



PUBLIC DISCLOSURE

August 6, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CornerstoneBank
Charter Number 715682

2060 Mount Paran Road, NW, Suite 100
Atlanta, Georgia 30327

Office of the Comptroller of the Currency

3 Ravinia Drive, Suite 1950
Atlanta, Georgia 30346

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

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Overall CRA Rating This institution is rated Satisfactory

The Lending Test is rated: Satisfactory

CornerstoneBank (Cornerstone or Bank) has a satisfactory record of meeting community credit needs based on the following:

- Cornerstone has maintained a loan-to-deposit (LTD) ratio on a quarterly basis that is more than reasonable considering the Bank's strategy, asset size, financial condition, and the credit needs of its assessment area (AA).
- Management originates a substantial majority of its loans by number and by dollar to customers located inside the Bank's AA.
- The overall lending performance to borrowers of different income levels and businesses of different sizes reflects adequate penetration.
- The overall geographic distribution of loans reflects reasonable dispersion.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A CT delineated by the U.S. Census Bureau in the most recent decennial census.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report).

These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Description of Institution

CornerstoneBank is a federal chartered single-state community bank headquartered in Atlanta, Georgia at 2060 Mount Paran Road, NW Suite 100. As of June 30, 2018, the Bank is a \$234 million institution owned by Cornerstone Bancshares, Inc., a one-bank holding company located in Atlanta, Georgia. For the evaluation period, the Bank has one AA located in the Atlanta-Sandy Springs-Roswell, Georgia MSA. The AA consists of the whole counties of Cobb, DeKalb, Fulton, and Gwinnett. Within the AA, the Bank maintains three branch offices located in upper-income CTs in Atlanta, Decatur, and Sandy Springs. The Bank also maintains two automated teller machines (ATMs) located at its Decatur and Sandy Spring branches. The only deposit taking ATM is located at the Sandy Springs branch. During the evaluation period, there were no new branch openings or branch closures, nor did the Bank have any merger and/or acquisition activity. Management's business strategy is to continue to grow the commercial loan portfolio through Small Business Administration (SBA) lending, small business banking, commercial lending, and residential real estate lending.

The Bank is a full service institution, which offers a range of financial products and services. Retail banking services offered include personal checking accounts, savings accounts, money market accounts, and certificates of deposit. The Bank also offers insurance services, debit cards, and online banking services. In addition, business lending products include SBA lending, commercial banking, merchant services, and commercial loans.

As of December 31, 2017, Cornerstone reported total assets of \$268 million, net loans and leases of \$175 million, and tier 1 capital of \$21 million. During the same time period, commercial loans represented 54.8 percent of gross loans, and residential real estate loans represented 33.8 percent. For this evaluation, we concluded that small business and residential real estate loans were the primary loan products.

There are no legal, financial, or other factors impeding the Bank's ability to meet the credit needs in its AA. The Bank received a CRA rating of "Satisfactory" at its last CRA evaluation, dated April 14, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a review of Cornerstone's CRA performance under the small bank CRA procedures, which is a review of the Lending Test. The Lending Test evaluates the Bank's record of meeting the credit needs of its AA through lending activities.

The evaluation period for the Lending Test is January 1, 2015 through December 31, 2017. Conclusions regarding the Bank's lending performance are based on small business and residential real estate loans, since they are the Bank's primary loan products. Our analyses is based on a valid sample of small business loans originated during the evaluation period and HMDA data.

Data Integrity

We performed a data integrity review that commenced on May 7, 2018. The purpose of the review was to determine the accuracy and reliability of the HMDA Loan Application Register (LAR) data. The review deemed the HMDA data accurate and reliable. No affiliates exist; therefore, we did not consider affiliated activities in this evaluation.

Selection of Areas for Full-Scope Review

Cornerstone designated the Atlanta-Sandy Springs-Roswell, Georgia MSA as its AA. We performed a full-scope review of the Atlanta-Sandy Springs-Roswell, Georgia MSA for the whole counties of Cobb, DeKalb, Fulton, and Gwinnett. Please refer to the table in Appendix A for more information.

Ratings

The Bank's overall rating is based on the Bank's only AA, which received a full-scope review. The rating is a combination of the borrower distribution, lending in the AA, and the LTD ratio tests.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

Cornerstone's performance under the Lending Test is "Satisfactory." The Bank's LTD ratio is more than reasonable. The Bank makes a substantial majority of its loans to customers located inside its AA. The overall lending performance to borrowers of different income levels and businesses of different sizes reflects adequate penetration. And, the overall geographic distribution of loans reflects reasonable dispersion.

Loan-to-Deposit Ratio

The Bank's average LTD ratio is more than reasonable given its size, financial condition, and AA credit needs. The Bank's quarterly LTD ratio averaged 81.7 percent over the 15 quarters since the previous CRA evaluation. The LTD ratio ranged from a high of 89.3 percent in March 2017 to a low of 70.7 percent in December 2017. We compared the Bank's LTD ratio to four similarly situated banks (peer group banks) in Baldwin, Morgan, and Spalding Counties, ranging in total asset size of \$236 million to \$272 million. The peer group banks' average LTD ratio was 61.8 percent, with a high average of 72.9 percent and a low average of 43.1 percent.

Lending in Assessment Area

A substantial majority of Cornerstone's lending activity occurred inside the Bank's AA. Our review consisted of 199 residential mortgage loans and 255 small business loans. Management originated 68.8 percent by number and 69.2 percent by dollar amount of residential real estate loans inside the Bank's AA. Of the small business loans, management originated 72.5 percent by number and 77.5 percent by dollar amount of loans inside the Bank's AA. The following table, Table 1, details the Bank's lending performance.

Table 1 - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	77	68.8	35	31.3	112	13,840	67.7	6,614	32.3	20,454
2016	37	60.7	24	39.3	61	16,591	60.8	10,700	39.2	27,291
2017	23	88.5	3	11.5	26	10,929	90.7	1,125	9.3	12,054
Subtotal	137	68.8	62	31.2	199	41,360	69.2	18,439	30.8	59,799
Small Business										
2015	52	82.5	11	17.5	63	15,946	83.4	3,174	16.6	19,121
2016	51	83.6	10	16.4	61	16,637	79.9	4,189	20.1	20,825
2017	82	62.6	49	37.4	131	25,412	72.8	9,511	27.2	34,922
Subtotal	185	72.5	70	27.5	255	57,995	77.5	16,874	22.5	74,869
Total	322	70.9	132	29.1	454	99,355	73.8	35,313	26.2	134,668
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 HMDA and Bank Data Due to rounding, totals may not equal 100.0</i>										

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

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

Residential Real Estate Loans

The overall distribution of residential real estate loans reflects poor penetration to low- and moderate-income (LMI) borrowers. In 2015-2016, the proportions of Bank loans to LMI borrowers was below the aggregate proportions, and significantly below the demographic proportions. Although the proportions improved in 2017, the volume of lending declined significantly. As a result, the number of LMI borrowers receiving loans remained limited.

Business Loans

The overall distribution of business loans reflects good penetration. Lending to businesses of different sizes reflects good penetration to businesses with revenues of \$1 million or less. Although the proportion of the Bank's loans to small businesses was below the percentage of small businesses with revenues of \$1 million or less, the proportion equaled or slightly exceeded the proportion of aggregate loans to small businesses over the period.

Geographic Distribution of Loans

Refer to Table O and Table Q in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's loan originations and purchases.

The overall geographic distribution of loans reflects adequate dispersion across geographies of different income levels. There were no conspicuous gaps identified in the geographic distribution. The AA consists of the four whole counties of Cobb, DeKalb, Fulton, and Gwinnett. Each county has LMI CTs, which allow for lending to LMI borrowers.

Residential Real Estate Loans

The geographic distribution of residential real estate loans reflects adequate dispersion among CTs of different income levels in the Bank's AA. For 2015-2016, the distribution of residential real estate loans reflects adequate dispersion for LMI CTs in the AA. Although the proportion of 2015-2016 Bank loans in LMI geographies was below demographic percentages, it was comparable to the aggregate. The percentage differences represent a single loan in each income category. Although the percentages in 2017 reflect strong performance in low-income CTs, and poor in moderate-income CTs, the differences represent two loans in each income category. This results in an overall distribution equivalent to the aggregate.

Business Loans

The geographic distribution of business loans reflects adequate dispersion of loans across geographies, within the CTs in the Bank's AA. Dispersion of loans in low-income CTs is poor, with reasonable dispersion in moderate-income CTs. Although the proportion of small business loans varies significantly across different income level geographies over the period, the small number of loans limits the value of percentage based comparisons. Overall, the proportion of loans in LMI geographies is below or equivalent to aggregate and demographic distributions. The loans in LMI geographies reflect a willingness of the Bank to lend in those areas.

Responses to Complaints

During the evaluation period, the Bank did not receive any complaints or public comments regarding CRA performance. In a review of non CRA related complaints, it is noted that Bank management appropriately responds to complaints.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/15 to 12/31/17	
Financial Institution	Products Reviewed	
CornerstoneBank Atlanta, Georgia	Small Business and Residential Real Estate Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Atlanta-Sandy Springs-Roswell, GA MSA	Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

Atlanta-Sandy Springs-Roswell, GA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta-Sandy Springs-Roswell, GA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	582	14.3	24.6	21.8	38.1	1.2
Population by Geography	3,278,601	10.0	24.0	26.2	39.3	0.5
Housing Units by Geography	1,338,310	11.1	24.6	24.7	39.4	0.2
Owner-Occupied Units by Geography	698,519	4.5	18.2	27.6	49.8	0.0
Occupied Rental Units by Geography	491,467	17.8	31.8	21.8	28.2	0.4
Vacant Units by Geography	148,324	20.3	31.0	20.9	27.5	0.2
Businesses by Geography	328,527	6.4	20.1	24.8	47.9	0.8
Farms by Geography	4,806	5.2	19.2	28.7	46.8	0.1
Family Distribution by Income Level	756,647	22.9	15.8	16.7	44.6	0.0
Household Distribution by Income Level	1,189,986	23.7	16.0	16.8	43.5	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,322	Median Housing Value			\$207,111
			Median Gross Rent			\$1,027
			Families Below Poverty Level			12.0%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Atlanta-Sandy Springs-Roswell, Georgia MSA is comprised of over 20 counties. In the MSA, Cornerstone claims the counties of Cobb, DeKalb, Fulton, and Gwinnett as its AA. The Bank claims whole counties for its AA and does not arbitrarily exclude low- and moderate-income CTs. According to the June 30, 2017 FDIC Summary of Deposits, Cornerstone had \$205 million of deposits in the MSA. The Bank's deposit market share in the MSA was 12.0 percent, which is 44th out of 88 institutions. There is strong competition for deposits from large national and regional banks, with the top five comprising 62.0 percent of the market. The largest competitors are SunTrust Bank; Bank of America, NA; Wells Fargo, NA; Branch Banking and Trust Company; and Synovus Bank. The Bank's primary business focus is small business lending,

particularly SBA lending. The Bank has three branches in the MSA, with an ATM at Decatur and Sandy Springs branch locations.

The 2010 U.S. Census indicates the population of the MSA was approximately 3.3 million. The 2017 FFIEC adjusted median family income was \$67,322. Low-income families earning a median income of \$34,600 or less in the AA represent 22.9 percent, while moderate-income families represent 15.8 percent of families in the AA. In the AA, 12.0 percent of the families are earning wages below the poverty level. The median housing value in Atlanta-Sandy Springs-Roswell MSA is \$207,111. According the U.S. Census, 52.2 percent are owner-occupied and 36.7 percent are rental units.

According to the Bureau of Labor Statistics, the Atlanta-Sandy Springs-Roswell MSA had a 6.2 percent unemployment rate at the beginning of the evaluation period in January 2015. Over the subsequent two years, unemployment percentages consistently decreased. The unemployment rate in the MSA in December 2016 was 4.9 percent and fell to 4.1 percent at the end of the evaluation period in December 2017. The Bureau of Labor Statistics indicates the national unemployment rate was 5.0 percent in December 2015, 4.7 percent in December 2016, and 4.1 percent in December 2017. In comparison, the annual unadjusted unemployment rate for Georgia decreased during this same period from 5.6 percent in December 2015, to 5.3 percent in December 2016, and again dropped to 4.5 percent in 2017. The unemployment rate in the MSA was higher than the national and state unemployment rate averages at the beginning of the evaluation period, yet was less than or equal to the national and state unemployment rates at the end of the evaluation period.

Moody's Analytics reports the Atlanta-Sandy Springs-Roswell MSA has a diverse economy, a business friendly environment, and strong demographics. High wage positions are shrinking, yet mid-wage jobs and a tightening labor market are assisting with gains in the average hourly earnings in the MSA. The majority of the jobs in the MSA are in the Information, Transportation, Warehousing, Professional, Scientific, and Tech Services segments. Top employers in the MSA are Delta Airlines, Inc.; Wal-Mart Stores; The Home Depot, Inc.; Emory University; and WellStar Health Systems, Inc.

Through the community contact program, we identified banking needs of the Atlanta-Sandy Springs-Roswell MSA. There are ample opportunities for financial institution involvement in community needs in the AA. Identified needs are opportunities to finance the expansion of small businesses, assistance with affordable housing across all counties in the AA, and financial literacy. Community contacts were from economic development organizations throughout the counties and one of the largest Community Development Financial Institutions (CDFI) in the AA with a focus on affordable housing. The community contacts identified that the banks are serving the needs of communities, yet additional assistance is needed in the AA.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The set of tables is provided for the State of Georgia. References to the “Bank” include activities of any affiliates that the Bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

- Table B. Median Family Income Ranges** - Details income ranges from the updated median family income values for the MSAs/MDs as produced annually by the FFIEC.
- Table C. Branch and ATM Distribution Level by Geography Income Level** - Contains demographic data from the US Census for the number of Census tracts, the population in those tracts, and branches and ATMs in those tracts.
- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller

than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table B – Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Atlanta-Sandy Springs-Roswell, GA MSA Median Family Income (12060)				
2015 (\$70,700)	<\$35,350	\$35,350 to <\$56,560	\$56,560 to <\$84,840	≥\$84,840
2016 (\$67,200)	<\$33,600	\$33,600 to <\$53,760	\$53,760 to <\$80,640	≥\$80,640
2017 (\$69,200)	<\$34,600	\$34,600 to <\$55,360	\$55,360 to <\$83,040	≥\$83,040
<i>Source: FFIEC Due to rounding, totals may not equal 100.0</i>				

Table C - Branch and ATM Distribution by Geography Income Level												
Assessment Area: Atlanta-Sandy Springs-Roswell, GA MSA												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	83	14.3	329,072	10.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	143	24.6	786,506	24.0	0	0.0	0	0.0	0	0.0	0	0.0
Middle	127	21.8	859,746	26.2	0	0.0	0	0.0	0	0.0	0	0.0
Upper	222	38.1	1,287,362	39.3	3	100.0	2	100.0	0	0.0	0	0.0
NA	7	1.2	15,915	0.5	0	0.0	0	0.0	0	0.0	0	0.0
Totals	582	100.0	3,278,601	100.0	3	100.0	2	100.0	0	100.0	0	100.0
<i>Source: 2015 ACS Census & Bank Data Due to rounding, totals may not equal 100.0</i>												

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (2015-2016)																				
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Atlanta-Sandy Springs-Roswell 2015-2016	114	30,431	83.2	248,169	4.1	1.8	2.6	16.5	12.3	13.3	31.9	15.8	31.0	47.6	70.2	53.0	0.0	0.0	0.0	
Total	114	30,431	83.2	248,169	4.1	1.8	2.6	16.5	12.3	13.3	31.9	15.8	31.0	47.6	70.2	53.0	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 HMDA Aggregate Data, "--" data not available and Loan Sample
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography (2017)																				
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	
Atlanta-Sandy Springs-Roswell 2017	23	10,929	16.8	117,102	4.5	13.0	4.2	18.2	8.7	17.4	27.6	13.0	28.4	49.8	65.2	49.9	0.0	0.0	0.0	
Total	23	10,929	16.8	117,102	4.5	13.0	4.2	18.2	8.7	17.4	27.6	13.0	28.4	49.8	65.2	49.9	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available and Loan Sample
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (2015-2016)

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Atlanta-Sandy Springs-Roswell 2015-2016	114	30,431	83.2	248,169	21.8	2.6	4.5	15.9	5.3	12.8	17.9	7.9	17.3	44.5	71.9	46.7	0.0	12.3	18.7
Total	114	30,431	83.2	248,169	21.8	2.6	4.5	15.9	5.3	12.8	17.9	7.9	17.3	44.5	71.9	46.7	0.0	12.3	18.7

*Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available and Loan Sample
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower (2017)

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
Atlanta-Sandy Springs-Roswell 2017	23	10,929	16.8	117,102	22.9	4.3	4.8	15.8	13.0	14.9	16.7	4.3	19.0	44.6	47.8	44.9	0.0	30.4	16.4
Total	23	10,929	16.8	117,102	22.9	4.3	4.8	15.8	13.0	14.9	16.7	4.3	19.0	44.6	47.8	44.9	0.0	30.4	16.4

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available and Loan Sample
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography (2015-2016)																			
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlanta-Sandy Springs-Roswell 2015-2016	12	3,892,703	60.0	189,911	5.8	8.3	5.0	19.2	8.3	17.1	29.3	16.7	26.6	45.7	66.7	51.3	0.0	--	0.0
Total	12	3,892,703	60.0	189,911	5.8	8.3	5.0	19.2	8.3	17.1	29.3	16.7	26.6	45.7	66.7	51.3	0.0	--	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. and Loan Sample
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography (2017)																			
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlanta-Sandy Springs-Roswell 2017	8	2,798,500	40.0	103,884	6.4	0.0	5.0	20.1	25.0	17.8	24.8	25.0	22.7	47.9	50.0	54.1	0.8	--	0.5
Total	8	2,797,500	40.0	103,884	6.4	0.0	5.0	20.1	25.0	17.8	24.8	25.0	22.7	47.9	50.0	54.1	0.8	--	0.5

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available. and Loan Sample
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues (2015-2016)

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta-Sandy Springs-Roswell 2015-2016	16	73,779,949	51.6	189,911	83.2	50.0	50.0	4.6	50.0	12.2	--
Total	16	73,779,949	51.6	189,911	83.2	50.0	50.0	4.6	50.0	12.2	--

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. and Loan Sample
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues (2017)

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta-Sandy Springs-Roswell 2017	15	24,073,206	48.4	103,884	87.3	53.3	50.0	5.0	46.7	7.7	--
Total	15	24,073,206	48.4	103,884	87.3	53.3	50.0	5.0	46.7	7.7	--

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available. and Loan Sample
Due to rounding, totals may not equal 100.0