jefferson	01	0004.00	Moderate	93.65
Jefferson	01	0005.00	Low	96.15
Jefferson	01	0007.00	Low	99.29
Jefferson	01	0008.00	Low	98.15
Jefferson	01	0011.00	Moderate	97.24
Jefferson	01	0012.00	Middle	95.23
Jefferson	01	0014.00	Moderate	98.55
Jefferson	01	0015.00	Low	93.76
Jefferson	01	0016.00	Moderate	86.92
Jefferson	01	0019.02	Low	90.8
Jefferson	01	0020.00	Low	80.97
Jefferson	01	0021.00	Moderate	83.29
Jefferson	01	0022.00	Low	91.84
Jefferson	01	0023.03	Moderate	95.6
Jefferson	01	0023.05	Middle	33.8
Jefferson	01	0023.06	Upper	22.36
Jefferson	01	0024.01	Low	42.81
Jefferson	01	0024.02	Low	94.54
Jefferson	01	0027.01	Upper	28.27
Jefferson	01	0027.02	Unknown	86.33
Jefferson	01	0029.00	Low	96.52
Jefferson	01	0030.01	Moderate	68.47
Jefferson	01	0030.02	Moderate	98.48
Jefferson	01	0031.00	Low	97.12
Jefferson	01	0032.00	Low	99.64
Jefferson	01	0033.00	Low	97.35
Jefferson	01	0034.00	Low	96.21
Jefferson	01	0035.00	Moderate	92.38
Jefferson	01	0036.00	Moderate	97.2
Jefferson	01	0037.00	Low	96.81
Jefferson	01	0038.02	Moderate	97.13
Jefferson	01	0038.03	Moderate	98.25
Jefferson	01	0039.00	Moderate	96.52
Jefferson	01	0040.00	Low	95.88
Jefferson	01	0042.00	Moderate	92.71
Jefferson	01	0045.01	Unknown	50.43

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Jefferson	01	0045.02	Low	61.03
Jefferson	01	0047.01	Upper	23.23
Jefferson	01	0047.02	Upper	15.31
Jefferson	01	0048.00	Upper	13.28
Jefferson	01	0049.01	Upper	31.79
Jefferson	01	0049.02	Upper	39.27
Jefferson	01	0050.00	Moderate	40.16
Jefferson	01	0051.01	Low	96.39
Jefferson	01	0051.03	Moderate	97.2
Jefferson	01	0051.04	Moderate	84.02
Jefferson	01	0052.00	Moderate	99.29
Jefferson	01	0053.02	Middle	59.13
Jefferson	01	0055.00	Low	86.16
Jefferson	01	0056.00	Middle	23.41
Jefferson	01	0057.01	Moderate	97.19
Jefferson	01	0057.02	Unknown	97.76
Jefferson	01	0058.00	Moderate	68.68
Jefferson	01	0059.03	Middle	80.7
Jefferson	01	0059.05	Moderate	86.5
Jefferson	01	0059.07	Moderate	81.46
Jefferson	01	0059.08	Moderate	87.18
Jefferson	01	0059.09	Moderate	91.85
Jefferson	01	0059.10	Moderate	93.62
Jefferson	01	0100.01	Moderate	53.83
Jefferson	01	0100.02	Middle	48.11
Jefferson	01	0101.00	Unknown	98.33
Jefferson	01	0102.00	Low	81.27
Jefferson	01	0103.01	Moderate	87.05
Jefferson	01	0103.02	Unknown	98.01
Jefferson	01	0104.01	Low	82.82
Jefferson	01	0104.02	Moderate	83
Jefferson	01	0105.00	Moderate	87.92
Jefferson	01	0106.03	Moderate	98.16
Jefferson	01	0106.04	Low	98.06
Jefferson	01	0106.05	Moderate	95.19
Jefferson	01	0107.01	Upper	41
Jefferson	01	0107.02	Upper	20.58
Jefferson	01	0107.03	Upper	9.52
Jefferson	01	0107.04	Upper	55.71
Jefferson	01	0107.05	Upper	12.9
Jefferson	01	0107.06	Middle	42.8

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Jefferson	01	0108.01	Upper	7.75
Jefferson	01	0108.02	Upper	3.99
Jefferson	01	0108.03	Upper	38.87
Jefferson	01	0108.04	Upper	5.89
Jefferson	01	0108.06	Upper	8.34
Jefferson	01	0108.07	Upper	22
Jefferson	01	0109.00	Moderate	80.21
Jefferson	01	0110.02	Moderate	55.17
Jefferson	01	0110.03	Moderate	28.94
Jefferson	01	0110.04	Upper	22.45
Jefferson	01	0111.08	Upper	27.28
Jefferson	01	0111.09	Upper	12.1
Jefferson	01	0111.10	Upper	38.78
Jefferson	01	0111.12	Moderate	68.22
Jefferson	01	0111.13	Middle	72.29
Jefferson	01	0111.14	Upper	18.64
Jefferson	01	0111.15	Upper	23.83
Jefferson	01	0111.16	Middle	16.64
Jefferson	01	0111.17	Middle	41.73
Jefferson	01	0112.05	Middle	43.92
Jefferson	01	0112.06	Middle	31.66
Jefferson	01	0112.07	Moderate	82.79
Jefferson	01	0112.08	Middle	55.67
Jefferson	01	0112.09	Middle	88.6
Jefferson	01	0112.10	Moderate	75.15
Jefferson	01	0113.01	Middle	28.21
Jefferson	01	0113.03	Upper	10.58
Jefferson	01	0113.04	Middle	10.65
Jefferson	01	0114.01	Moderate	24.47
Jefferson	01	0114.02	Upper	6.73
Jefferson	01	0115.00	Middle	6.91
Jefferson	01	0116.00	Middle	15.01
Jefferson	01	0117.04	Middle	9.92
Jefferson	01	0117.06	Middle	21.05
Jefferson	01	0117.07	Moderate	28.37
Jefferson	01	0117.08	Upper	29.76
Jefferson	01	0117.09	Middle	34.56
Jefferson	01	0117.10	Middle	13.68
Jefferson	01	0118.03	Moderate	89.13
Jefferson	01	0118.04	Moderate	88.48
Jefferson	01	0118.05	Moderate	72.83

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Jefferson	01	0118.06	Moderate	80.64
Jefferson	01	0119.01	Moderate	58.82
Jefferson	01	0119.04	Middle	94.67
Jefferson	01	0120.01	Middle	67
Jefferson	01	0120.03	Upper	49.24
Jefferson	01	0120.04	Middle	59.21
Jefferson	01	0121.03	Moderate	63.57
Jefferson	01	0121.04	Middle	50.68
Jefferson	01	0122.00	Middle	32.7
Jefferson	01	0123.02	Middle	12.51
Jefferson	01	0123.04	Middle	60.9
Jefferson	01	0123.06	Middle	86.9
Jefferson	01	0123.07	Middle	61.46
Jefferson	01	0124.01	Middle	94.32
Jefferson	01	0124.02	Moderate	76.92
Jefferson	01	0124.03	Middle	61.22
Jefferson	01	0125.00	Moderate	53.87
Jefferson	01	0126.02	Moderate	49.42
Jefferson	01	0127.01	Middle	43.45
Jefferson	01	0127.03	Upper	21.91
Jefferson	01	0127.04	Upper	17.8
Jefferson	01	0128.02	Upper	12.51
Jefferson	01	0128.04	Upper	11.9
Jefferson	01	0128.05	Upper	33.44
Jefferson	01	0129.05	Upper	7.72
Jefferson	01	0129.07	Middle	34.21
Jefferson	01	0129.08	Moderate	53.19
Jefferson	01	0129.10	Upper	21.9
Jefferson	01	0129.11	Upper	9.15
Jefferson	01	0129.13	Middle	67.7
Jefferson	01	0129.14	Upper	14.23
Jefferson	01	0129.16	Upper	16.11
Jefferson	01	0129.17	Upper	27.98
Jefferson	01	0129.18	Middle	62.78
Jefferson	01	0129.19	Middle	68.18
Jefferson	01	0129.20	Middle	35.38
Jefferson	01	0129.21	Upper	12.65
Jefferson	01	0130.02	Low	98.07
Jefferson	01	0131.00	Low	98.24
Jefferson	01	0132.00	Moderate	94.52
Jefferson	01	0133.00	Moderate	92.94

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Jefferson	01	0134.00	Moderate	94
Jefferson	01	0136.01	Moderate	95.44
Jefferson	01	0138.01	Moderate	91.19
Jefferson	01	0139.01	Moderate	78.34
Jefferson	01	0139.02	Middle	51.3
Jefferson	01	0140.01	Middle	8.72
Jefferson	01	0140.02	Upper	29.46
Jefferson	01	0141.04	Middle	60.81
Jefferson	01	0141.05	Middle	77.42
Jefferson	01	0141.06	Middle	18.32
Jefferson	01	0141.07	Middle	6.69
Jefferson	01	0142.05	Upper	52.54
Jefferson	01	0142.06	Middle	45.57
Jefferson	01	0142.07	Upper	46.87
Jefferson	01	0142.08	Upper	29.55
Jefferson	01	0142.09	Upper	49.44
Jefferson	01	0143.01	Middle	48.91
Jefferson	01	0143.03	Upper	38.58
Jefferson	01	0143.04	Middle	55.95
Jefferson	01	0144.04	Upper	35.37
Jefferson	01	0144.05	Middle	31.78
Jefferson	01	0144.06	Upper	15.97
Jefferson	01	0144.08	Middle	59.15
Jefferson	01	0144.09	Upper	17.36
Jefferson	01	0144.10	Upper	31.97
Jefferson	01	0144.12	Upper	12.29
Jefferson	01	0144.14	Upper	19.73
Jefferson	01	0144.15	Upper	41.02
Shelby	01	0301.02	Middle	28.19
Shelby	01	0301.03	Middle	15.85
Shelby	01	0302.11	Upper	12.95
Shelby	01	0302.12	Middle	48.32
Shelby	01	0302.15	Middle	24.02
Shelby	01	0302.16	Upper	20.35
Shelby	01	0302.18	Upper	17.62
Shelby	01	0302.19	Upper	17.43
Shelby	01	0302.20	Upper	15.7
Shelby	01	0302.21	Upper	31.24
Shelby	01	0303.04	Upper	15.51
Shelby	01	0303.05	Upper	9.63
Shelby	01	0303.06	Middle	36.78

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	01	0303.14	Middle	37.32
Shelby	01	0303.15	Middle	47.86
Shelby	01	0303.16	Middle	34.69
Shelby	01	0303.17	Upper	21.6
Shelby	01	0303.19	Middle	52.02
Shelby	01	0303.20	Middle	25.45
Shelby	01	0303.30	Upper	16.5
Shelby	01	0303.31	Upper	18.78
Shelby	01	0303.36	Upper	24.41
Shelby	01	0303.37	Middle	40.28
Shelby	01	0303.40	Middle	31.77
Shelby	01	0303.41	Middle	53.74
Shelby	01	0303.45	Upper	28.51
Shelby	01	0303.46	Upper	14.74
Shelby	01	0303.47	Middle	30.64
Shelby	01	0303.48	Upper	18.45
Shelby	01	0303.49	Middle	18.68
Shelby	01	0303.50	Upper	21.07
Shelby	01	0303.51	Upper	23.3
Shelby	01	0303.52	Upper	22.28
Shelby	01	0304.05	Moderate	41.42
Shelby	01	0304.06	Middle	35.69
Shelby	01	0304.07	Middle	34.01
Shelby	01	0304.08	Moderate	40.19
Shelby	01	0305.02	Middle	31.33
Shelby	01	0305.03	Upper	38.32
Shelby	01	0305.04	Middle	48.4
Shelby	01	0306.07	Upper	30.59
Shelby	01	0306.10	Middle	38.91
Shelby	01	0306.11	Upper	31.07
Shelby	01	0306.12	Upper	29.05
Shelby	01	0306.13	Middle	34.23
Shelby	01	0306.14	Middle	45.52
Shelby	01	0306.15	Upper	23.09
Shelby	01	0306.16	Upper	20.39
Shelby	01	0307.01	Middle	20.92
Shelby	01	0307.03	Middle	25.52
Shelby	01	0307.04	Middle	8.85
Shelby	01	0308.00	Middle	11.22
Shelby	01	0309.00	Moderate	8.56
Shelby	01	9800.00	Unknown	28.57

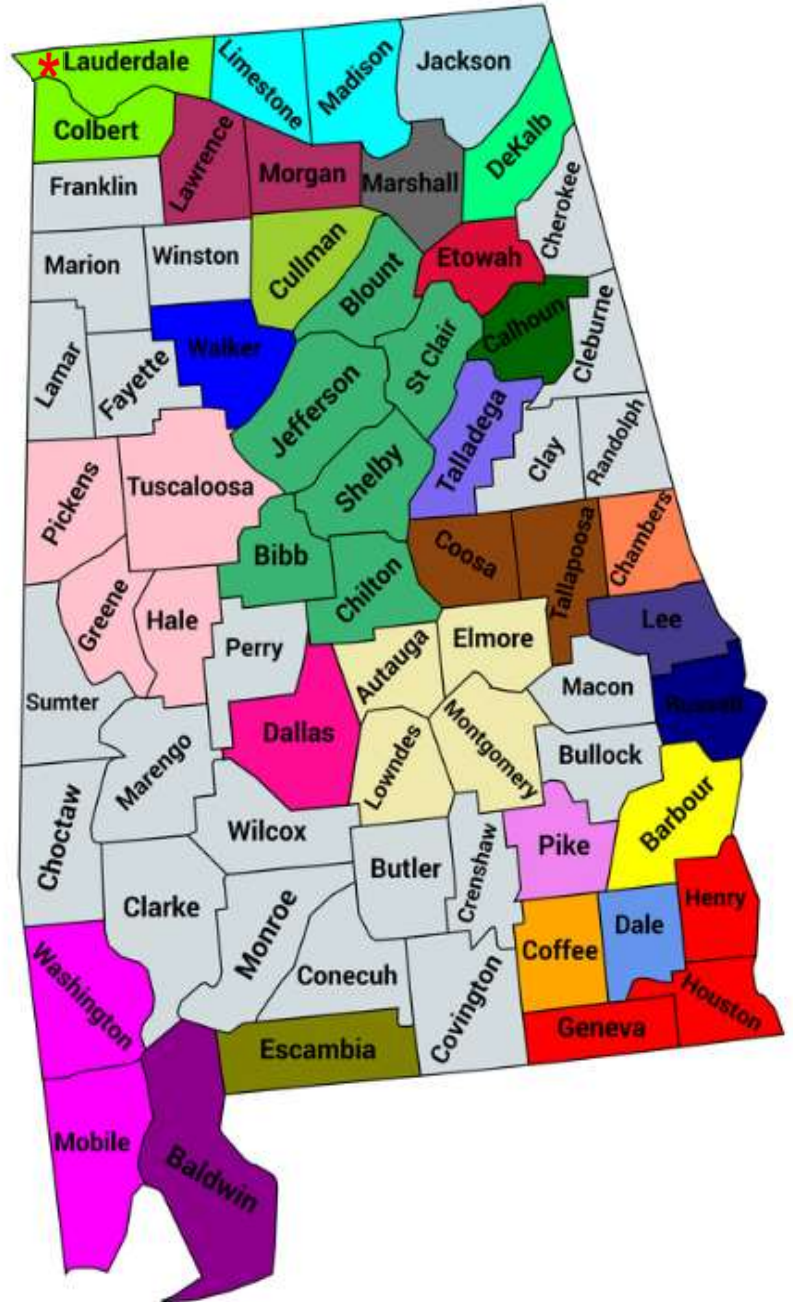
County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	01	9801.00	Unknown	100

# State of Alabama

## 22520 Florence-Muscle Shoals, AL

County: Lauderdale (077)

- Albertville, AL  $\mu$ SA
- Alexander City, AL  $\mu$ SA
- Anniston-Oxford, AL MSA
- Atmore, AL  $\mu$ SA
- Auburn-Opelika, AL MSA
- Birmingham-Hoover, AL MSA
- Columbus, GA-AL MSA
- Cullman, AL  $\mu$ SA
- Daphne-Fairhope-Foley, AL MSA
- Decatur, AL MSA
- Dothan, AL MSA
- Enterprise, AL  $\mu$ SA
- Eufaula, AL-GA  $\mu$ SA
- Florence-Muscle Shoals, AL MSA
- Fort Payne, AL  $\mu$ SA
- Gadsden, AL MSA
- Huntsville, AL MSA
- Jasper, AL  $\mu$ SA
- LaGrange, GA-AL  $\mu$ SA
- Mobile, AL MSA
- Montgomery, AL MSA
- Ozark, AL  $\mu$ SA
- Scottsboro, AL  $\mu$ SA
- Selma, AL  $\mu$ SA
- Talladega-Sylacauga, AL  $\mu$ SA
- Troy, AL  $\mu$ SA
- Tuscaloosa, AL MSA







**MSA: 22520 - Florence-Muscle Shoals, AL**  
**Facility-Based Assessment Area**  
**Geographical Information**

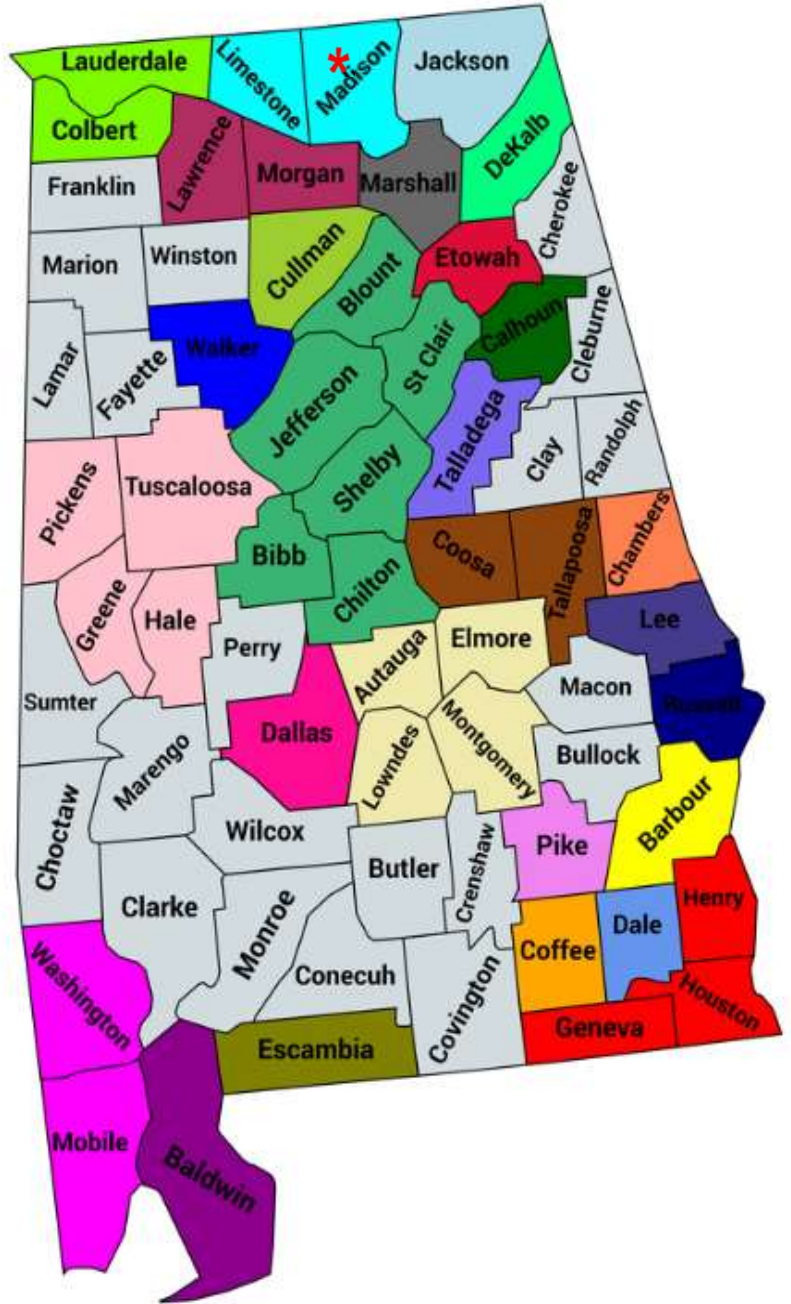
<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Lauderdale	13	0101.00	Low	38.59
Lauderdale	13	0102.00	Middle	30.78
Lauderdale	13	0103.00	Unknown	92.4
Lauderdale	13	0104.00	Middle	29.08
Lauderdale	13	0106.00	Moderate	28.11
Lauderdale	13	0107.00	Low	47.16
Lauderdale	13	0108.00	Moderate	41.88
Lauderdale	13	0109.01	Middle	25.3
Lauderdale	13	0109.02	Moderate	30.23
Lauderdale	13	0110.00	Moderate	39.06
Lauderdale	13	0111.01	Middle	16.64
Lauderdale	13	0111.02	Middle	16.73
Lauderdale	13	0112.00	Middle	16.43
Lauderdale	13	0113.00	Middle	4.75
Lauderdale	13	0114.01	Middle	6.4
Lauderdale	13	0114.02	Upper	7.46
Lauderdale	13	0115.02	Upper	6.22
Lauderdale	13	0115.03	Upper	11.78
Lauderdale	13	0115.04	Upper	13.34
Lauderdale	13	0116.02	Upper	6.15
Lauderdale	13	0116.03	Upper	6.83
Lauderdale	13	0116.05	Upper	12.05
Lauderdale	13	0116.06	Middle	10.61
Lauderdale	13	0117.00	Middle	6.69
Lauderdale	13	0118.01	Middle	5.75
Lauderdale	13	0118.02	Middle	12.57

# State of Alabama

## 26620 Huntsville, AL

County: Madison (089)

- Albertville, AL μSA
- Alexander City, AL μSA
- Anniston-Oxford, AL MSA
- Atmore, AL μSA
- Auburn-Opelika, AL MSA
- Birmingham-Hoover, AL MSA
- Columbus, GA-AL MSA
- Cullman, AL μSA
- Daphne-Fairhope-Foley, AL MSA
- Decatur, AL MSA
- Dothan, AL MSA
- Enterprise, AL μSA
- Eufaula, AL-GA μSA
- Florence-Muscle Shoals, AL MSA
- Fort Payne, AL μSA
- Gadsden, AL MSA
- ➔ ■ Huntsville, AL MSA
- Jasper, AL μSA
- LaGrange, GA-AL μSA
- Mobile, AL MSA
- Montgomery, AL MSA
- Ozark, AL μSA
- Scottsboro, AL μSA
- Selma, AL μSA
- Talladega-Sylacauga, AL μSA
- Troy, AL μSA
- Tuscaloosa, AL MSA





**MSA: 26620 - Huntsville, AL**  
**Facility-Based Assessment Area**  
**Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Minority %</b>
Madison	01	0002.03	Low	89.18
Madison	01	0003.01	Low	85.55
Madison	01	0003.02	Low	90.78
Madison	01	0004.03	Moderate	85.77
Madison	01	0005.01	Moderate	85.86
Madison	01	0005.02	Moderate	88.69
Madison	01	0005.03	Moderate	84.38
Madison	01	0006.01	Moderate	74.4
Madison	01	0006.02	Moderate	76.14
Madison	01	0007.01	Low	86.49
Madison	01	0007.02	Middle	72.08
Madison	01	0009.01	Middle	20.1
Madison	01	0009.02	Middle	20.27
Madison	01	0010.00	Middle	16.19
Madison	01	0012.00	Low	92.66
Madison	01	0013.01	Low	80.08
Madison	01	0013.02	Low	75.86
Madison	01	0014.01	Upper	30.76
Madison	01	0014.03	Unknown	54.17
Madison	01	0014.04	Moderate	43.52
Madison	01	0015.00	Low	49.52
Madison	01	0017.00	Upper	8.85
Madison	01	0018.01	Upper	9.44
Madison	01	0019.01	Upper	12.87
Madison	01	0019.02	Upper	13.52
Madison	01	0019.03	Upper	14.14
Madison	01	0020.00	Upper	12.54
Madison	01	0021.00	Low	68.01
Madison	01	0022.00	Low	56.46
Madison	01	0023.00	Low	61.26
Madison	01	0024.00	Low	70.68
Madison	01	0025.01	Low	77.26
Madison	01	0025.02	Moderate	64.9
Madison	01	0026.00	Upper	19.9
Madison	01	0027.01	Upper	18.75
Madison	01	0027.21	Middle	17.1
Madison	01	0027.22	Upper	18.98
Madison	01	0028.01	Moderate	28.59

County	State Code	Tract Code	Tract Income Level	Minority %
Madison	01	0028.03	Middle	29.75
Madison	01	0028.04	Upper	16.88
Madison	01	0029.11	Upper	15.88
Madison	01	0029.12	Upper	13.97
Madison	01	0029.22	Upper	16.56
Madison	01	0029.23	Upper	24.18
Madison	01	0029.24	Middle	31.22
Madison	01	0030.00	Low	55.8
Madison	01	0031.00	Upper	30.41
Madison	01	0101.01	Middle	21.09
Madison	01	0101.02	Middle	30.46
Madison	01	0102.00	Upper	20.08
Madison	01	0103.02	Middle	22.12
Madison	01	0103.03	Moderate	19.38
Madison	01	0103.04	Moderate	20.83
Madison	01	0104.03	Moderate	23.09
Madison	01	0104.04	Moderate	19.35
Madison	01	0104.05	Middle	29.08
Madison	01	0104.06	Moderate	35.22
Madison	01	0105.02	Middle	51.97
Madison	01	0105.03	Middle	49.43
Madison	01	0105.04	Upper	41.7
Madison	01	0106.12	Middle	45.09
Madison	01	0106.23	Upper	39.74
Madison	01	0106.25	Low	86.37
Madison	01	0106.26	Middle	49.36
Madison	01	0106.27	Middle	41
Madison	01	0106.28	Upper	31.52
Madison	01	0106.29	Upper	30.65
Madison	01	0106.30	Upper	34.18
Madison	01	0106.31	Upper	37.58
Madison	01	0107.03	Middle	32.98
Madison	01	0107.04	Middle	39.93
Madison	01	0107.05	Moderate	52.46
Madison	01	0107.06	Middle	35.23
Madison	01	0108.01	Upper	25.62
Madison	01	0108.02	Middle	22.22
Madison	01	0109.02	Moderate	19.77
Madison	01	0109.03	Middle	16.94
Madison	01	0109.04	Upper	21.31
Madison	01	0109.05	Upper	13.84

County	State Code	Tract Code	Tract Income Level	Minority %
Madison	01	0110.12	Upper	22.35
Madison	01	0110.13	Middle	28.37
Madison	01	0110.21	Moderate	47.86
Madison	01	0110.23	Upper	30.49
Madison	01	0110.24	Upper	31.88
Madison	01	0110.25	Middle	43.59
Madison	01	0110.26	Upper	29.96
Madison	01	0110.27	Upper	33.75
Madison	01	0110.28	Moderate	45.79
Madison	01	0111.00	Middle	41.5
Madison	01	0112.01	Upper	48.23
Madison	01	0112.02	Upper	42.67
Madison	01	0112.03	Upper	51.86
Madison	01	0113.01	Middle	20.66
Madison	01	0113.02	Upper	15.83
Madison	01	0114.00	Middle	10.78



# State of Georgia

## 19140 Dalton, GA

County: Whitfield (313)

- Albany, GA MSA
- Americus, GA μSA
- Athens-Clarke County, GA MSA
- Atlanta-Sandy Springs-Alpharetta, GA MSA
- Augusta-Richmond County, GA-SC MSA
- Bainbridge, GA μSA
- Brunswick, GA MSA
- Calhoun, GA μSA
- Cedartown, GA μSA
- Chattanooga, TN-GA MSA
- Columbus, GA-AL MSA
- Cordele, GA μSA
- Cornelia, GA μSA
- ➔ ■ Dalton, GA MSA
- Douglas, GA μSA
- Dublin, GA μSA
- Eufaula, AL-GA μSA
- Fitzgerald, GA μSA
- Gainesville, GA MSA
- Hinesville, GA MSA
- Jefferson, GA μSA
- Jesup, GA μSA
- LaGrange, GA-AL μSA
- Macon-Bibb County, GA MSA
- Milledgeville, GA μSA
- Moultrie, GA μSA
- Rome, GA MSA
- Savannah, GA MSA
- St. Marys, GA μSA
- Statesboro, GA μSA
- Summerville, GA μSA
- Thomaston, GA μSA
- Thomasville, GA μSA
- Tifton, GA μSA
- Toccoa, GA μSA
- Valdosta, GA MSA
- Vidalia, GA μSA
- Warner Robins, GA MSA
- Waycross, GA μSA





**MSA: 19140 - Dalton, GA**  
**Facility-Based Assessment Area**  
**Geographical Information**

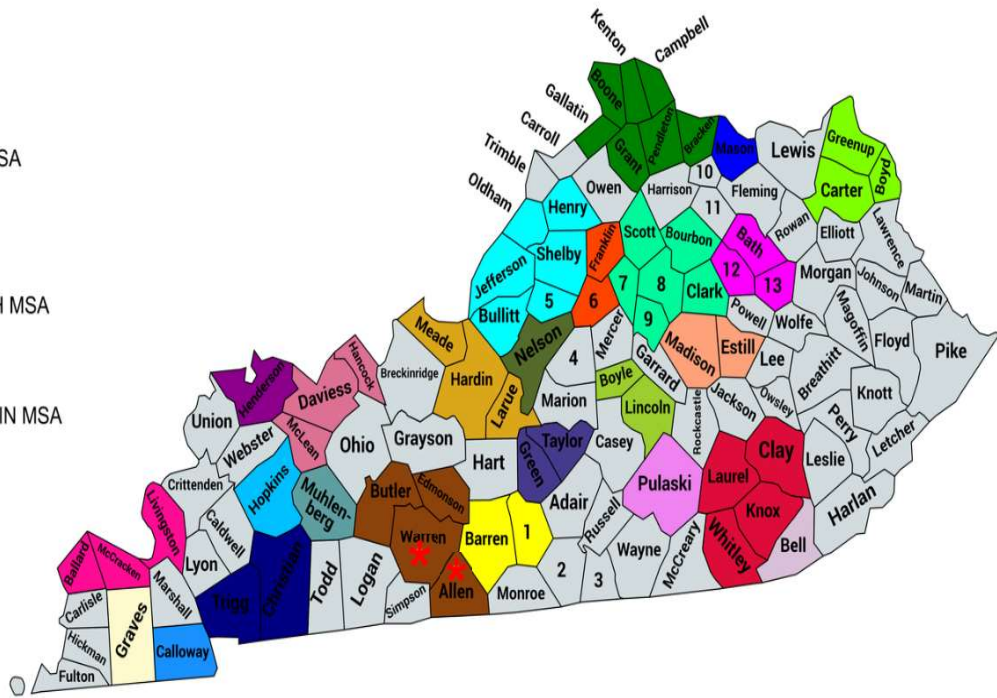
<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Whitfield	13	0001.01	Middle	11.95
Whitfield	13	0001.03	Upper	29.77
Whitfield	13	0001.04	Middle	15.46
Whitfield	13	0002.00	Middle	25.8
Whitfield	13	0003.01	Middle	53.37
Whitfield	13	0003.03	Middle	44.7
Whitfield	13	0003.04	Middle	36.33
Whitfield	13	0004.01	Middle	80.69
Whitfield	13	0004.02	Moderate	60.49
Whitfield	13	0005.01	Middle	30.43
Whitfield	13	0005.02	Moderate	57.73
Whitfield	13	0006.00	Upper	17.73
Whitfield	13	0007.00	Middle	14.98
Whitfield	13	0008.01	Middle	20.61
Whitfield	13	0008.02	Middle	20.92
Whitfield	13	0009.00	Upper	38.94
Whitfield	13	0010.00	Middle	84.47
Whitfield	13	0011.00	Moderate	52.74
Whitfield	13	0012.00	Moderate	63.39
Whitfield	13	0013.00	Moderate	79.65
Whitfield	13	0014.00	Upper	48.22
Whitfield	13	0015.00	Middle	33.38

# State of Kentucky

## 14540 Bowling Green, KY

Counties: Allen (003), Warren (227)

- Bardstown, KY μSA
- Bowling Green, KY MSA
- Campbellsville, KY μSA
- Central City, KY μSA
- Cincinnati, OH-KY-IN MSA
- Clarksville, TN-KY MSA
- Danville, KY μSA
- Elizabethtown-Fort Knox, KY MSA
- Evansville, IN-KY MSA
- Frankfort, KY μSA
- Glasgow, KY μSA
- Huntington-Ashland, WV-KY-OH MSA
- Lexington-Fayette, KY MSA
- London, KY μSA
- Louisville/Jefferson County, KY-IN MSA
- Madisonville, KY μSA
- Mayfield, KY μSA
- Maysville, KY μSA
- Middlesborough, KY μSA
- Mount Sterling, KY μSA
- Murray, KY μSA
- Owensboro, KY MSA
- Paducah, KY-IL μSA
- Richmond-Berea, KY μSA
- Somerset, KY μSA



- 1 Metcalfe
- 2 Cumberland
- 3 Clinton
- 4 Washington
- 5 Spencer
- 6 Anderson
- 7 Woodford
- 8 Fayette
- 9 Jessamine
- 10 Robertson
- 11 Nicholas
- 12 Montgomery
- 13 Menifee



**MSA: 14540 - Bowling Green, KY****Facility-Based Assessment Area****Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Allen	21	9201.00	Middle	6.83
Allen	21	9202.00	Middle	5.96
Allen	21	9203.00	Moderate	8.65
Allen	21	9204.00	Middle	8.92
Allen	21	9205.00	Moderate	7.08
Allen	21	9206.00	Middle	7.68
Allen	21	9999.99	Middle	7.78
Warren	21	0101.00	Unknown	27.66
Warren	21	0102.00	Low	57.83
Warren	21	0103.00	Moderate	51.79
Warren	21	0104.00	Upper	24.26
Warren	21	0105.00	Moderate	15.19
Warren	21	0106.00	Middle	26.55
Warren	21	0107.01	Middle	34.51
Warren	21	0107.02	Middle	41.28
Warren	21	0108.01	Middle	21.86
Warren	21	0108.02	Upper	18.47
Warren	21	0108.04	Moderate	32.51
Warren	21	0108.05	Middle	27.79
Warren	21	0109.00	Upper	24.6
Warren	21	0110.01	Moderate	62.67
Warren	21	0110.02	Moderate	49.77
Warren	21	0111.00	Upper	22.19
Warren	21	0112.00	Moderate	52.77
Warren	21	0113.00	Moderate	26.22
Warren	21	0114.01	Upper	13.31
Warren	21	0114.02	Upper	18.68
Warren	21	0115.00	Upper	9.02
Warren	21	0116.00	Middle	11.82
Warren	21	0117.01	Middle	30.34
Warren	21	0117.02	Middle	10.96
Warren	21	0118.01	Middle	7.53
Warren	21	0118.02	Middle	7.61
Warren	21	0119.00	Middle	12.45

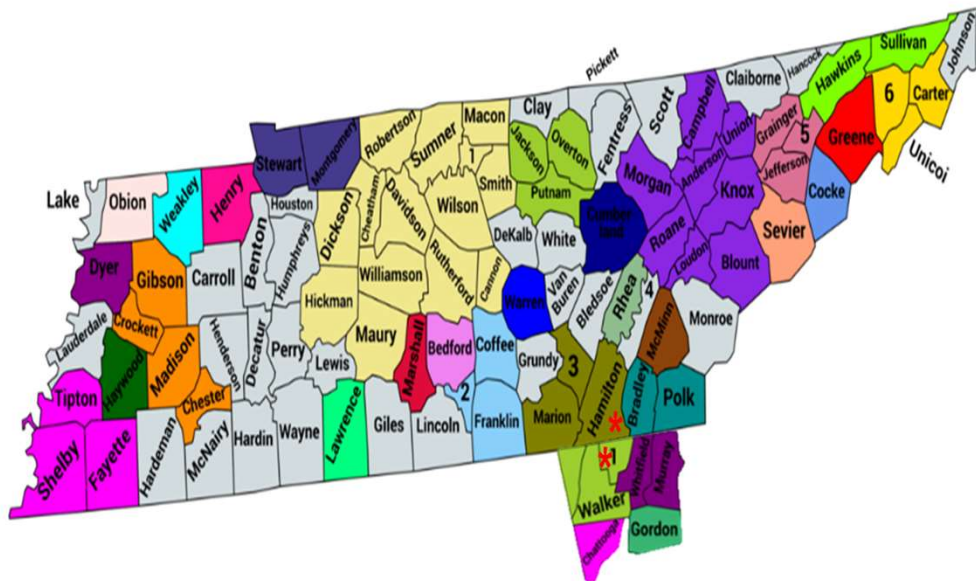
# Multi-States (TN-GA)

## 16860 Chattanooga, TN-GA

Counties: Hamilton (TN-065), Catoosa (GA-047)

- Athens, TN μSA
- Brownsville, TN μSA
- Chattanooga, TN-GA MS  Chattanooga, TN-GA MSA
- Clarksville, TN-KY MSA
- Cleveland, TN MSA
- Cookeville, TN μSA
- Crossville, TN μSA
- Dayton, TN μSA
- Dyersburg, TN μSA
- Greeneville, TN μSA
- Jackson, TN MSA
- Johnson City, TN MSA
- Kingsport-Bristol, TN-VA MSA
- Knoxville, TN MSA
- Lawrenceburg, TN μSA
- Lewisburg, TN μSA
- Martin, TN μSA
- McMinnville, TN μSA
- Memphis, TN-MS-AR MSA
- Morristown, TN MSA
- Nashville-Davidson--Murfreesboro--Franklin, TN MSA
- Newport, TN μSA
- Paris, TN μSA
- Sevierville, TN μSA
- Shelbyville, TN μSA
- Tullahoma-Manchester, TN μSA
- Union City, TN μSA

\* 1 Catoosa



- 1 Trousdale
- 2 Moore
- 3 Sequatchie
- 4 Meigs
- 5 Hamblen
- 6 Washington

**MSA: 16860 - Chattanooga, TN-GA****Facility-Based Assessment Area****Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Catoosa	13	0301.00	Middle	10.3
Catoosa	13	0302.01	Middle	13.68
Catoosa	13	0302.02	Middle	11.65
Catoosa	13	0303.03	Upper	9.34
Catoosa	13	0303.04	Middle	9.58
Catoosa	13	0303.05	Middle	9.61
Catoosa	13	0303.06	Middle	10.18
Catoosa	13	0304.02	Upper	13.42
Catoosa	13	0304.03	Upper	7.49
Catoosa	13	0304.04	Middle	14.04
Catoosa	13	0305.01	Middle	18.8
Catoosa	13	0305.02	Moderate	17.29
Catoosa	13	0306.00	Middle	14.07
Catoosa	13	0307.01	Moderate	15.3
Catoosa	13	0307.02	Middle	18.92
Hamilton	47	0004.00	Low	89.31
Hamilton	47	0006.00	Upper	12.9
Hamilton	47	0007.00	Upper	13.57
Hamilton	47	0008.00	Upper	24.49
Hamilton	47	0011.00	Moderate	57.47
Hamilton	47	0012.00	Moderate	82.33
Hamilton	47	0013.00	Low	64.58
Hamilton	47	0014.00	Moderate	53.54
Hamilton	47	0016.00	Low	72.37
Hamilton	47	0018.00	Moderate	25.8
Hamilton	47	0019.00	Low	89.33
Hamilton	47	0020.00	Upper	47.47
Hamilton	47	0023.00	Moderate	68.82
Hamilton	47	0024.00	Low	69.49
Hamilton	47	0025.00	Low	73.97
Hamilton	47	0026.00	Moderate	84.11
Hamilton	47	0028.00	Upper	32.01
Hamilton	47	0029.00	Middle	57.01
Hamilton	47	0030.00	Moderate	60.47
Hamilton	47	0031.00	Upper	25.71
Hamilton	47	0032.00	Moderate	82.56
Hamilton	47	0033.00	Middle	78.69
Hamilton	47	0034.00	Low	52.27

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Hamilton	47	0101.01	Middle	12.37
Hamilton	47	0101.03	Middle	11.5
Hamilton	47	0101.04	Middle	9.91
Hamilton	47	0102.01	Upper	6.86
Hamilton	47	0102.02	Middle	9.88
Hamilton	47	0103.03	Middle	8.99
Hamilton	47	0103.04	Upper	8.34
Hamilton	47	0103.05	Middle	5.87
Hamilton	47	0103.06	Middle	11.08
Hamilton	47	0103.08	Middle	7.7
Hamilton	47	0103.09	Unknown	9.37
Hamilton	47	0104.11	Upper	13.14
Hamilton	47	0104.12	Middle	12.2
Hamilton	47	0104.13	Upper	11.7
Hamilton	47	0104.31	Middle	22.77
Hamilton	47	0104.32	Upper	16
Hamilton	47	0104.33	Middle	34.77
Hamilton	47	0104.34	Upper	8.69
Hamilton	47	0104.35	Middle	23.72
Hamilton	47	0105.01	Middle	21.6
Hamilton	47	0105.02	Upper	16.68
Hamilton	47	0106.00	Middle	17.2
Hamilton	47	0107.00	Middle	20.16
Hamilton	47	0108.00	Moderate	24.88
Hamilton	47	0109.01	Upper	18.71
Hamilton	47	0109.02	Middle	13.3
Hamilton	47	0109.04	Middle	23.91
Hamilton	47	0109.05	Middle	18.28
Hamilton	47	0110.01	Middle	6.56
Hamilton	47	0110.03	Upper	10.45
Hamilton	47	0110.04	Upper	9.46
Hamilton	47	0111.00	Upper	7.34
Hamilton	47	0112.03	Upper	25.28
Hamilton	47	0112.04	Middle	19.04
Hamilton	47	0112.05	Upper	16.54
Hamilton	47	0112.06	Middle	23.43
Hamilton	47	0113.11	Middle	32.47
Hamilton	47	0113.14	Upper	25.85
Hamilton	47	0113.21	Upper	37.83
Hamilton	47	0113.23	Upper	28.66
Hamilton	47	0113.24	Upper	23.51

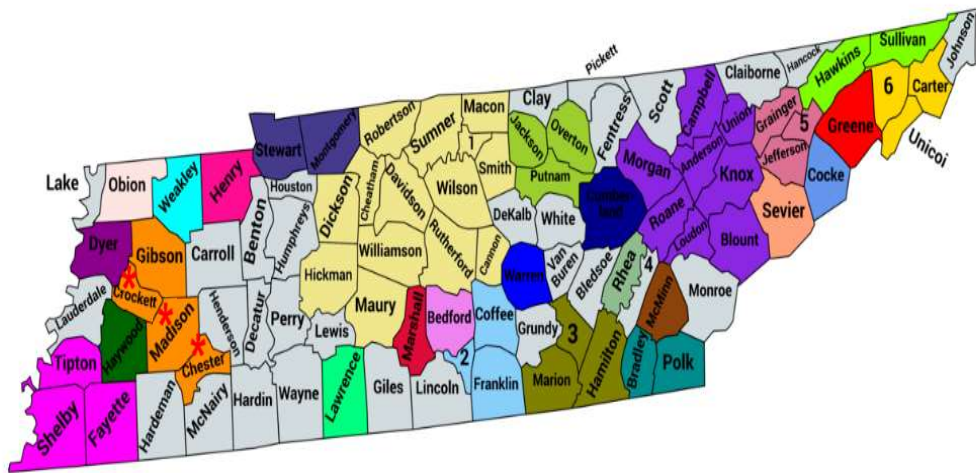
County	State Code	Tract Code	Tract Income Level	Tract Minority %
Hamilton	47	0113.25	Upper	24.89
Hamilton	47	0113.26	Upper	33.47
Hamilton	47	0114.02	Middle	69.06
Hamilton	47	0114.11	Moderate	50.7
Hamilton	47	0114.13	Middle	32.36
Hamilton	47	0114.42	Middle	33.24
Hamilton	47	0114.44	Moderate	84.93
Hamilton	47	0114.45	Moderate	57.41
Hamilton	47	0114.46	Middle	35.6
Hamilton	47	0114.47	Upper	21
Hamilton	47	0114.48	Middle	43.14
Hamilton	47	0114.49	Middle	44.39
Hamilton	47	0116.00	Moderate	35.29
Hamilton	47	0117.00	Middle	27.09
Hamilton	47	0118.00	Middle	33.24
Hamilton	47	0119.00	Moderate	42.46
Hamilton	47	0120.00	Upper	5.49
Hamilton	47	0121.00	Middle	11.46
Hamilton	47	0122.00	Low	93.85
Hamilton	47	0123.00	Moderate	68.39
Hamilton	47	0124.00	Upper	29.58
Hamilton	47	9801.00	Unknown	0
Hamilton	47	9802.00	Unknown	0

# State of Tennessee

## 27180 Jackson, TN

Counties: Chester (023), Crockett (033), Madison (113)

- Athens, TN μSA
- Brownsville, TN μSA
- Chattanooga, TN-GA MSA
- Clarksville, TN-KY MSA
- Cleveland, TN MSA
- Cookeville, TN μSA
- Crossville, TN μSA
- Dayton, TN μSA
- Dyersburg, TN μSA
- Greeneville, TN μSA
- Jackson, TN MSA
- Johnson City, TN MSA
- Kingsport-Bristol, TN-VA MSA
- Knoxville, TN MSA
- Lawrenceburg, TN μSA
- Lewisburg, TN μSA
- Martin, TN μSA
- McMinnville, TN μSA
- Memphis, TN-MS-AR MSA
- Morristown, TN MSA
- Nashville-Davidson--Murfreesboro--Franklin, TN MSA
- Newport, TN μSA
- Paris, TN μSA
- Sevierville, TN μSA
- Shelbyville, TN μSA
- Tullahoma-Manchester, TN μSA
- Union City, TN μSA



- 1 Trousdale
- 2 Moore
- 3 Sequatchie
- 4 Meigs
- 5 Hamblen
- 6 Washington



**MSA: 27180 - Jackson, TN**  
**Facility-Based Assessment Area**  
**Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Chester	47	9701.01	Upper	10.87
Chester	47	9701.02	Middle	12.37
Chester	47	9702.00	Middle	26.24
Chester	47	9703.01	Middle	12.48
Chester	47	9703.02	Middle	12.4
Chester	47	9999.99	Middle	16.55
Crockett	47	9610.00	Middle	19.92
Crockett	47	9611.00	Middle	31.02
Crockett	47	9612.00	Middle	15.31
Crockett	47	9613.00	Middle	22.56
Crockett	47	9614.00	Middle	36.8
Crockett	47	9999.99	Middle	27.71
Madison	47	0001.00	Middle	64.65
Madison	47	0002.00	Middle	72.4
Madison	47	0003.00	Middle	45.26
Madison	47	0004.00	Moderate	80.57
Madison	47	0005.00	Low	93.01
Madison	47	0006.00	Moderate	60.01
Madison	47	0007.00	Low	54.88
Madison	47	0008.00	Unknown	68.44
Madison	47	0009.00	Low	93.69
Madison	47	0010.00	Moderate	91.52
Madison	47	0011.00	Low	94.66
Madison	47	0013.00	Moderate	25.76
Madison	47	0014.01	Middle	36.64
Madison	47	0014.02	Upper	32.5
Madison	47	0015.01	Middle	51.2
Madison	47	0015.02	Upper	16.03
Madison	47	0016.03	Upper	35.49
Madison	47	0016.04	Upper	29.84
Madison	47	0016.05	Middle	31.17
Madison	47	0016.07	Middle	45.4
Madison	47	0016.08	Upper	22.36
Madison	47	0016.09	Upper	19.22
Madison	47	0016.10	Upper	19.73
Madison	47	0016.11	Upper	41.04
Madison	47	0016.12	Middle	48.13
Madison	47	0017.00	Upper	48.88

Madison	47	0018.00	Middle	34.74
Madison	47	0019.00	Upper	14.94

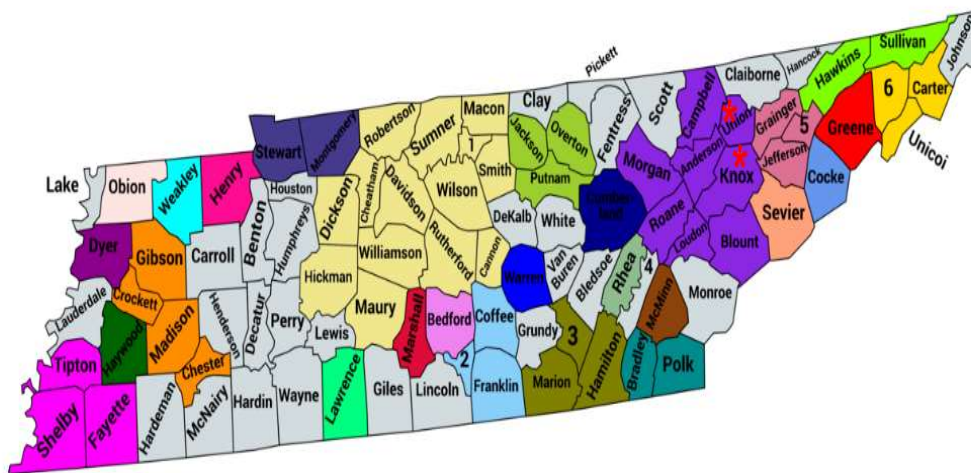


# State of Tennessee

## 28940 Knoxville, TN

Counties: Knox (093), Union (173)

- Athens, TN μSA
- Brownsville, TN μSA
- Chattanooga, TN-GA MSA
- Clarksville, TN-KY MSA
- Cleveland, TN MSA
- Cookeville, TN μSA
- Crossville, TN μSA
- Dayton, TN μSA
- Dyersburg, TN μSA
- Greeneville, TN μSA
- Jackson, TN MSA
- Johnson City, TN MSA
- Kingsport-Bristol, TN-VA MSA
- Knoxville, TN MSA
- Lawrenceburg, TN μSA
- Lewisburg, TN μSA
- Martin, TN μSA
- McMinnville, TN μSA
- Memphis, TN-MS-AR MSA
- Morristown, TN MSA
- Nashville-Davidson--Murfreesboro--Franklin, TN MSA
- Newport, TN μSA
- Paris, TN μSA
- Sevierville, TN μSA
- Shelbyville, TN μSA
- Tullahoma-Manchester, TN μSA
- Union City, TN μSA



- 1 Trousdale
- 2 Moore
- 3 Sequatchie
- 4 Meigs
- 5 Hamblen
- 6 Washington



**MSA: 28940 - Knoxville, TN**  
**Facility-Based Assessment Area**  
**Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Knox	47	0001.00	Upper	17.72
Knox	47	0008.00	Low	29.55
Knox	47	0009.01	Unknown	24.47
Knox	47	0009.02	Unknown	21.86
Knox	47	0014.00	Low	59.97
Knox	47	0015.00	Moderate	29.46
Knox	47	0016.00	Middle	21.19
Knox	47	0017.00	Moderate	32.69
Knox	47	0018.00	Middle	29.91
Knox	47	0019.00	Low	71.64
Knox	47	0020.00	Low	87.51
Knox	47	0021.00	Moderate	69.41
Knox	47	0022.00	Middle	18.32
Knox	47	0023.00	Middle	22.36
Knox	47	0024.00	Moderate	29.13
Knox	47	0026.00	Low	45.7
Knox	47	0027.00	Low	35.53
Knox	47	0028.00	Low	67.41
Knox	47	0029.00	Low	46.43
Knox	47	0030.00	Moderate	30.59
Knox	47	0031.00	Moderate	32.88
Knox	47	0032.00	Low	63.79
Knox	47	0033.00	Upper	33.77
Knox	47	0034.00	Middle	14.26
Knox	47	0035.01	Middle	13.82
Knox	47	0035.02	Middle	16.92
Knox	47	0037.00	Upper	22.6
Knox	47	0038.01	Middle	31.83
Knox	47	0038.02	Middle	29.1
Knox	47	0039.01	Middle	33.08
Knox	47	0039.02	Moderate	35.31
Knox	47	0040.00	Moderate	33.77
Knox	47	0041.00	Middle	22.77
Knox	47	0042.00	Middle	16.03
Knox	47	0043.00	Middle	28.46
Knox	47	0044.01	Upper	11.58
Knox	47	0044.03	Upper	24.71
Knox	47	0044.04	Upper	19.28

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Knox	47	0045.01	Moderate	27.89
Knox	47	0045.02	Upper	17.54
Knox	47	0046.06	Upper	19.42
Knox	47	0046.07	Upper	23.71
Knox	47	0046.08	Moderate	23.68
Knox	47	0046.09	Middle	25.44
Knox	47	0046.10	Middle	34.96
Knox	47	0046.11	Upper	20.72
Knox	47	0046.12	Upper	20.78
Knox	47	0046.13	Upper	27.71
Knox	47	0046.14	Moderate	24.97
Knox	47	0046.15	Moderate	28.1
Knox	47	0047.00	Middle	22.77
Knox	47	0048.00	Moderate	25.14
Knox	47	0049.00	Middle	18.43
Knox	47	0050.00	Middle	16.73
Knox	47	0051.00	Upper	14.08
Knox	47	0052.02	Moderate	23.95
Knox	47	0052.03	Middle	19.5
Knox	47	0052.04	Middle	9.9
Knox	47	0053.01	Middle	11.61
Knox	47	0053.02	Middle	10.3
Knox	47	0054.01	Middle	12.79
Knox	47	0054.02	Middle	10.19
Knox	47	0055.01	Middle	11.94
Knox	47	0055.02	Middle	9.53
Knox	47	0056.02	Middle	9.14
Knox	47	0056.03	Upper	15.36
Knox	47	0056.04	Middle	12.94
Knox	47	0057.01	Upper	11.71
Knox	47	0057.04	Middle	19.71
Knox	47	0057.06	Upper	21.83
Knox	47	0057.07	Upper	18.61
Knox	47	0057.08	Upper	13.46
Knox	47	0057.09	Upper	13.47
Knox	47	0057.10	Upper	11.8
Knox	47	0057.11	Upper	16.45
Knox	47	0057.13	Upper	12.83
Knox	47	0057.14	Upper	13.6
Knox	47	0058.03	Upper	19.65
Knox	47	0058.07	Upper	22.65

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Knox	47	0058.08	Upper	17.16
Knox	47	0058.09	Upper	14.57
Knox	47	0058.10	Upper	12.62
Knox	47	0058.11	Upper	18.97
Knox	47	0058.13	Upper	18.12
Knox	47	0058.14	Upper	14.62
Knox	47	0058.15	Upper	15.75
Knox	47	0059.03	Upper	19.61
Knox	47	0059.06	Upper	10.89
Knox	47	0059.07	Upper	17.66
Knox	47	0059.08	Middle	18.38
Knox	47	0059.09	Upper	12.43
Knox	47	0059.10	Upper	22.6
Knox	47	0059.11	Upper	22.88
Knox	47	0059.12	Upper	23.88
Knox	47	0060.01	Middle	19.11
Knox	47	0060.02	Middle	13.09
Knox	47	0060.03	Upper	12.9
Knox	47	0061.02	Middle	8.78
Knox	47	0061.03	Middle	12.23
Knox	47	0061.04	Upper	15.75
Knox	47	0062.02	Upper	8.39
Knox	47	0062.03	Middle	11.05
Knox	47	0062.05	Upper	7
Knox	47	0062.06	Middle	8.95
Knox	47	0062.07	Middle	15.01
Knox	47	0062.08	Middle	20.04
Knox	47	0063.01	Middle	8.53
Knox	47	0063.02	Moderate	6.64
Knox	47	0064.01	Middle	11.77
Knox	47	0064.02	Middle	7.56
Knox	47	0064.03	Middle	8.59
Knox	47	0065.01	Middle	9.42
Knox	47	0065.02	Middle	9.63
Knox	47	0066.00	Upper	18.71
Knox	47	0067.00	Moderate	56.84
Knox	47	0068.00	Low	67.14
Knox	47	0069.01	Unknown	23.72
Knox	47	0069.02	Unknown	22.65
Knox	47	0069.03	Low	21.86
Knox	47	0070.00	Low	60.87

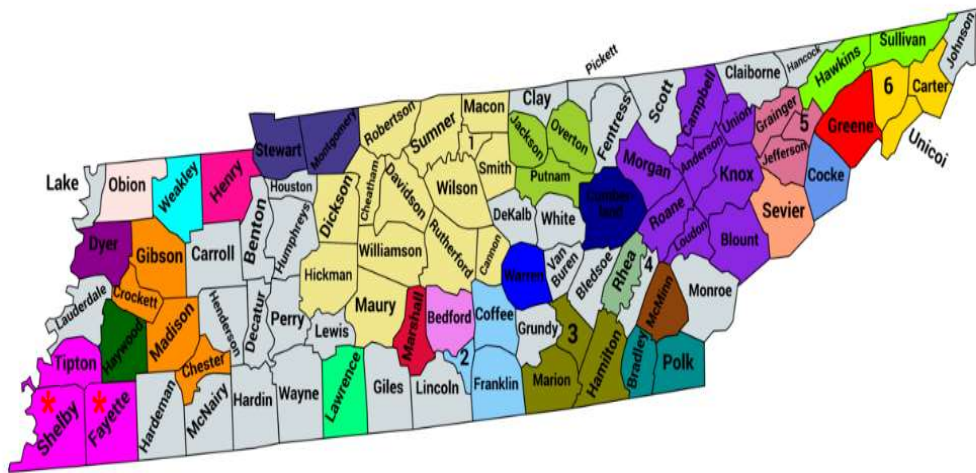
<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Knox	47	0071.00	Upper	11.91
Union	47	0401.01	Moderate	6.79
Union	47	0401.02	Moderate	4.17
Union	47	0402.01	Moderate	7.53
Union	47	0402.02	Middle	5.1
Union	47	0403.00	Middle	5.49
Union	47	9999.99	Moderate	5.86

# State of Tennessee

## 32820 Memphis, TN-MS-AR

Counties: Fayette (047), Shelby (157)

- Athens, TN μSA
- Brownsville, TN μSA
- Chattanooga, TN-GA MSA
- Clarksville, TN-KY MSA
- Cleveland, TN MSA
- Cookeville, TN μSA
- Crossville, TN μSA
- Dayton, TN μSA
- Dyersburg, TN μSA
- Greeneville, TN μSA
- Jackson, TN MSA
- Johnson City, TN MSA
- Kingsport-Bristol, TN-VA MSA
- Knoxville, TN MSA
- Lawrenceburg, TN μSA
- Lewisburg, TN μSA
- Martin, TN μSA
- McMinnville, TN μSA
- Memphis, TN-MS-AR MSA
- Morristown, TN MSA
- Nashville-Davidson--Murfreesboro--Franklin, TN MSA
- Newport, TN μSA
- Paris, TN μSA
- Sevierville, TN μSA
- Shelbyville, TN μSA
- Tullahoma-Manchester, TN μSA
- Union City, TN μSA



- 1 Trousdale
- 2 Moore
- 3 Sequatchie
- 4 Meigs
- 5 Hamblen
- 6 Washington

**MSA: 32820 - Memphis, TN-MS-AR****Facility-Based Assessment Area****Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Fayette	47	0603.00	Middle	53.7
Fayette	47	0604.01	Upper	29.1
Fayette	47	0604.02	Upper	31.03
Fayette	47	0604.03	Upper	28
Fayette	47	0604.04	Middle	30.28
Fayette	47	0605.01	Moderate	39.86
Fayette	47	0605.02	Middle	32.25
Fayette	47	0606.00	Middle	42.89
Fayette	47	0607.01	Middle	31.21
Fayette	47	0607.02	Upper	27.93
Fayette	47	0608.00	Middle	39.21
Shelby	47	0001.00	Upper	39.43
Shelby	47	0002.00	Low	97.31
Shelby	47	0003.00	Moderate	98.81
Shelby	47	0004.00	Low	98.96
Shelby	47	0006.00	Low	99.12
Shelby	47	0007.00	Low	91.06
Shelby	47	0008.00	Low	98.6
Shelby	47	0009.00	Moderate	97.22
Shelby	47	0011.00	Moderate	81.55
Shelby	47	0012.00	Moderate	65.91
Shelby	47	0013.00	Low	88.87
Shelby	47	0014.00	Low	95.09
Shelby	47	0015.00	Moderate	85.59
Shelby	47	0016.00	Upper	37.42
Shelby	47	0017.00	Middle	55.08
Shelby	47	0019.00	Moderate	98.78
Shelby	47	0020.00	Low	95.94
Shelby	47	0021.00	Middle	86.85
Shelby	47	0024.00	Low	90.31
Shelby	47	0025.00	Middle	57.89
Shelby	47	0026.00	Upper	17.74
Shelby	47	0027.00	Unknown	62.8
Shelby	47	0028.00	Low	87.59
Shelby	47	0029.00	Upper	14.26
Shelby	47	0030.00	Moderate	50.61
Shelby	47	0031.00	Middle	30.27
Shelby	47	0032.00	Upper	33.52

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	47	0033.00	Upper	15.14
Shelby	47	0034.00	Middle	37.63
Shelby	47	0035.00	Upper	26.91
Shelby	47	0036.00	Middle	60.4
Shelby	47	0037.00	Low	76.76
Shelby	47	0038.00	Unknown	75.92
Shelby	47	0039.00	Moderate	85.64
Shelby	47	0042.00	Upper	40.36
Shelby	47	0043.00	Upper	46.49
Shelby	47	0045.00	Unknown	97.71
Shelby	47	0046.00	Unknown	87.6
Shelby	47	0050.00	Low	98.43
Shelby	47	0053.00	Low	99.44
Shelby	47	0055.00	Moderate	98.71
Shelby	47	0056.00	Moderate	99.46
Shelby	47	0057.00	Moderate	98.91
Shelby	47	0058.00	Moderate	99.17
Shelby	47	0059.00	Low	98.77
Shelby	47	0060.00	Low	98.58
Shelby	47	0062.00	Moderate	93.97
Shelby	47	0063.00	Upper	32.36
Shelby	47	0064.00	Moderate	92.11
Shelby	47	0065.00	Moderate	98.76
Shelby	47	0066.00	Moderate	46.26
Shelby	47	0067.00	Low	98.15
Shelby	47	0068.00	Moderate	98.83
Shelby	47	0069.00	Low	98.81
Shelby	47	0070.00	Low	80.87
Shelby	47	0071.00	Upper	32.64
Shelby	47	0072.00	Upper	15.64
Shelby	47	0073.00	Upper	50.83
Shelby	47	0074.00	Middle	31.64
Shelby	47	0075.00	Low	99.55
Shelby	47	0078.10	Low	97.56
Shelby	47	0078.21	Moderate	98.58
Shelby	47	0078.22	Moderate	94.7
Shelby	47	0079.00	Moderate	97.04
Shelby	47	0080.00	Moderate	80.29
Shelby	47	0081.10	Low	98.19
Shelby	47	0081.20	Moderate	98.13
Shelby	47	0082.00	Low	95.12



County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	47	0085.00	Upper	9.98
Shelby	47	0086.00	Upper	25.7
Shelby	47	0087.00	Moderate	54.8
Shelby	47	0088.00	Moderate	75.1
Shelby	47	0089.00	Low	81.56
Shelby	47	0091.00	Low	70.17
Shelby	47	0092.01	Upper	18.45
Shelby	47	0092.02	Middle	24.23
Shelby	47	0093.00	Moderate	34.17
Shelby	47	0094.00	Middle	22.57
Shelby	47	0095.01	Middle	21.88
Shelby	47	0095.02	Upper	14.11
Shelby	47	0096.00	Upper	12.16
Shelby	47	0097.00	Moderate	81.01
Shelby	47	0098.00	Moderate	53.8
Shelby	47	0099.01	Low	75.53
Shelby	47	0099.02	Low	86.93
Shelby	47	0100.01	Low	96.78
Shelby	47	0100.02	Low	94.13
Shelby	47	0101.20	Low	91.72
Shelby	47	0101.21	Low	93.43
Shelby	47	0101.22	Middle	94.2
Shelby	47	0102.10	Moderate	95.03
Shelby	47	0102.20	Moderate	92.38
Shelby	47	0103.00	Low	97.38
Shelby	47	0105.00	Low	91.29
Shelby	47	0106.10	Low	95.22
Shelby	47	0106.20	Moderate	97.9
Shelby	47	0106.30	Low	97.6
Shelby	47	0107.10	Moderate	92.67
Shelby	47	0107.20	Moderate	94.2
Shelby	47	0108.10	Moderate	96.32
Shelby	47	0108.20	Middle	95.15
Shelby	47	0110.10	Moderate	86.51
Shelby	47	0110.20	Moderate	95.47
Shelby	47	0111.00	Low	98.71
Shelby	47	0112.00	Low	99.34
Shelby	47	0113.00	Middle	84.12
Shelby	47	0114.01	Unknown	91.75
Shelby	47	0114.02	Unknown	68.68
Shelby	47	0115.00	Low	98.84

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	47	0116.00	Low	98.42
Shelby	47	0117.00	Low	98.13
Shelby	47	0118.00	Middle	73.67
Shelby	47	0201.01	Moderate	70.71
Shelby	47	0201.02	Middle	20.94
Shelby	47	0202.10	Middle	43.8
Shelby	47	0202.21	Middle	48.83
Shelby	47	0202.22	Moderate	62.06
Shelby	47	0203.01	Middle	23.59
Shelby	47	0203.02	Moderate	40.92
Shelby	47	0204.00	Middle	44.16
Shelby	47	0205.11	Middle	89.15
Shelby	47	0205.21	Low	95.54
Shelby	47	0205.23	Low	93.66
Shelby	47	0205.24	Moderate	94.06
Shelby	47	0205.31	Moderate	88.2
Shelby	47	0205.32	Moderate	87.44
Shelby	47	0205.41	Middle	88.74
Shelby	47	0205.42	Low	91.64
Shelby	47	0205.43	Low	94.18
Shelby	47	0205.44	Low	87.89
Shelby	47	0206.10	Low	80.92
Shelby	47	0206.21	Moderate	69.81
Shelby	47	0206.22	Middle	29.15
Shelby	47	0206.32	Upper	24.93
Shelby	47	0206.33	Upper	16.06
Shelby	47	0206.34	Upper	19.29
Shelby	47	0206.35	Middle	18.01
Shelby	47	0206.51	Middle	48.83
Shelby	47	0206.52	Middle	21.99
Shelby	47	0206.53	Upper	48.21
Shelby	47	0206.54	Upper	43.97
Shelby	47	0206.55	Upper	24.68
Shelby	47	0206.56	Upper	43.4
Shelby	47	0206.57	Upper	61.79
Shelby	47	0206.58	Middle	72.85
Shelby	47	0207.00	Upper	18.18
Shelby	47	0208.33	Upper	42.57
Shelby	47	0208.34	Upper	27.35
Shelby	47	0208.35	Upper	32.25
Shelby	47	0208.36	Upper	24.69

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	47	0208.37	Middle	31.68
Shelby	47	0209.01	Upper	26.33
Shelby	47	0209.02	Upper	24.22
Shelby	47	0210.20	Upper	50.23
Shelby	47	0210.21	Middle	73.03
Shelby	47	0210.22	Middle	73.64
Shelby	47	0210.23	Upper	53.42
Shelby	47	0211.11	Moderate	72.18
Shelby	47	0211.12	Moderate	66.71
Shelby	47	0211.13	Upper	65.57
Shelby	47	0211.21	Middle	63.42
Shelby	47	0211.22	Moderate	68.07
Shelby	47	0211.24	Middle	71.45
Shelby	47	0211.25	Middle	55.33
Shelby	47	0211.26	Middle	63.2
Shelby	47	0211.35	Middle	65.18
Shelby	47	0211.36	Upper	62.02
Shelby	47	0211.38	Upper	64.73
Shelby	47	0211.39	Upper	45.57
Shelby	47	0211.40	Upper	49.47
Shelby	47	0211.41	Middle	66.92
Shelby	47	0211.42	Upper	53.47
Shelby	47	0211.43	Upper	55.99
Shelby	47	0211.44	Middle	61.6
Shelby	47	0212.00	Unknown	70.52
Shelby	47	0213.11	Upper	19.38
Shelby	47	0213.12	Upper	27.62
Shelby	47	0213.20	Upper	32.36
Shelby	47	0213.31	Upper	46.46
Shelby	47	0213.33	Upper	61.33
Shelby	47	0213.34	Upper	76.89
Shelby	47	0213.41	Upper	14.93
Shelby	47	0213.51	Upper	19.23
Shelby	47	0213.52	Upper	14.78
Shelby	47	0213.54	Middle	74.19
Shelby	47	0213.55	Upper	34.87
Shelby	47	0213.56	Upper	19.35
Shelby	47	0213.57	Upper	20.78
Shelby	47	0214.10	Upper	12.81
Shelby	47	0214.20	Upper	17.55
Shelby	47	0214.30	Upper	20.16

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	47	0215.30	Upper	24.46
Shelby	47	0215.41	Upper	25.9
Shelby	47	0215.42	Upper	23.87
Shelby	47	0215.43	Upper	65.68
Shelby	47	0215.44	Upper	56.62
Shelby	47	0215.45	Upper	40.72
Shelby	47	0215.46	Upper	65.15
Shelby	47	0215.47	Middle	90.98
Shelby	47	0215.48	Upper	70.18
Shelby	47	0216.11	Upper	17.11
Shelby	47	0216.12	Upper	10.32
Shelby	47	0216.13	Upper	19.11
Shelby	47	0216.20	Middle	60.19
Shelby	47	0217.10	Low	95.49
Shelby	47	0217.21	Moderate	95.62
Shelby	47	0217.24	Moderate	95.18
Shelby	47	0217.25	Low	96.29
Shelby	47	0217.31	Moderate	98.11
Shelby	47	0217.44	Middle	92.64
Shelby	47	0217.45	Upper	92.86
Shelby	47	0217.46	Moderate	94.95
Shelby	47	0217.47	Moderate	96.19
Shelby	47	0217.51	Upper	95
Shelby	47	0217.52	Middle	96.54
Shelby	47	0217.53	Middle	94.01
Shelby	47	0217.54	Moderate	95.26
Shelby	47	0217.55	Moderate	94.33
Shelby	47	0217.56	Middle	68.8
Shelby	47	0217.57	Low	97.57
Shelby	47	0217.58	Moderate	95.48
Shelby	47	0217.59	Middle	96.45
Shelby	47	0217.60	Moderate	96.35
Shelby	47	0219.00	Middle	98.21
Shelby	47	0220.23	Moderate	99.06
Shelby	47	0220.24	Moderate	97.38
Shelby	47	0220.25	Low	97.35
Shelby	47	0220.26	Low	96.66
Shelby	47	0221.11	Middle	97.98
Shelby	47	0221.21	Middle	96.65
Shelby	47	0221.22	Middle	97.99
Shelby	47	0221.30	Moderate	97.07

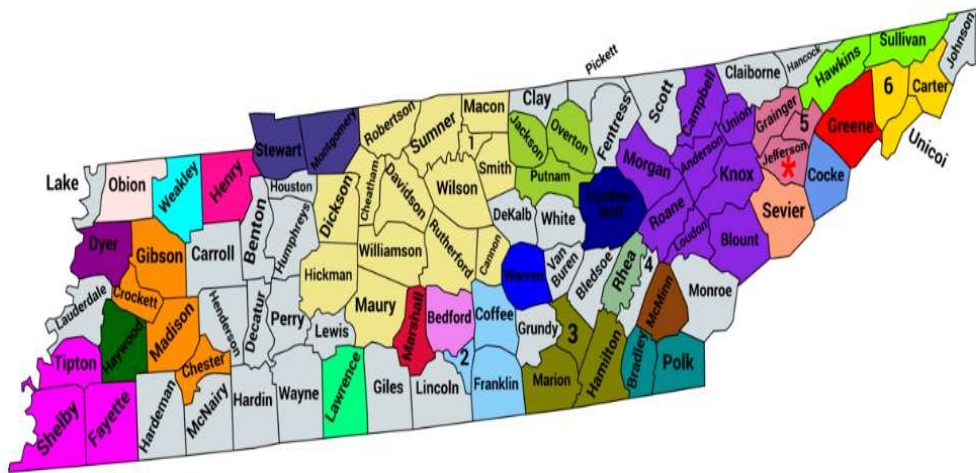
County	State Code	Tract Code	Tract Income Level	Tract Minority %
Shelby	47	0221.31	Moderate	98.58
Shelby	47	0221.32	Moderate	97.44
Shelby	47	0222.10	Moderate	98.57
Shelby	47	0222.20	Moderate	98.27
Shelby	47	0223.10	Low	99.42
Shelby	47	0223.21	Moderate	98.93
Shelby	47	0223.22	Moderate	98.97
Shelby	47	0223.30	Moderate	99.37
Shelby	47	0224.10	Middle	96.19
Shelby	47	0225.00	Moderate	94.86
Shelby	47	0226.00	Moderate	95.21
Shelby	47	0227.00	Moderate	98.7
Shelby	47	9801.00	Unknown	86.67
Shelby	47	9802.00	Unknown	90.91
Shelby	47	9803.00	Unknown	0
Shelby	47	9804.01	Unknown	81.68
Shelby	47	9804.02	Unknown	22.22

# State of Tennessee

## 34100 Morristown, TN

### County: Jefferson (089)

- Athens, TN μSA
- Brownsville, TN μSA
- Chattanooga, TN-GA MSA
- Clarksville, TN-KY MSA
- Cleveland, TN MSA
- Cookeville, TN μSA
- Crossville, TN μSA
- Dayton, TN μSA
- Dyersburg, TN μSA
- Greeneville, TN μSA
- Jackson, TN MSA
- Johnson City, TN MSA
- Kingsport-Bristol, TN-VA MSA
- Knoxville, TN MSA
- Lawrenceburg, TN μSA
- Lewisburg, TN μSA
- Martin, TN μSA
- McMinnville, TN μSA
- Memphis, TN-MS-AR MSA
- Morristown, TN MSA
- Nashville-Davidson--Murfreesboro--Franklin, TN MSA
- Newport, TN μSA
- Paris, TN μSA
- Sevierville, TN μSA
- Shelbyville, TN μSA
- Tullahoma-Manchester, TN μSA
- Union City, TN μSA



- 1 Trousdale
- 2 Moore
- 3 Sequatchie
- 4 Meigs
- 5 Hamblen
- 6 Washington



**MSA: 34100 - Morristown, TN**  
**Facility-Based Assessment Area**  
**Geographical Information**

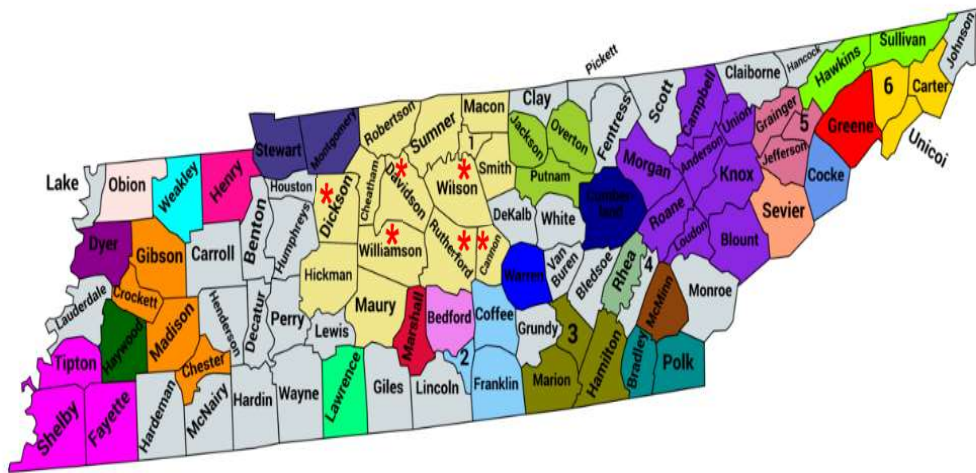
<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Jefferson	47	0701.01	Middle	9.93
Jefferson	47	0701.02	Upper	14.6
Jefferson	47	0702.00	Middle	7.84
Jefferson	47	0703.00	Middle	16.11
Jefferson	47	0704.00	Upper	9.26
Jefferson	47	0705.00	Middle	9.02
Jefferson	47	0706.00	Middle	13.22
Jefferson	47	0707.01	Upper	10.56
Jefferson	47	0707.02	Middle	6.55
Jefferson	47	0708.01	Middle	7.73
Jefferson	47	0708.02	Middle	7.57
Jefferson	47	0709.00	Middle	7.93

# State of Tennessee

## 34980 Nashville-Davidson-Murfreesboro-Franklin, TN

Counties: Chester (023), Crockett (033), Madison (113)

- Athens, TN μSA
- Brownsville, TN μSA
- Chattanooga, TN-GA MSA
- Clarksville, TN-KY MSA
- Cleveland, TN MSA
- Cookeville, TN μSA
- Crossville, TN μSA
- Dayton, TN μSA
- Dyersburg, TN μSA
- Greeneville, TN μSA
- Jackson, TN MSA
- Johnson City, TN MSA
- Kingsport-Bristol, TN-VA MSA
- Knoxville, TN MSA
- Lawrenceburg, TN μSA
- Lewisburg, TN μSA
- Martin, TN μSA
- McMinnville, TN μSA
- Memphis, TN-MS-AR MSA
- Morristown, TN MSA
- Nashville-Davidson--Murfreesboro--Franklin, TN MSA
- Newport, TN μSA
- Paris, TN μSA
- Sevierville, TN μSA
- Shelbyville, TN μSA
- Tullahoma-Manchester, TN μSA
- Union City, TN μSA



- 1 Trousdale
- 2 Moore
- 3 Sequatchie
- 4 Meigs
- 5 Hamblen
- 6 Washington



**MSA: 34980 - Nashville--Davidson--Murfreesboro--Franklin, TN****Facility-Based Assessment Area****Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Cannon	47	9601.00	Moderate	10.59
Cannon	47	9602.01	Moderate	12.2
Cannon	47	9602.02	Middle	9.02
Cannon	47	9603.00	Middle	8.8
Cannon	47	9999.99	Moderate	9.94
Davidson	47	0101.03	Middle	15.37
Davidson	47	0101.04	Middle	17.58
Davidson	47	0101.05	Middle	80.39
Davidson	47	0101.06	Middle	74.23
Davidson	47	0102.01	Middle	61.55
Davidson	47	0102.02	Middle	21.12
Davidson	47	0103.01	Middle	50.73
Davidson	47	0103.02	Middle	42.54
Davidson	47	0103.03	Moderate	50.05
Davidson	47	0104.01	Moderate	59.08
Davidson	47	0104.03	Low	70.3
Davidson	47	0104.04	Moderate	66.51
Davidson	47	0105.01	Middle	23.99
Davidson	47	0105.02	Middle	28.98
Davidson	47	0106.01	Moderate	62.5
Davidson	47	0106.02	Moderate	71.84
Davidson	47	0107.01	Middle	57.18
Davidson	47	0107.02	Moderate	63.29
Davidson	47	0108.01	Middle	61.42
Davidson	47	0108.02	Middle	42.19
Davidson	47	0109.01	Middle	55.49
Davidson	47	0109.03	Low	89.57
Davidson	47	0109.04	Low	89.63
Davidson	47	0110.01	Moderate	72.18
Davidson	47	0110.02	Middle	51.14
Davidson	47	0111.00	Upper	19.62
Davidson	47	0112.00	Middle	23.59
Davidson	47	0113.00	Moderate	60.4
Davidson	47	0114.00	Moderate	45.09
Davidson	47	0115.00	Middle	25.79
Davidson	47	0116.00	Middle	28.08
Davidson	47	0117.00	Upper	32.24
Davidson	47	0118.00	Moderate	65.15

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Davidson	47	0119.00	Low	54.59
Davidson	47	0121.00	Upper	15.33
Davidson	47	0122.00	Upper	19.3
Davidson	47	0126.00	Moderate	66.63
Davidson	47	0127.01	Moderate	92.42
Davidson	47	0127.02	Moderate	87.87
Davidson	47	0128.01	Low	85.54
Davidson	47	0128.02	Middle	72.69
Davidson	47	0130.01	Unknown	23.41
Davidson	47	0130.02	Unknown	54.22
Davidson	47	0131.00	Middle	43.76
Davidson	47	0132.01	Moderate	36.61
Davidson	47	0132.02	Middle	29.98
Davidson	47	0133.00	Middle	27.71
Davidson	47	0134.00	Upper	12.09
Davidson	47	0135.00	Upper	30.69
Davidson	47	0136.00	Low	75.92
Davidson	47	0137.01	Moderate	77.67
Davidson	47	0137.02	Unknown	72.82
Davidson	47	0138.00	Moderate	87.57
Davidson	47	0139.00	Low	78.28
Davidson	47	0142.00	Low	84.62
Davidson	47	0143.00	Low	83.76
Davidson	47	0144.00	Low	56.31
Davidson	47	0148.00	Low	97.11
Davidson	47	0151.00	Moderate	30.4
Davidson	47	0152.00	Middle	19.01
Davidson	47	0153.00	Middle	24.92
Davidson	47	0154.01	Middle	27.87
Davidson	47	0154.02	Middle	35.93
Davidson	47	0154.04	Moderate	40.13
Davidson	47	0154.05	Middle	38.05
Davidson	47	0155.01	Middle	29.65
Davidson	47	0155.02	Moderate	30.83
Davidson	47	0156.09	Middle	38.64
Davidson	47	0156.13	Moderate	70.57
Davidson	47	0156.14	Middle	64.67
Davidson	47	0156.15	Moderate	81.02
Davidson	47	0156.17	Middle	46.01
Davidson	47	0156.18	Moderate	65.08
Davidson	47	0156.19	Middle	62.19

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Davidson	47	0156.20	Moderate	68.25
Davidson	47	0156.22	Middle	42.73
Davidson	47	0156.23	Moderate	53.35
Davidson	47	0156.24	Middle	49.06
Davidson	47	0156.25	Middle	38.15
Davidson	47	0156.26	Low	69.42
Davidson	47	0156.27	Moderate	75.61
Davidson	47	0156.28	Moderate	81.81
Davidson	47	0156.29	Moderate	74.22
Davidson	47	0156.30	Moderate	70.55
Davidson	47	0156.32	Moderate	47.12
Davidson	47	0156.33	Upper	24.65
Davidson	47	0156.34	Middle	63.9
Davidson	47	0156.35	Upper	53.56
Davidson	47	0156.36	Middle	60.71
Davidson	47	0156.37	Moderate	64.61
Davidson	47	0157.00	Moderate	51.32
Davidson	47	0158.04	Moderate	65.82
Davidson	47	0158.05	Low	65.03
Davidson	47	0158.06	Moderate	70.79
Davidson	47	0159.00	Middle	39.34
Davidson	47	0160.00	Low	82.21
Davidson	47	0161.00	Moderate	50.35
Davidson	47	0162.00	Moderate	58.89
Davidson	47	0163.00	Unknown	47.27
Davidson	47	0164.00	Upper	28.18
Davidson	47	0165.00	Moderate	44.04
Davidson	47	0166.00	Middle	30.83
Davidson	47	0167.00	Upper	11.81
Davidson	47	0168.00	Upper	22.34
Davidson	47	0169.00	Upper	16.31
Davidson	47	0170.00	Upper	22.57
Davidson	47	0171.00	Upper	19.84
Davidson	47	0172.00	Moderate	31.81
Davidson	47	0173.00	Moderate	55.64
Davidson	47	0174.01	Moderate	61.68
Davidson	47	0174.02	Middle	49.02
Davidson	47	0175.00	Moderate	41.81
Davidson	47	0177.01	Upper	10.26
Davidson	47	0177.02	Upper	12.16
Davidson	47	0178.00	Upper	16.05

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Davidson	47	0179.01	Upper	14.68
Davidson	47	0179.02	Upper	11.79
Davidson	47	0180.00	Upper	11.46
Davidson	47	0181.01	Moderate	50.34
Davidson	47	0181.02	Upper	12.12
Davidson	47	0182.01	Upper	13.1
Davidson	47	0182.03	Upper	8.05
Davidson	47	0182.04	Moderate	33.94
Davidson	47	0182.05	Upper	24.32
Davidson	47	0183.02	Upper	15.51
Davidson	47	0183.03	Middle	32.53
Davidson	47	0183.04	Upper	22.64
Davidson	47	0184.04	Upper	26.52
Davidson	47	0184.05	Upper	16.33
Davidson	47	0184.07	Upper	21.35
Davidson	47	0184.08	Upper	17.99
Davidson	47	0184.09	Middle	19.13
Davidson	47	0184.10	Middle	30.32
Davidson	47	0184.11	Middle	35.98
Davidson	47	0184.12	Middle	23.88
Davidson	47	0185.00	Upper	6.55
Davidson	47	0186.01	Upper	7.04
Davidson	47	0186.02	Upper	9.28
Davidson	47	0187.00	Upper	7.99
Davidson	47	0188.01	Upper	17.29
Davidson	47	0188.03	Middle	18.77
Davidson	47	0188.04	Upper	22.71
Davidson	47	0189.01	Middle	41.04
Davidson	47	0189.02	Middle	27.63
Davidson	47	0189.04	Middle	52.26
Davidson	47	0189.05	Middle	55.51
Davidson	47	0190.03	Moderate	70.83
Davidson	47	0190.04	Moderate	71.97
Davidson	47	0190.07	Moderate	64.53
Davidson	47	0190.08	Moderate	77.74
Davidson	47	0191.05	Middle	58.85
Davidson	47	0191.06	Middle	39.46
Davidson	47	0191.08	Low	82.82
Davidson	47	0191.09	Middle	74.08
Davidson	47	0191.10	Moderate	64.6
Davidson	47	0191.11	Moderate	72.96

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Davidson	47	0191.12	Middle	63.06
Davidson	47	0191.15	Upper	30.54
Davidson	47	0191.16	Middle	39.64
Davidson	47	0191.17	Middle	61.31
Davidson	47	0191.18	Moderate	76.67
Davidson	47	0191.19	Upper	32.07
Davidson	47	0191.20	Upper	34.03
Davidson	47	0191.21	Unknown	36.82
Davidson	47	0192.00	Moderate	36.7
Davidson	47	0193.00	Low	76.92
Davidson	47	0194.01	Upper	42.62
Davidson	47	0194.02	Upper	22.86
Davidson	47	0195.01	Upper	23.42
Davidson	47	0195.02	Upper	21.7
Davidson	47	0195.03	Upper	34.25
Davidson	47	0196.00	Moderate	49.86
Davidson	47	9801.00	Unknown	50
Davidson	47	9802.00	Unknown	100
Dickson	47	0601.00	Moderate	8
Dickson	47	0602.01	Moderate	10.3
Dickson	47	0602.02	Middle	9.14
Dickson	47	0603.00	Middle	9.29
Dickson	47	0604.01	Middle	7.73
Dickson	47	0604.02	Middle	12.45
Dickson	47	0605.01	Moderate	15.23
Dickson	47	0605.02	Middle	18.72
Dickson	47	0606.01	Moderate	20.94
Dickson	47	0606.02	Moderate	23.16
Dickson	47	0607.00	Moderate	9.25
Rutherford	47	0401.01	Middle	65.47
Rutherford	47	0401.02	Middle	60.14
Rutherford	47	0401.04	Moderate	59.44
Rutherford	47	0401.05	Middle	51.21
Rutherford	47	0401.06	Moderate	67.41
Rutherford	47	0401.07	Middle	71.12
Rutherford	47	0402.00	Middle	44.59
Rutherford	47	0403.03	Moderate	36.07
Rutherford	47	0403.04	Moderate	48.49
Rutherford	47	0403.05	Moderate	42.33
Rutherford	47	0403.07	Upper	31.64
Rutherford	47	0403.08	Middle	40.98

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Rutherford	47	0403.09	Middle	27.28
Rutherford	47	0403.10	Middle	30.77
Rutherford	47	0403.11	Middle	44
Rutherford	47	0403.12	Middle	65.7
Rutherford	47	0404.04	Middle	42.45
Rutherford	47	0404.05	Moderate	55.94
Rutherford	47	0405.01	Middle	18.03
Rutherford	47	0405.02	Middle	15.19
Rutherford	47	0406.00	Middle	14.55
Rutherford	47	0407.02	Middle	23.01
Rutherford	47	0407.03	Middle	27.71
Rutherford	47	0407.04	Middle	17.22
Rutherford	47	0408.06	Upper	23.82
Rutherford	47	0408.07	Upper	20.5
Rutherford	47	0408.08	Upper	23.87
Rutherford	47	0408.09	Middle	14.32
Rutherford	47	0408.10	Middle	9.88
Rutherford	47	0408.11	Upper	35.61
Rutherford	47	0408.12	Middle	50.83
Rutherford	47	0409.01	Moderate	35.44
Rutherford	47	0409.04	Middle	30.45
Rutherford	47	0409.06	Middle	42.46
Rutherford	47	0409.07	Middle	33.35
Rutherford	47	0409.08	Middle	36.95
Rutherford	47	0409.09	Middle	38.53
Rutherford	47	0409.10	Middle	34.9
Rutherford	47	0409.11	Upper	28.64
Rutherford	47	0410.00	Upper	21.07
Rutherford	47	0411.02	Middle	23.47
Rutherford	47	0411.03	Middle	25.71
Rutherford	47	0411.04	Upper	24.49
Rutherford	47	0412.01	Middle	28.55
Rutherford	47	0412.02	Upper	26.86
Rutherford	47	0413.01	Upper	17.74
Rutherford	47	0413.02	Middle	21.65
Rutherford	47	0414.01	Middle	35.13
Rutherford	47	0414.04	Moderate	56.04
Rutherford	47	0414.05	Moderate	46.52
Rutherford	47	0414.06	Middle	46.84
Rutherford	47	0414.07	Middle	38.61
Rutherford	47	0415.00	Unknown	40.69

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Rutherford	47	0416.01	Moderate	45.09
Rutherford	47	0416.02	Unknown	36.71
Rutherford	47	0417.00	Moderate	35.36
Rutherford	47	0418.00	Moderate	46.41
Rutherford	47	0419.00	Moderate	64.11
Rutherford	47	0420.00	Moderate	40.45
Rutherford	47	0421.01	Low	55.11
Rutherford	47	0421.02	Low	44.09
Rutherford	47	0422.00	Middle	40.11
Rutherford	47	0423.01	Middle	55.48
Rutherford	47	0423.02	Middle	37.23
Williamson	47	0501.02	Upper	22
Williamson	47	0501.03	Upper	15.96
Williamson	47	0501.04	Upper	29.47
Williamson	47	0501.05	Upper	20.84
Williamson	47	0502.04	Upper	25.18
Williamson	47	0502.05	Upper	13.96
Williamson	47	0502.06	Upper	15.35
Williamson	47	0502.07	Upper	24.48
Williamson	47	0502.09	Upper	17.84
Williamson	47	0502.10	Upper	14.05
Williamson	47	0502.11	Upper	44.26
Williamson	47	0502.12	Upper	20.54
Williamson	47	0503.03	Upper	7.53
Williamson	47	0503.04	Upper	12.24
Williamson	47	0503.05	Upper	14.11
Williamson	47	0503.06	Upper	23.97
Williamson	47	0503.07	Middle	25.53
Williamson	47	0504.03	Upper	9.62
Williamson	47	0504.04	Upper	9.52
Williamson	47	0504.05	Upper	7.51
Williamson	47	0504.06	Upper	9.98
Williamson	47	0505.02	Upper	10.91
Williamson	47	0505.03	Middle	11.84
Williamson	47	0505.04	Middle	12.58
Williamson	47	0506.01	Upper	23.28
Williamson	47	0506.03	Upper	26.69
Williamson	47	0506.04	Upper	10.94
Williamson	47	0507.01	Middle	14.59
Williamson	47	0507.02	Upper	11.25
Williamson	47	0508.01	Moderate	54.58

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Williamson	47	0508.02	Upper	9.22
Williamson	47	0509.04	Middle	40.94
Williamson	47	0509.05	Upper	26.52
Williamson	47	0509.06	Upper	12.58
Williamson	47	0509.07	Upper	17.6
Williamson	47	0509.08	Upper	11.23
Williamson	47	0509.09	Upper	13.61
Williamson	47	0510.01	Upper	22.43
Williamson	47	0510.02	Upper	20.08
Williamson	47	0511.00	Upper	12.72
Williamson	47	0512.03	Middle	9.23
Williamson	47	0512.04	Upper	15.96
Williamson	47	0512.05	Upper	15.63
Williamson	47	0512.06	Upper	22.09
Williamson	47	0512.07	Middle	21.66
Williamson	47	0512.08	Upper	16.98
Wilson	47	0301.02	Middle	14.85
Wilson	47	0301.03	Middle	10.78
Wilson	47	0301.04	Upper	8.39
Wilson	47	0301.05	Middle	15.92
Wilson	47	0302.02	Middle	14.43
Wilson	47	0302.03	Upper	19.46
Wilson	47	0302.05	Upper	12.92
Wilson	47	0302.06	Upper	16.85
Wilson	47	0302.07	Upper	13.65
Wilson	47	0303.03	Upper	10.98
Wilson	47	0303.04	Middle	17.09
Wilson	47	0303.05	Upper	13.38
Wilson	47	0303.08	Upper	23.05
Wilson	47	0303.09	Upper	22.5
Wilson	47	0303.10	Upper	23.08
Wilson	47	0303.11	Upper	21.17
Wilson	47	0304.01	Moderate	25.66
Wilson	47	0304.02	Moderate	40.79
Wilson	47	0305.00	Moderate	28.82
Wilson	47	0306.00	Middle	26.24
Wilson	47	0307.00	Low	45.21
Wilson	47	0308.00	Moderate	14.94
Wilson	47	0309.04	Middle	10.52
Wilson	47	0309.05	Upper	13.66
Wilson	47	0309.06	Upper	14.45



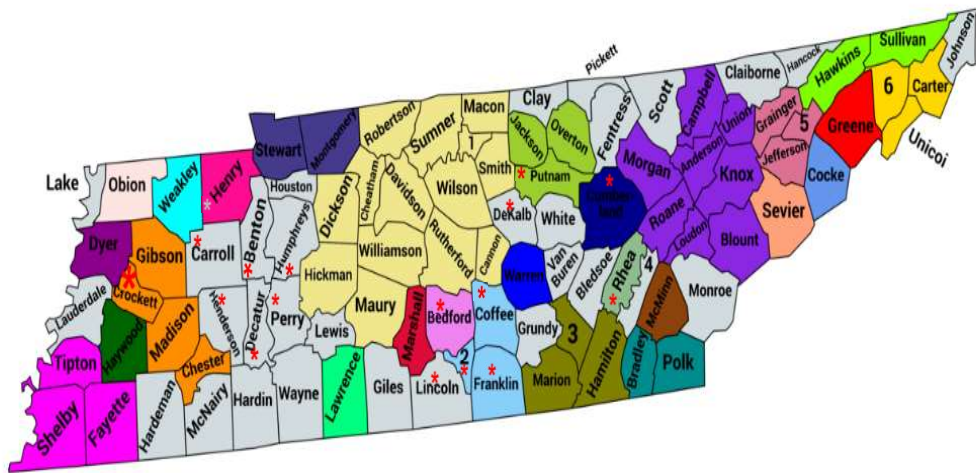
<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Wilson	47	0309.07	Middle	16.74
Wilson	47	0309.08	Upper	30.65
Wilson	47	0310.00	Middle	11.48

# State of Tennessee

## 99999 TN Non-MSA

Counties: Bedford (003), Benton (005), Carroll (017), Coffee (031), Cumberland (035), Franklin (051), Deatur (039), DeKalb (041), Henderson (077), Henry (079), Humphreys (085), Lincoln (103), Moore (127), Perry (135), Putnam (141), Rhea (143)

- Athens, TN μSA
- Brownsville, TN μSA
- Chattanooga, TN-GA MSA
- Clarksville, TN-KY MSA
- Cleveland, TN MSA
- Cookeville, TN μSA
- Crossville, TN μSA
- Dayton, TN μSA
- Dyersburg, TN μSA
- Greeneville, TN μSA
- Jackson, TN MSA
- Johnson City, TN MSA
- Kingsport-Bristol, TN-VA MSA
- Knoxville, TN MSA
- Lawrenceburg, TN μSA
- Lewisburg, TN μSA
- Martin, TN μSA
- McMinnville, TN μSA
- Memphis, TN-MS-AR MSA
- Morristown, TN MSA
- Nashville-Davidson--Murfreesboro--Franklin, TN MSA
- Newport, TN μSA
- Paris, TN μSA
- Sevierville, TN μSA
- Shelbyville, TN μSA
- Tullahoma-Manchester, TN μSA
- Union City, TN μSA



- 1 Trousdale
- 2 Moore
- 3 Sequatchie
- 4 Meigs
- 5 Hamblen
- 6 Washington

➔ NA (99999) – NA (Outside of MSA/MD), TN



**MSA: 99999 - TN Non-MSA**  
**Facility-Based Assessment Area**  
**Geographical Information**

<b>County</b>	<b>State Code</b>	<b>Tract Code</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>
Bedford	47	9501.00	Upper	12.32
Bedford	47	9502.01	Upper	11.34
Bedford	47	9502.02	Middle	11.18
Bedford	47	9503.00	Middle	12.51
Bedford	47	9504.01	Upper	34.04
Bedford	47	9504.02	Moderate	37.08
Bedford	47	9505.00	Middle	41.8
Bedford	47	9506.00	Middle	43.75
Bedford	47	9507.00	Middle	11.4
Bedford	47	9508.00	Upper	8.09
Benton	47	9630.00	Middle	6.95
Benton	47	9631.00	Middle	8.47
Benton	47	9632.00	Middle	8.43
Benton	47	9633.00	Middle	13.47
Benton	47	9634.00	Middle	8.48
Benton	47	9999.99	Middle	9.37
Carroll	47	9620.00	Middle	12.14
Carroll	47	9621.01	Middle	16.01
Carroll	47	9621.02	Middle	20.78
Carroll	47	9622.01	Middle	23.89
Carroll	47	9622.02	Upper	14.9
Carroll	47	9623.00	Middle	18.07
Carroll	47	9624.00	Upper	10.49
Carroll	47	9625.00	Middle	14.94
Carroll	47	9801.00	Unknown	0
Carroll	47	9999.99	Middle	16.51
Coffee	47	9701.00	Middle	9.83
Coffee	47	9702.01	Moderate	9.62
Coffee	47	9702.02	Middle	10.38
Coffee	47	9703.00	Upper	7.79
Coffee	47	9704.01	Upper	7.59
Coffee	47	9704.02	Middle	23.1
Coffee	47	9705.01	Moderate	16.43
Coffee	47	9705.02	Upper	19.25
Coffee	47	9706.00	Middle	14.51
Coffee	47	9707.00	Middle	10.71
Coffee	47	9708.01	Upper	16.87
Coffee	47	9708.03	Upper	11.94

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Coffee	47	9708.04	Upper	14.99
Coffee	47	9709.00	Moderate	26.91
Coffee	47	9710.01	Middle	18.38
Coffee	47	9710.02	Middle	15.8
Coffee	47	9801.00	Unknown	100
Cumberland	47	9701.01	Upper	6.87
Cumberland	47	9701.03	Middle	7.41
Cumberland	47	9701.04	Middle	5.85
Cumberland	47	9702.01	Middle	5.78
Cumberland	47	9702.02	Upper	5.85
Cumberland	47	9703.01	Middle	7.82
Cumberland	47	9703.02	Middle	8.26
Cumberland	47	9704.01	Moderate	15.08
Cumberland	47	9704.02	Middle	7.19
Cumberland	47	9705.01	Middle	9.64
Cumberland	47	9705.02	Moderate	12.73
Cumberland	47	9706.01	Upper	7.79
Cumberland	47	9706.02	Middle	6.03
Cumberland	47	9706.03	Middle	5.61
Cumberland	47	9707.01	Middle	7.94
Cumberland	47	9707.02	Middle	6.34
Cumberland	47	9708.00	Middle	5.17
Franklin	47	9601.00	Middle	13.07
Franklin	47	9602.01	Middle	8.53
Franklin	47	9602.02	Middle	10.3
Franklin	47	9603.00	Upper	11.05
Franklin	47	9604.01	Middle	20.36
Franklin	47	9604.02	Upper	15.51
Franklin	47	9605.00	Middle	23.06
Franklin	47	9606.00	Middle	13.69
Franklin	47	9607.00	Upper	14.32
Franklin	47	9608.00	Middle	12.66
Decatur	47	9550.01	Middle*	5.7
Decatur	47	9550.03	Middle*	8.75
Decatur	47	9550.04	Moderate	13.17
Decatur	47	9551.01	Middle*	11.45
Decatur	47	9551.02	Middle*	5.16
Decatur	47	9999.99	Middle	8.51
DeKalb	47	9201.01	Upper	7.58
DeKalb	47	9201.02	Middle	10.67
DeKalb	47	9202.01	Moderate	17.74

County	State Code	Tract Code	Tract Income Level	Tract Minority %
DeKalb	47	9202.02	Middle	16.8
DeKalb	47	9203.00	Middle	10.42
DeKalb	47	9999.99	Middle	12.72
Henderson	47	9750.00	Upper	8.05
Henderson	47	9751.00	Middle	16.98
Henderson	47	9752.00	Middle	7.82
Henderson	47	9753.01	Middle	16.83
Henderson	47	9753.02	Middle	16.43
Henderson	47	9754.00	Moderate	26.6
Henderson	47	9755.00	Middle	6.11
Henderson	47	9999.99	Middle	14.19
Henry	47	9690.01	Middle	6.63
Henry	47	9690.02	Middle	5.16
Henry	47	9691.00	Middle	8.87
Henry	47	9692.00	Middle	9.95
Henry	47	9693.00	Moderate	39.34
Henry	47	9694.00	Middle	31.01
Henry	47	9695.01	Middle	14.44
Henry	47	9695.02	Middle	17.62
Henry	47	9696.01	Middle	14.46
Henry	47	9696.02	Middle	9.29
Henry	47	9697.00	Middle	10.11
Henry	47	9698.00	Middle	14.98
Humphreys	47	1301.00	Middle	7.47
Humphreys	47	1302.00	Middle	7.91
Humphreys	47	1303.00	Middle	12.92
Humphreys	47	1304.00	Middle	10.42
Humphreys	47	1305.00	Middle	9.44
Humphreys	47	9999.99	Middle	9.94
Lincoln	47	9750.00	Upper	8.88
Lincoln	47	9751.00	Middle	9.87
Lincoln	47	9752.00	Upper	7.07
Lincoln	47	9753.00	Middle	28.7
Lincoln	47	9754.00	Middle	18.58
Lincoln	47	9755.00	Middle	11.97
Lincoln	47	9756.01	Upper	15.09
Lincoln	47	9756.02	Middle	13.31
Lincoln	47	9757.00	Upper	8.26
Moore	47	9301.00	Upper	5.35
Moore	47	9302.00	Upper	10.06
Moore	47	9999.99	Upper	7.15

County	State Code	Tract Code	Tract Income Level	Tract Minority %
Perry	47	9301.00	Middle*	6.36
Perry	47	9302.01	Middle*	9.87
Perry	47	9302.02	Upper	8.11
Perry	47	9999.99	Middle	7.96
Putnam	47	0001.00	Middle	21.29
Putnam	47	0002.01	Middle	12.57
Putnam	47	0002.02	Middle	11.34
Putnam	47	0003.01	Middle	10.52
Putnam	47	0003.03	Middle	25.64
Putnam	47	0003.04	Moderate	36.1
Putnam	47	0003.05	Middle	21.86
Putnam	47	0004.00	Upper	12.76
Putnam	47	0005.00	Middle	13.91
Putnam	47	0006.00	Upper	16.22
Putnam	47	0007.00	Middle	24.63
Putnam	47	0008.00	Moderate	28.87
Putnam	47	0009.00	Middle	11.27
Putnam	47	0010.00	Middle	6.84
Putnam	47	0011.00	Middle	9.8
Putnam	47	0012.01	Middle	12.22
Putnam	47	0012.02	Middle	12.04
Putnam	47	0013.00	Upper	9.25
Rhea	47	9750.00	Middle	7.36
Rhea	47	9751.00	Middle	7.35
Rhea	47	9752.00	Upper	9.98
Rhea	47	9753.00	Middle	14
Rhea	47	9754.01	Moderate	21.36
Rhea	47	9754.02	Middle	14.56

\*Distressed or Under-Served Tract



CRA Disclosure Statements may be obtained on the Federal Financial Institutions Examination Council's website at [FFIEC CRA Disclosure Report](https://www.ffiec.gov/craadweb/DisRptMainOffice.aspx).  
(<https://www.ffiec.gov/craadweb/DisRptMainOffice.aspx>)



HMDA Disclosure Statements may be obtained on the Consumer Financial

Protection Bureau's website at [Home Mortgage Disclosure Act \(HMDA\) Data |  
Consumer Financial Protection Bureau \(consumerfinance.gov\)](https://www.consumerfinance.gov/data-research/hmda/)

*([www.consumerfinance.gov/data-research/hmda/](https://www.consumerfinance.gov/data-research/hmda/))*