

PUBLIC DISCLOSURE

February 18, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Truist Bank
Certificate Number: 9846

214 North Tryon Street
Charlotte, NC 28202

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

10 Tenth Street, NE
Suite 800
Atlanta, GA 30309-3849

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.

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INSTITUTION RATING

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

An institution in this group has an outstanding 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		X	X
High Satisfactory	X		
Low Satisfactory			
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 High Satisfactory.

- Lending levels reflect good responsiveness to assessment area credit needs.
- A high percentage of loans are made in the institution’s assessment areas.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of borrowers reflects good penetration among retail customers of different income levels and businesses and farms of different sizes.
- The institution uses innovative and flexible lending practices in order to serve the assessment area credit needs.
- The institution is a leader in making community development loans.

The Investment Test is rated Outstanding.

- The institution has an excellent level of qualified community development investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits excellent responsiveness to credit and community economic development needs.

- The institution makes significant use of innovative and/or complex investments to support community development initiatives.

The Service Test is rated Outstanding.

- Truist's delivery systems are accessible to essentially all portions of the institution's assessment areas.
- To the extent changes have been made, the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies, and/or to low- and moderate-income individuals.
- Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- Truist is a leader in providing community development services.

DESCRIPTION OF INSTITUTION

Truist Bank (Truist) is a \$461.3 billion state-chartered financial institution, headquartered in Charlotte, North Carolina. Truist was formerly named Branch Banking and Trust Company (BB&T) and formerly headquartered in Winston-Salem, North Carolina. Truist is owned by one of the largest financial holding companies in the United States, Truist Financial Corporation (Corporation), formerly named BB&T Corporation. The name change of the bank, holding company, and relocation of the main office was effective on December 7, 2019 and were a result of the merger between SunTrust Banks, Inc. and BB&T Corporation. Truist is the largest subsidiary of the Corporation, which also operates non-bank subsidiaries offering consumer financial services and brokerage activities throughout its market areas. Shares of the Corporation are traded on the New York Stock Exchange under the symbol “TFC”.

The bank’s lending related subsidiaries include Grandbridge Real Estate Capital, LLC (Grandbridge), BB&T Equipment Finance Corporation, and Prime Rate Premium Finance Corporation, Inc. (Prime Rate). Grandbridge is a commercial real estate financing company, specializing in large-scale real estate construction and permanent financing, including multi-family housing projects. BB&T Equipment Finance Corporation provide loans and lease financing to commercial and small businesses. Prime Rate provides insurance premium financing.

During the evaluation period, the only bank merger activity was the merger of equals between BB&T and SunTrust Bank. This merger expanded or added new assessment areas as of December 7, 2019, as noted under the *Scope of Evaluation* section. Examiners excluded the expanded or new areas from the scope of the current evaluation, since the merger occurred close to the evaluation date. This merger provided 1,163 additional branches and approximately \$221.4 billion in assets. Through the merger, Truist entered 1 new multistate area, 7 new MSAs, and expanded its Non-MSA areas in 5 states.

The bank originates a wide variety of commercial loans including owner-occupied commercial real estate, commercial investment property, commercial and industrial, and small business commercial loans primarily through their branch network. In addition, the bank originates residential mortgage loans for sale in the secondary market as well as for retention in its loan portfolio. Moreover, Truist offers a full range of banking services, including investment, trust, and cash management products and services to both commercial and individual customers. Retail deposits generated through the bank’s branch operations have been utilized as the primary source of funding for operation and growth.

Operations

Truist operates 1,755 full-service branch offices in 13 states and 9 multi-state areas throughout its assessment areas. Refer to *Description of Assessment Areas* for a summary of the bank’s branches in each assessment area. Although the bank has a diverse business strategy, the main focuses are building banking relationships through commercial and residential lending, as well as the gathering of deposits.

As of the December 31, 2019, Consolidated Report of Condition and Income, Truist had total assets of \$461.3 billion, total deposits of \$347.5 billion, and total loans of \$303.6 billion. Total loans represent 65.8 percent of total assets. As shown in the following table, commercial real estate and commercial and industrial loans comprise 38.3 percent of total loans, while 1-4 family residential properties comprise 25.1 percent of total loans.

Loan Portfolio Distribution as of 12/31/2019		
Loan Category	\$(000s)	%
Construction and Land Development	9,221,000	3.0
Secured by Farmland	608,000	0.2
1-4 Family Residential	76,290,000	25.1
Multi-family (5 or more) Residential	5,031,000	1.7
Commercial Real Estate	43,181,000	14.2
Total Real Estate Loans	134,331,000	44.2
Commercial and Industrial	73,250,000	24.1
Agricultural	274,000	0.1
Consumer	52,781,000	17.4
Obligations of States/Political Subdivisions	10,019,000	3.3
Lease Financing Receivables	5,850,000	1.9
Other	27,138,000	9.0
Total Loans	303,643,000	100.0
<i>Source: Reports of Income and Condition – 12/31/2019</i>		

Ability and Capacity

Truist has provided for the credit needs of its assessment areas in a manner consistent with its size, financial capacity, location, resources, and local economic conditions. There are no financial, legal, or other impediments that would limit the bank’s ability to meet the credit needs of its assessment areas.

The bank received an Outstanding rating at the previous FDIC Performance Evaluation, dated January 17, 2017, based on Interagency Large Institution Examination Procedures.

DESCRIPTION OF ASSESSMENT AREAS

Economic and Demographic Data

Truist has 138 assessment areas, which are located in 13 states and 9 multistate Metropolitan Statistical Areas (MSAs). Examiners rated bank performance in each state and multistate MSA separately and combined the counties that are not part of a MSA to form statewide non-metropolitan assessment areas for this CRA evaluation. The bank defined each assessment area in accordance with the technical requirements of the CRA regulation. In each MSA or Metropolitan Division (MD) where Truist operates a branch, bank management designated the entire MSA or MD as the assessment area. The following table provides a description of the assessment areas.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
North Carolina			
Asheville MSA	Buncombe, Haywood, Henderson and Madison Counties	105	7
Burlington MSA	Alamance County	36	2
Durham MSA	Chatham, Durham, Orange, and Person Counties	108	14
Fayetteville MSA	Cumberland and Hoke Counties	77	15
Goldsboro MSA	Wayne County	26	4
Greensboro MSA	Guilford, Randolph, and Rockingham Counties	168	21
Greenville MSA	Pitt County	32	6
Hickory MSA	Alexander, Burke, Caldwell, and Catawba Counties	73	11
Jacksonville MSA	Onslow County	32	2
New Bern MSA	Craven, Jones, and Pamlico Counties	29	5
Raleigh MSA	Franklin, Johnston, and Wake Counties	224	32
Rocky Mount MSA	Edgecombe and Nash Counties	32	3
Wilmington MSA	New Hanover and Pender Counties	61	8
Winston-Salem MSA	Davidson, Davie, Forsyth, Stokes, and Yadkin Counties	150	20
Non-MSA	Bladen, Columbus, Harnett, Lee, Montgomery, Moore, Richmond, Robeson, Scotland, Chowan, Dare, Martin, Pasquotank, Tyrell, Washington, Granville, Halifax, Vance, Warren, Wilson, Carteret, Duplin, Lenoir, Sampson, Alleghany, Anson, Avery, Cherokee, Cleveland, Jackson, McDowell, Rutherford, Surry, Watauga, and Wilkes Counties.	426	72
North Carolina Subtotal		1,579	222
Florida			
Cape Coral MSA	Lee County	167	16
Crestview MSA	Okaloosa and Walton Counties	55	1
Deltona MSA	Flagler and Volusia Counties	135	8
Fort Lauderdale MD	Broward County	362	30
Homosassa Springs MSA	Citrus County	28	2
Jacksonville MSA	Baker, Clay, Duval, Nassau, and St. Johns Counties	262	13
Lakeland MSA	Polk County	154	7
Miami MD	Miami-Dade County	519	37
Naples MSA	Collier County	74	5
North Port MSA	Manatee and Sarasota Counties	174	16
Ocala MSA	Marion County	63	4
Orlando MSA	Lake, Orange, Osceola, and Seminole Counties	390	33

Description of Assessment Areas – Continued			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Florida – Continued			
Palm Bay MSA	Brevard County	114	6
Panama City MSA	Bay and Gulf Counties	48	2
Pensacola MSA	Escambia and Santa Rosa Counties	98	2
Port St Lucie MSA	Martin and St. Lucie Counties	81	8
Punta Gorda MSA	Charlotte County	39	3
Tallahassee MSA	Gadsden, Jefferson, Leon, and Wakulla Counties	86	3
Tampa MSA	Hernando, Hillsborough, Pasco, and Pinellas Counties	746	39
The Villages MSA	Sumter County	19	2
West Palm Beach MD	Palm Beach County	338	23
Non-MSA FL	Monroe County	31	2
Florida Subtotal		3,983	262
Virginia			
Blacksburg MSA	Floyd, Giles, Montgomery, Pulaski, and Radford City Counties	36	5
Charlottesville MSA	Albemarle, Buckingham, Charlottesville City, Fluvanna, Greene, and Nelson Counties	48	10
Harrisonburg MSA	Harrisonburg City and Rockingham Counties	30	6
Lynchburg MSA	Amherst, Appomattox, Bedford, Campbell, and Lynchburg City Counties	60	12
Richmond MSA	Amelia, Caroline, Charles City, Chesterfield, Colonial Heights City, Dinwiddie, Goochland, Hanover, Henrico, Hopewell City, King William, New Kent, Petersburg City, Powhatan, Prince George, Richmond City, and Sussex Counties	295	35
Roanoke MSA	Botetourt, Craig, Franklin, Roanoke, Roanoke City, and Salem City Counties	65	10
Staunton MSA	Augusta, Staunton City, and Waynesboro City Counties	24	5
Virginia Beach MSA	Chesapeake City, Gloucester, Hampton City, Isle of Wight, James City, Mathews, Newport News City, Norfolk City, Poquoson City, Portsmouth City, Suffolk City, Virginia Beach City, Williamsburg City, and York Counties	411	41
Winchester MSA	Frederick and Winchester City Counties	19	6
Non-MSA VA	Accomack, Alleghany, Bath, Bland, Buena Vista City, Carroll, Charlotte, Covington City, Danville City, Dickenson, Emporia City, Franklin City, Galax City, Grayson, Halifax, Henry, King and Queen, King George, Lexington City, Louisa, Martinsville City, Mecklenburg, Middlesex, Northampton, Nottoway, Orange, Page, Patrick, Pittsylvania, Prince Edward, Russell, Shenandoah, Smyth, Tazewell, Westmoreland, Wise, and Wythe Counties	221	50
Virginia Subtotal		1,209	180
Georgia			
Athens MSA	Clarke, Madison, Oconee, and Oglethorpe Counties	46	3
Atlanta MSA	Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton Counties	951	71
Brunswick MSA	Brantley, Glynn, and McIntosh Counties	24	2
Dalton MSA	Murray and Whitfield Counties	26	3
Gainesville MSA	Hall County	36	6
Macon MSA	Bibb, Crawford, Jones, Monroe, and Twiggs Counties	60	5
Savannah MSA	Bryan, Chatham, and Effingham Counties	89	8
Valdosta MSA	Brooks, Echols, Lanier, and Lowndes Counties	34	1
Warner Robins MSA	Houston, Peach, and Pulaski Counties	32	3

Description of Assessment Areas – Continued			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Georgia – Continued			
Non-MSA GA	Baldwin, Bulloch, Candler, Coffee, Cook, Chattooga, Emanuel, Fannin, Franklin, Gilmer, Gordon, Greene, Lumpkin, Macon, Screven, Taylor, Tift, Troup, Toombs, Ware, and Wayne Counties	140	23
Georgia Subtotal		1,438	125
Pennsylvania			
Allentown MSA	Carbon, Lehigh, and Northampton Counties	156	31
Chambersburg MSA	Franklin County	27	5
East Stroudsburg MSA	Monroe County	33	1
Gettysburg MSA	Adams County	23	3
Harrisburg MSA	Cumberland, Dauphin, and Perry Counties	124	14
Lancaster MSA	Lancaster County	98	24
Lebanon MSA	Lebanon County	31	2
Montgomery MD	Bucks, Chester, and Montgomery Counties	470	47
Philadelphia MD	Delaware and Philadelphia Counties	528	14
Reading MSA	Berks County	90	15
Scranton MSA	Lackawanna, Luzerne, and Wyoming Counties	170	5
State College MSA	Centre County	31	4
Williamsport MSA	Lycoming County	29	4
York MSA	York County	90	14
Non-MSA PA	Bedford, Fulton, Northumberland, Schuylkill, and Snyder Counties	86	12
Pennsylvania Subtotal		1,986	195
Texas			
Austin MSA	Bastrop, Caldwell, Hays, Travis, and Williamson Counties	350	13
College Station MSA	Brazos, Bureson, and Robertson Counties	52	5
Dallas MD	Collin, Dallas, Denton, Ellis, Hunt, Kaufman, and Rockwall Counties	897	40
Fort Worth MD	Hood, Johnson, Parker, Somervell, Tarrant, and Wise Counties	427	11
Houston MSA	Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties	1,072	22
Midland MSA	Martin and Midland Counties	29	2
Odessa MSA	Ector County	28	3
San Antonio MSA	Atascosa, Bandera, Bexar, Comal, Guadalupe, Kendall, Medina, and Wilson Counties	457	10
Texas Subtotal		3,312	106
Maryland			
Baltimore MSA	Anne Arundel, Baltimore, Baltimore City, Carroll, Harford, Howard, and Queen Anne's Counties	683	64
California MSA	St. Mary's County	18	1
Salisbury MSA	Somerset, Wicomico, and Worcester Counties	44	7
Silver Spring MD	Frederick and Montgomery Counties	276	23
Wilmington MD	Cecil County	19	1
Non-MSA MD	Caroline, Dorchester, Garrett, Kent, and Talbot Counties	43	7
Maryland Subtotal		1,083	103
South Carolina			
Charleston MSA	Berkeley, Charleston, and Dorchester Counties	156	12
Columbia MSA	Calhoun, Fairfield, Kershaw, Lexington, Richland, and Saluda Counties	191	20
Florence MSA	Darlington and Florence Counties	49	2
Greenville MSA	Anderson, Greenville, Laurens, and Pickens Counties	195	20

Description of Assessment Areas – Continued			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
South Carolina - Continued			
Hilton Head MSA	Beaufort and Jasper Counties	46	3
Spartanburg MSA	Spartanburg and Union Counties	78	6
Sumter MSA	Sumter County	23	2
Non-MSA SC	Colleton, Georgetown, Hampton, McCormick, Newberry, Oconee, and Orangeburg Counties	76	9
South Carolina Subtotal		814	74
West Virginia			
Beckley MSA	Fayette and Raleigh Counties	29	3
Charleston MSA	Boone, Clay, and Kanawha Counties	64	9
Huntington MSA	Cabell, Lincoln, Putnam, and Wayne Counties	55	4
Morgantown MSA	Monongalia and Preston Counties	32	5
Parkersburg MSA	Wirt and Wood Counties	28	3
Wheeling MSA	Marshall and Ohio Counties	27	3
Non-MSA WV	Greenbrier, Harrison, Jackson, Logan, Marion, Mason, Mercer, Mingo, Morgan, Nicholas, and Taylor Counties	100	15
West Virginia Subtotal		335	42
Alabama			
Anniston MSA	Calhoun County	31	4
Auburn MSA	Lee County	27	2
Birmingham MSA	Bibb, Blount, Chilton, Jefferson, Shelby, St. Clair, and Walker Counties	264	20
Daphne MSA	Baldwin County	32	5
Dothan MSA	Geneva, Henry, and Houston Counties	34	0
Gadsden MSA	Etowah County	30	2
Huntsville MSA	Limestone and Madison Counties	89	7
Mobile MSA	Mobile County	115	4
Montgomery MSA	Autauga, Elmore, Lowndes, and Montgomery Counties	96	6
Tuscaloosa MSA	Hale, Pickens, and Tuscaloosa Counties	58	1
Non-MSA AL	Butler, Chambers, Clay, Conecuh, Covington, Crenshaw, Dale, Escambia, Jackson, Marshall, Pike, and Tallapoosa Counties	117	13
Alabama Subtotal		893	64
Tennessee			
Chattanooga MSA	Hamilton, Marion, and Sequatchie Counties	91	4
Cleveland MSA	Bradley and Polk Counties	24	3
Johnson City MSA	Carter, Unicoi, and Washington Counties	44	2
Knoxville MSA	Anderson, Blount, Campbell, Grainger, Knox, Loudon, Morgan, Roane, and Union Counties	204	13
Morristown MSA	Hamblen and Jefferson Counties	21	2
Nashville MSA	Cannon, Cheatham, Davidson, Dickson, Hickman, Macon, Maury, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson Counties	380	3
Non-MSA TN	Greene, McMinn, Monroe, and Sevier Counties	50	8
Tennessee Subtotal		814	35

Description of Assessment Areas – Continued			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Kentucky			
Bowling Green MSA	Allen, Butler, Edmonson, and Warren Counties	39	5
Clarksville MSA	Christian and Trigg Counties	24	3
Lexington MSA	Bourbon, Clark, Fayette, Jessamine, Scott, and Woodford Counties	129	7
Owensboro MSA	Daviess, Hancock, and McLean Counties	29	5
Non-MSA KY	Barren, Calloway, Floyd, Harlan, Johnson, Knox, Laurel, Logan, Lyon, McCracken, Pike, Pulaski, Russell, Washington, and Wayne Counties	139	21
Kentucky Subtotal		360	41
New Jersey			
Atlantic City MSA	Atlantic County	70	3
Camden MSA	Burlington, Camden, and Gloucester Counties	304	15
New York MSA	Bergen, Hudson, Middlesex, Monmouth, Ocean, and Passaic Counties	890	1
Trenton MSA	Mercer County	77	2
Vineland MSA	Cumberland County	35	5
New Jersey Subtotal		1,376	26
Multistate MSAs			
Washington DC-MD-VA-WV MSA	District of Columbia, Calvert, Charles, Prince George's, Alexandria City, Arlington, Clarke, Culpeper, Fairfax, Fairfax City, Falls Church City, Fauquier, Fredericksburg City, Loudoun, Manassas City, Manassas Park City, Prince William, Rappahannock, Spotsylvania, Stafford, Warren, and Jefferson Counties	1,083	127
Charlotte NC-SC MSA	Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Union, Chester, Lancaster, and York Counties	539	60
Myrtle Beach SC-NC MSA	Brunswick and Horry Counties	105	21
Louisville KY-IN MSA	Clark, Floyd, Harrison, Scott, Washington, Bullitt, Henry, Jefferson, Oldham, Shelby, Spencer, and Trimble Counties	306	21
Cincinnati OH-KY MSA	Boone, Bracken, Campbell, Gallatin, Grant, Kenton, Pendleton, Brown, Butler, Clermont, Hamilton, and Warren Counties	484	24
Hagerstown MD-WV MSA	Washington and Berkeley Counties	46	13
Columbus GA-AL MSA	Russell, Chattahoochee, Harris, Marion, and Muscogee Counties	78	3
Kingsport TN-VA MSA	Hawkins, Sullivan, Bristol City, Scott, and Washington Counties	75	7
Cumberland MD-WV MSA	Alleghany and Mineral Counties	30	4
<i>Source: Bank records. Assessment areas are as of 12/31/2018. Any changes that occurred in 2019 due to Office of Management and Budget (OMB) changes to MSAs are noted in each assessment area description. Branch data as of 12/31/2019.</i>			

Refer to the individual state and assessment area sections of this evaluation for specific economic and demographic information by state and assessment area. However, select aggregate demographic, housing, and economic information for all assessment areas combined is presented below based on the 2015 American Community Survey Census (ACS Census), unless otherwise stated.

Demographics

- Population: 101.1 million
- Total Number of Households: 37.4 million
- Family Income Distribution: 22.0% Low-Income, 17.1% Moderate-Income, 19.3% Middle-Income, 41.6% Upper-Income
- Families Below Poverty Level: 11.2%

Distribution of Population and Households by Census Tract Income Throughout All Assessment Areas						
Census Tract Income Category	Number of Census Tracts		Total Population		Total Households	
	#	%	#	%	#	%
Low-Income	1,786	8.1	6,680,838	6.6	2,368,033	6.3
Moderate-Income	5,201	23.7	22,923,749	22.7	8,328,444	22.3
Middle-Income	8,364	38.2	40,419,315	40.0	15,221,285	40.7
Upper-Income	6,217	28.4	30,681,735	30.3	11,400,301	30.5
Not Available	360	1.6	446,807	.4	71,196	.2
Total	21,928	100.0	101,152,444	100.0	37,389,259	100.0

Source: 2015 ACS Census

Housing

- Total Housing Units: 42.9 million
- Occupancy: 56.4% owner-occupied, 30.7% rental units, 12.9% vacant
- Housing Stock: 73.8% 1-4 units, 19.3% 5 or more units, 6.9% mobile homes and other units
- Median Housing Value: \$213,726
- Median Gross Rent: \$984

Businesses

According to the 2018 Dun & Bradstreet (D&B) data, there were approximately 7.8 million businesses. Gross annual revenues (GARs) for these businesses are below.

- 85.6 percent have \$1 million or less.
- 5.1 percent have more than \$1 million.
- 9.3 percent have unknown revenues.

Economy

The unemployment statistics in the following table demonstrate the significant changes in the economy over the CRA evaluation period. In each State and the District of Columbia, the unemployment rate has decreased or remained the same over the review period. However, the unemployment rates in the District of Columbia, West Virginia, Pennsylvania, Kentucky, and Ohio remain significantly above the national average.

Unemployment Rates			
Area	2017	2018	2019
	%	%	%
North Carolina	4.5	3.6	3.7
Florida	3.9	3.3	3.0
Virginia	3.6	2.8	2.6
Georgia	4.5	3.6	3.2
Maryland	4.1	3.9	3.5
District of Columbia	5.9	5.5	5.3
Pennsylvania	4.8	4.2	4.5
Texas	4.0	3.7	3.5
South Carolina	4.2	3.3	2.3
Tennessee	3.3	3.6	3.3
West Virginia	5.4	5.1	5.0
Alabama	3.8	3.9	2.7
Kentucky	4.5	4.4	4.3
New Jersey	4.7	4.0	3.5
Ohio	4.9	4.6	4.2
Indiana	3.4	3.6	3.2
National Average	4.1	3.9	3.5
<i>Source: Bureau of Labor Statistics</i>			

The economic data for the States reflects mixed economic data. There is continued improvement in unemployment rates; however, job growth varied. Positive net job growth has occurred in seven states and negative job growth in nine states. The strongest net job growth occurred in North Carolina, Texas, Tennessee, and New Jersey. The strongest net job losses were in Georgia, West Virginia, Alabama, and Indiana. Per capita income in most of the States continues to be below the national level with the exception of Virginia, Maryland, District of Columbia, Pennsylvania, and New Jersey. The housing market throughout the bank’s assessment areas has been steady and will continue to be important to growth. In general, the long-term outlook for growth in the bank’s assessment areas remains positive despite economic slowdown caused by the pandemic.

Competition

The bank competes with a number of other financial institutions in its assessment areas. Refer to the *Description of Institution’s Operations* within each rated area of this performance evaluation for further details on the bank’s competition.

Community Contacts

During CRA evaluations, examiners conduct community contacts to develop a better understanding of the demographic, economic, and credit needs of an institution’s assessment areas. Examiners conducted 12 community contacts and referenced 222 community contacts in each state and multistate MSA where Truist operates branches.

Overall, the review of community contacts indicates that both urban and rural areas continue to have various small business and affordable housing needs that are not being met.

The vast majority of the contacts indicated that the economies in their areas are strong and doing well, some with the lowest unemployment rates in several years. However, in some rural areas and smaller cities contacts noted much weaker economic conditions compared to the overall nation. Numerous contacts stated small businesses continue to struggle to obtain financing, particularly start-up businesses. In addition, many small business owners lack the financial education needed to obtain business loans and establish good credit records. Regarding small businesses, contacts noted needs for very small dollar loans, Small Business Administration (SBA) loans, technical assistance for entrepreneurs, and financial literacy programs.

In most areas, contacts noted the need for additional affordable housing units, including rental units for low- and moderate-income families, who are not ready or able to purchase a home. Low- and moderate-income families need financial literacy and homeownership counseling in order to become prepared to apply for a home mortgage loan. In some areas, contacts noted that the housing stock is aging, which is creating a need for home improvement loans to rehabilitate the housing stock. In addition, many of the non-profit organizations contacted noted needs for grants and donations and for technical assistance from bankers.

Credit and Community Development Needs and Opportunities

A review of demographic and economic data, as well as community contact information, indicate the need for small business, home mortgage, and consumer loans in the bank's assessment areas. In particular, community contacts noted the need for small business loans, including loans for very small loan amounts. The community contacts also consistently mentioned the need for affordable housing loans for low- and moderate-income families and also affordable rental units. The lack of affordable rental units could be addressed by community development loans to provide affordable multi-family housing for low- and moderate-income families.

SCOPE OF EVALUATION

General Information

In evaluating Truist’s Community Reinvestment Act (CRA) performance, examiners used the Large Institution CRA Examination Procedures, which consist of three tests: Lending, Investment, and Service. Examiners used the procedures to evaluate the bank’s CRA performance in its designated assessment areas. The evaluation period was from January 1, 2017, to December 31, 2019. Subsidiary lending activity of Grandbridge has been combined with the bank’s own data for presentation purposes.

During the evaluation period, the bank merged with SunTrust Bank as of December 7, 2019. Examiners did not evaluate heritage SunTrust Bank CRA activity or post-merger expanded assessment areas since the merger occurred close to the evaluation date. The merger expanded or added new assessment areas as Truist entered 1 new multistate area, 7 new MSAs, and expanded its Non-MSA areas in 5 states.

The lending test considers an institution’s performance with respect to its lending activity and assessment area concentration; geographic distribution and borrower profile characteristics; innovative or flexible lending practices; and community development lending. The investment test considers the nature of an institution’s community development investments, grants, and donations. In particular, the investment test considers the level, responsiveness, innovativeness, and complexity of these activities. Lastly, the service test analyzes an institution’s retail services in relation to accessibility of delivery systems; branch locations, including openings and closures; and reasonableness of business hours and services. The service test also evaluates an institution’s level of community development services.

While reviewing lending in all assessment areas, examiners evaluated the bank’s lending data, deposit activity, and the number of branches to determine which areas would receive the most weight. As shown in the following table, North Carolina, Florida, Washington D.C., Virginia, Georgia, and Pennsylvania have the most lending and deposit activity. Consequently, examiners gave the most weight to the bank’s lending performance in those rated areas.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Asheville MSA	145,194	0.7	551,278	0.3	7	0.4
Burlington MSA	73,926	0.3	245,416	0.2	2	0.1
Durham MSA	263,043	1.2	1,327,761	0.8	14	0.8
Fayetteville MSA	112,311	0.5	1,092,719	0.7	15	0.9
Goldsboro MSA	66,101	0.3	572,511	0.3	4	0.2
Greensboro MSA	391,847	1.8	2,363,407	1.4	21	1.2
Greenville MSA	89,561	0.4	494,033	0.3	6	0.3
Hickory MSA	147,531	0.7	1,067,481	0.6	11	0.6
Jacksonville MSA	32,948	0.2	97,811	0.1	2	0.1

Assessment Area Breakdown of Loans, Deposits, and Branches						
New Bern MSA	74,306	0.4	610,404	0.4	5	0.3
Raleigh MSA	814,949	3.8	4,212,654	2.5	32	1.8
Rocky Mount MSA	52,198	0.3	350,846	0.2	3	0.2
Wilmington MSA	145,944	0.7	833,457	0.5	8	0.5
Winston-Salem MSA	437,097	2.0	25,356,306	15.2	20	1.1
Non-MSA NC	778,018	3.6	6,602,629	4.0	72	4.1
North Carolina Subtotal	3,624,974	16.9	45,778,713	27.5	222	12.6
Cape Coral MSA	116,946	0.6	928,412	0.6	16	0.9
Crestview MSA	90,119	0.4	56,453	0.0	1	0.1
Deltona MSA	117,443	0.6	400,668	0.2	8	0.5
Fort Lauderdale MD	249,135	1.2	2,765,522	1.7	30	1.7
Homosassa Springs MD	39,124	0.2	80,963	0.1	2	0.1
Jacksonville MSA	277,187	1.3	724,242	0.4	13	0.7
Lakeland MSA	73,817	0.3	383,026	0.2	7	0.4
Miami MD	239,904	1.1	2,804,929	1.7	37	2.1
Naples MSA	54,891	0.3	220,667	0.1	5	0.3
North Port MSA	225,250	1.0	1,192,487	0.7	16	0.9
Ocala MSA	41,999	0.2	126,039	0.1	4	0.2
Orlando MSA	320,408	1.5	2,163,227	1.3	33	1.9
Palm Bay MSA	123,984	0.6	650,875	0.4	6	0.3
Panama City MSA	20,069	0.1	75,181	0.0	2	0.1
Pensacola MSA	53,293	0.2	108,097	0.1	2	0.1
Port St. Lucie MSA	65,300	0.3	316,070	0.2	8	0.5
Punta Gorda MSA	28,234	0.1	141,369	0.1	3	0.2
Tallahassee MSA	60,963	0.3	497,492	0.3	3	0.2
Tampa MSA	781,275	3.6	2,603,198	1.6	39	2.2
The Villages MSA	19,427	0.1	126,265	0.1	2	0.1
West Palm Beach MD	257,114	1.2	1,717,783	1.0	23	1.3
Non-MSA FL	45,556	0.2	218,794	0.1	2	0.1
Florida Subtotal	3,301,438	15.4	18,301,759	11.0	262	14.9
Blacksburg MSA	29,550	0.1	301,561	0.3	5	0.3
Charlottesville MSA	101,541	0.5	769,090	0.5	10	0.6
Harrisonburg MSA	38,132	0.2	424,503	0.3	6	0.3
Lynchburg MSA	86,498	0.4	852,865	0.5	12	0.7
Richmond MSA	435,721	2.0	3,160,692	1.9	35	2.0
Roanoke MSA	76,176	0.4	879,258	0.5	10	0.6
Staunton MSA	33,427	0.2	216,827	0.1	5	0.3
Virginia Beach MSA	426,187	2.0	3,206,580	1.9	41	2.3
Winchester MSA	72,281	0.3	730,459	0.4	6	0.3
Non-MSA VA	203,167	0.9	2,883,828	1.7	50	2.9
Virginia Subtotal	1,502,680	7.0	13,425,663	8.1	180	10.3
Athens MSA	22,800	0.1	174,062	0.1	3	0.2

Assessment Area Breakdown of Loans, Deposits, and Branches						
Atlanta MSA	1,282,614	6.0	8,630,383	5.2	71	4.0
Brunswick MSA	21,297	0.1	201,090	0.1	2	0.1
Dalton MSA	41,561	0.2	484,631	0.3	3	0.2
Gainesville MSA	49,620	0.2	514,157	0.3	6	0.3
Macon MSA	22,543	0.1	460,615	0.3	5	0.3
Savannah MSA	81,714	0.4	468,028	0.3	8	0.5
Valdosta MSA	6,358	0.1	34,262	0.0	1	0.1
Warner Robins MSA	49,451	0.2	134,188	0.1	3	0.2
Non-MSA GA	107,615	0.5	1,393,403	0.8	23	1.2
Georgia Subtotal	1,685,573	7.8	12,494,819	7.5	125	7.1
Allentown MSA	150,721	0.7	2,123,535	1.3	31	1.8
Chambersburg MSA	42,388	0.2	530,849	0.3	5	0.3
East Stroudsburg MSA	5,161	0.0	47,767	0.1	1	0.1
Gettysburg MSA	19,435	0.1	133,804	0.1	3	0.2
Harrisburg MSA	63,488	0.2	533,207	0.3	14	0.8
Lancaster MSA	274,929	1.3	2,090,912	1.3	24	1.4
Lebanon MSA	15,639	0.1	62,360	0.1	2	0.1
Montgomery County MD	295,979	1.4	3,288,292	2.0	47	2.7
Philadelphia MD	128,958	0.6	736,779	0.4	14	0.8
Reading MSA	81,873	0.4	1,352,780	0.8	15	0.8
Scranton MSA	17,135	0.1	414,389	0.2	5	0.2
State College MSA	13,679	0.1	354,574	0.2	4	0.2
Williamsport MSA	18,764	0.1	246,001	0.1	4	0.2
York MSA	97,254	0.4	686,930	0.4	14	0.8
Non-MSA PA	51,079	0.2	746,986	0.4	12	0.7
Pennsylvania Subtotal	1,276,482	5.9	13,349,165	8.0	195	11.1
Austin MSA	206,896	1.0	529,855	0.3	13	0.7
College Station MSA	40,378	0.2	823,454	0.5	5	0.3
Dallas MD	498,335	2.3	2,775,255	1.7	40	2.2
Fort Worth MD	148,411	0.7	347,912	0.2	11	0.6
Houston MSA	331,491	1.5	1,383,189	0.8	22	1.3
Midland MSA	4,151	0.0	131,166	0.1	2	0.1
Odessa, TX MSA	5,710	0.0	136,947	0.1	3	0.2
San Antonio MSA	106,659	0.5	157,280	0.1	10	0.5
Texas Subtotal	1,342,031	6.2	6,285,058	3.8	106	6.0
Baltimore MSA	712,629	3.3	5,468,210	3.3	64	3.6
California MSA	22,549	0.1	104,559	0.1	1	0.1
Salisbury MSA	34,347	0.1	342,828	0.2	7	0.4
Silver Spring MD	443,927	2.1	1,749,407	1.0	23	1.3
Wilmington MD	11,907	0.1	30,389	0.0	1	0.1
Non-MSA MD	44,180	0.2	318,010	0.2	7	0.4
Maryland Subtotal	1,269,539	5.9	8,013,403	4.8	103	5.9

Assessment Area Breakdown of Loans, Deposits, and Branches						
Charleston MSA	263,898	1.2	916,648	0.6	12	0.7
Columbia MSA	250,254	1.2	2,229,691	1.3	20	1.1
Florence MSA	32,271	0.2	314,127	0.2	2	0.1
Greenville MSA	319,181	1.5	1,837,903	1.1	20	1.1
Hilton Head Island MSA	64,354	0.3	269,114	0.2	3	0.2
Spartanburg MSA	104,518	0.4	738,981	0.4	6	0.3
Sumter MSA	16,180	0.1	157,950	0.1	2	0.1
Non-MSA SC	75,228	0.3	535,275	0.3	9	0.6
South Carolina Subtotal	1,125,884	5.2	6,999,689	4.2	74	4.2
Beckley MSA	33,877	0.2	218,858	0.1	3	0.2
Charleston MSA	76,860	0.4	1,679,008	1.1	9	0.5
Huntington MSA	44,252	0.2	459,050	0.3	4	0.2
Morgantown MSA	49,844	0.2	505,118	0.3	5	0.3
Parkersburg MSA	15,812	0.1	223,094	0.1	3	0.2
Wheeling MSA	21,983	0.1	236,766	0.1	3	0.2
Non-MSA WV	96,130	0.4	1,321,277	0.8	15	0.8
West Virginia Subtotal	338,758	1.6	4,643,171	2.8	42	2.4
Anniston MSA	18,590	0.1	224,128	0.1	4	0.2
Auburn MSA	24,703	0.1	151,938	0.1	2	0.1
Birmingham MSA	183,956	0.8	1,241,104	0.7	20	1.1
Daphne MSA	33,031	0.2	222,352	0.1	5	0.3
Dothan MSA	16,418	0.1	12,578	0.0	0	0.0
Gadsden MSA	4,825	0.0	49,898	0.1	2	0.1
Huntsville MSA	122,291	0.6	453,953	0.3	7	0.4
Mobile MSA	25,374	0.1	136,649	0.1	4	0.2
Montgomery MSA	21,444	0.1	799,503	0.5	6	0.3
Tuscaloosa MSA	42,180	0.2	45,685	0.0	1	0.1
Non-MSA AL	25,002	0.1	325,366	0.2	13	0.8
Alabama Subtotal	517,814	2.4	3,663,154	2.2	64	3.6
Chattanooga MSA	41,166	0.2	123,184	0.1	4	0.2
Cleveland MSA	17,128	0.1	198,741	0.1	3	0.2
Johnson City MSA	12,974	0.1	59,863	0.0	2	0.1
Knoxville MSA	179,807	0.8	1,097,242	0.8	13	0.7
Morristown MSA	9,265	0.0	50,007	0.0	2	0.1
Nashville MSA	175,637	0.8	715,282	0.4	3	0.2
Non-MSA TN	34,433	0.2	355,054	0.2	8	0.5
Tennessee Subtotal	470,410	2.2	2,599,373	1.6	35	2.0
Bowling Green MSA	65,419	0.3	478,935	0.4	5	0.3
Clarksville MSA	8,482	0.0	229,303	0.1	3	0.2
Lexington MSA	74,221	0.3	406,448	0.2	7	0.4
Owensboro MSA	42,146	0.2	1,061,226	0.6	5	0.3
Non-MSA KY	80,144	0.5	1,062,796	0.6	21	1.1

Assessment Area Breakdown of Loans, Deposits, and Branches						
Kentucky Subtotal	270,412	1.3	3,238,708	1.9	41	2.3
Atlantic City MSA	22,673	0.1	318,895	0.2	3	0.2
Camden MD	62,297	0.4	912,982	0.5	15	0.9
New York MD	134,623	0.6	35,289	0.0	1	0.1
Trenton MSA	5,900	0.0	78,716	0.1	2	0.1
Vineland MSA	23,801	0.1	334,553	0.2	5	0.3
New Jersey Subtotal	249,294	1.2	1,680,435	1.0	26	1.6
Washington DC-MD-VA-WV MSA	2,443,690	11.4	12,372,662	7.4	127	7.3
Charlotte NC-SC MSA	1,071,020	5.0	6,235,190	3.7	60	3.4
Myrtle Beach SC-NC MSA	337,389	1.5	2,013,116	1.2	21	1.2
Louisville KY-IN MSA	259,615	1.2	1,603,406	1.0	21	1.2
Cincinnati OH-KY MSA	225,779	1.1	1,908,452	1.1	24	1.4
Hagerstown MD-WV MSA	74,570	0.3	1,012,842	0.6	13	0.7
Columbus GA-AL MSA	73,536	0.3	140,336	0.1	3	0.2
Kingsport TN-VA MSA	29,920	0.1	587,983	0.4	7	0.4
Cumberland MD-WV MSA	11,360	0.1	366,903	0.1	4	0.2
Total	21,502,168	100.0	166,714,000	100.0	1,755	100.0
<i>Source: 2018 HMDA and CRA LARs; Branch data as of 12/31/2019; FDIC Summary of Deposits as of 6/30/2018</i>						

Activities Reviewed

This evaluation includes a review of loans reported pursuant to the Home Mortgage Disclosure Act (HMDA) and the CRA for 2017, 2018, and 2019. The tables in Appendix D present 2018 lending figures as this is the most recent year for which aggregate data is available for comparison purposes. The written analysis of lending includes 2018 lending; however, examiners reviewed lending performance for 2017 through 2019 and discussed any significant performance variances, where appropriate, under the *Geographic Distribution* and *Borrower Profile* performance factors. In addition, lending analysis primarily considers the number of loans rather than the dollar amount for CRA evaluations. However, evaluations also consider the dollar amount of lending. Lastly, the *Geographic Distribution* and *Borrower Profile* discussion focuses only on loans Truist originated and purchased within the assessment areas.

Federal banking agencies rely on U.S. Census data that is updated every five years for purposes of CRA evaluations. Therefore, this evaluation includes a review of the bank's loan data compared to the 2015 American Community Survey (ACS) Census data. In addition, the bank's performance was compared to aggregate HMDA and CRA data from 2017 and 2018 and business demographic data from D&B.

When weighing the loan products' effect on the conclusions, examiners evaluated home mortgage, small business, and small farm loans on the volume of lending over the review period. As shown in the following table, Truist's reportable loans, by number, reflect a fairly similar emphasis on home mortgage and small business loans. However, by dollar volume, the bank originated a significantly higher dollar volume of home mortgage loans.

Since the bank primarily focuses on commercial and mortgage lending, examiners placed similar weight on the distribution of small business and home mortgage loans. However, in some rated areas, the bank’s lending distributions were more heavily weighted on one product and therefore examiners placed more weight on a particular product. The bank originated a nominal number and dollar amount of small farm loans. However, the number of small farm loans is sufficient to include in the analysis, but was only analyzed in assessment areas with a significant volume of loans. Due to the nominal amount of small farm lending, less emphasis was placed on small farm loans.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Home Mortgage	250,462	70,635,371	250,462	70,635,371
Small Business	352,581	17,308,827	352,581	17,308,827
Small Farm	3,118	430,255	3,118	430,255

Source: Bank Records from 01/01/2017 through 12/31/2019.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The overall Lending Test rating for this institution is High Satisfactory. The bank’s lending levels reflect good responsiveness to assessment area credit needs, and a high percentage of the loans are made in the institution’s assessment areas. The geographic distribution of loans reflects good penetration throughout the assessment areas, and the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses and farms of different size. The institution uses innovative and flexible lending practices in order to serve the assessment area credit needs and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs. During the evaluation period, Truist had an average loan-to-deposit ratio of 85.3 percent. The bank’s ratio ranged from a low of 82.8 percent in the first quarter of 2017 to a high of 87.8 percent in the third quarter of 2018. Truist’s loan-to-deposit ratio was much higher than the Uniform Bank Performance Report (UBPR) peer group average of 69.6 percent; the bank’s UBPR peer group includes all insured commercial banks having assets greater than \$100 billion. The bank’s home mortgage lending volumes increased substantially in 2018 and 2019, which is primarily attributable to the inclusion of home equity lines of credit due to HMDA reporting changes. However, the bank’s small business lending volumes also increased in 2018 and 2019.

Assessment Area Concentration

A high percentage of loans are made in the institution’s assessment areas. The table on the following page represents the bank’s lending inside and outside of the assessment areas. As shown in the following table, the bank originated a high percentage, by number and dollar amount, of all loan types within the assessment areas.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Home Mortgage										
2017	44,469	68.8	20,145	31.2	64,614	12,430,020	67.5	5,995,371	32.5	18,425,391
2018	66,893	76.7	20,318	23.3	87,211	15,541,993	64.1	8,693,717	35.9	24,235,710
2019	73,447	74.5	25,190	25.5	98,637	18,559,657	66.3	9,414,613	33.7	27,974,270
Subtotal	184,809	73.8	65,653	26.2	250,462	46,531,670	65.9	24,103,701	34.1	70,635,371
Small Business										
2017	79,723	80.6	19,188	19.4	98,911	4,849,504	93.3	345,611	6.7	5,195,115
2018	108,113	83.6	21,235	16.4	129,348	5,814,402	93.6	398,974	6.4	6,213,376
2019	103,304	83.1	21,018	16.9	124,322	5,515,070	93.5	385,266	6.5	5,900,336
Subtotal	291,140	82.6	61,441	17.4	352,581	16,178,976	93.5	1,129,851	6.5	17,308,827
Small Farm										
2017	819	89.5	96	10.5	915	106,189	87.2	15,643	12.8	121,832
2018	1,072	90.8	109	9.2	1,181	145,773	89.6	16,888	10.4	162,661
2019	940	92.0	82	8.0	1,022	129,643	88.9	16,119	11.1	145,762
Subtotal	2,831	90.8	287	9.2	3,118	381,605	88.7	48,650	11.3	430,255
Total	478,780	79.0	127,381	21.0	606,161	63,092,251	71.4	25,282,202	28.6	88,374,453
<i>Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data Due to rounding, totals may not equal 100.0</i>										

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the assessment areas. The tables in Appendix D detail the bank's geographic distribution of loans for each state and multistate MSA. The bank's performance varied across the assessment areas. However, the bank's percent of lending in low- and moderate-income census tracts was generally within a reasonable range of the aggregate data and the percent of owner-occupied housing units, businesses, and farms.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment areas. The bank's performance in low- and moderate-income census tracts was similar to the demographic and aggregate lending data in most assessment areas. However, in some assessment areas the bank's performance was either above or below the aggregate lending and demographic data. The bank's geographic distribution was adequate in Tennessee, Kentucky, New Jersey, Pennsylvania, and the Columbus multistate MSA. In all other rated areas, the bank's performance was good.

Small Business Loans

The geographic distribution of small business loans reflects good penetration throughout the assessment areas. The bank's performance in low- and moderate-income census tracts for small business loans was similar to the demographic and aggregate lending data in most assessment areas. As with the home mortgage loans, the bank's performance varied across the assessment areas. The bank's geographic distribution was adequate in Tennessee, New Jersey, Pennsylvania, and the Columbus multistate MSA. In all other rated areas, the bank's performance was good.

Small Farm Loans

The geographic distribution of small farm loans reflects adequate penetration throughout the assessment areas. In most assessment areas, Truist originated too few small farm loans to perform a meaningful analysis. As a result, the bank's small farm lending was only reviewed in the Owensboro, KY, Goldsboro, NC, Raleigh, NC, Montgomery, PA, and Lancaster, PA MSAs and the Non-MSA assessment areas of North Carolina, Georgia, Kentucky, and Virginia. The bank's performance varied considerably across the rated areas from excellent in Virginia to poor in Kentucky and Georgia. However, overall the bank's performance was adequate when compared to aggregate lending and demographic data.

Additional detail is available in the analyses of each assessment area by state and multistate MSA contained in this Performance Evaluation.

Borrower Profile

The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different size. In addition, lending to small farms reflects good penetration. The bank's performance varied across the assessment areas. However, the bank's performance generally compared favorably to the aggregate lending and demographic data.

Home Mortgage Loans

The bank's borrower distribution of home mortgage loans reflects good penetration among retail customers of different income levels. In most assessment areas, Truist's lending performance to low- and moderate-income borrowers was similar the aggregate lending data and the percent of low- and moderate-income families. However, the bank's performance to low- and moderate-income borrowers varied considerably among the assessment areas. The bank's performance was adequate in Georgia, New Jersey, Texas, Maryland, Tennessee, Florida, and the Washington, DC, Louisville, and Cincinnati multistate MSAs. In all other rated areas, the bank's performance was good.

Small Business Loans

The distribution of borrowers reflects good penetration among business customers of different size. In most of the assessment areas, the bank's performance was below the demographic data, but well above the aggregate lending data. The bank's performance was strongest in Texas, New Jersey, Tennessee, and the Kingsport and Myrtle Beach multistate MSAs, where performance was excellent. In all other rated areas, the bank's performance was good.

Small Farm Loans

The distribution of borrowers reflects excellent penetration among farms of different size. In most of the assessment areas analyzed, the bank's small farm lending performance was well above the aggregate lending data, but slightly below demographic data. The bank's performance was excellent in Georgia, Kentucky, and Pennsylvania. In Virginia and North Carolina, the bank's performance was good.

Additional detail is available in the analyses of each assessment area by state and multistate MSA contained in this Performance Evaluation.

Innovative or Flexible Lending Practices

Truist uses innovative and flexible lending programs in order to serve assessment area credit needs. Detailed below is a summary of the programs offered by Truist. The programs are available in all assessment areas with the exception of the Truist Down Payment Assistance Grants, which were offered in certain assessment areas.

Mortgage Loan Programs

Truist offers affordable housing loans through the following Federal government programs: Federal Housing Administration, Veterans Administration, and the United States Department of Agriculture (USDA) Rural Development. The bank also offers mortgages via various state housing agencies in its assessment areas. The state housing agency programs target first time homebuyers and low- and moderate-income borrowers and provide below market interest rates and flexible terms.

Truist further offers a proprietary affordable mortgage product targeted toward low- and moderate-income borrowers. This program is the Community Homeownership Incentive Program (CHIP). CHIP guidelines provide for low down payments, no private mortgage insurance, home ownership counseling, flexible credit criteria, and long-term fixed interest rates. The bank also offers its enhanced CHIP-to-CHIP refinance product, allowing existing CHIP borrowers to take advantage of a lower interest rate environment.

In addition, Truist offers HOME (Homeownership is Meant for Everyone) Now mortgages through Freddie Mac's Home Possible and Fannie Mae HomeReady affordable loan programs. These mortgages target low- and moderate-income borrowers and underserved neighborhoods. HOME Now mortgages feature low down payment requirements.

Truist also offers a First-Time Home Buyer (FTHB) mortgage through Fannie Mae. The FTHB mortgage features low down payment requirements, flexible underwriting criteria, and reduced mortgage insurance coverage.

During the evaluation period, the bank deployed the Truist Down Payment Assistance Grant, which provides eligible borrowers with a forgivable 3 percent grant, up to a maximum of \$4,000, for the purchase of a primary residence within certain assessment areas. The bank offered the grants in assessment areas with high costs of housing that created financial difficulties for low- and moderate-income borrowers to meet down payment requirements for the purchase of a home. During the evaluation period, the bank made the grants available in 43 assessment areas. The grant is forgiven at the time of loan closing. To be eligible for the program, the borrower's qualifying income must not exceed 80 percent of the area median income and for the purchase of a 1-unit primary residence under a Fannie Mae HomeReady product. During the evaluation period, the bank provided 344 grants totaling \$1,277,000 to support homebuyers.

The number of loans originated through these programs represents approximately 16 percent of all HMDA loans originated during the evaluation period (250,462). This represents a significant level of innovative and flexible mortgage lending. Detailed in the following table, are loans originated under innovative and flexible mortgage loan programs for this CRA evaluation period.

Innovative or Flexible Lending Programs								
Type of Program	2017		2018		2019		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
CHIP	1,767	233,757	1,194	160,309	1,011	136,918	3,972	530,984
State Housing Agencies	374	47,723	195	24,265	133	16,890	702	88,878
Freddie Mac and Fannie Mae (FTHB)	2,808	500,048	2,666	598,634	3,546	675,057	9,020	1,773,739
FHA/VA	8,440	2,136,428	7,358	1,898,474	9,915	3,208,968	25,713	7,243,870
Truist Down Payment Assistance Grant	1	4	65	237	278	1,036	344	1,277
Totals	13,390	2,917,960	11,478	2,681,919	14,883	4,038,869	39,751	9,638,748

Source: Bank Records

Business Loan Programs

Truist offers several flexible small business and farm loan programs for sole proprietors, businesses, and farmers who would otherwise not qualify for standard commercial loans. Truist is a Preferred Lender for the SBA and offers the following loan programs: SBA Express, SBA Express-Veterans Advantage, SBA 7(a), and SBA 504. In addition, Truist provides farmers and ranchers access to credit through the USDA Farm Service Agency (FSA) Farm Loan Programs. FSA Farm Loan Programs provide funding to start, improve, transition, market, and strengthen farming and ranching operations. The following table shows loans made through flexible small business and farm loan programs during this evaluation period.

Innovative or Flexible Small Business and Farm Loan Programs								
Type of Program	2017		2018		2019		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
SBA	189	74,751	236	71,037	252	98,329	677	244,117
FSA	0	0	0	0	7	464	7	464
Totals	189	74,751	236	71,037	259	98,793	684	244,581

Source: Bank Records

Community Development Lending

Truist is a leader in making community development loans. During this evaluation period, the bank originated 1,773 community development loans totaling \$6.3 billion. This performance represents 4.4 percent of average total loans (\$143.8 billion) and 2.8 percent of average total assets (\$225.0 billion) as of September 30, 2019, which was the most recent quarter prior to the merger. Since the prior evaluation, the number and dollar volume of community development loans increased by 53.5 and 39.2 percent, respectively. Also, the bank originated 5 community development loans totaling \$11.5 million outside the assessment areas. Since these loans benefit the broader regional areas of the bank's operations, these loans were included in the overall community development loans.

Truist's community development lending provides a source of capital that impacts community and social economic needs. Since the previous evaluation, the bank has identified and responded to community needs by financing essential infrastructure, community healthcare, affordable housing, disaster recovery, and revitalization and stabilization efforts. Moreover, the bank continues to support loan and consortium funds that provide affordable housing for low- and moderate-income individuals.

The following tables present the bank's community development lending by community development purpose and year, as well as in each rated area. The assessment areas of each rated area includes a detailed discussion of community development lending activities.

Community Development Lending by Activity Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	142	701,178	155	561,559	83	576,385	72	306,178	452	2,145,300
2018	156	623,401	228	349,475	132	470,643	101	273,735	617	1,717,254
2019	234	1,164,195	229	386,624	126	590,602	115	327,714	704	2,469,135
Total	532	2,488,774	612	1,297,658	341	1,637,630	288	907,627	1,773	6,331,689

Source: Bank Records

Community Development Lending by Rated Area

Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
North Carolina	103	332,625	131	246,160	39	186,713	42	96,686	315	862,184
Florida	57	382,053	42	107,806	85	536,966	68	167,137	252	1,193,962
Virginia	66	262,765	37	45,299	15	80,950	15	78,876	133	467,890
Georgia	39	219,092	58	113,661	32	174,648	27	136,019	156	643,420
Pennsylvania	49	68,368	32	99,614	15	63,143	17	108,109	113	339,234
Texas	17	139,798	40	169,891	47	158,726	28	84,529	132	552,944
Maryland	24	170,945	32	70,802	9	14,428	12	25,250	77	281,425
South Carolina	33	138,747	56	69,164	7	70,181	16	60,514	112	338,606
West Virginia	16	23,758	57	50,696	11	17,209	13	21,097	97	112,760
Alabama	17	106,845	9	8,868	20	75,719	12	49,250	58	240,682
Tennessee	11	12,284	5	19,490	8	62,612	6	11,593	30	105,979
Kentucky	11	14,453	11	32,719	11	39,893	6	8,162	39	95,227
New Jersey	5	6,842	8	6,158	5	32,208	1	3,400	19	48,608
Washington DC-VA-MD-WV MSA	26	242,665	32	147,000	11	55,411	7	8,597	76	453,673
Charlotte NC-SC MSA	38	212,391	24	46,627	8	25,256	3	3,391	73	287,665
Myrtle Beach SC-NC MSA	1	8,935	1	45,295	1	459	1	1,600	4	56,289
Louisville KY-IN MSA	5	8,203	3	1,809	6	21,094	1	3,000	15	34,106
Cincinnati KY-OH MSA	4	4,896	17	5,740	8	15,809	9	33,425	38	59,870
Hagerstown MD-WV MSA	2	296	14	7,534	2	3,400	0	0	18	11,230
Columbus GA-AL MSA	2	21,100	0	0	0	0	2	292	4	21,392
Kingsport TN-VA MSA	0	0	0	0	1	2,805	1	4,300	2	7,105
Cumberland MD-WV MSA	1	160	3	3,325	0	0	1	2,400	5	5,885
Regional Activities	5	111,553	0	0	0	0	0	0	5	111,553
Total	532	2,488,774	612	1,297,658	341	1,637,630	288	907,627	1,773	6,331,689

Source: Bank Records

INVESTMENT TEST

The overall Investment Test rating for this institution is Outstanding. The bank has an excellent level of qualified community development investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. In addition, the bank exhibits excellent responsiveness to credit and community economic development needs, and makes significant use of innovative and/or complex investments to support community development initiatives. The bank demonstrated excellent investment test performance throughout a majority of its assessment areas, particularly in the states where most of the bank's deposits and branches are located.

Investment and Grant Activity

Truist has an excellent level of qualified community development investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Investments and donations during this evaluation period totaled approximately \$1.8 billion, or 0.8 percent of average total assets (\$225.0 billion) and 3.7 percent of average total investments (\$48.2 billion) as of September 30, 2019, which was the most recent Call Report prior to the merger. CRA qualified investments have kept pace with the bank's asset growth since the last evaluation, when total investments were 0.7 percent of total assets and 3.4 percent of total investments.

The following tables show the bank's investments by community development purpose and year, as well as in each rated area. There were no prior period investments considered at this CRA evaluation, as the entire \$1.8 billion in CRA qualified investments represents new investments made during this three-year evaluation period. Of the \$1.8 billion total, approximately \$1.75 billion was made in qualified investments and \$32.5 million was made in grants and donations. Qualified community development investments primarily include tax credit projects and bonds designed to provide additional funding sources for affordable housing. CRA qualified investments and grants with a primary purpose of affordable housing totaled \$1.6 billion, or 91.7 percent of total CRA qualified investments. Further details regarding specific investment and grant and donation activity is provided later under the investment section of each assessment area.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	152	644,658	0	0	0	0	0	0	152	644,658
2018	262	639,649	12	6,320	13	37,227	0	0	287	683,196
2019	123	345,245	12	8,150	53	65,311	1	4,202	189	422,908
Subtotal	537	1,629,552	24	14,470	66	102,538	1	4,202	628	1,750,762
Qualified Grants & Donations	539	5,511	4,204	19,639	474	4,895	168	2,448	5,385	32,493
Total	1,076	1,635,063	4,228	34,109	540	107,433	169	6,650	6,013	1,783,255

Source: Bank Data

Qualified Investments by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Bank-wide	15	2,801	17	624	25	750	9	161	66	4,336
North Carolina	163	285,963	997	3,403	66	6,558	17	219	1,243	296,143
Florida	101	218,913	329	9,905	44	14,268	12	4,296	486	247,382
Virginia	115	164,637	321	839	52	11,519	9	121	497	177,116
Georgia	75	150,601	274	1,300	37	4,558	4	20	390	156,479
Pennsylvania	106	132,510	508	2,339	39	11,369	23	969	676	147,187
Texas	85	72,006	209	8,674	58	7,963	13	166	365	88,809
Maryland	76	92,392	190	904	31	9,740	11	64	308	103,100
South Carolina	39	68,805	204	1,131	22	296	2	53	267	70,285
West Virginia	49	52,518	212	764	36	7,105	15	112	312	60,499
Alabama	26	50,970	101	788	21	3,724	0	0	148	55,482
Tennessee	18	20,562	95	319	12	325	4	6	129	21,212
Kentucky	30	24,954	106	334	15	82	12	73	163	25,443
New Jersey	22	9,008	52	325	12	3,473	1	55	87	12,861
Washington DC-MD-VA-WV MSA	56	153,167	144	546	25	7,148	8	60	233	160,921
Charlotte NC-SC MSA	34	83,601	160	588	8	134	3	104	205	84,427
Myrtle Beach NC-SC MSA	4	9,942	18	105	1	519	0	0	23	10,566
Louisville IN-KY MSA	28	26,658	58	225	6	23	6	20	98	26,926
Cincinnati KY-OH MSA	22	8,392	70	365	21	13,952	19	148	132	22,857
Hagerstown MD-WV MSA	4	4,068	13	53	0	0	0	0	17	4,121
Columbus GA-AL MSA	2	1,566	7	24	1	527	0	0	10	2,117
Kingsport TN-VA MSA	2	66	13	27	5	3,386	0	0	20	3,479
Cumberland MD-WV MSA	4	963	5	11	0	0	0	0	9	974
Regional	0	0	125	516	3	14	1	3	129	533
Total	1,076	1,635,063	4,228	34,109	540	107,433	169	6,650	6,013	1,783,255

Source: Bank Records

Responsiveness to Credit and Community Development Needs

Truist exhibits excellent responsiveness to credit and community economic development needs. Affordable housing is a primary credit need throughout the bank's assessment areas, and the bank has responded by serving in a leadership position to create or rehabilitate more than 26,600 affordable housing units. Low-Income Housing Tax Credits (LIHTCs) and other affordable housing bonds and securities make up the bulk of the bank's investments. Specifically, the bank invested in 297 affordable housing tax credit projects totaling \$1.2 billion. LIHTCs are very responsive to affordable housing needs, as these investments enable developers to gain access to capital markets to complete a project that would not otherwise be financially feasible. The community gains quality affordable housing, which attracts residents and businesses in areas that would not traditionally attract such investment without enhanced incentives. The bank has invested in affordable housing bonds totaling \$314.5 million in areas where LIHTCs are not available. In addition, the bank increased its investment in a targeted CRA fund of debt securities that support affordable housing to \$7 million.

To meet the need for small business lending, the bank made numerous investments. The bank invested almost \$49 million in a Small Business Investment Company (SBIC). The bank also invested in New Market Tax Credits, 22 projects totaling nearly \$45 million. These New Market Tax Credit investments provide gap financing for commercial projects in low-income communities and help create jobs, provide education, healthcare, and other critical services to underserved areas. During the evaluation period, Truist expanded its support of economic development efforts by purchasing SBA Participation Certificates, which provide additional liquidity for entrepreneurs through the SBA 504 loan program. The bank made investments in these certificates totaling \$49.5 million, an increase of 272 percent from the prior evaluation, when investments of \$13.3 million were noted. In addition, the bank partners with and provides funding for the Association for Enterprise Opportunity, an organization that provides capital and services to assist underserved entrepreneurs in starting, stabilizing, and expanding their businesses. Finally, the bank provided funds totaling \$1.6 million to numerous entities that provide training, technical assistance, and other business development services to entrepreneurs. One of these referenced strategic partnerships places certified counselors inside bank branches in low-and moderate-income and minority areas to provide access to training for entrepreneurs in their own community or neighborhood.

Truist provided 5,385 qualifying community development grants and donations totaling \$32.5 million over the evaluation period. The institution's community development grant and donations activity supports affordable housing, homelessness, financial literacy, revitalization and stabilization of distressed communities, small business development, food insecurity, and a broad range of other activities identified as community development under the CRA regulation. Grants and donations are considered responsive to needs as community contacts have indicated that grants or donations are one of the best ways financial institutions can support community development organizations and those in need. The qualifying grants and donations are made through programs the bank has implemented in response to the needs of the local communities where the bank maintains branches. As such, this funding is very responsive to local community needs.

A significant portion of the bank's grants, \$4.6 million, was to support housing and ancillary services for homelessness issues. As a leader, the bank continued its responsive Homelessness Outreach Initiative, which provided grants totaling \$1.5 million for emergency assistance through school systems in 7 states and the Washington D.C. multistate MSA. The objective of the program is to fill gaps in federal funding to provide emergency housing, food, transportation, medical care and other basic services for the families of homeless school children. Starting in 2017, the bank piloted partnering with nonprofit organizations and utilizing them as the referral point for the school district homelessness liaisons.

In addition, another significant portion of the bank's CRA qualified grants, \$5.5 million, were for the Lighthouse Project. Truist continued its Lighthouse Project throughout the evaluation period, celebrating its 11th year in 2019. The Lighthouse Project is a company-wide community service project designed to exemplify the bank's mission of improving the communities in which its employees live and work. Employees identify local community needs and are an integral part of the implementation and delivery of the grants.

In response to the identified need for financial literacy, the bank has 2 initiatives that exhibit the bank's responsiveness and leadership. First, the BankBus, a mobile commercial bus retrofitted as a self-contained production and education center, continued its tour of the bank's assessment areas. During this evaluation period, the BankBus provided financial education at 376 Truist and nonprofit-sponsored events in the bank's assessment areas. Truist's investment in the BankBus during the evaluation period was \$752,394. The BankBus has 11 computer workstations, including 2 in a private office for one-on-one counseling, as well as printers, internet connectivity and other, typical classroom furnishings. Second, the bank provided funds totaling \$1 million for education to community development nonprofit practitioners. The bank's unique combination of subsidized training programs and scholarships to attend national training conferences provides educational opportunities for government and nonprofit staff. The practitioners learn best practices critical to organizational sustainability and community development via training that addresses current and emerging trends, affordable housing, economic development, and community development lending.

Community Development Initiatives

Truist makes significant use of innovative and/or complex investments to support community development initiatives. During this evaluation period, the bank invested in new funds with a CRA purpose of affordable housing and job creation, and purchased an investment in an innovative LIHTC fund that utilized a new type of credit enhancement. In addition, many of the grant programs administered by the bank are innovative and complex as it is specifically tailored to individual assessment area needs. Finally, the bank expanded their involvement with Community Development Financial Institutions (CDFIs), a more complex type of financial institution, during this evaluation period.

The bank invested \$10 million in a new entity that is raising capital to provide financing for affordable rental housing. This new initiative was developed out of the concern for lack of affordable housing and the potential for significant housing cost increases related to the new Amazon headquarters development in the Washington D.C. multistate MSA. The ability to maintain affordable rents in these properties is dependent upon the unconventional financing structure supported by this limited liability corporation.

The bank invested \$5 million in a new affordable housing fund benefitting the Charlotte multistate MSA. The fund is structured to deploy capital at below-market rates to incentivize the construction or preservation of affordable rental housing. The bank's investment provided capital support that further incentivized risk-adverse institutions to consider an investment in the fund.

The bank invested \$2.5 million in a new affordable housing fund targeting the homeownership needs of low-and moderate-income families in the Baltimore and Washington D.C. areas. This new investor and community collaborative was formed to buy and renovate at least 3,000 single-family homes, and it is the only fund in the area to focus on providing affordable homeownership rather than rental housing. This collaborative is unique, as it will also create construction jobs for local residents through an apprenticeship program. Each renovation crew will provide on-the-job training, and the developer will work with each trainee to find permanent employment in the high-wage, high-demand construction industry upon completion of the six-month training program.

The bank invested \$3 million in a new type of LIHTC fund that primarily benefitted the Baltimore MSA, and to a lesser extent the East Stroudsburg PA MSA. This fund is considered innovative because it consisted of a new type of credit enhancement that supports the developer's ability to meet the guaranty obligations required by the LIHTC equity investors. In addition, the fund has a new focus to encourage investments in public housing properties.

The bank invested \$1.2 million in CDFIs, which are specialized financial institutions that operate in markets underserved by traditional financial institutions. During the current period, the bank expanded its work with these complex financial institutions that have unique needs. The bank provided grants, funds for loan loss reserves, marketing funds to attract new investors, funds for educational and technical assistance needs, and funds to foster the formation of new CDFIs.

SERVICE TEST

The overall Service Test rating for this institution is Outstanding. Truist's delivery systems are accessible to essentially all portions of the institution's assessment areas, and the opening and closing of branches throughout the assessment areas has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies, and/or individuals. In addition, Truist is a leader in providing community development services.

Accessibility of Delivery Systems

Truist's delivery systems are accessible to essentially all portions of the institution's assessment areas. However, since the last evaluation, the number of branches has declined from 2,153 to 1,755 (398 or 18.5 percent). As of December 31, 2019, 1,111 or 63.3 percent of Truist's 1,755 branches were located in Florida, North Carolina, Pennsylvania, Virginia, Georgia, and the Washington D.C. multistate MSA. Consequently, examiners placed more weight on the performance in these 6 areas.

Overall, Truist’s branch distribution provided a good level of accessibility to low- and moderate-income individuals and geographies. Refer to the rated and assessment areas’ conclusion sections for additional details regarding each area’s branch distribution. The following table details the bank’s branches, population, and census tracts by geographic income level.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	81	4.6	6,680,838	6.6	1,786	8.1
Moderate	385	21.9	22,923,749	22.7	5,201	23.7
Middle	750	42.8	40,419,315	40.0	8,364	38.2
Upper	534	30.4	30,681,735	30.3	6,217	28.4
NA	5	0.3	446,807	0.4	360	1.6
Total	1,755	100.0	101,152,444	100.0	21,928	100.0

Source: 2015 ACS Data & Bank records

Changes in Branch Locations

To the extent changes have been made, the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies, and/or to low- and moderate-income individuals. During the evaluation period, the bank opened 23 branches and closed 409 branches. Of the 23 new branches, 5 (21.7 percent) were opened in low-income census tracts and 8 (34.8 percent) were opened in moderate-income census tracts. Of the 409 branch closures, 8 (2.0 percent) were located in low-income census tracts and 50 (12.2 percent) were located in moderate-income census tracts. A negative net effect in branches resulted in a decrease of 3 branches in low-income geographies and a decrease of 42 branches in moderate-income geographies. However, in most assessment areas where branches were closed, other offices were located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. Truist offers a wide range of products and services designed to meet the banking needs of its assessment areas. Consumer and commercial loan and deposit products include various affordable home mortgage programs, government loan sponsored programs for home mortgage borrowers and small businesses, low-cost deposit products for consumers, and affordable deposit products for small businesses and nonprofit organizations. Performance in this criterion is generally consistent throughout all assessment areas. Therefore, the Service Test conclusions for each rated area and full-scope reviewed assessment areas omit further discussion of business hours and services.

Although business hours vary at some locations, business hours are generally 9:00 a.m. to 5:00 p.m. on Monday through Friday, with select locations open on Saturdays. Additionally, branch drive thru hours either mirror business hours or are extended to meet each assessment area’s needs.

Truist offers several different delivery systems for its customers. In addition to the bank's branches, Truist maintains a network of 2,326 automated teller machines (ATMs) including 395 stand-alone ATMs. Other services, including online banking, bill pay, mobile banking, customer care center, and toll-free 24-hour automated telephone-banking center, are available to customers. The online banking services are accessible 24-hours a day, allowing customers to check account balances, transfer money between accounts, make loan payments, and pay bills.

The bank's transactional website at www.truist.com provides free tools and resources, including financial calculators, home purchasing information, cybersecurity education, and resources for small businesses. The website is available in Spanish to reach the unbanked and underserved Hispanic markets. Further, Truist increased its multicultural banking centers from 488 to 598 branches. See comments under the heading *Multicultural Banking Centers* for more details regarding the impact of the bank's multicultural efforts.

Community Development Services

Truist is a leader in providing community development services. The bank took a leadership role by assessing community development needs and developing and expanding responsive and effective initiatives to meet the identified needs. The results of the ongoing needs assessment are based on information generated from internal and external CRA committees, capacity building initiatives, and the bank's significant involvement with nonprofit organizations.

During the evaluation period, the bank provided 8,334 services that met the definition of community development. This represents a quantitative increase of 45.5 percent compared to the 5,728 activities noted at the last evaluation. Directors, officers, and employees in many capacities provided financial expertise and assistance to local and statewide organizations whose missions are consistent with the definition of community development. These organizations focus on affordable housing, economic development, community services, and revitalization or stabilization activities. The type and level of financial and technical assistance provided varied with each employee and organization, but the assistance provided is mostly ongoing from year-to-year and targeted to low- and moderate-income individuals and areas as well as small businesses.

Truist's community development service activities exhibit good responsiveness, innovation, and complexity. These efforts are exemplified through capacity building programs with CDFIs, National Development Council, NeighborWorks America, and Association for Enterprise Opportunity. Further, the bank's leadership and responsiveness in financial literacy is demonstrated through its Banking on Your Success, Ever Fi, Operation Hope, and the BankBus programs.

Quantitatively, Truist's total community development services provided equate to approximately 1.6 community development services per branch per year. In addition, 53.7 percent of the community development services performed are categorized as community services. The following tables provide a list of community services by rated area and purpose and then by activity year and purpose.

Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
North Carolina	183	566	221	8	978
Florida	281	550	371	6	1,208
Virginia	154	600	133	4	891
Georgia	231	226	255	1	713
Pennsylvania	94	571	283	7	955
Texas	138	275	151	3	567
Maryland	120	180	174	6	480
South Carolina	66	119	49	1	235
West Virginia	25	191	88	13	317
Alabama	35	183	64	6	288
Tennessee	17	126	47	0	190
Kentucky	16	155	48	2	221
New Jersey	13	79	15	0	107
Washington DC-MD-VA-WV MSA	58	228	179	2	467
Charlotte NC-SC MSA	48	126	66	0	240
Myrtle Beach NC-SC MSA	0	58	13	0	71
Louisville IN-KY MSA	9	105	17	0	131
Cincinnati KY-OH MSA	35	76	39	5	155
Hagerstown MD-WV MSA	10	21	16	0	47
Columbus AL-GA MSA	0	11	9	0	20
Kingsport TN-VA MSA	0	19	9	0	28
Cumberland MD-WV MSA	3	13	9	0	25
Total	1,536	4,478	2,256	64	8,334

Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2017	463	1,728	326	25	2,542
2018	677	1,535	357	20	2,589
2019	396	1,215	1,573	19	3,203
Total	1,536	4,478	2,256	64	8,334
<i>Source: Bank records from January 1, 2017 through December 31, 2019</i>					

A more detailed description of the bank’s community development service initiatives follows.

Financial Education

Since the last evaluation, Truist has displayed a strong commitment to increasing financial literacy for both individuals and small businesses throughout its communities. Specifically, the bank has invested millions of dollars and allocated thousands of bank associates towards this goal.

Within its assessment areas, Truist employees teach homeownership education, credit management, basic banking information, and money management classes. This education also involves the bank partnering with many local government and nonprofit organizations. Truist uses Money Smart (FDIC), Credit Smart (Freddie Mac), and 3 programs through Cemark as its primary consumer financial literacy programs. For the Cemark financial literacy program, 75.4 percent of the elementary and high schools sponsored are schools that are either Title 1 (which are schools with at least 40 percent low-income students), located in a low- or moderate-income census tract, or have greater than 50 percent of students on the free or reduced lunch programs. Truist also provided adults with basic financial education in their faith based institutions through the Bank on Your Success program and senior citizens with education on the risks of financial fraud through the Safe Banking for Seniors program. Further, as discussed below, small business training initiatives including Bank on Your Success and FDIC Money Smart for Small Businesses, were utilized to educate small businesses and the entrepreneurs.

Bank on Your Success

Truist continued to expand its proprietary Bank on Your Success curriculum. The instructor-led financial education program has three-modules: “Banking Basics”, “Family Budgeting” and “Becoming a Homeowner.” Truist has taught and partnered on sessions of Bank on Your Success at its branches, minority churches, community groups, and colleges and universities across its footprint. Since the last evaluation, bank employee participation has resulted in over 1,700 community development service activities using the Bank on Your Success program.

In 2018, the bank developed a fourth module named “Growing Your Business” to provide training for small businesses on how to run a business in a successful manner. This training is conducted at the bank branches or through various community organizations and uses delivery systems including videos, coaching guides, and participant workbooks. Since its inception in 2018, this initiative resulted in approximately 1,300 new qualified community development services.

FDIC Money Smart

Truist uses the Money Smart curriculums to assist in its consumer and small business education efforts. Since the last examination, the bank has primarily utilized Money Smart for Adults, Money Smart for Young Adults, and the newly added FDIC Money Smart for Small Business program. The FDIC Money Smart for Small Business provides small business owners with knowledge on business financial management, credit, and banking services.

Financial Foundations for High School Students (EverFi)

Since 2010, Truist has partnered with EverFi to teach high school students the core concepts of financial literacy. The program is entitled BB&T Financial Foundations and is targeted to Title 1 schools. The program is web-based using a gaming theory that quickly engages the students and allows them to track their own progress and manage their own learning pace. As of December 31, 2019, 1,675 schools were participating in this program available throughout the bank’s footprint. Further, 737 schools (44.0 percent) were Title 1 schools, had a majority of students on the free or reduced lunch program, and/or were located in low- or moderate-income census tracts or distressed or underserved nonmetropolitan middle-income census tracts.

Further, Truist continues to use EverFi to provide web-based financial education to college students attending Historically Black Colleges and Universities in Alabama, Maryland, Virginia, North Carolina, and Texas. This educational program was available at Alabama A&M University, Coppin State, Northern Virginia Community College, North Carolina A&T State University, Texas Southern University, and University of Maryland Eastern Shore. During the evaluation period, the program included more than 36,000 students.

Truist BankBus

Truist continued to utilize its BankBus to provide mobile financial literacy through its retrofitted commercial bus that brings bank staff to the community where community development organizations are located and the public meets. The BankBus is a self-contained production and financial education center with internet access for 11 computers and a network printer. The BankBus and the traveling bank staff that occupy it provide financial literacy activities including credit report counseling, homeownership education, investment management, Earned Income Tax Credit information, and insurance programs to individuals throughout the bank's assessment areas.

Further, through Volunteer Income Tax Assistance (VITA), the bank provides free tax preparation during tax season for low- and moderate-income individuals and households throughout its footprint. From 2017 through 2019, the BankBus participated in 61 events to assist VITA sites with free tax preparation services. The BankBus also participated and contributed to 27 multicultural events and 3 disaster relief efforts. Regarding the disaster relief efforts, for example, the BankBus went to the Panama City Beach area after Hurricane Michael caused damage to the bank's branch, and communications were not available. Bank employees on the BankBus helped individual clients with basic human needs, such as internet service to reach insurance providers. In addition, the bank placed a mobile ATM unit to provide the community access to money.

Building Capacity

National Development Council (NDC) Capacity Building

Truist continued certifying community economic development practitioners through its partnership with the NDC. Through this partnership, Truist helps community based organizations stimulate investment, redevelop neighborhoods, and create jobs and affordable housing. This assistance allows economic development professionals to receive the certification at a significantly discounted cost. To illustrate, Truist provides the funding, classroom facilities, travel subsidies, reduced enrollment fees, and administration for numerous training courses to assist these practitioners in becoming self-sustaining in their community development endeavors.

The goal of the NDC Capacity Building Program's goal is to equip nonprofit community development corporations with permanent, self-sustaining skills through training courses and technical assistance. The training program includes four offerings including Boutique, Economic Development Finance Professional, Housing Development Financial Professional, and the Cash Reigns Supreme certifications. The classes address the needs and concerns of local community development leaders, economic development and real estate finance, and cash flow management. Since the last evaluation, 324 community economic development professionals attended the training from 7 states and the Washington D.C. multistate MSA.

NeighborWorks America

Truist continued its partnership with NeighborWorks to provide scholarships for 102 community development professionals to participate in training through the NeighborWorks Training Institutes. The training addresses current and emerging trends; improving the affordability of neighborhood housing; and building strong, safe, and vibrant low-income communities. The selected professionals were identified from the organizations that could not be served by other Truist support offerings.

Opportunity Finance Network (OFN)

Truist continued its partnership with the OFN and the University of New Hampshire to underwrite the costs of the Certificate in Community Development Finance course. The course is designed to build the capacity of current CDFI practitioners, and attract and develop new talent to the CDFI industry. Due to demand, the course is now offered annually rather than on a biennial basis, and the bank provided 36 scholarships over the evaluation period.

During the last evaluation period, Truist and the OFN offered a 2-day workshop for small business lenders in the southeast. The workshop focused on developing a business model for growth for 17 CDFIs with the goal of increased small business lending. The second phase of this initiative began in April 2016 when a group of 5 CDFIs participated in an 8-month program to develop a customized growth plan to increase small business lending. In 2017 and 2018, based on the experiences and challenges faced by the CDFIs, the bank and the OFN collaborated to develop and deliver customized training for the Board of Directors of the 5 CDFIs. This training provided each Board a comprehensive understanding of the CDFI's structure and growth plan to assist with the implementation of the business model.

Association for Enterprise Opportunity (AEO)

Truist provided scholarships for 10 professionals from microenterprise development organizations to attend the biennial training conference through AEO in 2018. AEO assists underserved entrepreneurs in starting, stabilizing, and expanding businesses. Truist also sponsored the 2018 conference, which included 22 CDFIs receiving micro- and small business training seeking to improve resource allocation for communities and enhance their impact in underserved communities.

Operation Hope

Truist continued its partnership with Operation Hope, which places trained, certified counselors inside Truist branches to provide credit and money management, homeownership, and small business counseling training for individuals in a branch's community. From 2017 through 2019, Truist provided branch space in low- and moderate-income communities within the Atlanta, Baltimore, Columbia, and Houston assessment areas. During the evaluation period, counselors and Truist employees completed 450 small business workshops and 266 individuals graduated from the Entrepreneurial Training Program. Ninety-one percent of participants identified as low- or moderate-income.

Other Initiatives

Individual Development Accounts Savings Programs (IDAs)

Truist continues to offer and service IDAs with 11 community development organizations in 6 states: Florida, Kentucky, North Carolina, Pennsylvania, South Carolina, and Virginia. IDA programs provide eligible, low-income depositors with options to save money, buy a home, start a business, or pay for educational expenses without incurring a maintenance fee. The funds saved by the depositor are matched by the community development organization. In addition, participants can attend free financial education workshops on personal finance.

Multicultural Banking Centers

Truist continues to invest significant resources to assist multicultural communities throughout its assessment areas. Within multicultural markets, the bank targets Asian and Hispanic individuals to provide language services for these segments of the population. As of December 31, 2019, Truist maintained 598 multicultural banking centers bank-wide. At these branches, bank brochures and signage are bilingual, mobile alerts and the bank website are available in Spanish, and newspaper and radio advertising are provided in Spanish. Some of the branches also offer marketing and pricing materials in Korean and Mandarin. Cultural sensitivity training is provided to staff, and bilingual employees are located at each center. Branches offer a real-time translator by phone when clients visit, but speak a language Truist associates do not.

Deferred Action for Childhood Arrivals (DACA)

Truist conducted more than 75 DACA forums with community partners and universities to bring awareness to the communities about what DACA is and how Truist helps the immigrant population. DACA is a federal policy enacted in 2012 that allows undocumented immigrants who arrived as children to be eligible for work authorized for a period of 2 years. A majority of DACA-eligible individuals are low-income. DACA allows for an employment authorization document (EAD), which allows individuals to work legally and apply for a social security number. Truist continues to accept the EAD as a form of identification, allowing DACA recipients to open a checking account. Truist was one of the first financial institutions in the United States to take this action.

Community Business Development Officers (CBDO) and Regional Multicultural Banking Officers (RMBOs)

During the evaluation period, Truist continues to utilize CBDO positions in Atlanta, Baltimore, Dallas, and Houston. The CBDO is responsible for the referral of loans to small and minority-owned businesses with annual revenues of \$1 million or less and small businesses located in low- and moderate-income census tracts. The CBDOs conduct community outreach and financial education with various local organizations and assist business owners in learning more about accessing credit, managing cash flow, mitigating risk, retaining employees, and recruiting and developing leadership talent. The results of this position have helped increase small business lending and community development services by the bank. Truist has 4 RMBOs in Atlanta, GA; McLean, VA; Miami, FL; and Dallas, TX. RMBOs lead Truist's community engagement with Hispanic, Asian, African-American, and other minority organizations.

Community Development Councils (CDCs)

Truist hosted CDCs, which were previously referred to as Steering Committees in 13 areas throughout the bank's footprint. Led by Truist Community Development Specialists, each Community Development Council membership is representative of community leaders who can provide feedback on low- and moderate-income households and community economic development needs. The knowledge gained from these meetings guides Truist's response to affordable housing, economic development, community services, and neighborhood revitalization efforts. During the evaluation period, the bank expanded several city-focused Councils to include the broader state to better gauge state-level community needs. The bank has statewide CDCs in Alabama, Maryland, Pennsylvania, South Carolina, Texas, and West Virginia. Truist also has CDCs in Atlanta, Charlotte, Louisville, South Florida, Triangle region of North Carolina, Washington, D.C., and Winston-Salem.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

NORTH CAROLINA

CRA RATING FOR NORTH CAROLINA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH CAROLINA

The bank operates 222, or 12.6 percent, of its total branch offices in North Carolina. North Carolina accounts for 27.5 percent of the bank-wide deposits. Overall, Truist ranks 2nd in the state in deposit market share at 15.2 percent. Competitor institutions in the North Carolina assessment areas include Bank of America, N.A., Wells Fargo Bank, N.A., and First-Citizens Bank & Trust Company.

SCOPE OF EVALUATION – NORTH CAROLINA

The evaluation of the bank's North Carolina performance considered the operations of Truist in 15 assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the North Carolina Non-MSA and in the Raleigh, Winston-Salem, and Greensboro-High Point (Greensboro) MSA assessment areas. Limited scope areas included the Durham-Chapel Hill (Durham), Hickory-Lenoir-Morganton (Hickory), Wilmington, Fayetteville, Asheville, New Bern, Greenville, Goldsboro, Rocky Mount, Burlington, and Jacksonville MSA assessment areas. During the review period, small business loans were given more weight than home mortgage loans considering the number and dollar volume of these products in the state. Based on the number of loans, small farm loans were only reviewed in the North Carolina Non-MSA, Raleigh MSA, and Goldsboro MSA assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NORTH CAROLINA

LENDING TEST

The Lending Test rating for North Carolina is High Satisfactory. The bank's lending levels reflect good responsiveness to the North Carolina assessment areas' credit needs. The geographic distribution reflects good penetration and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the North Carolina assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each North Carolina assessment area. Examiners based conclusions primarily on the performance in the full-scope assessment areas. The performance in assessment areas that received limited-scope reviews was generally consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment areas. The geographic distribution of small business loans reflects good penetration throughout the assessment areas and is supported by performance in each full-scope assessment area. Good home mortgage performance was noted in each full-scope assessment area, with the exception of the Greensboro MSA where adequate performance was noted. Small farm lending performance was good in the North Carolina Non-MSA and Raleigh MSA assessment areas.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans is good among borrowers of different income levels. The borrower distribution of small business loans is good among business customers of different sizes. Good home mortgage and small business performance in each of the full-scope assessment areas support this conclusion. In addition, small farm lending performance was good in the North Carolina Non-MSA and Raleigh MSA assessment areas.

Community Development Loans

Truist is a leader in making community development loans in North Carolina. During this evaluation period, the bank originated 315 community development loans totaling \$862.2 million. This performance represents 17.8 percent, by number, and 13.6 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 222 community development loans totaling \$690.3 million were made.

Truist originated 12 loans totaling \$23.7 million outside the assessment areas but in North Carolina. As the bank has been responsive to community development needs and opportunities within its assessment areas, these loans were included in the overall analysis. The analysis for each full-scope North Carolina assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in North Carolina. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and complex investments, and occasionally serves in a leadership position. The bank's performance was excellent in each of the full-scope assessment areas, with the exception of the Greensboro MSA where performance was good. Performance among the limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$296 million, or 16.6 percent, of bank-wide community development investments that exceeds the percent of branches, 12.6, and the percent of adjusted deposits in the state. Adjusted deposits in North Carolina of 14.1 percent exclude large corporate deposits allocated to the bank’s main office. By number of investments, the bank had 1,243 in North Carolina, or 20.7 percent of all investments. Investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$5.3 million.

Qualified Investments – North Carolina										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Non-MSA NC	46	81,214	384	875	8	3,992	7	62	445	86,143
Raleigh MSA	32	52,817	142	727	14	161	2	2	190	53,707
Winston-Salem MSA	28	37,054	210	913	18	167	4	44	260	38,178
Greensboro MSA	15	34,559	87	333	4	5	0	0	106	34,897
Limited Scope Areas	39	80,269	170	496	21	2,203	3	11	233	82,979
Statewide	3	50	3	57	1	30	1	100	8	237
Regional	0	0	1	2	0	0	0	0	1	2
Total	163	285,963	997	3,403	66	6,558	17	219	1,243	296,143
<i>Source: Bank Records</i>										

On a statewide level, the bank provided \$236,500 in donations to organizations with a purpose consistent with the CRA definition of community development. The bank provided \$150,000 in donations to an organization that works to address the problems of poverty, hunger, housing, health and financial services for low-wealth North Carolinians. In addition, the bank provided a \$10,000 donation to the only full-time advocacy agency in the state working on affordable housing. Additional examples of the bank’s CRA investments in North Carolina are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs include affordable housing and homelessness, rural economic transition, food insecurity, healthcare, and hurricane recovery assistance. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The Housing Coalition reports that 43 percent of households in the state cannot afford a modest 2-bedroom apartment. Many of the rural counties in the state are undergoing economic restructuring, and resources that are available in metropolitan areas are not always readily available in some rural areas of the state.

The bank has responded with many initiatives and investments in rural North Carolina counties as detailed in the Non-MSA assessment area section. North Carolina ranks among the 10 worst states in the nation for food insecurity, and the bank has initiated and partnered with numerous public and private organizations that provide food to help with this need. The state was impacted by two major hurricanes that resulted in large sections of the state being declared as disaster zones, and the bank provided much needed grant assistance to help revitalize and stabilize impacted areas. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. Some of the bank’s investments are considered innovative; and, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for North Carolina is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 222 branches in North Carolina, which represents 12.6 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in these respective census tracts. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes 78 branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in North Carolina.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	13	5.9	317,153	4.4	84	5.3
Moderate	50	22.5	1,586,148	21.9	350	22.3
Middle	106	47.7	3,504,157	48.3	706	44.9
Upper	53	23.9	1,817,666	25.0	403	25.6
NA	0	0.0	28,396	0.4	30	1.9
Total	222	100.0	7,253,520	100.0	1,573*	100.0
<i>Source: 2015 ACS Data & Bank Records</i> <i>*Difference from the total number of North Carolina census tracts on Page 5 (1,579) results from the decrease of 46 census tracts in the non-MSA assessment area (Anson, Granville, and Harnett Counties were removed) and increases of 13 census tracts in the Durham MSA assessment area (Granville County was added) and 27 census tracts in the Fayetteville MSA assessment area (Harnett County was added).</i>						

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches in North Carolina. However, the bank closed 50 branches that resulted in closing 2 branches in low-income, 8 branches in moderate-income, 29 in middle-income, and 11 in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in North Carolina. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 978 community development services since the last evaluation. This performance represents 11.7 percent of bank-wide activities, which is consistent with the statewide share of branches at 12.6 percent. The types of services provided reflect excellent responsiveness to the rated area needs. In North Carolina, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

The bank's performance was strong in several full-scope areas including the Greensboro MSA, Winston-Salem MSA, and North Carolina Non-MSA assessment areas. Performance in the limited-scope assessment areas was generally consistent with the bank's performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following four community development services benefit the entire state:

- A bank employee serves on the Board for a statewide organization that provides services such as technical assistance and community development plans to economic development organizations and government agencies.
- A bank employee serves on the Loan Committee reviewing SBA 504 loan applications for a nonprofit community development corporation that serves small businesses and startups unable to obtain traditional bank financing across the state.
- A bank employee serves on the Board for an organization whose mission is to develop, promote, and implement sound economic strategies to improve the quality of life of rural North Carolinians. The organization serves the state's 80 rural counties, with a special focus on individuals with low- or moderate-incomes and communities with limited resources.
- A bank employee serves as Chairman of an affordable housing partnership that oversees and allocates funding for the North Carolina Housing Trust Fund. This affordable housing resource is the largest source of financing for supportive housing and emergency repairs or accessibility modifications in the state.

The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Non-MSA NC	21	190	47	3	261
Raleigh MSA	20	61	41	0	122
Winston-Salem MSA	44	52	27	1	124
Greensboro MSA	51	49	27	1	128
Durham MSA	30	31	3	0	64
Hickory MSA	2	43	14	0	59
Wilmington MSA	1	10	8	0	19
Fayetteville MSA	6	19	22	0	47
Asheville MSA	0	37	1	0	38
New Bern MSA	2	13	6	2	23
Greenville MSA	0	13	0	0	13
Goldsboro MSA	2	11	2	1	16
Rocky Mount MSA	0	3	11	0	14
Burlington MSA	0	25	0	0	25
Jacksonville MSA	0	6	1	0	7
Statewide Activities	4	3	11	0	18
Total	183	566	221	8	978
<i>Source: Bank Records</i>					

**NORTH CAROLINA NON-MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTH
CAROLINA NON-MSA ASSESSMENT AREA**

The North Carolina Non-MSA assessment area consists of 35 counties, as noted in the Description of Assessment Areas section of this evaluation. The bank operates 72, or 32.4 percent, of its North Carolina branch offices in the assessment area. The assessment area represents 21.5 percent of the rated area loans and 14.4 percent of rated area deposits. In 2019, Anson, Granville, and Harnett Counties were removed from the North Carolina Non-MSA assessment area due to OMB changes. This decreased the number of census tracts in the assessment area by 46, which included a reduction of 1 low-, 9 moderate-, 27 middle-, 8 upper- and 1 NA-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate-, middle-, and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA NC						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	426	2.3	21.6	52.6	22.1	1.4
Population by Geography	1,776,702	1.7	21.8	56.3	20.1	0.1
Housing Units by Geography	863,916	1.5	20.4	54.7	23.3	0.0
Owner-Occupied Units by Geography	459,407	0.6	19.6	57.7	22.1	0.0
Occupied Rental Units by Geography	218,902	3.4	26.1	52.9	17.6	0.0
Vacant Units by Geography	185,607	1.4	15.9	49.4	33.2	0.0
Businesses by Geography	90,671	1.5	19.9	52.4	26.1	0.0
Farms by Geography	5,592	0.4	19.2	61.4	18.9	0.0
Family Distribution by Income Level	453,546	22.2	17.6	19.0	41.1	0.0
Household Distribution by Income Level	678,309	25.4	15.5	16.9	42.2	0.0
Median Family Income Non-MSAs – NC		\$47,794	Median Housing Value			\$136,536
			Median Gross Rent			\$695
			Families Below Poverty Level			16.6%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, unemployment rates generally trended downward in each assessment area county over the evaluation period. As of December 31, 2019, the overall average unemployment rate for this assessment area was 4.6 percent. All but two of the counties had rates above the national average, and a majority of the counties had rates above the State average. Granville and Watauga Counties recorded the lowest unemployment rates at 3.4 and 3.5 percent, respectively. Scotland County recorded the highest unemployment rate of 6.6 percent, as of December 31, 2019.

In 2019, according to D&B, the top industries were services, retail trade, and non-classifiable establishments. Information regarding top employers is not available.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 47 FDIC-insured institutions operated 440 branches within this area. Of these institutions, the bank ranked 1st in total deposits with a market share of 29.6 percent. Competitor institutions in the North Carolina Non-MSA assessment area included Wells Fargo Bank, N.A., First Citizens Bank & Trust Company, and First Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.8 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NORTH CAROLINA NON-MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the North Carolina Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area. Small farm loans received less weight than either product based on the lower volume in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was similar to both demographic data and aggregate lending data. Performance in moderate-income census tracts was below demographic data, but exceeded aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

The geographic distribution of small farm loans reflects good penetration throughout the assessment area. Although the bank did not make any small farm loans in low-income census tracts, this is not considered unusual given the extremely small percent of farms located in these tracts. The bank's performance in moderate-income census tracts was comparable to both demographic and aggregate lending data. Of note, performance in moderate-income census tracts was well above the demographic data in 2019.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was comparable to demographic data, when adjusted for the percent of families below the poverty level, and the aggregate lending data. Lending to moderate-income borrowers was below demographic data, but similar to the aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 74.9 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but significantly exceeded aggregate lending data. Of note, bank performance in 2019 was weaker.

The borrower distribution of small farm loans reflects good penetration among small farm customer of different sizes. In 2018, the bank originated 58.0 percent of small farm loans to farmers with gross revenues of \$1 million for less. This performance was significantly less than demographics but exceeded aggregate lending data. Of note, bank performance was stronger in 2017 and 2019.

Community Development Lending

Truist is a leader in making community development loans in the North Carolina Non-MSA assessment area. The bank originated 99 community development loans totaling \$162.4 million. This amount represents 31.4 percent, by number, and 18.8 percent, by dollar volume, of total community development loans originated in North Carolina. Regarding the community development purpose, 30 loans supported affordable housing, 44 loans supported community services, 4 loans supported economic development, and 21 loans supported revitalization or stabilization. Community development loans include an \$11.2 million loan to build an 80-unit LIHTC multifamily apartment complex. The project is located in a distressed/underserved middle-income census tract. The bank also funded an \$8.2 million loan to refinance existing debt and build an independent charter public school that predominantly serves low- and moderate-income students.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$86 million, or 4.8 percent, of bank-wide community development investments that exceeds the percent of deposits, 4.0, and branches, 4.1, in this assessment area. Most of the CRA investments, \$81 million, went towards affordable housing. An additional \$3.8 million supported economic development. Investments also included grants totaling \$1 million. Examples are provided below.

- Invested \$5.8 million in a new 50-unit affordable housing development for seniors with units set aside for persons with disabilities and the homeless.
- Invested \$2.8 million in a SBA bond investment designed to support lending to small businesses who are unable to obtain financing in the private credit marketplace.
- Provided a \$1 million investment in a new market tax credit project to finance the construction of a distribution and retail facility in a low-income high poverty area.
- The bank donated \$75,000 in grant assistance to provide rural leaders with training and resources to implement meaningful rural economic development strategies.
- The bank partnered with a highly acclaimed regional teacher training organization to provide \$500,000 in funds to offer the opportunity for educators to attend teacher training. The bank purposefully identified rural educators working in low-wealth communities, and more than 150 educators from 13 rural North Carolina counties attended training.
- The bank provided grants totaling \$48,000 to help support disaster relief efforts in the aftermath of Hurricane Florence.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. A primary need as identified by community contacts is affordable housing. Additionally, many of the rural counties in the state are undergoing economic restructuring, and resources that are available in metropolitan areas are not always readily available in some rural areas of the state. In order to maintain economic vitality in rural areas, there is a need to create leadership training, capacity building, and technical resources for community leaders to help them manage the demands of economic transition. The rural areas of the state are also in need of education and job training in order to improve workforce readiness to reduce disparate outcomes in rural communities. Finally, the area was impacted by two hurricanes during this evaluation period, and disaster recovery assistance was needed. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. None of the bank’s investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. To illustrate, the percent of branches in moderate-income census tracts is above the population demographics in the respective census tracts. The bank did not have any branches in low-income census tracts; however, only 1.6 percent of the population resides in these census tracts. In addition, the bank offers an array of alternative delivery systems for its customers and 25 branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the North Carolina Non-MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	25,617	1.6	9	2.4
Moderate	22	30.6	343,204	21.9	83	21.8
Middle	40	55.5	886,284	56.5	197	51.9
Upper	10	13.9	313,033	20.0	86	22.6
NA	0	0.0	0	0.0	5	1.3
Total	72	100.0	1,568,138	100.0	380*	100.0

Source: 2015 ACS Data & Bank Records

**Difference from total number of census tracts on Page 44 (426) results from the decrease of 46 census tracts in this assessment area (Anson, Granville, and Harnett Counties were removed).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches, but closed 3 branches in moderate-income census tracts, 13 branches in middle-income census tracts, and 6 branches in upper-income census tracts in the assessment area. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in North Carolina.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 261 community development services. This performance represents 26.7 percent of all activities in the state, which is lower than the assessment area's share of statewide branches at 32.4 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on many Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The diversity of services includes financial literacy or homebuyer education classes and small business technical assistance sessions. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a nonprofit community development corporation. The mission of the organization is to strengthen communities and improve the quality of life for residents in Elizabeth City and Northeastern North Carolina.
- A bank employee serves on the Board of a community development corporation in Wilson County. The organization fulfills its mission by fostering economic development opportunities through real estate and workforce development and improving social services to low- and moderate-income individuals and families.
- A bank employee serves on the Board of a nonprofit affordable housing organization that provides safe, decent, and affordable housing for low- and moderate-income individuals in Moore and Richmond Counties.

RALEIGH, NC MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE RALEIGH, NC
MSA ASSESSMENT AREA

The Raleigh MSA assessment area consists of all 3 counties that make up the entire Raleigh MSA. The bank operates 32, or 14.4 percent, of its North Carolina branch offices in the Raleigh MSA assessment area. The assessment area represents 22.5 percent of the rated area loans and 9.2 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate, middle-, and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Raleigh MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	224	7.6	26.3	29.5	35.3	1.3
Population by Geography	1,216,711	6.5	29.6	32.5	31.1	0.4
Housing Units by Geography	489,031	6.1	29.7	33.2	30.9	0.0
Owner-Occupied Units by Geography	295,478	3.0	26.6	35.2	35.2	0.0
Occupied Rental Units by Geography	154,647	11.5	34.3	30.3	24.0	0.0
Vacant Units by Geography	38,906	8.7	34.8	30.3	26.1	0.0
Businesses by Geography	101,265	4.3	23.7	33.0	38.8	0.2
Farms by Geography	2,685	4.6	27.9	40.0	27.5	0.0
Family Distribution by Income Level	306,186	22.3	17.4	19.2	41.2	0.0
Household Distribution by Income Level	450,125	23.1	17.2	17.8	41.9	0.0
Median Family Income MSA - 39580 Raleigh, NC MSA		\$78,057	Median Housing Value			\$226,048
			Median Gross Rent			\$937
			Families Below Poverty Level			8.6%
<i>Source: 2015 ACS Census and 2018 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>						

According to Moody’s Analytics, the top industries in the Raleigh MSA in 2019 were professional and business services, government, and education and health services. The top employers were IBM Corporation, WakeMed Health & Hospitals, North Carolina State University, Rex Healthcare, and SAS Institute.

During the evaluation period, the unemployment rate declined from 3.9 percent in 2017 to 3.4 percent in 2019, which is below both state and national rates for all years under review.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 35 FDIC-insured institutions operated 297 branches within this area. Of these institutions, the bank ranked 2nd in total deposits with a market share of 14.8 percent. Competitor institutions in the Raleigh MSA assessment area included Wells Fargo Bank, N.A., Bank of America, N.A., and First Citizens Bank & Trust Company.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.7 percent of the families are low- or moderate-income and median home prices are relatively high at \$226,048.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE RALEIGH, NC MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Raleigh MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and originated a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area. Small farm loans received significantly less weight than either product due to the low volume of originations.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was comparable to both demographic and aggregate lending data. The bank's performance in moderate-income census tracts was below demographic data, but comparable to aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was comparable to both demographic and aggregate lending data. The bank's performance in moderate-income census tracts was also comparable to both demographic and aggregate lending data.

The geographic distribution of small farm loans reflects good penetration throughout the assessment area. Although the bank did not make any small farm loans in low-income census tracts, this is not considered unusual given the small percent of farms located in these tracts. In addition, the bank's performance in low-income census tracts in both 2017 and 2019 was similar to the demographic data. Regarding moderate-income census tracts, the bank's performance was above demographic data, but below aggregate lending data. However, performance in moderate-income census tracts was above the aggregate lending data in 2017 and was very strong in 2019.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered, but comparable to aggregate lending data. Lending to moderate-income borrowers was comparable to both demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 68.6 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data.

The borrower distribution of small farm loans reflects good penetration among small farm customer of different sizes. In 2018, the bank originated 51.9 percent of small farm loans to farmers with gross revenues of \$1 million for less. This performance was significantly less than the demographic data, but slightly above aggregate lending data. Of note, the bank's performance was stronger in both 2017 and 2019.

Community Development Lending

Truist has made a relatively high level of community development loans in the Raleigh MSA assessment area. The bank originated 46 community development loans totaling \$126.3 million. This amount represents 14.6 percent, by number and dollar volume, of total community development loans originated in North Carolina. Regarding the community development purpose, 16 loans supported affordable housing, 14 loans supported community services, 10 loans supported economic development, and 6 loans supported revitalization or stabilization. Community development loans include a \$22.6 million loan to build a shopping center. The shopping center will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$1.2 million line of credit to a nonprofit organization for emergency capital needs. The organization provides services for at-risk youth.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$53.7 million, or 3.0 percent, of bank-wide community development investments that exceeds the percentage of deposits, 2.5, and branches, 1.8, in this assessment area. Most of the CRA investments, \$52.8 million, went towards affordable housing. Investments also included grants totaling \$985,000. Examples are provided below.

- Provided a \$8.5 million affordable housing tax credit investment to build a 120-unit rental housing development in Southeast Raleigh. This project was part of a private/public partnership, and residents of the new rental community will have access to a new adjacent elementary school and services at an adjacent YMCA.
- Provided grants totaling \$275,000 to support the bank's student Homelessness Outreach Initiative that focuses on supporting long-term solutions for housing for identified students and their families.
- Provided \$20,000 in grant funds to an organization that provides personal finance education to individuals in need.
- Donated \$20,000 to a homeless program focused on serving veterans.
- Donated \$75,000 to a nonprofit organization dedicated to providing educational and recreational services to children and teenagers with limited income resources.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. To meet its current housing needs, Raleigh City officials indicate there is a gap of 56,000 affordable units. Other identified community development needs include homelessness and financial literacy. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment area. To illustrate, the percent of branches in low-income census tracts is slightly below the population demographics. Further, the branch distribution in moderate-income census tracts is lower than the percent of the population in the moderate-income census tracts. However, the majority of the branches in middle-income census tracts border low- or moderate-income census tracts mitigating the lower performance. In addition, the bank offers an array of alternative delivery systems for its customers and 13 branches serving as a multicultural banking center. The following table reflects the bank’s branch distribution by tract income level for the Raleigh MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	3.1	78,622	6.5	17	7.6
Moderate	6	18.8	359,763	29.6	59	26.3
Middle	13	40.6	395,245	32.5	66	29.5
Upper	12	37.5	378,642	31.1	79	35.3
NA	0	0.0	4,439	0.3	3	1.3
Total	32	100.0	1,216,711	100.0	224	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed one branch in low-income census tract, one branch in moderate-income census tract, two branches in middle-income census tracts, and two branches in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in North Carolina.

Community Development Services

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 122 community development services. This performance represents 12.5 percent of all activities in the state, which is slightly lower than the assessment area’s share of statewide branches at 14.4 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on a few Boards that provide services to low- and moderate-income families. The majority of the services were financial literacy classes or assistance for low- or moderate-income individuals or families. The following are examples of community development services provided in the assessment area.

- Throughout 2018, 24 bank employees participated in financial education events for new hires and staff of a nonprofit organization that empowers families with developmental disabilities through education, community, and support services.
- Two bank employees provided several homebuyer education classes at a Department of Housing and Urban Development (HUD)-approved counseling agency that is available to households with low- and moderate-incomes.
- The Bank Bus was utilized to provide financial education for a nonprofit organization whose mission is to break the cycle of poverty for the communities in Wake County.

WINSTON-SALEM, NC MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WINSTON-SALEM, NC MSA ASSESSMENT AREA

The Winston-Salem MSA assessment area consists of all 5 counties that make up the entire MSA. The bank operates 20, or 9.0 percent, of its North Carolina branch offices in the Winston-Salem MSA assessment area. The assessment area represents 12.1 percent of the rated area loans and 55.4 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Winston-Salem MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	150	10.7	18.7	39.3	30.0	1.3
Population by Geography	651,630	7.7	20.3	40.8	30.6	0.6
Housing Units by Geography	289,934	7.7	20.8	41.5	29.7	0.3
Owner-Occupied Units by Geography	174,068	3.3	15.8	44.9	35.9	0.0
Occupied Rental Units by Geography	83,588	16.0	28.9	34.5	19.7	0.8
Vacant Units by Geography	32,278	9.5	27.1	41.3	21.7	0.4
Businesses by Geography	36,404	6.1	17.2	39.0	37.2	0.6
Farms by Geography	1,397	1.9	14.7	50.1	33.0	0.2
Family Distribution by Income Level	170,293	22.4	17.6	19.0	41.1	0.0
Household Distribution by Income Level	257,656	23.6	16.7	17.1	42.6	0.0
Median Family Income MSA - 49180 Winston-Salem, NC MSA		\$56,536	Median Housing Value			\$145,961
			Median Gross Rent			\$704
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2018 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>						

According to Moody’s Analytics, the top industries in the Winston-Salem MSA in 2019 were education and health services, professional and business services, and government. The top employers were Novant Health, Wake Forest University Baptist Medical Center, Truist, Wells Fargo, and Wake Forest University.

During the evaluation period, the unemployment rate declined from 4.2 percent in 2017 to 3.7 percent in 2019; this compared to the state rate but was above the national rate for years in review.

Competition

A significant level of competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 20 FDIC-insured institutions operated 145 branches within this area. Of these institutions, the bank ranked 1st in total deposits with a market share of 76.4 percent. Competitor institutions in the Winston-Salem MSA assessment area included Wells Fargo Bank, N.A., Pinnacle Bank, and First National Bank of Pennsylvania.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 40.0 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WINSTON-SALEM, NC MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Winston-Salem MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects a good distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was similar to the aggregate lending data, but slightly below the demographic data. The bank's performance in moderate-income census tracts was also similar to the aggregate lending data, but below the demographic data. Of note, the bank's performance in moderate-income census tracts increased throughout the evaluation period and was only slightly below the demographic data in 2019.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was slightly below the percent of low-income families, even when families below the poverty level are considered, but was consistent with aggregate lending data. Lending to moderate-income borrowers was slightly below the aggregate lending data, but comparable to the demographic data. Of note, performance to moderate-income borrowers was weaker in 2017, but stronger in 2019.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 76.4 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less, which was slightly below demographic data, but significantly exceeded aggregate lending data. Of note, performance was weaker in 2017 and 2019, but still exceeded aggregate lending data in 2017.

Community Development Lending

Truist is a leader in making community development loans in the Winston-Salem MSA assessment area. The bank originated 35 community development loans totaling \$83.6 million. This amount represents 11.1 percent, by number, and 9.7 percent, by dollar volume, of total community development loans originated in North Carolina. Regarding the community development purpose, 16 loans supported affordable housing, 13 loans supported community services, 4 loans supported economic development, and 2 loans supported revitalization or stabilization. Community development loans include a \$4.9 million loan to build a 66-unit LIHTC multifamily apartment complex. The bank also funded a \$2.0 million loan to refinance the debt of a nonprofit organization. The organization provides services to low- and moderate-income families.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$38.2 million, or 2.1 percent, of bank-wide community development investments and exceeded the percent of branches, 1.1, and deposits, 1.8, in this assessment area (deposits excluded large corporate deposits allocated to the bank's former main office in Winston-Salem). Most of the CRA investments, \$37.1 million, went towards affordable housing. Investments also included grants totaling \$1.8 million. Examples are provided below.

- Invested \$7.3 million in an affordable housing tax credit project to build 80 new rental units restricted to households earning 60 percent or less of the average median income. In addition, 16 of the units are reserved for persons with mental disabilities, and 2 units are reserved for veterans.

- Provided \$575,000 in grants to an organization that builds affordable housing and helps families transition to homeownership.
- Provided a \$32,500 grant to an organization with a mission of helping residents with debt, lost jobs, low wages, and a lack of financial literacy. This contribution will support programs to help individuals and families resolve debt; learn to budget and use credit wisely; avoid foreclosure and other financial crises; and set and meet financial goals such as saving for education or for homeownership.
- Provided \$45,000 in grant assistance to an organization that transports nutritious meals and fruits and vegetables to children and families in low- and moderate-income areas.
- Provided \$85,000 in contributions to a CDFI that focuses on providing capital, training, and coaching for entrepreneurs and small businesses.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. According to the December 2018 Winston-Salem/Forsyth Housing Study, the area's population is growing rapidly, increasing the demand for homes. This demand contributed to escalating housing costs and neighborhood change, particularly among lower-income households in search of affordable housing options. In addition, Winston-Salem is in the top 10 of the highest rates of hunger across the nation's 100 largest metro areas. Other identified community development needs include small business development and financial literacy. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution's assessment area. To illustrate, the percent of branches in low-income census tracts is almost double the population demographics. However, the branch distribution in moderate-income census tracts is below the percent of the population in the respective geographies. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes seven branches serving as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Winston-Salem MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	15.0	50,006	7.7	16	10.7
Moderate	3	15.0	132,246	20.3	28	18.7
Middle	5	25.0	265,657	40.8	59	39.3
Upper	9	45.0	199,717	30.6	45	30.0
NA	0	0.0	4,004	0.6	2	1.3
Total	20	100.0	651,630	100.0	150	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed one branch in a moderate-income census tract and two branches in middle-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in North Carolina.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 124 community development services. This performance represents 12.7 percent of all activities in the state, which is higher than the assessment area’s share of statewide branches at 9.0 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on many Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The diversity of services includes financial literacy or homebuyer education classes and small business technical assistance sessions. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an organization that connects community leaders with the resources needed to become self-determined producers of sustainable community development. This Forsyth County based organization goal is to improve Winston-Salem’s most economically disadvantaged neighborhoods and the lives of the residents who call those places home.
- A bank employee is on the Board for an organization that provides credit-challenged low- and moderate-income individuals the ability to obtain low interest loans for purchasing a car and eventually achieve economic self-sufficiency.
- A bank employee serves on the Board of a food pantry that provides supplemental groceries to Forsyth County residents living at or below the poverty line.

**GREENSBORO, NC MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE
GREENSBORO, NC MSA ASSESSMENT AREA**

The Greensboro MSA assessment area consists of all 3 counties that make up the entire MSA. The bank operates 21, or 9.5 percent, of its North Carolina branch offices in the Greensboro MSA assessment area. The assessment area represents 10.8 percent of the rated area loans and 5.2 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Greensboro MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	6.5	26.2	38.7	28.0	0.6
Population by Geography	741,433	5.7	23.3	42.8	28.1	0.0
Housing Units by Geography	326,899	5.7	23.7	42.9	27.6	0.0
Owner-Occupied Units by Geography	184,429	2.7	17.2	45.8	34.3	0.0
Occupied Rental Units by Geography	107,201	10.2	32.7	38.2	18.8	0.0
Vacant Units by Geography	35,269	8.2	30.5	42.1	19.2	0.0
Businesses by Geography	53,613	4.1	21.9	36.5	37.3	0.2
Farms by Geography	1,715	1.6	14.2	52.2	32.0	0.0
Family Distribution by Income Level	189,747	21.7	18.3	18.4	41.7	0.0
Household Distribution by Income Level	291,630	23.4	16.6	17.4	42.6	0.0
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA		\$55,218	Median Housing Value			\$145,143
			Median Gross Rent			\$747
			Families Below Poverty Level			13.3%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to Moody’s Analytics, the top industries in the Greensboro MSA in 2019 were education and health services, professional and business services, and government. The top employers were Cone Health, Ralph Lauren Corp., High Point Regional Hospital, University of North Carolina, and Bank of America Corp.

During the evaluation period, the unemployment rate declined from 4.7 percent in 2017 to 4.1 percent in 2019, which is higher than both state and national rates for all years under review.

Competition

A significant level of competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 23 FDIC-insured institutions operated 170 branches within this area. Of these institutions, the bank ranked 2nd in total deposits with a market share of 19.4 percent. Competitor institutions in the Greensboro MSA assessment area included Wells Fargo Bank, N.A., Bank of America, N.A., and Pinnacle Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 40.0 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GREENSBORO, NC MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Greensboro MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects a good distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was comparable to both demographic and aggregate lending data. However, the bank's performance in moderate-income census tracts was slightly below the aggregate lending data and well below the demographic data. Of note, performance in moderate-income census tracts was slightly better in 2017 and 2019.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. The bank's performance in moderate-income census tracts was also consistent with both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was slightly below the percent of low-income families, even when families below the poverty level are considered, but consistent with aggregate lending data. Lending to moderate-income borrowers was similar to both the demographic and aggregate lending data. Of note, performance to moderate-income borrowers was weaker in 2017.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 72.9 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less, which was below demographic data, but significantly exceeded aggregate lending data. Of note, performance was weaker in 2017 and 2019, but still exceeded aggregate lending data in 2017.

Community Development Lending

Truist is a leader in making community development loans in the Greensboro MSA assessment area. The bank originated 31 community development loans totaling \$129.1 million. This amount represents 9.8 percent, by number, and 15.0 percent, by dollar volume, of total community development loans originated in North Carolina. Regarding the community development purpose, 15 loans supported affordable housing, 10 loans supported community services, 2 loans supported economic development, and 4 loans supported revitalization or stabilization. Community development loans include an \$8.4 million loan to build a distribution center. The bank also funded a \$1.4 million loan to purchase and renovate a vacant industrial building in a moderate-income census tract. These 2 projects will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments is excellent. The bank exhibits good responsiveness to community needs. In addition, the bank makes significant use of complex investments, and serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$34.9 million, or 2.0 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.4, and branches, 1.2. Most of the CRA investments, \$34.6 million, went towards affordable housing. Investments also included grants totaling \$353,000. Examples are provided below.

- Invested \$14.4 million in LIHTCs and bonds to support the rehabilitation of 645 units of affordable housing in conjunction with HUD and the Greensboro Housing Authority.
- Provided \$10,500 in donations to an affordable housing nonprofit organization.

- Provided \$25,000 donation to a homeless shelter to demolish and construct new shower facilities.
- Provided \$25,000 to an organization that serves to empower vulnerable households out of poverty and towards economic mobility.
- Provided \$38,000 to numerous organizations that provide food for those in need.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified need is affordable housing. In Greensboro, an estimated 30,000 households spend more than 30 percent of their monthly income on housing costs. Other identified community development needs include homelessness, economic mobility, food insecurity, small business development, and financial literacy. The bank responded to the affordable housing, homelessness, economic mobility, and food insecurity needs using CRA qualified investments.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution's assessment area. Overall, the branch distribution in low-income census tracts is consistent with the percent of the population in low-income census tracts. Further, the branch distribution in moderate-income census tracts is above the percent of the population in moderate-income census tracts. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes seven branches serving as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Greensboro MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	4.8	42,476	5.7	11	6.5
Moderate	7	33.3	172,932	23.3	44	26.2
Middle	4	19.0	317,334	42.8	65	38.7
Upper	9	42.9	208,691	28.2	47	28.0
NA	0	0.0	0	0.0	1	0.6
Total	21	100.0	741,433	100.0	168	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches and closed one branch each in a moderate- and middle-income census tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in North Carolina.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 128 community development services. This performance represents 13.1 percent of all activities in the state, which is higher than the assessment area's share of statewide branches at 9.5 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The diversity of services includes financial literacy or homebuyer education classes, small business technical assistance sessions, and Bank Bus events. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Brownfield subcommittee of a city project in a low-income census tract. This redevelopment project was coordinated with local businesses to transform a brownfield site into a multi-purpose stadium designed for community events. This revitalization activity resulted in 500 private-sector jobs, 15 to 20 new restaurants and shops, 250 residential housing units, and a space for community events.
- The Bank Bus was utilized to support several qualifying activities in the assessment area including financial literacy training, credit report reviews with credit counseling, and VITA free income tax preparation and advice for low- and moderate-income residents.
- A bank employee serves on a job committee of a local economic development corporation that serves as a public/private partnership to create jobs through support of education and the expansion and recruitment of companies.

**OTHER NORTH CAROLINA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the 11 North Carolina assessment areas 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
Durham MSA	Consistent	Consistent	Consistent
Hickory MSA	Consistent	Consistent	Consistent
Wilmington MSA	Consistent	Consistent	Consistent
Fayetteville MSA	Consistent	Consistent	Consistent
Asheville MSA	Consistent	Consistent	Consistent
New Bern MSA	Consistent	Consistent	Consistent
Greenville MSA	Consistent	Consistent	Consistent
Goldsboro MSA	Consistent	Below	Consistent
Rocky Mount MSA	Consistent	Consistent	Consistent
Burlington MSA	Consistent	Consistent	Consistent
Jacksonville MSA	Consistent	Consistent	Below

A summary of Truist Bank’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

Durham MSA Assessment Area

The Durham MSA assessment area consists of Chatham, Durham, Orange, and Person Counties. Truist Bank operates 14 branches in this assessment area. Granville County was added to this assessment area in 2019 due to the OMB changes. This added 13 census tracts to the assessment area: 8 moderate-income, 2 middle-income, and 3 upper-income. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	3,868	\$224.0 million
Home Mortgage Loans	2,402	\$607.3 million
Small Farm Loans	15	\$1.7 million
Community Development Loans	20	\$63.1 million
Investments (New)	7	\$18.4 million
Investments (Prior Period)	0	\$0
Donations	31	\$281.4 thousand
CD Services	64	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Durham MSA assessment area are in Appendix D.

Hickory MSA Assessment Area

The Hickory MSA assessment area consists of Alexander, Burke, Caldwell, and Catawba Counties. Truist Bank operates 11 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,876	\$154.7 million
Home Mortgage Loans	1,929	\$258.0 million
Small Farm Loans	4	\$247 thousand
Community Development Loans	11	\$23.1 million
Investments (New)	4	\$15.5 million
Investments (Prior Period)	0	\$0
Donations	22	\$68.8 thousand
CD Services	59	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Hickory MSA assessment area are in Appendix D.

Wilmington MSA Assessment Area

The Wilmington MSA assessment area consists of New Hanover and Pender Counties. Truist Bank operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,784	\$146.9 million
Home Mortgage Loans	1,230	\$279.1 million
Small Farm Loans	12	\$2.2 million
Community Development Loans	8	\$57.1 million
Investments (New)	4	\$11.4 million
Investments (Prior Period)	0	\$0
Donations	14	\$67.2 thousand
CD Services	19	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Wilmington MSA assessment area are in Appendix D.

Fayetteville MSA Assessment Area

The Fayetteville MSA assessment area consists of Cumberland and Hoke Counties. Harnett County was added to this assessment area in 2019 due to OMB changes. This added 27 census tracts to the assessment area: 2 moderate-income, 21 middle-income, and 4 upper-income. Truist Bank operates 15 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,988	\$157.4 million
Home Mortgage Loans	1,152	\$184.9 million
Small Farm Loans	8	\$898 thousand
Community Development Loans	11	\$39.7 million
Investments (New)	5	\$8.3 million
Investments (Prior Period)	0	\$0
Donations	43	\$68.5 thousand
CD Services	47	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Fayetteville MSA assessment area are in Appendix D.

Asheville MSA Assessment Area

The Asheville MSA assessment area consists of Buncombe, Haywood, Henderson, and Madison Counties. Truist Bank operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,086	\$136.4 million
Home Mortgage Loans	1,193	\$348.3 million
Small Farm Loans	1	\$30 thousand
Community Development Loans	12	\$69.2 million
Investments (New)	3	\$8.5 million
Investments (Prior Period)	0	\$0
Donations	18	\$50.3 thousand
CD Services	38	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Asheville MSA assessment area are in Appendix D.

New Bern MSA Assessment Area

The New Bern MSA assessment area consists of Craven, Jones, and Pamlico Counties. Truist Bank operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,472	\$95.1 million
Home Mortgage Loans	748	\$120.1 million
Small Farm Loans	63	\$8.4 million
Community Development Loans	5	\$9.3 million
Investments (New)	1	\$6 million
Investments (Prior Period)	0	\$0
Donations	17	\$31.8 thousand
CD Services	23	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the New Bern MSA assessment area are in Appendix D.

Greenville MSA Assessment Area

The Greenville MSA assessment area consists of Pitt County. Truist Bank operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,264	\$89.7 million
Home Mortgage Loans	1,123	\$202.8 million
Small Farm Loans	10	\$1.4 million
Community Development Loans	11	\$14.1 million
Investments (New)	2	\$6.4 million
Investments (Prior Period)	0	\$0
Donations	16	\$323.7 thousand
CD Services	13	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Greenville MSA assessment area are in Appendix D.

Goldsboro MSA Assessment Area

The Goldsboro MSA assessment area consists of Wayne County. Truist Bank operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,205	\$84.6 million
Home Mortgage Loans	730	\$93.2 million
Small Farm Loans	97	\$19.7 million
Community Development Loans	5	\$49.3 million
Investments (New)	3	\$240 thousand
Investments (Prior Period)	0	\$0
Donations	17	\$49.6 thousand
CD Services	16	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Goldsboro MSA assessment area are in Appendix D.

Rocky Mount MSA Assessment Area

The Rocky Mount MSA assessment area consists of Edgecombe and Nash Counties. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	768	\$65.2 million
Home Mortgage Loans	649	\$84.2 million
Small Farm Loans	24	\$4.2 million
Community Development Loans	3	\$5.0 million
Investments (New)	2	\$4.4 million
Investments (Prior Period)	0	\$0
Donations	8	\$31.6 thousand
CD Services	14	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Rocky Mount MSA assessment area are in Appendix D.

Burlington MSA Assessment Area

The Burlington MSA assessment area consists of Alamance County. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	790	\$85.7 million
Home Mortgage Loans	432	\$82.3 million
Small Farm Loans	7	\$804 thousand
Community Development Loans	4	\$5.7 million
Investments (New)	2	\$1.5 million
Investments (Prior Period)	0	\$0
Donations	10	\$43.2 thousand
CD Services	25	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Burlington MSA assessment area are in Appendix D.

Jacksonville MSA Assessment Area

The Jacksonville MSA assessment area consists of Onslow County. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	499	\$26.5 million
Home Mortgage Loans	418	\$74.3 million
Small Farm Loans	6	\$750 thousand
Community Development Loans	2	\$1.5 million
Investments (New)	1	\$1.2 million
Investments (Prior Period)	0	\$0
Donations	3	\$5.2 thousand
CD Services	7	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Jacksonville MSA assessment area are in Appendix D.

FLORIDA

CRA RATING FOR FLORIDA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

The bank operates 262, or 14.9 percent, of its total branch offices in Florida. Florida accounts for 11.0 percent of the bank-wide deposits. Overall, Truist ranks 7th in the state in deposit market share at 3.0 percent. Competitor institutions in the Florida assessment areas include Bank of America, N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A.

SCOPE OF EVALUATION – FLORIDA

The evaluation of the Florida performance considered the operations of Truist in 22 assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Tampa-St. Petersburg-Clearwater (Tampa) and Orlando-Kissimmee-Sanford (Orlando) MSA assessment areas and the Miami-Miami Beach-Kendall (Miami), Fort Lauderdale-Pompano Beach-Deerfield Beach (Fort Lauderdale), and West Palm Beach-Boca Raton-Delray Beach (West Palm Beach) MD assessment areas. Limited-scope areas included the North Port-Sarasota-Bradenton (North Port), Jacksonville, Cape Coral-Fort Myers (Cape Coral), Palm Bay-Melbourne-Titusville (Palm Bay), Port St. Lucie, Deltona-Daytona Beach-Ormond Beach (Deltona), Lakeland-Winter Haven (Lakeland), Tallahassee, Ocala, Naples-Immokalee-Marco Island (Naples), Pensacola-Ferry Pass-Brent (Pensacola), Crestview-Fort Walton Beach-Destin (Crestview), Punta Gorda, Homosassa Springs, The Villages, and Panama City MSA assessment areas, and the Florida Non-MSA assessment area. Small business loans received more weight than home mortgage loans when considering the bank's performance during the evaluation period. Based on the minimal number, small farm loans were not reviewed in any of the assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA

LENDING TEST

The Lending Test rating for Florida is High Satisfactory. The bank's lending levels reflect good responsiveness to the Florida assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Florida assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Florida assessment area. Examiners based conclusions primarily on the performance in the Tampa MSA, Orlando MSA, Miami MD, Fort Lauderdale MD, and West Palm Beach MD assessment areas. Performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage and small business loans reflects good penetration throughout the assessment areas. Good performance in all full-scope assessment areas supports this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans is adequate among borrowers of different income levels. This conclusion is supported by adequate performance in the Tampa and Orlando MSA assessment areas and the West Palm Beach MD assessment area and good performance in the Miami and Fort Lauderdale MD assessment areas. The borrower distribution of small business loans is good among businesses of different sizes; good performance in all full-scope assessment areas supports this conclusion.

Community Development Loans

Truist is a leader in making community development loans in Florida. During this evaluation period, the bank originated 252 community development loans totaling \$1.2 billion. This performance represents 14.2 percent, by number, and 18.9 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 176 community development loans totaling \$831.2 million were originated.

Since the previous evaluation, Truist Bank has originated 1 loan totaling \$228,000, benefitting a broader statewide area that included the assessment areas. The bank made the loan to a LIHTC housing fund. In addition, the bank originated 4 loans totaling \$21.0 million, outside of the assessment areas, but within Florida. Since the bank has been responsive to community development needs and opportunities within its assessment areas, examiners included these loans in the overall analysis. The analysis for each full-scope Florida assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in Florida. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position. The bank's performance in all of the full-scope assessment areas is excellent. Performance among the limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$247.4 million, or 13.9 percent, of bank-wide community development investments that exceeds the percent of deposits, 11.0, and is slightly below the percent of branches, 14.9, in the state. By number of investments, the bank had 486 in Florida, or 8.1 percent of all investments. The bank’s investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$3.8 million.

Qualified Investments – Florida										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Tampa MSA	22	42,454	29	158	5	24	0	0	56	42,636
Miami MD	12	35,988	40	458	7	60	2	4,212	61	40,718
Fort Lauderdale MD	10	35,716	41	554	5	43	1	10	57	36,323
Orlando MSA	9	25,351	57	434	7	81	1	5	74	25,871
West Palm Beach MD	10	18,670	28	183	4	9,418	2	25	44	28,296
Limited Scope Areas	35	60,709	130	7,601	10	4,522	5	34	180	72,866
Statewide	3	25	3	515	6	120	1	10	13	670
Regional	0	0	1	2	0	0	0	0	1	2
Total	101	218,913	329	9,905	44	14,268	12	4,296	486	247,382

Source: Bank Records

On a statewide level, the bank provided \$670,000 in donations to organizations with a purpose consistent with the CRA definition of community development. To support the state of Florida after Hurricane Irma, the bank provided \$500,000 in humanitarian supplies to affected areas. Another example is a \$50,000 donation to an economic development organization that provides loan capital and financial technical assistance to underserved minority businesses throughout Florida. A third example is a \$25,000 donation to an organization with a mission to improve the quality of life for low-income communities by addressing the lack of affordable housing in Florida. Other examples of CRA investments in Florida are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community development needs. The primary identified need is affordable housing, and other needs are small business development, hurricane recovery, homelessness, and financial education. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The need for affordable housing is supported by the fact that the state is the third most challenged in the nation in terms of rental stability, with more than 30 percent of renters paying 50 percent of their income on rent and utility costs. Florida has the third highest concentration of African-American businesses in the nation, and a significant majority of minority-owned small businesses face financial challenges and funding gaps.

During this evaluation period, Florida was impacted by three hurricanes that caused severe destruction. In addition, Florida has the third largest homeless population in the nation. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development needs in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for Florida is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 262 branches in Florida, which represents 14.9 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 120 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the state. The following table reflects the bank’s branch distribution by tract income level in Florida.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	5	1.9	817,067	4.4	212	5.3
Moderate	67	25.6	4,645,715	25.1	1,022	25.7
Middle	94	35.9	7,440,441	40.3	1,485	37.3
Upper	96	36.6	5,527,179	29.9	1,171	29.4
NA	0	0.0	59,131	0.3	89	2.3
Total	262	100.0	18,489,533	100.0	3,979*	100.0
<i>Source: 2015 ACS Data & Bank Records</i>						
<i>*Difference from total number of Florida census tracts on Page 6 (3,983) results from the decrease of 4 census tracts in the Panama City MSA assessment area (Gulf County was removed).</i>						

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 5 branches, including 1 in a low-income, 2 in moderate-income, and 2 in middle-income census tracts. Further, the bank closed 58 branches, including 7 in moderate-income, 21 in middle-income, and 29 in upper-income census tracts, as well as 1 branch in a census tract without an income designation.

As a result, the bank had a net change of opening 1 branch in a low-income census tract and closing 5 branches in moderate-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Florida. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in Florida. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 1,208 community development services since the last evaluation. This performance represents 14.5 percent of bank-wide activities, which is consistent with the statewide share of branches at 14.9 percent. The types of services provided reflect good responsiveness to the rated area needs. In Florida, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various literacy or assistance capacities. Further, in several instances, bank associates serve in a qualified leadership capacity with an organization resulting in community development service activities.

The bank performed the strongest in the full-scope Fort Lauderdale MD, Miami MD, and Orlando MSA assessment areas. Performance in the limited-scope assessment areas was generally consistent with the bank's performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following community development service benefited multiple assessment areas in the state:

- A bank employee serves on the Community Development Committee for a Miami-based organization that provides loan capital and business development training to minority and underserved businesses and communities throughout Florida. Further, in 2019, Truist partnered with this organization to offer 17 sessions of Growing Your Business seminars impacting over 150 people in the Jacksonville MSA, Miami MD, and Orlando MSA assessment areas.

Refer to the Community Development Services section in each assessment area for additional examples. The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Tampa MSA	42	47	59	0	148
Miami MD	81	60	47	0	188
Fort Lauderdale MD	96	49	45	0	190
Orlando MSA	29	69	67	0	165
West Palm Beach MD	6	38	9	2	55
Northport MSA	3	53	25	0	81
Jacksonville MSA	4	39	11	0	54
Cape Coral MSA	6	50	31	0	87
Palm Bay MSA	4	20	4	0	28
Port St. Lucie MSA	0	27	11	0	38
Deltona MSA	0	12	16	0	28
Lakeland MSA	2	23	5	0	30
Tallahassee MSA	2	2	4	0	8
Ocala MSA	0	1	12	0	13
Naples MSA	0	30	11	0	41
Pensacola MSA	0	5	0	0	5
Crestview MSA	0	0	0	0	0
Punta Gorda MSA	3	6	0	0	9
Homosassa Springs MSA	2	4	1	0	7
Florida Non-MSA	1	4	6	4	15
The Villages MSA	0	2	7	0	9
Panama City MSA	0	6	0	0	6
Statewide Activities	0	3	0	0	3
Total	281	550	371	6	1,208

Source: Bank Records

**TAMPA, FL MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TAMPA, FL
MSA ASSESSMENT AREA**

The Tampa MSA assessment area consists of all 4 counties within the MSA. The bank operates 39, or 14.9 percent, of its Florida branch offices in the Tampa MSA assessment area. The assessment area represents 23.7 percent of the rated area loans and 14.2 percent of the rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Tampa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	746	5.5	26.1	36.3	29.8	2.3
Population by Geography	2,888,458	4.5	24.4	38.0	32.7	0.4
Housing Units by Geography	1,368,924	4.3	25.4	39.2	30.9	0.2
Owner-Occupied Units by Geography	737,411	1.9	21.9	39.7	36.5	0.1
Occupied Rental Units by Geography	408,090	8.5	29.3	38.6	23.2	0.4
Vacant Units by Geography	223,423	4.7	30.0	38.8	26.3	0.1
Businesses by Geography	300,326	4.0	20.8	35.3	39.7	0.3
Farms by Geography	7,867	2.5	24.4	39.8	33.2	0.1
Family Distribution by Income Level	702,244	21.6	17.9	19.1	41.4	0.0
Household Distribution by Income Level	1,145,501	24.0	16.3	17.5	42.2	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$58,916	Median Housing Value			\$155,283
			Median Gross Rent			\$979
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS Census and 2018 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.</i>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, at 3.0 percent, the unemployment rate in the Tampa MSA was consistent with the state average. However, the unemployment rate matched the national average in 2017 and was slightly below the national average in 2018 and 2019.

In 2019, according to Moody's Analytics, the top industries were professional and business services, education and health services, and leisure and hospitality services. The top employers were Publix Super Markets, BayCare Health System, HCA Holdings, MacDill Air Force Base, and Verizon Communications.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 55 FDIC-insured institutions operated 670 branches within this area. Of these institutions, the bank ranked 8th in total deposits with a market share of 2.9 percent. Competitor institutions in the Tampa MSA included Raymond James Bank, N.A., Bank of America, N.A., and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 39.5 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE TAMPA, FL MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Tampa MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for the assessment area. Small business and home mortgage loans received equal weight when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. The bank's performance in moderate-income census tracts was consistent with the demographic data and above the aggregate lending data. Of note, in 2019, performance in moderate-income census tracts declined and was below the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data. Of note, in 2019, performance in moderate-income census tracts was above the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, when families below the poverty level are considered, but consistent with aggregate lending data. Lending to moderate-income borrowers was below both demographic and aggregate lending data. It is important to note that the bank's performance to both low- and moderate-income borrowers increased throughout the evaluation period.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 76.4 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data. Of note, in 2019, the bank's performance declined to 70.4 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased.

Community Development Lending

Truist is a leader in making community development loans in the Tampa MSA assessment area. The bank originated 46 community development loans totaling \$281.0 million. This amount represents 18.3 percent, by number, and 23.5 percent, by dollar volume, of total community development loans originated in Florida. Regarding the community development purpose, 17 loans supported affordable housing, 6 loans supported community services, 15 loans supported economic development, and 8 loans supported revitalization or stabilization. Community development loans include a \$19.5 million loan to refinance a 300-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also funded a \$16.4 million loan to build a shopping center. The shopping center will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$42.6 million or 2.4 percent of bank-wide community development investments that exceeds the percentage of deposits, 1.6, and branches, 2.2. Most of the CRA investments, \$42.5 million, went towards affordable housing. Investments also included grants totaling \$357,000. Examples are provided below.

- Invested \$5.6 million in a LIHTC project to develop 56 new units of affordable housing with 6 units set aside for persons transitioning out of homelessness. Supportive services are required per the tax credit applications, and the developer will partner with local agencies to provide childcare, employment programs, and other social services.
- Provided a \$100,000 grant to a CDFI in order to fund an affordable housing lending program. The funds were used for the loan loss reserve that allowed for \$1 million in lending in targeted communities.
- Provided grants totaling \$50,000 to support the bank's student Homelessness Outreach Initiative that focuses on supporting long-term solutions for housing for identified students and their families.
- Provided \$10,500 in donations to a private, nonprofit economic development corporation. The donated funds went towards teaching financial literacy at small business incubator locations located in economically challenged areas.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include small business development, homelessness, and financial education. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the of assessment area. The bank provides a relatively high level community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is below the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is slightly above the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 11 branches serve as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Tampa MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	131,192	4.5	41	5.5
Moderate	11	28.2	704,278	24.4	195	26.1
Middle	19	48.7	1,097,912	38.0	271	36.3
Upper	9	23.1	944,596	32.7	222	29.8
NA	0	0.0	10,480	0.4	17	2.3
Total	39	100.0	2,888,458	100.0	746	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one branch in a moderate-income census tract. Further, the bank closed eight branches, including one in a moderate-income, two in middle-income, and five in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Florida.

Community Development Services

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 148 community development services. This performance represents 12.3 percent of all activities in the state, which is slightly below the assessment area's share of statewide branches at 14.9 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The substantial majority of qualified services were either technical assistance provided to small businesses or financial literacy to low- and moderate-income individuals. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an economic development council, whose primary mission is to promote economic development in Pasco County. The employee also serves as the Chairman of the Economic Growth Task Force for a council that provides micro loans to start-up companies and small business technical assistance oversight for business training to the Pasco County small business incubators.
- A bank employee serves on the Board for a nonprofit organization that focuses on the economic revitalization of downtown New Port Richey.
- A bank employee serves on the Board of a nonprofit health clinic that offers free- or reduced rates for low- and moderate-income families in Pinellas County.

MIAMI, FL MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MIAMI, FL MD
ASSESSMENT AREA

The Miami MD assessment area consists of Miami-Dade County, which comprises the entire MD. The bank operates 37, or 14.1 percent, of its Florida branch offices in the Miami MD assessment area. The assessment area represents 7.3 percent of the rated area loans and 15.3 percent of the rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Miami MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	519	5.8	27.7	28.9	34.1	3.5
Population by Geography	2,639,042	5.5	29.7	30.9	33.2	0.7
Housing Units by Geography	998,833	5.3	27.5	29.3	37.2	0.6
Owner-Occupied Units by Geography	452,826	2.0	21.4	31.9	44.4	0.2
Occupied Rental Units by Geography	389,327	9.6	37.8	28.2	23.5	0.8
Vacant Units by Geography	156,680	4.3	19.4	24.6	50.4	1.3
Businesses by Geography	346,484	3.1	21.3	25.8	47.5	2.4
Farms by Geography	4,202	3.4	21.9	26.6	47.3	0.8
Family Distribution by Income Level	572,388	24.0	16.6	16.9	42.5	0.0
Household Distribution by Income Level	842,153	26.1	15.1	15.9	42.9	0.0
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL MD		\$49,264	Median Housing Value			\$244,010
			Median Gross Rent			\$1,155
			Families Below Poverty Level			16.9%

*Source: 2015 ACS Census and 2018 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.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, at 2.0 percent, the unemployment rate in the Miami MD was below both the state and national averages in 2019. However, the unemployment rate in the Miami MD was above both the state and national averages in 2017 and above the state average but below the national average in 2018.

In 2019, according to Moody's Analytics, the top industries were education and health services, professional and business services, and leisure and hospitality services. The top employers were University of Miami, Jackson Health System, Publix Super Markets, Baptist Health Systems of Southern Florida, and American Airlines.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 60 FDIC-insured institutions operated 628 branches within this area. Of these institutions, the bank ranked 12th in total deposits with a market share of 2.1 percent. Competitor institutions included Bank of America, N.A., Wells Fargo Bank, N.A., and Citibank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 40.6 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MIAMI, FL MD ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Miami MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for the assessment area. Small business loans received more weight than home mortgage loans when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, when families below the poverty level are considered, but consistent with aggregate lending data. Lending to moderate-income borrowers was well below demographic data, but consistent with aggregate lending data. The low percent of aggregate lending data indicates limited opportunities to low- and moderate-income borrowers may exist.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 82.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data. Of note, in 2019, the bank's performance declined to 69.4 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased.

Community Development Lending

Truist Bank is a leader in making community development loans in the Miami MD assessment area. The bank originated 16 community development loans totaling \$92.2 million. This amount represents 6.4 percent by number and 7.7 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 3 loans supported affordable housing, 4 loans supported community services, 3 loans supported economic development, and 6 loans supported revitalization or stabilization. Community development loans include a \$16.2 million loan to develop a retail complex. The complex will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$2.0 million loan to a nonprofit organization for debt restructuring. The organization provides health and wellness, and academic enrichment programs for at-risk youth.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$40.7 million, or 2.3 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.7, and branches, 2.1. Most of the CRA investments, \$36.0 million, went towards affordable housing. Investments also included grants totaling \$555,000. Examples are provided below.

- Invested \$10.9 million to rehabilitate 340 units of affordable apartments for low- and moderate-income families and senior citizens.

- Invested \$4.2 million in a bond used to fund a multifamily affordable housing project in conjunction with a FHA loan guaranty in an area designated by the local government in need of revitalization.
- Provided grants totaling \$100,000 to support the bank’s student Homelessness Outreach Initiative that focuses on supporting long-term solutions for housing for identified students and their families.
- Provided grants totaling \$45,000 to an organization that provides 2 homeless centers with comprehensive support programs that includes emergency housing, meals, healthcare, day care, job training, and assistance with securing stable housing.
- Provided grants totaling \$30,000 to a micro-business development program that provides business assessments, coaching, technical assistance, and entrepreneurial readiness workshops.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include small business development, homelessness, disaster recovery, and financial education. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank’s investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is well below the percent of the population in the respective tracts. The bank offers an array of alternative delivery systems for its customers, and 36 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank’s branch distribution by tract income level for the Miami MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	2	5.4	145,206	5.5	30	5.8
Moderate	6	16.2	782,478	29.7	144	27.7
Middle	6	16.2	815,663	30.9	150	28.9
Upper	23	62.2	876,124	33.2	177	34.1
NA	0	0.0	19,571	0.7	18	3.5
Total	37	100.0	2,639,042	100.0	519	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened two branches, including one each in a low-income census tract and a middle-income census tract. Further, the bank closed five branches, including two in middle-income census tracts and three in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Florida.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 188 community development services. This performance represents 15.6 percent of all activities in the state, which is comparable, but slightly higher than the assessment area's share of statewide branches at 14.1 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualified services were homebuyer education classes for low- and moderate-income individuals. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a nonprofit organization whose mission is to provide humanitarian services to the indigent and homeless populations of Miami-Dade County.
- A bank employee serves on the Board of a nonprofit organization that provides emergency housing, meals, health care, job training, job placement, and assistance with securing stable housing for homeless and low-income individuals.
- A bank employee serves on the loan committee for a nonprofit organization that helps low-to moderate-income working families secure low interest loans to purchase used cars or refinance existing car loans.

**FORT LAUDERDALE, FL MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE FORT
LAUDERDALE, FL MD ASSESSMENT AREA**

The Fort Lauderdale MD assessment area consists of Broward County, which comprises the entire MD. The bank operates 30, or 11.5 percent, of its Florida branch offices in the Fort Lauderdale MD assessment area. The assessment area represents 7.5 percent of the rated area loans and 15.1 percent of the rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Fort Lauderdale MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	362	5.5	29.3	32.3	32.3	0.6
Population by Geography	1,843,152	5.1	28.9	32.7	33.3	0.0
Housing Units by Geography	814,454	5.4	28.7	33.2	32.7	0.0
Owner-Occupied Units by Geography	425,691	2.8	24.8	34.0	38.4	0.0
Occupied Rental Units by Geography	244,593	9.4	34.6	33.2	22.9	0.0
Vacant Units by Geography	144,170	6.6	30.2	30.7	32.4	0.0
Businesses by Geography	250,693	5.1	23.8	30.4	40.7	0.0
Farms by Geography	3,756	5.3	29.0	28.9	36.8	0.0
Family Distribution by Income Level	425,680	22.3	17.3	18.7	41.7	0.0
Household Distribution by Income Level	670,284	24.4	16.1	17.3	42.2	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Deerfield Beach, FL		\$61,809	Median Housing Value			\$206,124
			Median Gross Rent			\$1,233
			Families Below Poverty Level			11.2%

*Source: 2015 ACS Census and 2018 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.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, at 2.9 percent, the unemployment rate in the Fort Lauderdale MD was consistent with the state average, and slightly below the national average, for all years under review.

In 2019, according to Moody's Analytics, the top industries were professional and business services, retail trade, and education and health services. The top employers were Tenet Healthcare Corp., HCA East Florida Division Office, Memorial Healthcare System, Broward Health, and Nova Southeastern University.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 47 FDIC-insured institutions operated 442 branches within this area. Of these institutions, the bank ranked 6th in total deposits with a market share of 4.6 percent. Competitor institutions included Bank of America, N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 39.6 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE FORT LAUDERDALE, FL MD ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Fort Lauderdale MD assessment area reflects adequate responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect adequate responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for the assessment area. Small business loans received more weight than home mortgage loans when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. Performance in moderate-income census tracts was consistent with demographic data and above aggregate lending data. Of note, in 2017, performance in moderate-income census tracts was above both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. Performance in moderate-income census tracts was above both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, when families below the poverty level are considered, but consistent with aggregate lending data. Lending to moderate-income borrowers was below the demographic data, but consistent with aggregate lending data. It is important to note that the bank's performance to both low- and moderate-income borrowers increased throughout the evaluation period.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 78.9 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data. Of note, in 2019, the bank's performance declined to 68.0 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased.

Community Development Lending

Truist Bank is a leader in making community development loans in the Fort Lauderdale MD assessment area. The bank originated 27 community development loans totaling \$150.7 million. This amount represents 10.7 percent by number and 12.6 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 6 loans supported affordable housing, 7 loans supported community services, 4 loans supported economic development, and 10 loans supported revitalization or stabilization. Community development loans include an \$8.5 million loan to develop a retail shopping center in a moderate-income census tract. The shopping center will provide permanent employment opportunities for low- and moderate-income individuals. The bank also renewed a \$1.0 million line of credit to a housing authority that oversees public housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$36.3 million, or 2.0 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.7, and branches, 1.7. Most of the CRA investments, \$35.7 million, went towards affordable housing. Investments also included grants totaling \$648,000. Examples are provided below.

- Invested \$12.3 million for the rehabilitation of 100 units of affordable housing for a senior-citizen public housing development. This community has resident programs such as literacy training, computer training, and 24-hour emergency support.
- Provided \$10,000 in donations to the local chapter of a global organization that provides first time entrepreneurs with the skills and support needed to grow and lead their businesses.
- Provided \$25,000 grant to a newly formed public/private initiative to end chronic homelessness.
- Provided \$65,000 to an organization that provides financial education and counseling services to low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include small business development, homelessness, disaster recovery, and financial education. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is below the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 19 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank's branch distribution by tract income level for the Fort Lauderdale MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	93,324	5.1	20	5.5
Moderate	10	33.3	533,183	28.9	106	29.3
Middle	7	23.3	602,986	32.7	117	32.3
Upper	13	43.4	613,659	33.3	117	32.3
NA	0	0.0	0	0.0	2	0.6
Total	30	100.0	1,843,152	100.0	362	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed eight branches, including five in middle-income census tracts and three in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Florida.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 190 community development services. This performance represents 15.7 percent of all activities in the state, which is higher than the assessment area's share of statewide branches at 11.4 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were homebuyer education classes for low- and moderate-income residents. The following are examples of community development services provided in the assessment area.

- For the past three years, a bank employee served on the Board for a nonprofit organization that assists abandoned and neglected children in both Broward and Palm Beach Counties.
- Several bank employees taught housing classes in conjunction with a local housing authority targeted to low- and moderate-income families in Broward County.
- Several bank employees provided financial literacy training for a community development corporation that supported affordable housing for low- and moderate-income residents in blighted areas of Broward and Miami-Dade Counties.

**ORLANDO, FL MSA ASSESSMENT AREA
(Full-Scope Review)**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ORLANDO, FL
MSA ASSESSMENT AREA**

The Orlando MSA assessment area consists of all four counties in the MSA. The bank operates 33, or 12.6 percent, of its Florida branch offices in the Orlando MSA assessment area. The assessment area represents 9.7 percent of the rated area loans and 11.8 percent of the rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Orlando MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	390	3.6	29.7	35.9	30.3	0.5
Population by Geography	2,277,816	2.5	28.2	36.9	32.4	0.0
Housing Units by Geography	964,253	2.7	28.0	38.6	30.7	0.0
Owner-Occupied Units by Geography	487,196	1.0	21.1	39.1	38.8	0.0
Occupied Rental Units by Geography	310,972	5.2	37.9	35.6	21.4	0.0
Vacant Units by Geography	166,085	2.9	29.7	43.1	24.3	0.0
Businesses by Geography	260,268	1.5	25.1	34.5	38.9	0.0
Farms by Geography	6,480	1.1	23.5	40.7	34.5	0.1
Family Distribution by Income Level	532,416	21.5	18.1	19.2	41.2	0.0
Household Distribution by Income Level	798,168	23.0	16.9	18.4	41.7	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Median Housing Value			\$162,453
			Median Gross Rent			\$1,056
			Families Below Poverty Level			12.4%

*Source: 2015 ACS Census and 2018 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.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, at 2.7 percent, the unemployment rate in the Orlando MSA was below the state average, and below the national average, for all years under review.

In 2019, according to Moody's Analytics, the top industries were leisure and hospitality services, professional and business services, and education and health services. The top employers were Walt Disney World Resort, Universal Orlando, Adventist Health System, Publix Super Markets, and Orlando International Airport.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 45 FDIC-insured institutions operated 522 branches within this area. Of these institutions, the bank ranked 5th in total deposits with a market share of 3.9 percent. Competitor institutions included Bank of America, N.A., SunTrust Bank, and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 39.6 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ORLANDO, FL MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Orlando MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for the assessment area. Small business loans received more weight than home mortgage loans when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. Performance in moderate-income census tracts was above both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, when families below the poverty level are considered, but consistent with aggregate lending data. Lending to moderate-income borrowers was well below both demographic and aggregate lending data. However, in 2017, lending to moderate-income borrowers was only slightly below aggregate lending data. Further, in 2019, lending to moderate-income borrowers doubled from the previous year, and was only slightly below the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 76.4 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data. Of note, in 2019, the bank's performance declined to 69.3 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased.

Community Development Lending

Truist Bank is a leader in making community development loans in the Orlando MSA assessment area. The bank originated 29 community development loans totaling \$118.4 million. This amount represents 11.5 percent by number and 9.9 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 6 loans supported affordable housing, 3 loans supported community services, 13 loans supported economic development, and 7 loans supported revitalization or stabilization. Community development loans include a \$6.4 million loan to develop a retail shopping center in a moderate-income area. The shopping center will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$1.2 million loan to refinance a 194-unit apartment complex that provides affordable housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$25.9 million, or 1.5 percent, of bank-wide community development investments that is similar to the percent of deposits, 1.3, and branches, 1.9. Most of the CRA investments, \$25.3 million, went towards affordable housing. Investments also included grants totaling \$580,000. Examples are provided below.

- Invested \$9.1 million in an affordable housing development that is targeted toward providing housing to the previously homeless. This is the first project of its kind in the area, and 50 percent of the units will be leased to individuals and families who are ready to move into permanent housing.
- Invested \$7.9 million to construct a new affordable housing apartment complex with 102 units in a low-income area.
- Provided grants totaling \$225,000 to support the bank's student Homelessness Outreach Initiative that focuses on supporting long-term solutions for housing for identified students and their families.
- Provided \$25,000 in grants to a microfinance organization that specializes in working with small business owners who need flexible financing alternatives due to business type, length of time in business, or credit history.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include small business development, homelessness, disaster recovery, and financial education. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex and innovative investments to support community development initiatives. The bank's use of housing tax credits fills funding gaps for affordable housing projects that normally would not qualify for conventional financing. The bank made two significant investments in new developments in new areas to serve the homeless and very low-income people. In addition, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is slightly below the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 21 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank's branch distribution by tract income level for the Orlando MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	56,831	2.5	14	3.6
Moderate	11	33.3	642,140	28.2	116	29.7
Middle	11	33.3	841,059	36.9	140	35.9
Upper	11	33.4	737,336	32.4	118	30.3
NA	0	0.0	450	0.0	2	0.5
Total	33	100.0	2,277,816	100.0	390	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed six branches, including two each in moderate-income, middle-income, and upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Florida.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 165 community development services. This performance represents 13.7 percent of all activities in the state, which is consistent with the assessment area's share of statewide branches at 12.6 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were financial literacy classes for low- and moderate-income individuals or providing technical assistance to small businesses. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an organization whose mission is to attract, retain, and facilitate the expansion of businesses and create local job opportunities.
- Five bank employees provided a homeownership class to approximately 100 individuals that attended a minority women's organization event where the average income of attendees was only 30 percent of area median income.
- Two bank employees provided multiple financial education classes for the clients of a nonprofit organization whose mission is to assist low-income individuals and families through programs that assist clients gain or retain employment.

WEST PALM BEACH, FL MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WEST PALM
BEACH, FL MD ASSESSMENT AREA

The West Palm Beach MD assessment area consists of Palm Beach County, which comprises the entire MD. The bank operates 23, or 8.8 percent, of its Florida branch offices in the West Palm Beach MD assessment area. The assessment area represents 7.8 percent of the rated area loans and 9.4 percent of the rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: West Palm Beach MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	338	7.7	27.8	27.2	34.0	3.3
Population by Geography	1,378,806	7.3	27.5	30.9	33.9	0.4
Housing Units by Geography	671,317	6.0	27.5	30.4	35.8	0.3
Owner-Occupied Units by Geography	369,521	3.1	23.3	32.7	40.6	0.2
Occupied Rental Units by Geography	165,084	12.3	35.9	29.8	21.7	0.4
Vacant Units by Geography	136,712	6.0	28.7	25.0	39.9	0.4
Businesses by Geography	191,350	5.2	20.7	29.6	43.8	0.7
Farms by Geography	4,301	5.7	21.3	33.0	39.6	0.4
Family Distribution by Income Level	332,725	22.8	17.3	17.8	42.1	0.0
Household Distribution by Income Level	534,605	24.5	16.1	16.9	42.5	0.0
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Delray Beach, FL MD		\$65,914	Median Housing Value			\$230,203
			Median Gross Rent			\$1,229
			Families Below Poverty Level			10.5%

Source: 2015 ACS Census and 2018 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.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, at 3.1 percent, the unemployment rate in the West Palm Beach MD was slightly above the state average. In 2017, the assessment area unemployment rate was consistent with the national average and slightly below the national average in 2018 and 2019.

In 2019, according to Moody's Analytics, the top industries were professional and business services, education and health services, and leisure and hospitality services. The top employers were Publix Super Markets, Tenet Healthcare Corp., NextEra Energy, Comcast, and Hospital Corp. of America.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 52 FDIC-insured institutions operated 432 branches within this area. Of these institutions, the bank ranked 9th in total deposits with a market share of 3.2 percent. Competitor institutions included Bank of America, N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 40.1 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WEST PALM BEACH, FL MD ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the West Palm Beach MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for the assessment area. Small business loans received more weight than home mortgage loans when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. Performance in moderate-income census tracts was above both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data. Of note, in 2017 and 2019, performance in moderate-income census tracts was above the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, when families below the poverty level are considered, but consistent with the aggregate lending data. Lending to moderate-income borrowers was well below both demographic and aggregate lending data. However, in 2019, lending to moderate-income borrowers nearly doubled from the previous year and was only slightly below demographic data.

The borrower distribution of small business loans reflects good penetration to business customers of different sizes. The bank originated 79.6 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data but significantly above aggregate lending data. Of note, bank performance declined to 72.4 percent in 2019, when the percent of businesses with gross annual revenues of \$1.0 million or less increased.

Community Development Lending

Truist Bank is a leader in making community development loans in the West Palm Beach MD assessment area. The bank originated 25 community development loans totaling \$134.5 million. This amount represents 9.9 percent by number and 11.3 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 5 loans supported affordable housing, 1 loan supported community services, 9 loans supported economic development, and 10 loans supported revitalization or stabilization. Community development loans include a \$22.7 million loan to develop a hotel in a moderate-income area. The hotel will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded an \$8.8 million loan to a community redevelopment agency for the acquisition and renovation of existing properties into affordable housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$28.3 million, or 1.6 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.0, and branches, 1.3. Most of the CRA investments, \$18.7 million, went towards affordable housing. Investments also included grants totaling \$291,000. Examples are provided below.

- Invested \$9.2 million in tax credit funding for a new 110-unit affordable housing apartment complex.
- Invested \$9.4 million in a SBIC investment fund benefitting the assessment area.
- Provided \$30,000 in grants to a nonprofit affordable housing developer that provides a comprehensive level of services to low- and moderate-income families including financial literacy, budgeting, and homeownership training, access to down payment assistance, and mortgage products.
- Provided a \$10,000 grant to a small business incubator that assists emerging entrepreneurs with training, market information, technology, and access to financing. This organization's mission includes serving primarily low- and moderate-income persons.
- Provided \$5,000 in donations to a financial literacy organization with a mission of helping low- and moderate-income families gain control over their finances.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include small business development, homelessness, disaster recovery, and financial education. The bank responded to most of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides an adequate level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is below the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and eight branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank's branch distribution by tract income level for the West Palm Beach MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	100,650	7.3	26	7.7
Moderate	8	34.8	378,752	27.5	94	27.8
Middle	8	34.8	425,691	30.9	92	27.2
Upper	7	30.4	467,838	33.9	115	34.0
NA	0	0.0	5,875	0.4	11	3.3
Total	23	100.0	1,378,806	100.0	338	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 1 branch in a middle-income census tract. Further, the bank closed 10 branches, including 4 branches in middle-income census tracts and 5 branches in upper-income census tracts, as well as 1 branch in a census tract without an income designation.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Florida.

Community Development Services

Truist provides an adequate level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 55 community development services. This performance represents 4.6 percent of all activities in the state, which is below the assessment area's share of statewide branches at 8.8 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were financial literacy classes for low- and moderate-income individuals.

The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a community development corporation with a mission to revitalize low- and moderate-income areas in Riviera Beach. The community development corporation operates within the redevelopment area of Riviera Beach and acquires, rehabilitates, and manages affordable housing units.
- A bank employee serves on the Board of an organization whose mission is to attract, retain, and facilitate the expansion of businesses and create local job opportunities.

- A bank employee serves on the Board of a nonprofit organization that collaborates with other local non-profit organizations to provide community development services that benefit low- and moderate-income individuals.

**OTHER FLORIDA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the 17 Florida assessment areas 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
North Port MSA	Consistent	Consistent	Consistent
Jacksonville MSA	Consistent	Consistent	Consistent
Cape Coral MSA	Consistent	Below	Consistent
Palm Bay MSA	Consistent	Consistent	Consistent
Port St. Lucie MSA	Consistent	Below	Consistent
Deltona MSA	Consistent	Consistent	Consistent
Lakeland MSA	Consistent	Consistent	Consistent
Tallahassee MSA	Consistent	Below	Below
Ocala MSA	Consistent	Below	Below
Naples MSA	Consistent	Consistent	Consistent
Pensacola MSA	Consistent	Consistent	Below
Crestview MSA	Consistent	Consistent	Below
Punta Gorda MSA	Consistent	Consistent	Consistent
Homosassa Springs MSA	Consistent	Consistent	Consistent
Non-MSA FL	Consistent	Consistent	Consistent
The Villages MSA	Consistent	Consistent	Below
Panama City MSA	Consistent	Consistent	Below

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

North Port MSA Assessment Area

The North Port MSA assessment area consists of Manatee and Sarasota Counties. Truist operates 16 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	3,206	\$100.6 million
Home Mortgage Loans	1,896	\$533.2 million
Small Farm Loans	2	\$90.0 thousand
Community Development Loans	13	\$41.3 million
Investments (New)	3	\$19.2 million
Investments (Prior Period)	0	\$0
Donations	8	\$37.8 thousand
CD Services	81	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the North Port MSA assessment area are in Appendix D.

Jacksonville MSA Assessment Area

The Jacksonville MSA assessment area consists of Baker, Clay, Duval, Nassau, and St. Johns Counties. Truist operates 13 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,751	\$117.1 million
Home Mortgage Loans	1,843	\$637.0 million
Small Farm Loans	0	\$0
Community Development Loans	26	\$124.7 million
Investments (New)	2	\$12.4 million
Investments (Prior Period)	0	\$0
Donations	20	\$158.7 thousand
CD Services	54	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Jacksonville MSA assessment area are in Appendix D.

Cape Coral MSA Assessment Area

The Cape Coral MSA assessment area consists of Lee County. Truist operates 16 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,981	\$67.3 million
Home Mortgage Loans	1,025	\$218.9 million
Small Farm Loans	1	\$47.0 thousand
Community Development Loans	11	\$7.4 million
Investments (New)	4	\$4.7 million
Investments (Prior Period)	0	\$0
Donations	8	\$25.9 thousand
CD Services	87	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Cape Coral MSA assessment area are in Appendix D.

Palm Bay MSA Assessment Area

The Palm Bay MSA assessment area consists of Brevard County. Truist operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,442	\$88.2 million
Home Mortgage Loans	1,315	\$350.2 million
Small Farm Loans	1	\$117.0 thousand
Community Development Loans	8	\$25.5 million
Investments (New)	7	\$13.5 million
Investments (Prior Period)	0	\$0
Donations	24	\$215.5 thousand
CD Services	28	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Palm Bay MSA assessment area are in Appendix D.

Port St. Lucie MSA Assessment Area

The Port St. Lucie MSA assessment area consists of Martin and St. Lucie Counties. Truist operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,336	\$36.6 million
Home Mortgage Loans	804	\$137.4 million
Small Farm Loans	1	\$25.0 thousand
Community Development Loans	2	\$3.3 million
Investments (New)	2	\$1 million
Investments (Prior Period)	0	\$0
Donations	16	\$63 thousand
CD Services	38	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Port St. Lucie MSA assessment area are in Appendix D.

Deltona MSA Assessment Area

The Deltona MSA assessment area consists of Flagler and Volusia Counties. Truist operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,192	\$43.4 million
Home Mortgage Loans	868	\$218.7 million
Small Farm Loans	0	\$0
Community Development Loans	7	\$30.0
Investments (New)	5	\$6.9 million
Investments (Prior Period)	0	\$0
Donations	17	\$42.5 thousand
CD Services	28	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Deltona MSA assessment area are in Appendix D.

Lakeland MSA Assessment Area

The Lakeland MSA assessment area consists of Polk County. Truist operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,108	\$29.2 million
Home Mortgage Loans	600	\$127.2 million
Small Farm Loans	1	\$80.0 thousand
Community Development Loans	7	\$16.6 million
Investments (New)	4	\$5.3 million
Investments (Prior Period)	0	\$0
Donations	7	\$36.9 thousand
CD Services	30	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Lakeland MSA assessment area are in Appendix D.

Tallahassee MSA Assessment Area

The Tallahassee MSA assessment area consists of Gadsden, Jefferson, Leon, and Wakulla Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	473	\$30.2 million
Home Mortgage Loans	883	\$159.7 million
Small Farm Loans	2	\$290.0 thousand
Community Development Loans	5	\$34.5 million
Investments (New)	4	\$1.3 million
Investments (Prior Period)	0	\$0
Donations	7	\$20 thousand
CD Services	8	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Tallahassee MSA assessment area are in Appendix D.

Ocala MSA Assessment Area

The Ocala MSA assessment area consists of Marion County. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	657	\$26.2 million
Home Mortgage Loans	612	\$95.9 million
Small Farm Loans	2	\$152.0 thousand
Community Development Loans	0	\$0
Investments (New)	2	\$400 thousand
Investments (Prior Period)	0	\$0
Donations	6	\$13 thousand
CD Services	13	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Ocala MSA assessment area are in Appendix D.

Naples MSA Assessment Area

The Naples MSA assessment area consists of Collier County. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	891	\$33.4 million
Home Mortgage Loans	406	\$142.7 million
Small Farm Loans	0	\$0
Community Development Loans	2	\$2.7 million
Investments (New)	3	\$1.2 million
Investments (Prior Period)	0	\$0
Donations	6	\$29.5 thousand
CD Services	41	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Naples MSA assessment area are in Appendix D.

Pensacola MSA Assessment Area

The Pensacola MSA assessment area consists of Escambia and Santa Rosa Counties. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	416	\$21.9 million
Home Mortgage Loans	603	\$149.9 million
Small Farm Loans	11	\$1.6 million
Community Development Loans	2	\$11.6 million
Investments (New)	2	\$1.1 million
Investments (Prior Period)	0	\$0
Donations	0	\$0
CD Services	5	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Pensacola MSA assessment area are in Appendix D.

Crestview MSA Assessment Area

The Crestview MSA assessment area consists of Okaloosa and Walton Counties. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	290	\$10.4 million
Home Mortgage Loans	642	\$299.9 million
Small Farm Loans	1	\$25.0 thousand
Community Development Loans	1	\$1.3 million
Investments (New)	2	\$2 million
Investments (Prior Period)	0	\$0
Donations	1	\$2 thousand
CD Services	0	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Crestview MSA assessment area are in Appendix D.

Punta Gorda MSA Assessment Area

The Punta Gorda MSA assessment area consists of Charlotte County. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	421	\$11.7 million
Home Mortgage Loans	379	\$68.8 million
Small Farm Loans	1	\$55.0 thousand
Community Development Loans	3	\$11.5 million]
Investments (New)	1	\$2.2 million
Investments (Prior Period)	0	\$0
Donations	2	\$4.7 thousand
CD Services	9	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Punta Gorda MSA assessment area are in Appendix D.

Homosassa Springs MSA Assessment Area

The Homosassa Springs MSA assessment area consists of Citrus County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	274	\$8.2 million
Home Mortgage Loans	453	\$96.8 million
Small Farm Loans	0	\$0
Community Development Loans	1	\$200 thousand
Investments (New)	1	\$150 thousand
Investments (Prior Period)	0	\$0
Donations	5	\$13 thousand
CD Services	7	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Homosassa Springs MSA assessment area are in Appendix D.

Florida Non-MSA Assessment Area

The Florida Non-MSA assessment area consists of Monroe County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	472	\$35.1 million
Home Mortgage Loans	224	\$112.5 million
Small Farm Loans	0	\$0
Community Development Loans	10	\$55.7 million
Investments (New)	2	\$512.6 thousand
Investments (Prior Period)	0	\$0
Donations	6	\$10.5 thousand
CD Services	15	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Florida Non-MSA assessment area are in Appendix D.

The Villages MSA Assessment Area

The Villages MSA assessment area consists of Sumter County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	236	\$6.3 million
Home Mortgage Loans	347	\$63.2 million
Small Farm Loans	1	\$155.0 thousand
Community Development Loans	2	\$16.7 million
Investments (New)	2	\$200 thousand
Investments (Prior Period)	0	\$0
Donations	0	\$0
CD Services	9	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for The Villages MSA assessment area are in Appendix D.

Panama City MSA Assessment Area

The Panama City MSA assessment area consists of Bay and Gulf Counties. Truist operates two branches in this assessment area. Due to OMB changes, in 2019, Gulf County was removed from the Panama City MSA. As a result, the number of census tracts decreased by 4 tracts: 2 middle-income, 1 upper-income, and 1 no available income. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	232	\$13.7 million
Home Mortgage Loans	210	\$49.3 million
Small Farm Loans	0	\$0
Community Development Loans	4	\$13.0 million
Investments (New)	1	\$250 thousand
Investments (Prior Period)	0	\$0
Donations	0	\$0
CD Services	6	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Panama City MSA assessment area are in Appendix D.

VIRGINIA

CRA RATING FOR VIRGINIA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA

The bank operates 180, or 10.3 percent, of its total branch offices in Virginia. Virginia accounts for 8.1 percent of the bank-wide deposits. Overall, Truist ranks 6th in the state in deposit market share at 6.9 percent. Competitor institutions in the Virginia assessment areas include Capital One Bank (USA), N.A., E*TRADE Bank, and Wells Fargo Bank, N.A.

SCOPE OF EVALUATION – VIRGINIA

The evaluation of the Virginia performance considered the operations of Truist in 10 assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Virginia Beach-Norfolk-Newport News (Virginia Beach) MSA, Richmond MSA, and the Virginia Non-MSA assessment areas. Limited scope areas included the Charlottesville, Lynchburg, Roanoke, Winchester, Harrisonburg, Blacksburg-Christiansburg-Radford (Blacksburg) and Staunton-Waynesboro (Staunton) MSA assessment areas. More weight was given to small business loans than home mortgage loans when considering the number and dollar volume of these products in the state. Based on the number of loans, small farm loans were only reviewed in the Virginia Non-MSA assessment area. As a result, small farm loans were given the least weight.

CONCLUSIONS ON PERFORMANCE CRITERIA IN VIRGINIA

LENDING TEST

The Lending Test rating for Virginia is High Satisfactory. The bank's lending levels reflect good responsiveness to the Virginia assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Virginia assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA, CRA, and Farm loans in 2018 for each Virginia assessment area. Examiners based conclusions primarily on the performance in the Virginia Beach and Richmond MSAs and the Virginia Non-MSA assessment areas. Performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment areas. The geographic distribution of small business loans also reflects good penetration throughout the assessment areas. Good performance in each of the full-scope assessment areas supports this conclusion. The geographic distribution of small farm loans reflects excellent penetration based solely on performance in the Virginia Non-MSA assessment area.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans is good among borrowers of different income levels. The borrower distribution of small business loans is also good among business customers of different sizes. Good performance in each of the full-scope assessment areas supports this conclusion. The borrower distribution of farm loans is good among farm customers of different sizes based solely on performance in the Virginia Non-MSA assessment area.

Community Development Loans

Truist is a leader in making community development loans in Virginia. During the evaluation period, the bank originated 133 community development loans totaling \$467.9 million. This performance represents 7.5 percent, by number, and 7.4 percent, by dollar volume, of total bank-wide community development loans. The percent of community development loans by number and dollar volume in the state is above the bank's lending levels in Virginia at 7.0 percent. The bank's community development lending in Virginia has increased since the previous evaluation, when the bank originated 111 community development loans totaling \$366.3 million.

Since the previous evaluation, Truist Bank has originated 4 loans totaling \$3.8 million, outside of the assessment areas, but within Virginia. Since the bank has been responsive to community development needs and opportunities within its assessment areas, examiners included these loans in the overall analysis. The analysis for each full-scope Virginia assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in Virginia. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position. The bank's performance was excellent in each of the three full-scope assessment areas. Performance among the limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified investments totaled \$177.1 million, or 9.9 percent, of bank-wide community development investments that exceeds the percent of deposits, 8.1, and is similar to the percent of branches, 10.3, in the state. By number of investments, the bank had 497 in Virginia, or 8.3 percent of all investments. The bank’s investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$1.8 million.

Qualified Investments – Virginia										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Virginia Beach MSA	16	44,483	59	161	8	1,502	0	0	83	46,146
Richmond MSA	35	43,588	93	253	19	146	7	86	154	44,073
Non-MSA VA	16	34,460	62	133	10	8,697	0	0	88	43,290
Limited Scope Areas	35	41,906	101	184	12	871	1	10	149	42,971
Statewide	12	197	2	103	3	303	1	25	18	628
Regional	1	3	4	5	0	0	0	0	5	8
Total	115	164,637	321	839	52	11,519	9	121	497	177,116

Source: Bank Records

On a statewide level, the bank provided \$378,000 in donations to organizations with a purpose consistent with the CRA definition of community development. As one example of donations, the bank provided a \$119,000 grant to cover the cost of bringing affordable housing training to Virginia. The training program covered the development process, financial analysis techniques, and structuring and negotiating skills needed to successfully develop and finance affordable home ownership and rental housing development. The training attracted approximately 60 participants from across Virginia including representatives from state government, the Virginia Housing Development Authority, nonprofit organizations, city and county governments and redevelopment authorities, and educational institutions. In addition, the bank purchased a \$250,000 certificate of deposit in a CDFI serving the State of Virginia. Additional examples of the bank’s CRA investments in Virginia are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing, and other needs are small business development, capacity building for community based organizations, rural development and support, and financial education. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. Researchers at Virginia Tech University found that affordable housing is an issue throughout Virginia. Small business development resources are needed as 90 percent of Virginia’s businesses are categorized as small businesses according to the SBA. Community based organizations provide much needed resources for low- and moderate-income people, and there is a need for donations and technical, professional, and leadership training to help ensure the organizations can carry out their stated missions.

With the decline in agricultural and manufacturing employment, the socioeconomic differences between rural and urban Virginia continues to increase. According to a United Way report, more than 39 percent of households are facing financial hardship as they earn more than the poverty level, but less than the basic cost of living. Financial education is needed to help more households reach financial stability. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for Virginia is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 180 branches in Virginia, which represents 10.3 percent of bank-wide branches. The branch distribution in low-income geographies is below the population in low-income census tracts. The branch distribution in moderate-income census tracts is slightly higher than the percent of the population in moderate-income census tracts. The bank also offers an array of alternative delivery systems for its customers. This includes 40 branches serving as multicultural banking centers. The below table reflects the bank’s branch distribution by tract income level in Virginia.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	1.7	242,741	4.8	76	6.3
Moderate	43	23.9	1,095,267	21.6	274	22.8
Middle	96	53.3	2,363,536	46.6	542	45.0
Upper	36	20.0	1,336,517	26.3	279	23.2
NA	2	1.1	35,018	0.7	33	2.7
Total	180	100.0	5,073,079	100.0	1,204*	100.0

Source: 2015 ACS Data & Bank Records
** Difference from total number of Virginia census tracts on Page 6 (1,209) results from the increase of 7 census tracts in the Virginia Beach MSA assessment area (Southampton County and Franklin City were added) and decreases of 5 census tracts in the Richmond MSA assessment area (Caroline County was removed and King and Queen County was added), 4 census tracts in the Charlottesville MSA assessment area (Buckingham County was removed), and 3 census tracts in the Blacksburg MSA assessment area (Floyd County was removed).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches in Virginia.

However, the bank closed 38 branches that resulted in closing 3 branches in moderate-income, 23 in middle-income, and 12 in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Virginia. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 891 community development services since the last evaluation. This performance represents 10.7 percent of bank-wide activities, which is consistent with the statewide share of branches at 10.3 percent. The types of services provided reflect good responsiveness to the rated area needs. In Virginia, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

The bank demonstrated the strongest performance in the full-scope Virginia Beach and Richmond MSA assessment areas. Performance in the limited-scope assessment areas was consistent with the bank's performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following community development services benefited multiple assessment areas in the state:

- A bank employee serves on the Board for a statewide nonprofit organization that partners with public and private organizations to address affordable housing needs for low- and moderate-income individuals and families throughout the state.
- A bank employee serves as the President of a statewide nonprofit organization whose primary mission is to help develop women-owned small businesses through grants and technical assistance.
- A bank employee serves on the Financial Opportunity Center Advisory Committee for a statewide nonprofit organization, whose primary mission is to build the capacity for rural nonprofit organizations serving low- and moderate-income individuals and families.

Refer to the Community Development Services section in each assessment area for examples. The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Virginia Beach MSA	51	87	32	2	172
Richmond MSA	58	99	20	0	177
Virginia Non-MSA	6	165	36	0	207
Charlottesville MSA	0	29	10	0	39
Lynchburg MSA	0	71	10	0	81
Roanoke MSA	28	78	3	0	109
Winchester MSA	2	19	11	0	32
Harrisonburg MSA	2	17	9	0	28
Blacksburg MSA	6	12	1	0	19
Staunton MSA	0	20	0	0	20
Statewide Activities	1	3	1	2	7
Total	154	600	133	4	891
<i>Source: Bank Records</i>					

VIRGINIA BEACH, VA MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE VIRGINIA
BEACH, VA MSA ASSESSMENT AREA

The Virginia Beach MSA assessment area consists of all 14 counties and independent cities in the MSA. The bank operates 41, or 22.8 percent, of its Virginia branch offices in the assessment area. The assessment area represents 28.4 percent of the rated area loans and 23.9 percent of rated area deposits. Due to OMB changes, in 2019, Southampton County and Franklin City were added to the bank's assessment area. These changes resulted in a net increase of 7 census tracts: low-income tracts decreased by 1; moderate-income tracts increased by 1; middle-income tracts increased by 2; upper-income tracts increased by 4; and tracts with no income available increased by 1.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate-, middle-, and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Virginia Beach MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	411	7.8	27.0	35.3	27.0	2.9
Population by Geography	1,670,662	6.1	26.7	35.8	31.1	0.3
Housing Units by Geography	681,382	6.2	26.6	36.3	30.5	0.4
Owner-Occupied Units by Geography	377,595	2.8	18.1	39.3	39.7	0.2
Occupied Rental Units by Geography	240,002	10.8	39.4	32.2	17.2	0.5
Vacant Units by Geography	63,785	8.8	29.4	34.0	26.8	1.0
Businesses by Geography	106,277	4.2	22.7	37.0	34.8	1.3
Farms by Geography	2,736	2.3	15.5	39.9	41.9	0.4
Family Distribution by Income Level	415,072	21.4	17.6	20.3	40.8	0.0
Household Distribution by Income Level	617,597	22.8	16.7	19.0	41.4	0.0
Median Family Income MSA - 47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA		\$70,501	Median Housing Value			\$237,250
			Median Gross Rent			\$1,097
			Families Below Poverty Level			9.5%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

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

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates for this assessment area decreased. As of December 31, 2019, at 3.1 percent, the unemployment rate in the Virginia Beach MSA was above the state average, but below the national average.

In 2019, according to Moody's Analytics, the top industries were government, professional and business services, and education and health services. The top employers were Huntington Ingalls Industries Inc., Sentara Healthcare, Walmart, Riverside Regional Medical Center, and Food Lion.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 24 FDIC-insured institutions operated 307 branches within this area. Of these institutions, the bank ranked 4th in total deposits with a market share of 12.4 percent. Competitor institutions in the Virginia Beach MSA assessment area included Towne Bank, Wells Fargo Bank, N.A., and Bank of America, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.0 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE VIRGINIA BEACH, VA MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Virginia Beach MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans were given more weight than home mortgage loans based on the number and dollar volume of these products.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Bank performance in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic and aggregate lending data. In 2017, performance in moderate-income census tracts was consistent with demographic and aggregate lending data and consistent with demographic data in 2019.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was slightly below the percent of low-income families, when families below the poverty level are considered, but above the aggregate lending data. Lending to moderate-income borrowers was consistent with both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 82.2 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was consistent with demographic data and significantly above aggregate lending data. However, the bank's performance declined to 61.4 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased slightly.

Community Development Lending

Truist is a leader in making community development loans in the Virginia Beach MSA assessment area. The bank originated 37 community development loans totaling \$136.7 million. This amount represents 27.8 percent, by number, and 29.2 percent, by dollar volume, of total community development loans originated in Virginia. Regarding the community development purpose, 24 loans supported affordable housing, 7 loans supported community services, 2 loans supported economic development, and 4 loans supported revitalization or stabilization. Community development loans include a \$15.1 million loan to purchase a 139-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also funded a \$1.5 million loan to build a manufacturing facility in a low-income area. The facility will help revitalize the area and provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$46.1 million, or 2.6 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.9, and branches, 2.3. Most of the CRA investments, \$44.5 million, went towards affordable housing. Investments also included grants totaling \$206,000. Examples are provided below.

- Invested \$15.2 million in a bond to finance the purchase and renovation of 274 units of affordable housing.
- Invested \$1.5 million in a SBA bond to help fund loans to small businesses that are unable to obtain financing in the private credit marketplace.
- Donated \$70,000 to an organization that provides permanent supportive housing to the homeless, especially the chronically homeless, medically vulnerable, and mentally ill individuals.
- Provided \$9,000 in donations to a HUD approved housing counseling agency.
- Provided \$10,000 to an affordable housing community organization to cover the costs of a training conference.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include small business development, homelessness, capacity building for community based organizations, and financial education. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution's assessment area. To illustrate, the percent of branches in low- and moderate-income census tracts is consistent with the population demographics. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes 11 branches serving as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Virginia Beach MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	2	4.9	98,811	5.8	31	7.4
Moderate	10	24.4	450,158	26.5	112	26.8
Middle	15	36.6	605,901	35.7	147	35.2
Upper	13	31.7	536,668	31.6	115	27.5
NA	1	2.4	5,991	0.4	13	3.1
Total	41	100.0	1,697,529	100.0	418*	100.0

Source: 2015 ACS Data & Bank Records

**Difference from the total number of census tracts on Page 121 (411) results from the increase of 7 census tracts in this assessment area (Southampton County and Franklin City were added).*

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches and closed four branches in middle-income census tracts and three branches in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Virginia.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 172 community development services. This performance represents 19.3 percent of all activities in the state, which was below the assessment area’s share of statewide branches at 22.8 percent. However, the types of services provided reflect good responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a nonprofit organization that provides financial assistance to low- and moderate-income individuals and families.
- A bank employee serves on the Board of a nonprofit organization that collaborates with other local nonprofit organizations within the assessment area to provide community development services that benefit low- and moderate-income individuals and families.
- A bank employee serves on the Board of a nonprofit organization, under the federally funded Workforce Innovation Opportunity Act, that collaborates with a network of other agencies to assist low- and moderate-income individuals and families in areas such as adult education, literacy, job training, and job placement.

RICHMOND, VA MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RICHMOND,
VA MSA ASSESSMENT AREA

The Richmond MSA assessment area consists of all 17 counties and independent cities within the MSA. The bank operates 35, or 19.4 percent, of its Virginia branch offices in the Richmond MSA assessment area. The assessment area represents 29.0 percent of the rated area loans and 23.5 percent of rated area deposits. In 2019, Caroline County was removed from the assessment area due to OMB changes, and King and Queen County was added, which resulted in a net decrease of 5 census tracts: moderate-income tracts increased by 1 and middle-income tracts decreased by 6.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Richmond MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	295	12.2	23.7	35.6	26.4	2.0
Population by Geography	1,246,215	8.7	21.5	39.3	29.8	0.7
Housing Units by Geography	514,906	9.5	22.8	38.7	28.6	0.4
Owner-Occupied Units by Geography	308,241	4.4	16.9	43.4	35.1	0.2
Occupied Rental Units by Geography	160,407	17.4	31.8	31.4	19.0	0.5
Vacant Units by Geography	46,258	16.4	30.3	33.0	19.2	1.1
Businesses by Geography	91,805	5.9	21.2	36.1	36.2	0.6
Farms by Geography	2,616	1.9	14.3	49.4	34.3	0.1
Family Distribution by Income Level	304,729	21.1	18.0	20.1	40.8	0.0
Household Distribution by Income Level	468,648	23.3	16.7	18.2	41.7	0.0
Median Family Income MSA - 40060 Richmond, VA MSA		\$75,126	Median Housing Value			\$219,517
			Median Gross Rent			\$986
			Families Below Poverty Level			8.8%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment rates for this assessment area decreased. In 2017 and 2018, the unemployment rates in the Richmond MSA were slightly above the state average, but below the national average. This trend continued and as of December 31, 2019, at 2.9 percent, the unemployment rate in the Richmond MSA was again slightly above the state average, but below the national average.

In 2019, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were Capital One Financial Corp., Fort Lee, VCU Health System, HCA Inc., and Bon Secours Richmond Health System.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 16 FDIC-insured institutions operated 49 branches within this area. Of these institutions, the bank ranked 5th in total deposits with a market share of 3.6 percent. Competitor institutions in the Richmond MSA assessment area included Bank of America, N.A.; Wells Fargo Bank, N.A., and Atlantic Union Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 39.1 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE RICHMOND, VA MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Richmond MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans were given slightly more weight than home mortgage loans based on the number and dollar volume of these products.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the aggregate lending data and demographic data, when families below the poverty level are considered. Lending to moderate-income borrowers was consistent with demographic data, but slightly below aggregate lending data. However, the bank's performance to low- and moderate-income borrowers in 2017 was below both aggregate lending and demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 72.7 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data.

Community Development Lending

Truist is a leader in making community development loans in the Richmond MSA assessment area. The bank originated 27 community development loans totaling \$170.7 million. This amount represents 20.3 percent, by number, and 36.5 percent, by dollar volume, of total community development loans originated in Virginia. Regarding the community development purpose, 19 loans supported affordable housing, 5 loans supported community services, and 3 loans supported economic development. Community development loans include a \$6.6 million loan to an economic development authority to expand an education center. The center provides life skills and employment programs for disadvantaged individuals. The bank also funded a \$6.0 million loan to build a 60-unit LIHTC apartment complex in a low-income census tract.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$44.1 million, or 2.5 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.9, and branches, 2.0. Most of the CRA investments, \$43.6 million, went towards affordable housing. Investments also included grants totaling \$668,000. Examples are provided below.

- Invested \$9.4 million in 2 affordable housing projects funded with tax credits and using the FHLB Affordable Housing Program (AHP) grant subsidies. This investment demonstrates leadership and complexity. Through the competitive AHP, member institutions partner with developers, community organizations, units of government, public housing authorities, and tribal governments to apply for annual grants to subsidize the acquisition, new construction, and/or rehabilitation of affordable rental or owner-occupied housing. AHP subsidy is provided as a forgivable grant from the FHLB through a member, to a project sponsor.

- Invested \$1 million in an SBIC providing small business loans in the assessment area.
- Invested \$4.1 million in a tax credit affordable housing project that will provide 80 units of permanent housing for the homeless. The \$19 million project was funded through a variety of sources including LIHTCs, loans from the Virginia Development Housing Authority, city grants, and private donors and foundations.
- Provided \$25,000 donation to an organization whose mission is to advance the financial capability and economic opportunities of the underbanked.
- Provided \$2,800 for lodging and tuition for a representative of a community development corporation to attend a nationally recognized training program for community development practitioners.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include small business development, homelessness, capacity building for community based organizations, and financial education. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are readily accessible to all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the institution's assessment area. To illustrate, the percent of branches in moderate-income census tracts is almost double the population demographics in the respective census tracts. However, the bank only had one branch in a low-income census tract, which is below the population demographics. In addition, the bank offers an array of alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the Richmond MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	2.9	108,417	8.9	36	12.4
Moderate	14	40.0	275,460	22.5	71	24.5
Middle	11	31.4	460,031	37.6	99	34.1
Upper	8	22.8	370,750	30.3	78	26.9
NA	1	2.9	9,314	0.7	6	2.1
Total	35	100.0	1,223,972	100.0	290*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from the total number of census tracts on Page 126 (295) results from the decrease of 5 census tracts in this assessment area (Caroline County was removed and King and Queen County was added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches, but closed one branch in a moderate-income, and two branches each in middle-income and upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Virginia.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the Richmond MSA assessment area participated in 177 community development services. This performance represents 19.9 percent of all activities in the state, which is consistent with the assessment area’s share of statewide branches at 19.4 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on a Board of a nonprofit organization that promotes women-owned small businesses through technical assistance and integrated support services.
- A bank employee serves on the Board of a nonprofit community service organization that assists homeless families with obtaining permanent rental housing as well as providing integrated support services, including employment training and budgeting assistance.
- A bank employee serves on the Board of a nonprofit organization that provides access to quality care and education for children of low- and moderate-income families who are unable to afford such services.

**VIRGINIA NON-MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE VIRGINIA
NON-MSA ASSESSMENT AREA**

The Virginia Non-MSA assessment area consists of the counties and independent cities of Accomack, Alleghany, Bath, Bland, Buena Vista City, Carroll, Charlotte, Covington City, Danville City, Dickenson, Emporia City, Franklin City, Galax City, Grayson, Halifax, Henry, King and Queen, King George, Lexington City, Louisa, Martinsville City, Mecklenburg, Middlesex, Northampton, Nottoway, Orange, Page, Patrick, Pittsylvania, Prince Edward, Russell, Shenandoah, Smyth, Tazewell, Westmoreland, Wise, and Wythe. The bank operates 50, or 27.8 percent, of its Virginia branch offices in the assessment area. The assessment area represents 13.5 percent of the rated area loans and 21.5 percent of rated area deposits. Due to OMB changes, in 2019, Franklin City and King and Queen County were removed, and Buckingham County was added to the bank's assessment area. As a result of these changes, middle-income census tracts increased by 2 and upper-income census tracts decreased by 2.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA VA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	221	0.5	18.6	61.1	15.8	4.1
Population by Geography	850,830	0.4	17.1	63.4	18.8	0.2
Housing Units by Geography	427,250	0.4	17.2	63.9	18.4	0.0
Owner-Occupied Units by Geography	244,195	0.2	16.2	64.2	19.3	0.0
Occupied Rental Units by Geography	96,610	0.9	21.4	62.4	15.3	0.0
Vacant Units by Geography	86,445	0.5	15.3	64.8	19.4	0.0
Businesses by Geography	44,773	0.2	14.2	63.7	21.7	0.2
Farms by Geography	3,078	0.0	9.3	70.4	20.3	0.0
Family Distribution by Income Level	225,893	21.3	17.9	20.1	40.7	0.0
Household Distribution by Income Level	340,805	24.8	16.3	17.1	41.8	0.0
Median Family Income Non-MSAs - VA	\$51,375		Median Housing Value			\$134,460
			Median Gross Rent			\$661
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment rates fluctuated for each county in this assessment area. As of December 31, 2019, the overall average unemployment rate for this assessment area is 3.6 percent. Bath and Shenandoah Counties recorded the lowest unemployment rates at 2.5 percent, and Danville City recorded the highest unemployment rate of 5.0 percent, as of December 31, 2019.

In 2019, according to D&B, the top industries were services, retail trade, and non-classifiable establishments. Information regarding top employers is not available.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 54 FDIC-insured institutions operated 320 branches within this area. Of these institutions, the bank ranked 1st in total deposits with a market share of 19.3 percent. Competitor institutions in the Virginia Non-MSA assessment area included Carter Bank & Trust, Wells Fargo N.A., and American National Bank and Trust Company.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.2 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE VIRGINIA NON-MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Virginia Non-MSA assessment area reflects adequate responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects an excellent distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect adequate responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans were given slightly more weight than home mortgage loans, and small farm loans were given the least weight based on the number and dollar volume of these products.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank did not originate any home mortgage loans in low-income census tracts. This was given little weight since less than one percent of owner-occupied housing units are located in those tracts and aggregate lending was below one percent. Performance in moderate-income census tracts was below the demographic data, but above the aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data, but was given little weight since less than one percent of businesses are located in those tracts. Small business lending in moderate-income census tracts was consistent with the demographic and aggregate lending data. Of note, the bank's 2017 performance in moderate-income census tracts was above the demographic and aggregate lending data.

The geographic distribution of small farm loans reflects excellent penetration throughout the assessment area. The bank did not make any small farm loans in low-income census tracts; however, there are no farms located in these tracts. The bank's performance in moderate-income census tracts was slightly above the demographic data and consistent with aggregate lending data. Of note, performance in moderate-income census tracts was above both demographic and aggregate lending data in 2017. In 2019, performance in moderate-income census tracts was significantly above the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the percent of low-income families, when families below the poverty level are considered, and slightly above the aggregate lending data. Lending to moderate-income borrowers was consistent with both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration to business customers of different sizes. In 2018, the bank originated 88.3 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was above the demographic data and significantly above the aggregate lending data. In 2017, the bank's performance was also significantly above aggregate lending data, but below the demographic data. However, the bank's performance declined to 65.6 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area remained relatively constant.

The borrower distribution of small farm loans reflects good penetration among small farm customers of different sizes. In 2018, the bank originated 72.0 percent of small farm loans to farmers with gross annual revenues of \$1 million or less. This performance was less than the demographic data, but significantly above the aggregate lending data.

Community Development Lending

Truist is a leader in making community development loans in the Virginia Non-MSA assessment area. The bank originated 30 community development loans totaling \$74.9 million.

This amount represents 22.6 percent, by number, and 16.0 percent, by dollar volume, of total community development loans originated in Virginia. Regarding the community development purpose, 7 loans supported affordable housing, 12 loans supported community services, 3 loans supported economic development, and 8 loans supported revitalization or stabilization. Community development loans include a \$5.0 million loan to a public broadband authority for the installation of fiber optic cables. The broadband authority will provide services to economically distressed areas. The bank also funded a \$1.1 million loan to an economic development authority for the renovation of an industrial facility. The facility will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$43.3 million, or 2.4 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.7, and is slightly below the percentage of branches, 2.9. Most of the CRA investments, \$34.5 million, went towards affordable housing. CRA qualified investments totaling \$8.7 million were for economic development purposes. Investments also included grants totaling \$253,000. Examples are provided below.

- Invested \$6.5 million in an affordable housing tax credit project to provide 51 units of housing for households earning 60 percent or less of the area median income. This project involved collaboration between the county, property owner, a local nonprofit organization, and the developer.
- Invested \$3.6 million in a New Market Tax Credit investment that provided gap financing for expansion of a meat production facility in a low-income area.
- Provided a \$100,000 grant to a community development organization that provides a range of services, including training, technical assistance, and financial support to address rural community development.
- Donated \$45,000 to an organization that provides professional development opportunities for professionals that support affordable housing and the homeless.
- Donated \$12,000 to a nonprofit organization that provides programs to combat poverty including financial literacy programs.
- Provided a \$10,000 grant to an economic development foundation that provides resources to entrepreneurs to start, run, and grow their business with a focus on rural communities.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other needs include rural economic development, small business development, homelessness, capacity building for community based organizations, and financial education. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. None of the bank’s investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. To illustrate, the percent of branches in moderate-income census tracts is slightly below the population demographics in the respective census tracts. However, several branches are located in tracts adjacent to moderate-income census tracts. The bank did not have any branches in low-income census tracts; however, less than one-half of one percent of the population resides in these census tracts. In addition, the bank offers an array of alternative delivery systems for its customers and three branches served as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Virginia Non-MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	3,744	0.4	1	0.4
Moderate	7	14.0	147,282	17.3	41	18.6
Middle	35	70.0	547,454	64.2	137	62.0
Upper	8	16.0	152,103	17.9	33	14.9
NA	0	0.0	1,752	0.2	9	4.1
Total	50	100.0	852,335	100.0	221	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches, but closed seven branches in middle-income census tracts and two branches in upper-income census tracts in the assessment area.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Virginia.

Community Development Services

Truist provides a relatively high level of community development services. During the evaluation period, bank records show that employees in the Virginia Non-MSA assessment area participated in 207 community development services. This performance represents 23.2 percent of all activities in the state, which is below the assessment area's share of statewide branches at 27.8 percent.

However, the types of services provided reflect good responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a nonprofit community service organization that assist low- and moderate-income individuals and families in areas such as financial stability, education, and health.
- Two bank employees provided financial education for the clients of a nonprofit organization whose mission is to assist low-income individuals and families in areas such as budgeting, basic banking skills, and homebuyer counseling.
- A bank employee collaborated with the economic development unit of a city in the assessment area and provided technical assistance on financial matters for small businesses, including start-up small businesses.

**OTHER VIRGINIA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the seven Virginia assessment areas 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
Charlottesville MSA	Consistent	Consistent	Consistent
Lynchburg MSA	Consistent	Consistent	Consistent
Roanoke MSA	Consistent	Below	Consistent
Winchester MSA	Consistent	Consistent	Consistent
Harrisonburg MSA	Consistent	Below	Consistent
Blacksburg MSA	Consistent	Consistent	Below
Staunton MSA	Consistent	Consistent	Consistent

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

Charlottesville MSA Assessment Area

The Charlottesville MSA assessment area consists of Charlottesville City and Albemarle, Buckingham, Fluvanna, Green, and Nelson Counties. Due to OMB changes, in 2019, Buckingham County was removed from the Charlottesville MSA. This change resulted in a decrease of four middle-income census tracts. Truist operates ten branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,286	\$80.2 million
Home Mortgage Loans	983	\$217.2 million
Small Farm Loans	7	\$365 thousand
Community Development Loans	6	\$19.1 million
Investments (New)	5	\$12.7 million
Investments (Prior Period)	0	\$0
Donations	26	\$71.5 thousand
CD Services	39	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Charlottesville MSA assessment area are in Appendix D.

Lynchburg MSA Assessment Area

The Lynchburg MSA assessment area consists of Lynchburg City and Amherst, Appomattox, Bedford, and Campbell Counties. Truist operates 12 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,831	\$94.8 million
Home Mortgage Loans	1,107	\$131.7 million
Small Farm Loans	8	\$503 thousand
Community Development Loans	6	\$13.1 million
Investments (New)	5	\$7.5 million
Investments (Prior Period)	0	\$0
Donations	19	\$84.3 thousand
CD Services	81	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Lynchburg MSA assessment area are in Appendix D.

Roanoke MSA Assessment Area

The Roanoke MSA assessment area consists of Roanoke City, Salem City, and Botetourt, Craig, Franklin, and Roanoke Counties. Truist operates 10 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1636	\$64.1 million
Home Mortgage Loans	1077	\$148.0 million
Small Farm Loans	9	\$640 thousand
Community Development Loans	9	\$5.7 million
Investments (New)	10	\$5.2 million
Investments (Prior Period)	26	\$69.5 thousand
Donations	0	\$0 thousand
CD Services	109	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Roanoke MSA assessment area are in Appendix D.

Winchester MSA Assessment Area

The Winchester MSA assessment area consists of Winchester City and Frederick County. Truist operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	985	\$49.5 million
Home Mortgage Loans	567	\$114.6 million
Small Farm Loans	6	\$600 thousand
Community Development Loans	2	\$40 thousand
Investments (New)	7	\$4.4 million
Investments (Prior Period)	0	\$0
Donations	13	\$20 thousand
CD Services	32	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Winchester MSA assessment area are in Appendix D.

Harrisonburg MSA Assessment Area

The Harrisonburg MSA assessment area consists of Harrisonburg City and Rockingham County. Truist operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	676	\$32.4 million
Home Mortgage Loans	551	\$76.6 million
Small Farm Loans	8	\$185 thousand
Community Development Loans	3	\$25.4 million
Investments (New)	1	\$394.1 thousand
Investments (Prior Period)	0	\$0
Donations	14	\$14.5 thousand
CD Services	28	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Harrisonburg MSA assessment area are in Appendix D.

Blacksburg MSA Assessment Area

The Blacksburg MSA assessment area consists of Radford City, and Floyd, Giles, Montgomery, and Pulaski Counties. Due to OMB changes, in 2019, Floyd County was removed from the Blacksburg MSA. This change resulted in a decrease of three middle-income census tracts.

Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	617	\$19.7 million
Home Mortgage Loans	465	\$88.9 million
Small Farm Loans	0	\$0
Community Development Loans	8	\$17.6 million
Investments (New)	3	\$7.2 million
Investments (Prior Period)	0	\$0
Donations	10	\$21 thousand
CD Services	19	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Blacksburg MSA assessment area are in Appendix D.

Staunton MSA Assessment Area

The Staunton MSA assessment area consists of Staunton City, Waynesboro City, and Augusta County. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	636	\$24.5 million
Home Mortgage Loans	445	\$62.0 million
Small Farm Loans	4	\$933 thousand
Community Development Loans	1	\$880 thousand
Investments (New)	2	\$5.3 million
Investments (Prior Period)	0	\$0
Donations	8	\$13.5 thousand
CD Services	20	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Staunton MSA assessment area are in Appendix D.

GEORGIA

CRA RATING FOR GEORGIA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

The bank operates 125, or 7.1 percent, of its total branch offices in Georgia. Georgia accounts for 7.5 percent of the bank-wide deposits. Overall, Truist ranks 5th in the state in deposit market share at 5.0 percent. Competitor institutions in the Georgia assessment areas include Bank of America, N.A., Wells Fargo, N.A., and Synovus Bank.

SCOPE OF EVALUATION – GEORGIA

The evaluation of the Georgia performance considered the operations of Truist in 10 assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Atlanta-Sandy Springs-Roswell (Atlanta) MSA and the Georgia Non-MSA assessment areas. Limited scope areas included the Savannah, Gainesville, Dalton, Macon-Bibb (Macon), Warner Robins, Athens-Clarke (Athens), Brunswick, and Valdosta MSA assessment areas. During the review period, small business loans were given more weight than home mortgage loans when considering the number and dollar volume of these products in the state. Based on the number of loans, small farm loans were only reviewed in the Georgia Non-MSA assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

LENDING TEST

The Lending Test rating for Georgia is High Satisfactory. The bank's lending levels reflect good responsiveness to the Georgia assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Georgia assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Georgia assessment area. Examiners based conclusions primarily on the performance in the Atlanta MSA and the Georgia Non-MSA assessment area. The performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of small business, home mortgage, and small farm loans is good. The geographic distribution of small business and home mortgage loans reflects good penetration throughout the assessment areas. Good performance in both full-scope assessment areas supports this conclusion. The geographic distribution of small farm loans reflects poor penetration based solely on the conclusions in the Georgia Non-MSA assessment area.

Borrower Profile

The overall borrower distribution of small business, home mortgage, and small farm loans is good. The borrower distribution of small business loans is good among business customers of different sizes for both the Atlanta MSA and for the Georgia Non-MSA assessment areas. The borrower distribution of home mortgage loans is adequate among borrowers of different income levels. Adequate performance for the Atlanta MSA assessment area and good performance for the Georgia Non-MSA assessment area supports the conclusion. The borrower distribution of loans is excellent among farm customers of different sizes based solely on the conclusions in the Georgia Non-MSA assessment area.

Community Development Loans

Truist is a leader in making community development loans in Georgia. During this evaluation period, the bank originated 156 community development loans totaling \$643.4 million. This performance represents 8.8 percent, by number, and 10.2 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 93 community development loans totaling \$365.8 million were originated.

Since the previous evaluation, Truist Bank has originated 31 loans totaling \$111.4 million, outside of the assessment areas, but within Georgia. Since the bank has been responsive to community development needs and opportunities within its assessment areas, examiners included these loans in the overall analysis. The analysis for each full-scope Georgia assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in Georgia. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position. The bank's performance was excellent in both full-scope assessment areas. Performance among the limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$156.5 million, or 8.8 percent, of bank-wide community development investments that exceeds the percent of deposits, 7.5, and the percent of branches, 7.1, in the state. By number of investments, the bank had 390 in Georgia, or 6.5 percent of all investments. The bank's investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$1.7 million.

Qualified Investments – Georgia										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Atlanta MSA	33	105,450	186	964	23	114	1	5	243	106,533
Non-MSA GA	18	18,034	45	73	1	2,031	1	5	65	20,143
Limited Scope Areas	24	27,117	40	251	12	2,403	2	10	78	29,781
Statewide	0	0	0	0	1	10	0	0	1	10
Regional	0	0	3	12	0	0	0	0	3	12
Total	75	150,601	274	1,300	37	4,558	4	20	390	156,479

Source: Bank Records

On a statewide level, the bank provided a \$10,000 grant to support training for staff of a CDFI to attend a small business finance forum. The bank also provided 2 donations totaling \$11,000 to a regional medical center located in a middle-income distressed census tract with high poverty. Additional examples of the bank’s CRA investments in Georgia are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. According to a July 2018 report from the Federal Reserve Bank of Atlanta, there is a widespread lack of affordable housing in Georgia. Other identified needs include workforce development, youth education programs, homelessness, economic development, and financial literacy. Regarding workforce development, under the state’s Complete College Georgia initiative the university and technical college systems are working to establish collaborative partnerships to increase the proportion of adults with a certificate or degree because there is a gap in workforce readiness knowledge and skills. In addition, the Brookings Institute identified the Atlanta MSA as one of the most difficult in the nation for economic mobility due to a lack of needed job skills and educational attainment. Programs for youth education are needed as school district leaders cite challenges faced by students from low-income families. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development needs in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. Some of the investments were considered innovative, and the bank makes extensive efforts to tailor their investments and grants to identified needs. For example, the bank created a workforce investment program in collaboration with leaders from a college foundation, economic development, and adult education. The bank provides grants that focus on education and training programs for the unemployed and underemployed designed to expedite their move toward securing and sustaining livable wage employment.

SERVICE TEST

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The Service Test rating for Georgia is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 125 branches in Georgia, which represents 7.1 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is below the percent of the population in low-income census tracts. Further, the branch distribution in moderate-income census tracts is above the percent of the population in moderate-income census tracts. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes 53 branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in Georgia.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	6	4.8	558,645	7.2	145	10.1
Moderate	39	31.2	1,872,964	24.2	352	24.5
Middle	47	37.6	2,913,847	37.6	500	34.9
Upper	33	26.4	2,380,601	30.7	422	29.4
NA	0	0.0	23,686	0.3	16	1.1
Total	125	100.0	7,749,743	100.0	1,435*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from the total number of census tracts on Page 7 (1,438) results from the decrease of 3 census tracts in the Warner Robins MSA assessment area (Pulaski County was removed).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches, but closed 24 branches. As a result, the bank closed 4 branches in moderate-income census tracts, 11 in middle-income census tracts, and 9 in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Georgia. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in Georgia. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services in the state. Bank records show that employees participated in 713 community development services since the last evaluation. This performance represents 8.6 percent of bank-wide activities, which is above the statewide share of branches at 7.1 percent. The types of services reflect excellent responsiveness to rated area needs. In Georgia, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with an organization resulting in community development service activities.

The bank’s performance was strongest in the full-scope Atlanta MSA assessment area. Performance in the limited-scope assessment areas was generally consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following are two examples of community development service activities that occurred outside of the bank’s designated assessment areas, but within Georgia:

- Five employees provided small business technical assistance at a women-owned business seminar hosted by a community development financial institution.
- The Bank Bus was utilized to provide free income tax services to low- and moderate-income residents in the state

The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Atlanta MSA	167	102	224	0	493
Georgia Non-MSA	14	59	7	0	80
Savannah MSA	20	5	6	0	31
Gainesville MSA	5	21	1	0	27
Dalton MSA	0	6	3	1	10
Macon MSA	5	5	5	0	15
Warner Robins MSA	3	4	3	0	10
Athens MSA	14	10	1	0	25
Brunswick MSA	2	7	0	0	9
Valdosta MSA	0	6	0	0	6
Statewide Activities	1	1	5	0	7
Total	231	226	255	1	713

Source: Bank Records

**ATLANTA-SANDY SPRINGS-ROSWELL, GA MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ATLANTA, GA
MSA ASSESSMENT AREA**

The Atlanta MSA assessment area consists of all 29 counties within the MSA. The bank operates 71, or 56.8 percent, of its Georgia branch offices in the Atlanta MSA assessment area. The assessment area represents 76.1 percent of the rated area loans and 69.1 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Atlanta MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	951	10.6	26.5	30.6	31.4	0.8
Population by Geography	5,535,837	7.4	26.2	34.3	31.8	0.3
Housing Units by Geography	2,202,308	8.3	26.9	33.0	31.7	0.1
Owner-Occupied Units by Geography	1,248,212	3.2	20.8	37.3	38.7	0.0
Occupied Rental Units by Geography	716,104	14.7	35.4	27.1	22.5	0.3
Vacant Units by Geography	237,992	15.8	33.1	28.6	22.4	0.1
Businesses by Geography	498,542	5.5	22.5	31.2	40.2	0.6
Farms by Geography	9,974	3.4	21.2	40.4	34.9	0.1
Family Distribution by Income Level	1,331,952	23.1	16.8	18.2	41.9	0.0
Household Distribution by Income Level	1,964,316	23.9	16.5	17.5	42.1	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,322	Median Housing Value			\$184,540
			Median Gross Rent			\$996
			Families Below Poverty Level			12.0%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019 at 2.7 percent, the unemployment rate in the Atlanta MSA was at or below the state and national averages for all years under review.

In 2019, according to Moody's Analytics, the top industries were professional and business services, education and health services, and government. The top employers were Delta Air Lines, Wal-Mart Stores, The Home Depot, Emory University, and WellStar Health System.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 85 FDIC-insured institutions operated 1,172 branches within this area. Of these institutions, the bank ranked 4th in total deposits with a market share of 5.0 percent. Competitor institutions include Bank of America, N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.9 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ATLANTA, GA MSA ASSESSMENT AREA

LENDING TEST

Truist Bank's Lending Test performance in the Atlanta MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was well below the percent of low-income families, even when families below the poverty level are considered, and was slightly below aggregate lending data. However, the low percent of aggregate lending data indicates limited opportunities may exist. Lending to moderate-income borrowers was also lower than both the demographic and aggregate lending data. However, the bank's performance to moderate-income borrowers improved in 2019 to a level consistent with the demographic data.

The borrower distribution of small business loans reflects good penetration to business customers of different sizes. The bank originated 70.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but significantly above the aggregate lending data.

Community Development Lending

Truist is a leader in making community development loans in the Atlanta MSA assessment area. The bank originated 78 community development loans totaling \$388.6 million. This amount represents 50.0 percent, by number, and 60.4 percent, by dollar volume, of total community development loans originated in Georgia. Regarding the community development purpose, 23 loans supported affordable housing, 18 loans supported community services, 21 loans supported economic development, and 16 loans supported revitalization or stabilization. Community development loans include a \$22.3 million loan to refinance a 308-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also funded an \$8.6 million loan to develop a retail center. The retail center will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$106.5 million, or 6.0 percent, of bank-wide community development investments that exceeds the percentage of deposits, 5.2, and branches, 4.0. Most of the CRA investments, \$105.5 million, went towards affordable housing. Investments also included grants totaling \$1.2 million. Examples are provided below.

- Invested \$9.1 million in a tax credit affordable housing project to build 162 units of senior housing. Units are available to persons with 60 percent or less of the area median income, and rental assistance from the Atlanta Housing Authority is provided to ensure that all residents pay no more than 30 percent of their monthly income in rent.

- Invested \$4.6 million in tax credit funding for a \$24 million affordable housing project to renovate a structure that was the nation’s first federally funded, church sponsored affordable senior housing complex. The project will provide 210 units of affordable housing. Project partners and funding sources also include HUD and the city economic development authority.
- Provided \$272,000 in donations to a financial literacy organization with a mission to expand economic opportunity through financial education and career empowerment for low- and moderate-income youth and adults.
- Provided grants totaling \$45,000 to an organization that provides career training, financial assistance for occupational certifications, job placement assistance, and financial coaching to low- and moderate-income communities.
- Provided \$120,000 in the first installment of a \$500,000 three-year commitment to a non-profit private middle school in Atlanta that primarily serves children from low-income families.
- Donated \$10,000 to an employment assistance center that supports struggling families’ transition into living-wage careers and financial stability.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include workforce development, youth education programs, homelessness, economic development, and financial literacy. The bank responded to each identified need using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank’s investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. To illustrate, the percent of branches in low-income census tracts is slightly below the population demographics. Further, the branch distribution in moderate-income census tracts is above the percent of the population in the respective geographies. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes 33 branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Atlanta MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	4.2	407,036	7.4	101	10.6
Moderate	24	33.8	1,453,107	26.2	252	26.5
Middle	19	26.8	1,900,554	34.3	291	30.6
Upper	25	35.2	1,759,225	31.8	299	31.4
NA	0	0.0	15,915	0.3	8	0.9
Total	71	100.0	5,535,837	100.0	951	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed 15 branches. As a result, the bank had a net change of closing two branches in moderate-income census tracts, six in middle-income census tracts and seven in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Georgia.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 493 community development services. This performance represents 69.1 percent of all activities in the state, which exceeds the assessment area's share of statewide branches at 56.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The bulk of qualifying services were teaching financial literacy to low- and moderate-income residents and providing small business technical assistance. The following are examples of community development services provided in the assessment area.

- An employee serves on the Board of a nonprofit organization whose mission is to lead low-income families out of poverty by meeting hunger, housing, and financial literacy needs.
- An employee serves on the Board and loan committee of a business support organization, which provides micro-loans and technical assistance to women-owned small businesses.
- An employee serves on the Board of a nonprofit family services organization, which provides emergency temporary shelter, career counseling, and job development and placement services to low- and moderate-income residents.

GEORGIA NON-MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GEORGIA
NON-MSA ASSESSMENT AREA

The Georgia Non-MSA assessment area consists of 21 counties, as noted in the Description of Assessment Area section of this evaluation. The bank operates 23, or 18.4 percent, of its Georgia branch offices in this assessment area. The assessment area represents 6.4 percent of the rated area loans and 11.2 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Georgia Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	140	3.6	14.3	60.7	21.4	0.0
Population by Geography	654,171	3.5	14.1	60.8	21.6	0.0
Housing Units by Geography	289,832	3.0	13.9	61.1	22.1	0.0
Owner-Occupied Units by Geography	149,784	0.9	11.5	61.4	26.2	0.0
Occupied Rental Units by Geography	87,288	6.7	18.2	59.2	15.9	0.0
Vacant Units by Geography	52,760	2.8	13.5	63.1	20.6	0.0
Businesses by Geography	38,565	2.5	16.7	59.4	21.3	0.0
Farms by Geography	2,227	0.9	12.2	60.2	26.7	0.0
Family Distribution by Income Level	159,095	23.0	16.9	17.8	42.3	0.0
Household Distribution by Income Level	237,072	26.3	14.7	16.3	42.7	0.0
Median Family Income Non-MSAs – GA		\$45,816	Median Housing Value			\$111,997
			Median Gross Rent			\$671
			Families Below Poverty Level			18.8%

Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
() The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, the unemployment ranged from 2.4 percent to 12.2 percent, with an overall average of 3.9 percent. The average unemployment rate in the Georgia Non-MSA assessment area was above the state and national averages for all years under review.

In 2019, according to D&B data, the top industries were services, non-classifiable establishments, and retail trade. Information regarding top employers is not available.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 62 FDIC-insured institutions operated 185 branches within this area. Of these institutions, the bank ranked second in total deposits with a market share of 11.9 percent. Competitor institutions include Synovus Bank, Ameris Bank, and United Community Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.9 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GEORGIA NON-MSA ASSESSMENT AREA

LENDING TEST

Truist Bank's Lending Test performance in the Georgia Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects an excellent distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight than home mortgage when considering the number and dollar volume of these products in the assessment area. In addition, due to the limited number and dollar volume of small farm loans, this product received minimal weight.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data, but was given little weight since less than 1 percent of owner-occupied housing units are located in those tracts. The bank's performance in moderate-income census tracts was consistent with demographic data and above aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

The geographic distribution of small farm loans reflects poor penetration throughout the assessment area. The bank did not originate any small farm loans in low-income census tracts, which was consistent with aggregate lending data; however, this performance was given little weight since less than 1 percent of farms are located in those tracts. The bank's performance in moderate-income census tracts was well below demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with both the percent of low-income families, when families below the poverty level are considered, and the aggregate lending data. Lending to moderate-income borrowers was lower than the demographic data, but consistent with aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 85.1 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was slightly above demographic data and significantly above the aggregate lending data. However, in 2017, the bank's performance was considerably lower at 73.1 percent and declined to 63.9 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area remained consistent.

The borrower distribution of small farm loans reflects excellent penetration among farm customers of different sizes. The bank originated 90.3 percent of small farm loans to farmers with annual gross revenues of \$1.0 million or less. Performance was slightly below demographic data, but significantly above the aggregate lending data.

Community Development Lending

Truist has made a relatively high level of community development loans in the Georgia Non-MSA assessment area. The bank originated 15 community development loans totaling \$19.2 million. This amount represents 9.6 percent, by number, and 3.0 percent, by dollar volume, of total community development loans originated in Georgia. Regarding the community development purpose, 4 loans each supported affordable housing and revitalization or stabilization, 6 loans supported community services, and 1 loan supported economic development. Community development loans include a \$4.8 million loan to a municipality for an infrastructure project. The project is part of a redevelopment plan in a low-income census tract. The bank also funded a \$1.8 million loan to refinance and upgrade a 48-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments is excellent, and responsiveness to community needs is good. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$20.1 million, or 1.1 percent, of bank-wide community development investments that is similar to the percent, of deposits, 0.8, and branches, 1.2. Most of the CRA investments, \$18.0 million, went towards affordable housing. Investments also included grants totaling \$80,000. Examples are provided below.

- Invested \$2.2 million to construct a 68-unit LIHTC project for senior citizens.
- Invested \$2.0 million in a SBA bond to fund loans to aid small businesses which are unable to obtain financing in the private credit marketplace.
- Invested \$3.3 million in affordable housing bonds.
- Donated \$13,000 to an organization that provides recreational and educational support to at risk youth from low-income families.
- Donated \$12,500 to a camp that provides a free two-week program to kids whose families live at or below the poverty rate. The bank partnered with the camp to provide basic financial literacy and bank savings information.
- Provided \$5,000 in donations to an event targeted at an underserved and underbanked community for which the bank provided financial literacy seminars.
- Donated \$11,000 to an organization that provides funds to low-income homeowners who need help with home repairs.
- Donated \$1,500 to support a financial literacy program for low- and moderate-income students.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community development needs. The primary identified need is affordable housing. Other identified needs include workforce development, youth education programs, homelessness, economic development, and financial literacy. Programs that support youth education are particularly needed as Georgia has the third largest number of rural students in the U.S. and the fifth lowest rural graduation rate. The bank responded to most of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are readily accessible to all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the institution’s assessment area. To illustrate, the percent of branches in low- and moderate-income census tracts is significantly higher than the population demographics in the respective census tracts. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes six branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Georgia Non-MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	2	8.7	23,084	3.5	5	3.6
Moderate	6	26.1	98,198	15.0	21	15.0
Middle	13	56.5	391,784	59.9	84	60.0
Upper	2	8.7	141,105	21.6	30	21.4
NA	0	0.0	0	0.0	0	0.0
Total	23	100.0	654,171	100.0	140	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed one branch in a moderate-income census tract. However, another branch office is located in relatively close proximity to the closed branch, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Georgia.

Community Development Services

Truist provided a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 80 community development services. This performance represents 11.2 percent of all activities in the state, which is below the assessment area’s share of statewide branches at 18.4 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The bulk of qualifying services were teaching financial literacy to low- and moderate-income residents. The following are examples of community development services provided in the assessment area.

- An employee serves on the Board and financial literacy committee of a nonprofit organization that provides financial literacy training and tutoring services to low- and moderate-income residents.
- An employee serves on the Board of an organization that provides temporary shelter and other support services to low- and moderate-income women suffering from domestic abuse.

- Two employees provided free income tax services and credit counseling to low- and moderate-income residents of the assessment area.

**OTHER GEORGIA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the eight Georgia assessment areas 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
Savannah MSA	Consistent	Consistent	Below
Gainesville MSA	Consistent	Consistent	Consistent
Dalton MSA	Consistent	Consistent	Consistent
Macon MSA	Consistent	Consistent	Consistent
Warner Robins MSA	Consistent	Consistent	Consistent
Athens MSA	Consistent	Consistent	Consistent
Brunswick MSA	Consistent	Consistent	Consistent
Valdosta MSA	Consistent	Consistent	Consistent

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is included in Appendix E.

Savannah MSA Assessment Area

The Savannah MSA assessment area consists of Bryan, Chatham, and Effingham Counties. Truist Bank operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	916	\$80.0 million
Home Mortgage Loans	840	\$168.9 million
Small Farm Loans	15	\$1.4 million
Community Development Loans	8	\$40.9 million
Investments (New)	4	\$7.3 million
Investments (Prior Period)	0	\$0
Donations	14	\$72.2 thousand
CD Services	31	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Savannah MSA assessment area are in Appendix D.

Gainesville MSA Assessment Area

The Gainesville MSA assessment area consists of Hall County. Truist Bank operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	941	\$52.5 million
Home Mortgage Loans	533	\$105.6 million
Small Farm Loans	1	\$98 thousand
Community Development Loans	4	\$24.3 million
Investments (New)	1	\$4.6 million
Investments (Prior Period)	0	\$0
Donations	9	\$51.7 thousand
CD Services	27	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Gainesville MSA assessment area are in Appendix D.

Dalton MSA Assessment Area

The Dalton MSA assessment area consists of Murray and Whitfield Counties. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	701	\$52.0 million
Home Mortgage Loans	417	\$52.5 million
Small Farm Loans	3	\$479 thousand
Community Development Loans	1	\$207 thousand
Investments (New)	2	\$6.6 million
Investments (Prior Period)	0	\$0
Donations	10	\$28.8 thousand
CD Services	10	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Dalton MSA assessment area are in Appendix D.

Macon MSA Assessment Area

The Macon MSA assessment area consists of Bibb, Crawford, Jones, Monroe, and Twiggs Counties. Truist Bank operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	823	\$40.9 million
Home Mortgage Loans	252	\$34.3 million
Small Farm Loans	5	\$790 thousand
Community Development Loans	10	\$6.7 million
Investments (New)	5	\$6.3 million
Investments (Prior Period)	0	\$0
Donations	8	\$157 thousand
CD Services	15	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Macon MSA assessment area are in Appendix D.

Warner Robins MSA Assessment Area

The Warner Robins MSA assessment area consists of Houston, Peach, and Pulaski Counties. Due to OMB changes, in 2019, Pulaski County was removed from the Warner Robins MSA. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	622	\$53.2 million
Home Mortgage Loans	198	\$51.9 million
Small Farm Loans	12	\$1.6 million
Community Development Loans	3	\$17.8 million
Investments (New)	2	\$1.1 million
Investments (Prior Period)	0	\$0
Donations	6	\$17.4 thousand
CD Services	10	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Warner Robins MSA assessment area are in Appendix D.

Athens MSA Assessment Area

The Athens MSA assessment area consists of Clarke, Madison, Oconee, and Oglethorpe Counties. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	454	\$29.8 million
Home Mortgage Loans	278	\$51.0 million
Small Farm Loans	0	\$0
Community Development Loans	2	\$16.5 million
Investments (New)	1	\$693.9 thousand
Investments (Prior Period)	0	\$0
Donations	2	\$6.2 thousand
CD Services	25	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Athens MSA assessment area are in Appendix D.

Brunswick MSA Assessment Area

The Brunswick MSA assessment area consists of Brantley, Glynn, and McIntosh Counties. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	226	\$17.5 million
Home Mortgage Loans	181	\$45.7 million
Small Farm Loans	2	\$214 thousand
Community Development Loans	3	\$15.7 million
Investments (New)	2	\$2.6 million
Investments (Prior Period)	0	\$0
Donations	5	\$18.5 thousand
CD Services	9	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Brunswick MSA assessment area are in Appendix D.

Valdosta MSA Assessment Area

The Valdosta MSA assessment area consists of Brooks, Echols, Lanier, and Lowndes Counties. Truist Bank operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	164	\$8.2 million
Home Mortgage Loans	50	\$7.7 million
Small Farm Loans	0	\$0
Community Development Loans	1	\$2.1 million
Investments (New)	6	\$242 thousand
Investments (Prior Period)	0	\$0
Donations	1	\$54.5 thousand
CD Services	6	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Valdosta MSA assessment area are in Appendix D.

PENNSYLVANIA

CRA RATING FOR PENNSYLVANIA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PENNSYLVANIA

The bank operates 195, or 11.1 percent, of its total branch offices in Pennsylvania. Pennsylvania accounts for 8.0 percent of the bank-wide deposits. Overall, Truist ranks 10th in the state in deposit market share at 3.1 percent. Competitor institutions in the Pennsylvania assessment areas include PNC Bank, N.A., Wells Fargo Bank, N.A., and Citizens Bank, NA.

SCOPE OF EVALUATION – PENNSYLVANIA

The evaluation of the Pennsylvania performance considered the operations of Truist in 15 assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Montgomery County-Bucks County-Chester County (Montgomery) MD, Lancaster MSA, Allentown-Bethlehem-Easton (Allentown) MSA, and Reading MSA assessment areas. Limited scope areas included the York-Hanover (York) MSA, Philadelphia MD, Harrisburg-Carlisle (Harrisburg) MSA, Chambersburg-Waynesboro (Chambersburg) MSA, Williamsport MSA, Scranton-Wilkes-Barre-Hazleton (Scranton) MSA, Gettysburg MSA, State College MSA, Lebanon MSA, East Stroudsburg MSA, and Pennsylvania Non-MSA assessment areas. During the review period, small business loans and home mortgage loans were given similar weight when considering the number and dollar volume of these products in the state. Based on the number of loans, small farm loans were only reviewed in the Montgomery MD and Lancaster MSA assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA IN PENNSYLVANIA

LENDING TEST

The Lending Test rating for Pennsylvania is High Satisfactory. The bank's lending levels reflect good responsiveness to the Pennsylvania assessment areas' credit needs. The geographic distribution reflects adequate penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Pennsylvania assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Pennsylvania assessment area.

Examiners based conclusions primarily on the performance in the Montgomery MD, Lancaster MSA, Allentown MSA, and Reading MSA assessment areas. The performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is adequate. The geographic distribution of home mortgage, small business and small farm loans reflects adequate penetration throughout the assessment areas. The overall HMDA and small business lending performance is good in the Montgomery MD and Allentown MSA assessment areas, while it is adequate in the Lancaster and Reading MSA assessment areas. In addition, the geographic distribution of small farm loans is excellent in the Montgomery MD assessment area and adequate in the Lancaster MSA assessment areas: the only assessment areas where small farm loans were reviewed.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good. The borrower distribution of home mortgage loans is good among borrowers of different income levels for each of the full-scope assessment areas. The borrower distribution of small business loans is also good among business customers of different sizes for each of the full-scope assessment areas. In addition, the borrower distribution of small farm loans among farm customers of different sizes is excellent in both assessment areas where small farm loans were reviewed.

Community Development Loans

Truist is a leader in making community development loans in Pennsylvania. During this evaluation period, the bank originated 113 community development loans totaling \$339.2 million. This performance represents 6.4 percent, by number, and 5.4 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when the bank originated 47 community development loans totaling \$197.2 million.

Since the previous evaluation, Truist has originated 5 loans totaling \$16.9 million outside of the assessment areas, but within Pennsylvania. Since the bank has been responsive to community development needs and opportunities within its assessment areas, examiners included these loans in the overall analysis. The analysis for each full-scope Pennsylvania assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates a High Satisfactory record regarding the Investment Test in Pennsylvania. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position. The bank's performance was good in each of the full-scope assessment areas. Performance among the limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$147.2 million, or 8.3 percent, of bank-wide community development investments that is similar to the percent of deposits, 8.0, but less than the percentage of branches, 11.1, in the state. By number of investments, the bank had 676 in Pennsylvania, or 11.2 percent of all investments. Most of the investments were to support affordable housing. Investments also included grants totaling \$4.3 million.

Qualified Investments – Pennsylvania										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Montgomery County MD	14	28,339	102	446	7	9,017	3	200	126	38,002
Lancaster MSA	9	12,253	65	351	9	450	2	10	85	13,064
Allentown MSA	35	22,327	75	369	6	760	8	498	124	23,954
Reading MSA	6	2,036	54	212	4	103	0	0	64	2,351
Limited Scope	41	67,547	208	954	13	1,039	9	256	271	69,796
Statewide	1	8	1	2	0	0	0	0	2	10
Regional	0	0	3	5	0	0	1	5	4	10
Total	106	132,510	508	2,339	39	11,369	23	969	676	147,187

Source: Bank Records

On a statewide level, the bank provided an \$8,000 grant to a statewide affordable housing coalition. On a regional level, the bank provided a \$5,000 donation to an economic development organization, and \$3,000 to community development organizations that serve the Pittsburgh area. Another \$2,000 was donated to a community center in Lewisburg, PA that provides recreation, education, and food to children from low-income families. Additional examples of the bank’s CRA investments in Pennsylvania are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. According to the National Low-Income Housing Coalition, there is a shortage across the state of affordable rental housing. In Pennsylvania, for every 100 households earning 50 percent of the area median income, there are only 68 affordable rentals available. Of those households, 72 percent are cost-burdened, spending more than 30 percent of their income on housing. Other identified needs include small business development, revitalization of blighted and abandoned areas, and financial literacy. The state’s Department of Community and Economic Development estimates that small communities have a funding need of up to \$3 million per community, while cities could spend up to \$35 million to combat blight and revitalize abandoned properties. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for Pennsylvania is High Satisfactory. A Low Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. Truist operates 195 branches in Pennsylvania, which represents 11.1 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is slightly below to the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 49 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the state. The following table reflects the bank's branch distribution by tract income level in Pennsylvania.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	8	4.1	549,377	6.5	148	7.5
Moderate	32	16.4	1,615,462	19.1	418	21.0
Middle	110	56.4	4,070,784	48.1	899	45.3
Upper	45	23.1	2,184,998	25.8	495	24.9
NA	0	0.0	46,610	0.5	26	1.3
Total	195	100.0	8,467,231	100.0	1,986	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 2 branches, including 1 each in a moderate-income census tract and an upper-income census tract. Further, the bank closed 58 branches, including 7 in moderate-income, 41 in middle-income, and 9 in upper-income census tracts, as well as 1 branch in a census tract without an income designation. As a result, the bank had a net change of closing 6 branches in moderate-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Pennsylvania. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in Pennsylvania. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 955 community development services since the last evaluation. This performance represents 11.5 percent of bank-wide activities, which is consistent with the statewide share of branches at 11.1 percent. The types of services provided reflect excellent responsiveness to the rated area needs. In Pennsylvania, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

The bank's performance was strongest in the full-scope Montgomery MD and Allentown MSA assessment areas. Performance in the limited-scope assessment areas was generally consistent with the bank's performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following three community development services benefit the entire state:

- Over the evaluation period, 32 bank employees collaborated with 6 chapters of a nonprofit organization that promotes economic development by providing small business technical assistance and training. The training activities were delivered to over 800 small business entrepreneurs in 8 counties. The training focused on financing, insurance, and banking for small businesses.
- A bank employee provided financial literacy training for a nonprofit organization that supports affordable housing for low- and moderate-income residents throughout the state.
- A bank employee provided capacity building training to the leaders of several state non-profits organizations, including a community development corporation, in order to enhance their ability to provide financial literacy and technical assistance to residents and small businesses in the state.

The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Montgomery MD	7	137	73	2	219
Lancaster MSA	9	47	32	1	89
Allentown MSA	39	124	37	3	203
Reading MSA	2	50	13	0	65
York MSA	15	35	13	0	63
Pennsylvania Non-MSA	0	37	4	1	42
Philadelphia MD	6	64	57	0	127
Harrisburg MSA	8	35	31	0	74
Chambersburg MSA	0	8	6	0	14
Williamsport MSA	0	9	0	0	9
Scranton MSA	3	9	10	0	22
Gettysburg MSA	1	4	2	0	7
State College MSA	3	4	0	0	7
Lebanon MSA	0	4	0	0	4
East Stroudsburg MSA	0	3	4	0	7
Statewide Activities	1	1	1	0	3
Total	94	571	283	7	955

Source: Bank Records

**MONTGOMERY COUNTY, PA MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
MONTGOMERY COUNTY, PA MD ASSESSMENT AREA**

The Montgomery MD assessment area consists of all 3 counties within the MD. The bank operates 47, or 24.1 percent, of its Pennsylvania branch offices in the Montgomery MD assessment area. The assessment area represents 23.2 percent of the rated area loans and 24.6 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within the middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Montgomery County MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	470	4.0	21.1	46.6	27.7	0.6
Population by Geography	1,949,350	3.5	19.0	47.9	29.3	0.3
Housing Units by Geography	768,553	3.9	20.1	48.2	27.8	0.0
Owner-Occupied Units by Geography	541,872	1.6	16.4	49.9	32.2	0.0
Occupied Rental Units by Geography	185,877	9.8	29.9	44.6	15.8	0.0
Vacant Units by Geography	40,804	8.3	25.9	42.1	23.6	0.0
Businesses by Geography	177,705	2.5	14.9	48.3	34.2	0.1
Farms by Geography	4,908	1.4	15.5	53.4	29.8	0.0
Family Distribution by Income Level	508,147	20.0	18.3	22.0	39.7	0.0
Household Distribution by Income Level	727,749	23.6	16.5	18.2	41.6	0.0
Median Family Income MSA - 33874 Montgomery County-Bucks County- Chester County, PA		\$99,939	Median Housing Value			\$318,012
			Median Gross Rent			\$1,187
			Families Below Poverty Level			4.3%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, the unemployment rates within the assessment area counties declined from 2017 to 2018, but ticked back up in 2019. As of December 31, 2019, the average unemployment rate in the Montgomery MD, at 3.4 percent, was below the state and national averages for all years under review.

In 2019, according to Moody's Analytics, the top industries were professional and business services, education and health services, and retail trade. The top employers were Main Line Health, The Vanguard Group, Abington Memorial Hospital, Holy Redeemer Health System, and Aetna Inc.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 52 FDIC-insured institutions operated 677 branches within this area. Of these institutions, the bank ranked 6th in total deposits with a market share of 4.9 percent. Competitor institutions include Wells Fargo Bank, N.A., TD Bank, N.A., and Citizens Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering the demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 38.3 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MONTGOMERY, PA MD ASSESSMENT AREA

LENDING TEST

Lending Test performance in the Montgomery MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. The bank uses flexible lending practices and made a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans received similar weight, but small farm loans received less weight based on the number and dollar volume of in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with the aggregate lending and demographic data. Of note, the bank's performance in moderate-income census tracts in 2017 was above both aggregate lending and demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. Performance in moderate-income census tracts was slightly above both aggregate lending and demographic data.

The geographic distribution of small farm loans reflects excellent penetration throughout the assessment area. Although the bank did not make any small farm loans in low-income census tracts, this is not unusual given the extremely small percent of farms located in these tracts. The bank's performance in moderate-income tracts was well above the aggregate lending data and three times the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farms loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was slightly above the aggregate lending data, but it was slightly below the percent of low-income families when examiners considered families below the poverty level. Lending to moderate-income borrowers was consistent with the aggregate lending data, but it was slightly above the demographic data. However, the bank's performance to both low- and moderate-income borrowers was considerably lower in 2017.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 72.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but was below the demographic data.

The borrower distribution of small farm loans reflects excellent penetration among small farm customer of different sizes. The bank originated 81.3 percent of small farm loans to farmers with gross revenues of \$1 million for less. This performance was significantly above the aggregate lending data, but was below the demographic data. Of note, the bank's performance increased to 90.2 percent in 2019, just slightly below the demographic data.

Community Development Lending

Truist has made a relatively high level of community development loans in the Montgomery County MSA assessment area. The bank originated 24 community development loans totaling \$46.0 million. This amount represents 21.2 percent, by number, and 13.6 percent, by dollar volume, of total community development loans originated in Pennsylvania. Regarding the community development purpose, 11 loans supported affordable housing, 7 loans supported community services, and 3 loans each supported economic development and revitalization or stabilization. Community development loans include a \$12.8 million loan to a nonprofit organization that administers government-funded programs for at-risk youth and adults. The bank also funded a \$2.2 million loan for the renovation of an office building located in a low-income census tract. The municipality has designated the area for revitalization.

INVESTMENT TEST

The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$38.0 million, or 2.1 percent, of bank-wide community development investments that is similar to the percent of deposits, 2.0, but below the percent of branches, 2.7. Most of the CRA investments, \$28.3 million, went towards affordable housing. Economic development investments and grants totaled \$9 million. Investments also included grants totaling \$830 thousand. Examples are provided below.

- Invested \$12 million in a tax credit project to construct a new 64-unit affordable housing building. Under the terms of the tax credit allocation, supportive services such as financial literacy classes, wellness and health programs, and social services are required.
- Invested \$9 million in a SBA bond investment to finance loans to small businesses, which are unable to obtain financing in the private credit marketplace.
- Provided \$200,000 in grants to a community based organization with a mission to support the development of affordable housing, neighborhood revitalization, and the education of consumers on housing and financial issues. The organization serves a moderate-income area that is burdened by large-scale blight with many vacant and foreclosed properties.
- Provided \$62,000 in donations to a small business development organization that provides counseling, advising, and mentorship to aspiring entrepreneurs and small business owners.
- Provided \$20,000 in donations to a nonprofit organization that empowers low-income families with education, skills, and resources necessary to achieve and maintain economic self-sufficiency.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include small business development, revitalization of blighted and abandoned areas, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are readily accessible to all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the assessment area. The branch distribution in low-income census tracts is almost double the percent of the population in the respective tracts. Additionally, the branch distribution in moderate-income census tracts is well above the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 13 branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Montgomery MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	6.4	68,714	3.5	19	4.0
Moderate	14	29.8	370,026	19.0	99	21.1
Middle	23	48.9	933,462	47.9	219	46.6
Upper	7	14.9	570,652	29.3	130	27.7
NA	0	0.0	6,496	0.3	3	0.6
Total	47	100.0	1,949,350	100.0	470	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 2 branches, including 1 each in a moderate-income census tract and an upper-income census tract. Further, the bank closed 17 branches, including 3 in moderate-income, 8 in middle-income, and 6 in upper-income census tracts. As a result, the bank had a net change of closing 2 branches in moderate-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Pennsylvania.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 219 community development services. This performance represents 22.9 percent of all activities in the state, which is comparable to the assessment area’s share of statewide branches at 24.1 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were teaching financial literacy to low- and moderate-income residents. The following are examples of community development services provided in the assessment area.

- An employee serves on the Board of a nonprofit organization that supports affordable housing in the assessment area, with an emphasis on projects that are leveraged with low-income housing tax credits.
- An employee serves on the Board of a nonprofit dental organization, which provides free and reduced-cost dental healthcare to low- and moderate-income children in the assessment area.
- The Bank Bus was utilized to support several qualifying activities in the assessment area including financial literacy training, credit report reviews with credit counseling, and VITA free income tax preparation and advice for low- and moderate-income residents.

LANCASTER, PA MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LANCASTER,
PA MSA ASSESSMENT AREA

The Lancaster MSA assessment area consists of Lancaster County, the only county within the Lancaster, PA MSA. The bank operates 24, or 12.3 percent, of its Pennsylvania branch offices in the Lancaster MSA assessment area. The assessment area represents 21.5 percent of the rated area loans and 15.7 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within the middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Lancaster MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	98	6.1	14.3	68.4	11.2	0.0
Population by Geography	530,216	4.3	10.6	73.6	11.6	0.0
Housing Units by Geography	205,587	4.0	11.3	72.4	12.3	0.0
Owner-Occupied Units by Geography	134,548	1.6	8.8	76.1	13.5	0.0
Occupied Rental Units by Geography	60,782	8.6	16.0	66.0	9.5	0.0
Vacant Units by Geography	10,257	8.1	16.3	63.2	12.4	0.0
Businesses by Geography	33,665	4.2	11.5	72.3	12.0	0.0
Farms by Geography	1,791	0.6	3.1	85.5	10.8	0.0
Family Distribution by Income Level	137,133	18.3	19.2	23.1	39.4	0.0
Household Distribution by Income Level	195,330	22.1	17.4	19.6	40.8	0.0
Median Family Income MSA - 29540 Lancaster, PA MSA		\$68,937	Median Housing Value			\$188,318
			Median Gross Rent			\$959
			Families Below Poverty Level			7.3%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, unemployment rates for the assessment area declined from 2017 to 2018, but ticked up in 2019 to its 2017 level. As of December 31, 2019, the unemployment rate in the Lancaster MSA at 3.3 percent was below the state and national averages for all years under review.

In 2019, according to Moody's Analytics, the top industries were education and health services, manufacturing, and retail trade. The top employers were Lancaster General Hospital, Lancaster General Hospital Group, Chartwell Staffing Services, Inc., Dart Container Corporation, and Turkey Hill Company, Inc.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 22 FDIC-insured institutions operated 182 branches within this area. Of these institutions, the bank ranked 2nd in total deposits with a market share of 16.9 percent. Competitor institutions include Fulton Bank, N.A., PNC Bank, N.A., and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 37.5 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LANCASTER, PA MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Lancaster MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans received similar weight, but small farm loans received less weight based on the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farms loans is adequate.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. Performance in moderate-income census tracts was similar to the demographic data, but slightly below the aggregate lending data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. However, performance in moderate-income census tracts was below both aggregate lending and demographic data.

The geographic distribution of small farm loans reflects adequate penetration throughout the assessment area. The bank did not originate any small farm loans in low- or moderate-income census tracts. However, this performance is not unusual given the extremely small percent of farms located in these tracts. In addition, the aggregate lending data in low- and moderate-income census tracts was 0.0 percent and 0.1 percent, respectively.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was slightly above the aggregate lending data and was consistent with the percent of low-income families when examiners considered families below the poverty level. Lending to moderate-income borrowers was consistent with the aggregate lending and demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 68.8 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above the aggregate lending data, but was below the demographic data.

The borrower distribution of small farm loans reflects excellent penetration among small farm customer of different sizes. The bank originated 91.2 percent of small farm loans to farmers with gross revenues of \$1 million for less. This performance was above the aggregate lending data, but was slightly below the demographic data.

Community Development Lending

Truist is a leader in making community development loans in the Lancaster MSA assessment area. The bank originated 20 community development loans totaling \$90.5 million. This amount represents 17.7 percent, by number, and 26.7 percent, by dollar volume, of total community development loans originated in Pennsylvania. Regarding the community development purpose, 10 loans supported affordable housing, 4 loans each supported community services and economic development, and 2 loans supported revitalization or stabilization. Community development loans include a \$9.0 million loan to finance the expansion of a hotel in a low-income census tract. The hotel will revitalize the area and provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$2.8 million loan to refinance a 72-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments is adequate, and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an adequate level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$13.0 million, or 0.7 percent, of bank-wide community development investments that is less than the percent of deposits, 1.3, and branches, 1.4. Most of the CRA investments, \$12.3 million, went towards affordable housing. Investments also included grants totaling \$521,000. Examples are provided below.

- Invested \$12.2 million in a tax credit project to construct 52 units of affordable housing for senior citizens.
- Invested \$343,000 in an SBA bond investment to provide financing to small businesses, which are unable to obtain financing in the private credit marketplace.
- Donated \$55,000 to a CDFI that provides lending and technical assistance to low- and moderate-income people and communities.
- Donated \$30,000 to an organization that assists entrepreneurs with microloans and technical assistance.
- Donated \$25,000 to a housing development corporation that provides quality housing and expands residential opportunities for moderate-income households.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include small business development, revitalization of blighted and abandoned areas, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is slightly below the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and two branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Lancaster MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	22,775	4.3	6	6.1
Moderate	3	12.5	56,045	10.6	14	14.3
Middle	18	75.0	390,040	73.5	67	68.4
Upper	3	12.5	61,356	11.6	11	11.2
NA	0	0.0	0.0	0.0	0	0.0
Total	24	100.0	530,216	100.0	98	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed seven branches, including one in a moderate-income census tract and six in middle-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Pennsylvania.

Community Development Services

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 89 community development services. This performance represents 9.3 percent of all activities in the state, which is below the assessment area’s share of statewide branches at 12.3 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were teaching financial literacy to low- and moderate-income residents. The following are examples of community development services provided in the assessment area.

- An employee serves on the Board of a nonprofit economic development corporation that promotes small business development and expansion and provides technical assistance.
- An employee serves on the Board of a nonprofit medical foundation that assists low-income families that have no insurance or high copayments or deductibles with quality affordable healthcare.
- Two bank employees serve on the Board of a nonprofit affordable housing organization, certified as a CDFI, which serves low- and moderate-income families of the assessment area.

ALLENTOWN, PA MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ALLENTOWN,
PA MSA ASSESSMENT AREA

The Allentown MSA assessment area consists of all 3 counties within the MSA. The bank operates 31, or 15.9 percent, of its Pennsylvania branch offices in the Allentown MSA assessment area. The assessment area represents 11.8 percent of the rated area loans and 15.9 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within the middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Allentown MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	10.3	19.9	44.9	25.0	0.0
Population by Geography	721,006	8.7	20.4	41.6	29.3	0.0
Housing Units by Geography	298,710	8.4	20.5	43.8	27.3	0.0
Owner-Occupied Units by Geography	190,410	3.5	14.9	46.5	35.1	0.0
Occupied Rental Units by Geography	82,228	17.5	30.7	38.3	13.5	0.0
Vacant Units by Geography	26,072	14.9	29.0	42.0	14.1	0.0
Businesses by Geography	46,866	7.0	17.1	42.0	33.9	0.0
Farms by Geography	1,321	2.2	8.3	50.3	39.1	0.0
Family Distribution by Income Level	185,549	21.3	18.5	21.4	38.8	0.0
Household Distribution by Income Level	272,638	24.3	16.5	18.9	40.3	0.0
Median Family Income MSA - 10900 Allentown-Bethlehem-Easton, PA-NJ MSA	\$71,539	Median Housing Value				\$186,888
		Median Gross Rent				\$936
		Families Below Poverty Level				8.2%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the examination period, the unemployment rate for the assessment area declined from 2017 to 2018, but ticked up in 2019 and was slightly above its 2017 levels. As of December 31, 2019, the unemployment rate in the Allentown MSA, at 4.5 percent, was similar to the state average, but higher than the national average. However, in 2017 and 2018, the unemployment rate in the Allentown MSA was below the state average, but was similar to the national average.

In 2019, according to Moody's Analytics, the top industries were education and health services, professional and business services, and retail trade. The top employers were Lehigh Valley Health Network, St. Luke's University Health Network, Air Products and Chemicals, Sands Bethworks Gaming, LLC. and Dorney Park/Wildwater Kingdom.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 32 FDIC-insured institutions operated 246 branches within this area. Of these institutions, the bank ranked 2nd in total deposits with a market share of 11.8 percent. Competitor institutions include Wells Fargo Bank, N.A., PNC Bank, N.A., and Lafayette Ambassador Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing is a need, as 39.8 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ALLENTOWN, PA MSA ASSESSMENT AREA

LENDING TEST

Truist Bank's Lending Test performance in the Allentown MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans were given similar weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was above the aggregate lending and demographic data. Performance in moderate-income census tracts was similar to the demographic data, but slightly below the aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. However, performance in moderate-income census tracts was slightly below the aggregate lending and demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was above the aggregate lending data and consistent with the percent of low-income families when examiners considered families below the poverty level. Lending to moderate-income borrowers was slightly below the aggregate lending and demographic data. Of note, the bank's performance to moderate-income borrowers increased in 2019 and was slightly above the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 78.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but was below the demographic data. However, the bank's performance was not as strong in 2017, but was still above the aggregate lending data.

Community Development Lending

Truist is a leader in making community development loans in the Allentown MSA assessment area. The bank originated 13 community development loans totaling \$69.5 million. This amount represents 11.5 percent, by number, and 20.5 percent, by dollar volume, of total community development loans originated in Pennsylvania. Regarding the community development purpose, 6 loans supported affordable housing, 3 loans supported community services, and 4 loans supported revitalization or stabilization. Community development loans include a \$35.0 million loan for the construction of several residential and commercial buildings primarily in low-income census tracts. The local development authority has designated the area as a Neighborhood Improvement Zone. The bank also funded a \$2.2 million loan for the renovation of an office building for a nonprofit organization located in a low-income census tract. The organization provides health and wellness programs for low- and moderate-income individuals.

The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$23.9 million, or 1.3 percent, of bank-wide community development investments that is similar to the percent of deposits, 1.3, but below the percent of branches, 1.8. Most of the CRA investments, \$22.3 million, went towards affordable housing. Investments also included grants totaling \$1.1 million. Examples are provided below.

- Invested \$4.3 million in a tax credit project to rehabilitate 27 units of affordable housing with all units receiving rent subsidies from HUD.
- Invested \$2.8 million in a mortgage backed security fund for which the underlying mortgage loans are to low- and moderate-income borrowers.
- Invested \$572,000 in a SBA bond to finance small businesses.

- Provided \$400,000 in donations to a community development corporation that focuses on the revitalization of the downtown low- and moderate-income areas of Allentown.
- Provided \$64,200 in donations to a financial literacy organization.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include small business development, revitalization of blighted and abandoned areas, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank’s investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Of note, several branches are located in census tracts that are adjacent to low- and moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers, and nine branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Allentown MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	2	6.5	63,051	8.7	16	10.2
Moderate	4	12.9	147,175	20.4	31	19.9
Middle	16	51.6	299,659	41.6	70	44.9
Upper	9	29.0	211,121	29.3	39	25.0
NA	0	0.0	0	0.0	0	0.0
Total	31	100.0	721,006	100.0	156	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed five branches, including four in middle-income census tracts and one in an upper-income census tract.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Pennsylvania.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 203 community development services. This performance represents 21.3 percent of all activities in the state, which is above the assessment area's share of statewide branches at 15.9 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were teaching financial literacy to low- and moderate-income residents. The following are examples of community development services provided in the assessment area.

- An employee serves as the Chairman of a local organization that supports economic development and revitalization of low- and moderate-income census tracts within the assessment area.
- Two employees serve on the Board of a community-based financial organization, which provides free or affordable financial services to meet the credit needs of low- and moderate-income families. In addition, 2 employees provided several financial literacy-training sessions through this organization to more than 300 attendees.
- Two employees serve on the Board of a nonprofit county economic development organization that provides support to small businesses with a focus on women- and minority-owned businesses as well as start-up businesses.

**READING, PA MSA ASSESSMENT AREA
(Full-Scope Review)**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE READING, PA
MSA ASSESSMENT AREA**

The Reading MSA assessment area consists of Berks County, the only county within the Reading, PA MSA. The bank operates 15, or 7.7 percent, of its Pennsylvania branch offices in the Reading MSA assessment area. The assessment area represents 6.4 percent of the rated area loans and 10.1 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within the middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Reading MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	90	21.1	7.8	53.3	17.8	0.0
Population by Geography	413,965	15.5	5.5	55.7	23.3	0.0
Housing Units by Geography	164,853	15.9	5.3	56.1	22.7	0.0
Owner-Occupied Units by Geography	110,223	7.1	4.1	61.1	27.7	0.0
Occupied Rental Units by Geography	43,089	33.2	7.7	46.4	12.7	0.0
Vacant Units by Geography	11,541	34.9	8.0	44.0	13.1	0.0
Businesses by Geography	23,548	10.2	5.2	58.3	26.2	0.0
Farms by Geography	1,087	1.2	0.6	70.4	27.9	0.0
Family Distribution by Income Level	105,998	21.4	17.2	21.4	40.1	0.0
Household Distribution by Income Level	153,312	24.3	15.8	18.3	41.6	0.0
Median Family Income MSA - 39740 Reading, PA MSA		\$67,696	Median Housing Value			\$157,955
			Median Gross Rent			\$836
			Families Below Poverty Level			10.3%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, unemployment rates for the assessment area declined from 2017 to 2018, but ticked up in 2019 and was above its 2017 levels. As of December 31, 2019, the unemployment rate in the Reading MSA, at 4.4 percent, was similar to the state average, but higher than the national average. However, in 2017 and 2018, the unemployment rates in the Reading MSA were below the state and national averages.

In 2019, according to Moody's Analytics, the top industries were education and health services, manufacturing, and professional and business services. The top employers were East Penn Manufacturing Company, Tower Health, Carpenter Technology Corporation, Supportive Concepts for Families, and Walmart.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 17 FDIC-insured institutions operated 115 branches within this area. Of these institutions, the bank ranked 4th in total deposits with a market share of 7.7 percent. Competitor institutions include Santander Bank, N.A., Customers Bank, and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 38.6 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE READING, PA MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Reading MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans received similar weight based on the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was below the aggregate lending and demographic data. Of note, in 2017 the bank's performance in low-income census tracts was consistent with the aggregate lending data and only slightly below the demographic data. Performance in moderate-income census tracts was consistent with the aggregate lending and demographic data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was below the demographic and aggregate lending data. However, the bank's performance in low-income tracts was stronger in 2017 and was consistent with the aggregate lending data, but still below the demographic data. Performance in low-income tracts in 2019 was also stronger, but still below the demographic data. The bank's performance in moderate-income census tracts was consistent with the aggregate lending data, but slightly below the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was above the aggregate lending data and was consistent with the percent of low-income families when examiners considered families below the poverty level. Lending to moderate-income borrowers was consistent with the demographic data, but was below the aggregate lending data. Of note, the bank's performance to moderate-income borrowers increased in 2019 and was above the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 75.6 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above the aggregate lending data, but was below the demographic data. However, the bank's performance was not as strong in 2017 and 2019.

Community Development Lending

Truist is a leader in making community development loans in the Reading MSA assessment area. The bank originated 11 community development loans totaling \$27.3 million. This amount represents 9.7 percent, by number, and 8.1 percent, by dollar volume, of total community development loans originated in Pennsylvania. Regarding the community development purpose, 2 loans supported affordable housing, 7 loans supported community services, and 1 loan each supported economic development and revitalization or stabilization. Community development loans include an \$8.1 million loan to a redevelopment authority to build a training and technology center for a local community college. The community college predominately serves low- and moderate-income students. The bank also renewed a \$1.8 million line of credit to a nonprofit organization that operates group homes for economically disadvantaged youth and adults.

INVESTMENT TEST

The level of investments is adequate, and responsiveness to community needs is good. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an adequate level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$2.3 million, or 0.13 percent, of bank-wide community development investments that is less than the percent of deposits, 0.8, and branches, 0.8.

Most of the CRA investments, \$2.0 million, went towards affordable housing. Investments also included grants totaling \$351,000. Examples are provided below.

- Invested \$2 million in an affordable housing tax credit project.
- Donated \$50,000 to a partnership between a community foundation and a university to create a small business incubator and resource center.
- Donated \$25,000 to a small business development corporation that targets entrepreneurs.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include small business development, revitalization of blighted and abandoned areas, and financial literacy. The bank responded to most of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to limited portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the assessment area. The branch distribution in low-income census tracts is below the percent of the population in the respective tracts. Additionally, the bank does not operate any branches in moderate-income census tracts, which is below the percent of the population in the respective tracts. The bank offers an array of alternative delivery systems for its customers, and four branches serve as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Reading MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	6.7	64,306	15.5	19	21.1
Moderate	0	0.0	22,693	5.5	7	7.8
Middle	10	66.7	230,378	55.7	48	53.3
Upper	4	26.6	96,588	23.3	16	17.8
NA	0	0.0	0	0.0	0	0.0
Total	15	100.0	413,965	100.0	90	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed three branches in middle-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Pennsylvania.

Community Development Services

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 65 community development services. This performance represents 6.8 percent of all activities in the state, which is below the assessment area's share of statewide branches at 7.7 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were teaching financial literacy to low- and moderate-income residents. The following are examples of community development services provided in the assessment area.

- Two employees serve on the Board of a nonprofit agency that combats poverty in the assessment area with a focus on helping low- and moderate-income residents become self-sufficient.
- An employee serves on the Board and audit committee of a nonprofit transitional housing organization that provides free or low-cost housing to homeless or near-homeless women with children.
- Two employees serve on the Board of a nonprofit organization that supports small business economic development and the revitalization of targeted downtown areas in the assessment area.

**OTHER PENNSYLVANIA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the 11 Pennsylvania assessment areas 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
York MSA	Consistent	Consistent	Consistent
Pennsylvania Non-MSA	Consistent	Consistent	Exceeds
Philadelphia MSA	Consistent	Consistent	Consistent
Harrisburg MSA	Consistent	Exceeds	Consistent
Chambersburg MSA	Consistent	Consistent	Consistent
Williamsport, MSA	Consistent	Consistent	Consistent
Scranton MSA	Consistent	Consistent	Exceeds
Gettysburg MSA	Consistent	Below	Consistent
State College MSA	Consistent	Consistent	Consistent
Lebanon MSA	Consistent	Consistent	Consistent
East Stroudsburg MSA	Consistent	Consistent	Consistent

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas are included in Appendix E.

York MSA Assessment Area

The York MSA assessment area consists of York County. Truist Bank operates 14 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,055	\$68.1 million
Home Mortgage Loans	903	\$138.4 million
Small Farm Loans	34	\$5.1 million
Community Development Loans	3	\$5.4 million
Investments (New)	2	\$8.5 million
Investments (Prior Period)	0	\$0
Donations	36	\$124 thousand
CD Services	63	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the York MSA assessment area are in Appendix D.

Pennsylvania Non-MSA Assessment Area

The Pennsylvania Non-MSA assessment area consists of Bedford, Fulton, Northumberland, Schuylkill, and Snyder Counties. Truist Bank operates 12 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	977	\$47.1 million
Home Mortgage Loans	798	\$69.2 million
Small Farm Loans	31	\$4.3 million
Community Development Loans	4	\$3.6 million
Investments (New)	2	\$12.4 million
Investments (Prior Period)	0	\$0
Donations	42	\$120 thousand
CD Services	42	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Pennsylvania Non-MSA assessment area are in Appendix D.

Philadelphia MSA Assessment Area

The Philadelphia MSA assessment area consists of Delaware and Philadelphia Counties. Truist Bank operates 14 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	882	\$84.7 million
Home Mortgage Loans	668	\$231.9 million
Small Farm Loans	1	\$450 thousand
Community Development Loans	18	\$37.8 million
Investments (New)	2	\$7.4 million
Investments (Prior Period)	0	\$0
Donations	85	\$912.8 thousand
CD Services	127	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Philadelphia MSA assessment area are in Appendix D.

Harrisburg MSA Assessment Area

The Harrisburg MSA assessment area consists of Cumberland, Dauphin, and Perry Counties. Truist Bank operates 14 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	803	\$51.0 million
Home Mortgage Loans	593	\$129.9 million
Small Farm Loans	19	\$2.2 million
Community Development Loans	7	\$29.4 million
Investments (New)	3	\$27.1 million
Investments (Prior Period)	0	\$0
Donations	38	\$152.3 thousand
CD Services	74	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Harrisburg MSA assessment area are in Appendix D.

Chambersburg MSA Assessment Area

The Chambersburg MSA assessment area consists of Franklin County. Truist Bank operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	571	\$44.2 million
Home Mortgage Loans	451	\$58.9 million
Small Farm Loans	10	\$1.8 million
Community Development Loans	4	\$855 thousand
Investments (New)	1	\$6.0 million
Investments (Prior Period)	0	\$0
Donations	5	\$11 thousand
CD Services	14	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Chambersburg MSA assessment area are in Appendix D.

Williamsport MSA Assessment Area

The Williamsport MSA assessment area consists of Lycoming County. Truist Bank operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	268	\$19.4 million
Home Mortgage Loans	292	\$28.0 million
Small Farm Loans	4	\$710 thousand
Community Development Loans	0	\$0
Investments (New)	2	\$315.3 thousand
Investments (Prior Period)	0	\$0
Donations	10	\$20.2 thousand
CD Services	9	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Williamsport MSA assessment area are in Appendix D.

Scranton MSA Assessment Area

The Scranton MSA assessment area consists of Lackawanna, Luzerne, and Wyoming Counties. Truist Bank operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	301	\$18.7 million
Home Mortgage Loans	286	\$30.2 million
Small Farm Loans	1	\$144 thousand
Community Development Loans	1	\$2.9 million
Investments (New)	2	\$4.7 million
Investments (Prior Period)	0	\$0
Donations	10	\$31.8 thousand
CD Services	22	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Scranton MSA assessment area are in Appendix D.

Gettysburg MSA Assessment Area

The Gettysburg MSA assessment area consists of Adams County. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	310	\$25.4 million
Home Mortgage Loans	225	\$34.8 million
Small Farm Loans	8	\$1.1 million
Community Development Loans	0	\$0
Investments (New)	2	\$165.4 thousand
Investments (Prior Period)	0	\$0
Donations	8	\$35.7 thousand
CD Services	7	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Gettysburg MSA assessment area are in Appendix D.

State College MSA Assessment Area

The State College MSA assessment area consists of Centre County. Truist Bank operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	205	\$16.8 million
Home Mortgage Loans	147	\$33.8 million
Small Farm Loans	1	\$130 thousand
Community Development Loans	1	\$2.1 million
Investments (New)	1	\$1 million
Investments (Prior Period)	0	\$0
Donations	10	\$45.5 thousand
CD Services	7	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the State College MSA assessment area are in Appendix D.

Lebanon MSA Assessment Area

The Lebanon MSA assessment area consists of Lebanon County. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	223	\$19.9 million
Home Mortgage Loans	115	\$19.0 million
Small Farm Loans	14	\$3.2 million
Community Development Loans	0	\$0
Investments (New)	2	\$294.4 thousand
Investments (Prior Period)	0	\$0
Donations	5	\$12.5 thousand
CD Services	4	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Lebanon MSA assessment area are in Appendix D.

East Stroudsburg MSA Assessment Area

The East Stroudsburg MSA assessment area consists of Monroe County. Truist Bank operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	111	\$3.6 million
Home Mortgage Loans	115	\$14.7 million
Small Farm Loans	0	\$0
Community Development Loans	2	\$6.9 million
Investments (New)	2	\$444.2 thousand
Investments (Prior Period)	0	\$0
Donations	1	\$1 thousand
CD Services	7	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the East Stroudsburg MSA assessment area are in Appendix D.

TEXAS

CRA RATING FOR TEXAS: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS

The bank operates 106, or 6.0 percent, of its total branch offices in Texas. Texas accounts for 3.8 percent of the bank-wide deposits. Overall, Truist ranks 16th in the state in deposit market share at 0.8 percent. Competitor institutions in the Texas assessment areas include JPMorgan Chase Bank, N.A., Bank of America, N.A., and USAA Federal Savings Bank.

SCOPE OF EVALUATION – TEXAS

The evaluation of the Texas performance considered the operations of Truist in eight assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Dallas-Plano-Irving (Dallas) MD, Houston-The Woodlands-Sugar Land (Houston) MSA, and the Fort Worth-Arlington (Fort Worth) MD assessment areas. Limited scope areas included the Austin-Round Rock (Austin) MSA, San Antonio-New Braunfels (San Antonio) MSA, College Station-Bryan (College Station) MSA, Odessa MSA, and Midland MSA assessment areas. During the review period, small business loans and home mortgage loans were given similar weight when considering the number and dollar volume of these products in the state. Small farm loans were limited and not reviewed.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TEXAS

LENDING TEST

The Lending Test rating for Texas is High Satisfactory. The bank's lending levels reflect good responsiveness to the Texas assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in originating community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Texas assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Texas assessment area. Examiners based conclusions primarily on the performance in the Dallas MD, Houston MSA, and the Fort Worth MD assessment areas. The performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good. The geographic distribution of home mortgage and small business reflects good penetration throughout the assessment areas. Good performance in the Dallas and Fort Worth MD assessment areas and excellent performance in the Houston MSA assessment area primarily supports this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good. The borrower distribution of home mortgage loans is adequate among borrowers of different income levels for all three assessment areas that received full-scope reviews. In addition, the borrower distribution of small business loans is excellent among business customers of different sizes for the three assessment areas that received full-scope reviews.

Community Development Loans

Truist is a leader in making community development loans in Texas. During this evaluation period, the bank originated 132 community development loans totaling \$552.9 million. This performance represents 7.5 percent, by number, and 8.7 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the previous evaluation, when the bank originated 74 community development loans totaling \$319.4 million.

Since the previous evaluation, Truist Bank has originated 29 loans totaling \$63.7 million, outside of the assessment areas, but within Texas. Since the bank has been responsive to community development needs and opportunities within its assessment areas, examiners included these loans in the overall analysis. The analysis for each full-scope Texas assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in Texas. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position. The bank's performance was excellent in each of the three full-scope assessment areas. Performance among the limited-scope assessment areas was generally consistent with the full scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$88.8 million, or 5.0 percent, of bank wide community development investments that exceeds the percent of deposits, 3.8, and is slightly less than the percent of branches, 6.0, in the state. By number of investments, the bank had 365 in Texas, or 6.1 percent of all investments. The bank's investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$2.5 million.

Qualified Investments – Texas										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Dallas MD	30	27,580	78	5,637	20	700	2	10	130	33,927
Houston MSA	17	18,409	50	591	3	18	5	130	75	19,148
Fort Worth MD	8	6,766	18	2,092	4	12	0	0	30	8,870
Limited Scope	30	19,251	61	348	26	7,076	6	26	123	26,701
Statewide	0	0	1	5	5	157	0	0	6	162
Regional	0	0	1	1	0	0	0	0	1	1
Total	85	72,006	209	8,674	58	7,963	13	166	365	88,809

Source: Bank Records

On a statewide level, the bank provided a \$50,000 donation to a state association that supports CDFIs, and \$5,000 donation to support a statewide financial coaching services program. In addition, funds totaling \$107 thousand supported sponsorship of capacity building courses for community development corporations. Additional examples of the bank’s CRA investments in Texas are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. According to the National Low-Income Housing Coalition, every metropolitan area in Texas has significant affordable housing shortages. Other identified needs include economic development, economic inclusion, and financial literacy. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. With regard to economic inclusion, Texas ranks among the top 5 states having the highest percent of unbanked and underbanked households, 33.7 percent, according to the 2017 FDIC survey. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for Texas is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 106 branches in Texas, which represents 6.0 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts. The branch distribution in moderate-income census tracts is slightly below the percent of the population in the respective census tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 59 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the state. The following table reflects the bank’s branch distribution by tract income level in Texas.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	11	10.4	1,833,165	10.3	407	12.3
Moderate	21	19.8	4,561,706	25.5	890	27.0
Middle	27	25.5	5,464,272	30.6	960	29.1
Upper	47	44.3	5,939,006	33.3	1,011	30.6
NA	0	0.0	61,136	0.3	32	1.0
Total	106	100.0	17,859,285	100.0	3,300*	100.0
<i>Source: 2015 ACS Data & Bank Records</i>						
<i>*Difference from the total number of census tracts on Page 7 (3,312) results from the decrease of 12 census tracts in the Fort Worth MSA assessment area (Hood and Somervell Counties were removed).</i>						

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 5 branches, including 2 in low-income, 2 in moderate-income, and 1 in an upper-income census tract. However, the bank closed 21 branches, including 1 in a low-income, 1 in a moderate-income, 6 in middle-income, and 13 in upper-income census tracts. As a result, the bank had a net change of opening 1 branch each in a low-income census tract and a moderate-income census tract.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Texas. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in Texas. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 567 community development services since the last evaluation. This performance represents 6.8 percent of bank-wide activities, which is above the bank-wide share of branches at 6.0 percent. The types of services provided reflect excellent responsiveness to the rated area needs. In Texas, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities.

Further, in several instances, the bank associate served in a qualified leadership capacity with an organization resulting in community development service activities. The bank demonstrated the strongest performance in the full-scope Dallas MD and Houston MSA assessment areas. Performance in the limited-scope assessment areas was consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following community development services benefited multiple assessment areas in the state:

- A bank employee serves on a committee of a charitable foundation that raises funds and awards grants to nonprofit organizations working to revitalize low-income and distressed neighborhoods within the state. The employee uses his financial services expertise to evaluate the grant proposals and the financial strength of the non-profit organizations seeking funds.
- A bank employee serves on the Board of a statewide nonprofit community development organization that specializes in providing financial education, affordable housing loans, and small dollar loans to low- and moderate-income individuals and families.
- A bank employee serves on the Board of a statewide nonprofit organization whose mission is to improve the lives of low- and moderate-income individuals and families by strengthening the capacity of other community development organizations through generating resources and relationships for these organizations.

Refer to the Community Development Services section in each assessment area for examples. The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Dallas MD	85	96	66	0	247
Houston MSA	39	46	29	1	115
Fort Worth MD	5	28	17	0	50
Austin MSA	0	41	17	0	58
San Antonio MSA	4	32	14	0	50
College Station MSA	2	13	8	0	23
Odessa MSA	0	13	0	0	13
Midland MSA	1	4	0	1	6
Statewide Activities	2	2	0	1	5
Total	138	275	151	3	567
<i>Source: Bank Records</i>					

DALLAS, TX MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DALLAS, TX
MD ASSESSMENT AREA

The Dallas MD assessment area consists of all 7 counties within the MD. The bank operates 40, or 37.7 percent, of its Texas branch offices in the Dallas MD assessment area. The assessment area represents 37.1 percent of the rated area loans and 44.2 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate-, middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Dallas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	897	13.5	26.2	25.5	34.1	0.7
Population by Geography	4,519,004	11.8	26.1	27.4	34.5	0.2
Housing Units by Geography	1,721,065	12.5	24.5	27.8	34.9	0.3
Owner-Occupied Units by Geography	930,164	5.4	20.4	28.9	45.2	0.1
Occupied Rental Units by Geography	661,577	20.8	29.6	26.7	22.4	0.5
Vacant Units by Geography	129,324	21.6	27.8	25.7	24.5	0.4
Businesses by Geography	395,893	7.3	18.8	26.2	46.9	0.8
Farms by Geography	7,356	5.4	17.7	32.2	44.0	0.6
Family Distribution by Income Level	1,098,880	23.7	16.5	17.6	42.2	0.0
Household Distribution by Income Level	1,591,741	24.0	16.5	17.5	42.0	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD		\$71,149	Median Housing Value			\$186,544
			Median Gross Rent			\$994
			Families Below Poverty Level			11.5%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, the unemployment rate in the Dallas MD, at 2.9 percent, was below the state and national averages for all years under review.

In 2019, according to Moody’s Analytics, the top industries were professional and business services, education and health services, and government. The top employers were Wal-Mart, AT&T, Baylor Scott & White Health, Bank of America Corporation, and Texas Instruments.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 163 FDIC-insured institutions operated 1,615 branches within this area. Of these institutions, the bank ranked 14th in total deposits with a market share of 1.2 percent. Competitor institutions include Bank of America, N.A., JPMorgan Chase Bank, N.A., and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Also, affordable housing represents a need, as 40.2 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE DALLAS, TX MD ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Dallas MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans received similar weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was above the aggregate lending data, but was slightly below the demographic data. In addition, the bank's performance in moderate-income tracts was above the demographic data in 2017 and 2019.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with the demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was slightly below the aggregate lending data, and it was well below the percent of low-income families even when examiners considered families below the poverty level. Lending to moderate-income borrowers was well below the demographic and aggregate lending data. However, in 2019, the bank's performance to moderate-income borrowers was consistent with the demographic data, and performance to low-income borrowers improved when compared with the 2018 performance.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 76.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but was below the demographic data.

Community Development Lending

Truist has made a relatively high level of community development loans in the Dallas MD assessment area. The bank originated 26 community development loans totaling \$97.4 million. This amount represents 19.7 percent, by number, and 17.6 percent, by dollar volume, of total community development loans originated in Texas. Regarding the community development purpose, 2 loans supported affordable housing, 7 loans supported community services, 12 loans supported economic development, and 5 loans supported revitalization or stabilization. Community development loans include a \$42.0 million loan to build a 331-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also funded a \$5.2 million loan to a school district for capital improvements. The school district predominantly serves low- and moderate-income students.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$33.9 million or 1.9 percent of bank wide community development investments that is similar to the percent of deposits, 1.7, and branches, 2.2. Most of the CRA investments, \$27.6 million, went towards affordable housing. Investments also included grants totaling \$774,000. Examples are provided below.

- Invested \$6.1 million in a LIHTC investment for a \$28.2 million rehabilitation project of 200 units of affordable housing.
- Provided a \$28,000 grant to a community development corporation that is active in affordable housing construction.
- Invested \$3.0 million in a New Market Tax Credit investment to renovate and expand a 45,000 square foot community facility that serves as a hub for nonprofit organizations that provide health and human services to assist people in becoming self-sufficient.

- Invested \$621,000 in a commercial development located in moderate-income area with a high poverty rate, 29 percent, as part of a community redevelopment and revitalization plan.
- Provided \$115,000 in funding for a community development professionals training program on the development, financial analysis, and structuring needed to successfully develop and finance affordable housing.
- Provided \$25,000 to an organization that provides financial education and employment coaching to families with limited incomes.
- Provided a \$3,000 grant to an organization that has an Individual Development Account program to encourage low- and moderate-income families to contribute to savings.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community development needs. The primary identified need is affordable housing. Other identified needs include economic development, economic inclusion, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community economic development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts. The branch distribution in moderate-income census tracts is slightly below the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 28 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank's branch distribution by tract income level for the Dallas MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	4	10.0	535,272	11.8	121	13.5
Moderate	9	22.5	1,178,015	26.1	235	26.2
Middle	11	27.5	1,237,912	27.4	229	25.5
Upper	16	40.0	1,559,553	34.5	306	34.1
NA	0	0.0	8,252	0.2	6	0.7
Total	40	100.0	4,519,004	100.0	897	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one branch in a low-income census tract. Further, the bank closed six branches, including one in a middle-income census tract and five in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Texas.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 247 community development services. This performance represents 43.6 percent of all activities in the state, which is above the assessment area’s share of statewide branches at 37.7 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a nonprofit organization whose objectives include providing programs that lead to self-sufficiency for low- and moderate-income individuals and families.
- A bank employee serves on the Board for a community development corporation established to address poverty, economic divestment, blight, infrastructure decline, neighborhood safety, and unemployment in the South Dallas community.
- A bank employee serves on the Board for a nonprofit organization whose clients are adults with severe intellectual, physical, and/or mental health disabilities from Dallas County and surrounding areas. The organization’s focus is workforce development for these adults with disabilities who are primarily low- and moderate-income.

HOUSTON, TX MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOUSTON, TX
MSA ASSESSMENT AREA

The Houston MSA consists of all 9 counties within the MSA. The bank operates 22, or 20.8 percent, of its Texas branch offices in the Houston MSA assessment area. The assessment area represents 24.7 percent of the rated area loans and 22.0 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Houston MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,072	14.8	29.0	25.6	29.5	1.1
Population by Geography	6,346,653	11.6	25.9	27.9	34.2	0.4
Housing Units by Geography	2,402,507	12.2	25.3	27.2	35.1	0.3
Owner-Occupied Units by Geography	1,314,631	5.2	21.3	29.4	44.1	0.1
Occupied Rental Units by Geography	854,011	20.9	30.2	24.6	23.7	0.6
Vacant Units by Geography	233,865	19.5	29.6	24.0	26.6	0.3
Businesses by Geography	478,600	9.8	19.1	23.6	47.3	0.2
Farms by Geography	8,021	5.3	17.1	31.6	45.9	0.1
Family Distribution by Income Level	1,530,226	24.4	16.1	17.1	42.4	0.0
Household Distribution by Income Level	2,168,642	24.9	15.9	16.8	42.4	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housing Value			\$172,974
			Median Gross Rent			\$972
			Families Below Poverty Level			12.8%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

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

According to the U.S. Bureau of Labor Statistics, unemployment rates declined during the evaluation period. As of December 31, 2019, the unemployment rate in the Houston MSA at 3.6 percent was comparable to the state and national rates for 2019, but above the state and national averages for 2017 and 2018.

In 2019, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were Memorial Hermann Health System, The University of Texas Health Science Center, Schlumberger Ltd, Landry's Inc., and Exxon Mobil Corporation.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 95 FDIC-insured institutions operated 1,416 branches within this area. Of these institutions, the bank ranked 19th in total deposits with a market share of 0.5 percent. Competitor institutions include JPMorgan Chase Bank, N.A., and Wells Fargo Bank, N.A., and Bank of America, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 40.5 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE HOUSTON, TX MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Houston MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects excellent penetration throughout the assessment area and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans received similar weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is excellent.

The geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was above the aggregate lending and demographic data.

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was above the demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the aggregate lending data and well below the percent of low-income families even when examiners considered families below the poverty level. Lending to moderate-income borrowers was well below the demographic and aggregate lending data. However, in 2019, the bank's performance to both low- and moderate-income borrowers improved significantly compared to performance in 2018.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 78.8 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but was below the demographic data.

Community Development Lending

Truist is a leader in making community development loans in the Houston MSA assessment area. The bank originated 25 community development loans totaling \$129.4 million. This amount represents 18.9 percent, by number, and 23.4 percent, by dollar volume, of total community development loans originated in Texas. Regarding the community development purpose, 8 loans supported affordable housing, 1 loan supported community services, 10 loans supported economic development, and 6 loans supported revitalization or stabilization. Community development loans include a \$7.8 million loan to purchase and renovate a shopping center in a moderate-income census tract, which will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$6.0 million loan to refinance a 232-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$19.1 million, or 1.0 percent, of bank wide community development investments that is similar to the percent of deposits, 0.8, and branches, 1.3. Most of the CRA investments, \$18.4 million, went towards affordable housing. Investments also included grants totaling \$791,000. Examples are provided below.

- Invested \$10.8 million in a LIHTC project.
- Invested \$1.8 million in a housing bond to rehabilitate a 284-unit affordable housing community that was an integral part of a neighborhood revitalization plan.
- Donated \$272,000 to an organization with a mission to expand economic opportunity in under-served communities by providing financial education and empowerment programs that equip persons with the knowledge and tools needed to create a secure future. The programs offered on credit and money management result in converting check-cashing customers into banking customers.
- Provided grants totaling \$30,000 to an organization that provides financial opportunity centers to low- and moderate-income people whereby they can access services that help families increase their income, reduce financial transaction costs, and offer low-cost financial products to help build savings and wealth.
- Donated \$16,000 to an organization that fosters small business development in low- and moderate-income areas.
- Provided \$7,500 to fund a portion of an annual event to bring the city's unbanked into the financial mainstream.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include economic development, economic inclusion, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has improved the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is well below the percent of the population in the respective tracts. The bank offers an array of alternative delivery systems for its customers, and 10 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank's branch distribution by tract income level for the Houston MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	13.6	736,659	11.6	159	14.8
Moderate	3	13.6	1,642,876	25.9	311	29.0
Middle	6	27.3	1,771,773	27.9	274	25.6
Upper	10	45.5	2,172,133	34.2	316	29.5
NA	0	0.0	23,212	0.4	12	1.1
Total	22	100.0	6,346,653	100.0	1,072	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened two branches in moderate-income census tracts. Further, the bank closed four branches, including three in middle-income census tracts and one in an upper-income census tract.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Texas.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the Houston MSA assessment area participated in 115 community development services. This performance represents 20.3 percent of all activities in the state, which is consistent with the assessment area’s share of statewide branches at 20.8 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the financial products innovation committee of a nonprofit organization that helps low- and moderate-income families and areas access traditional banking systems.
- A bank employee serves on the Board of a nonprofit organization that provides free financial education events to empower low- and moderate-income individuals and families to make disciplined and effective financial decisions.
- A bank employee serves on the Board of a nonprofit organization that provides social and financial education services to low- and moderate-income individuals and families.

**FORT WORTH, TX MD ASSESSMENT AREA
(Full-Scope Review)**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE FORT WORTH,
TX MD ASSESSMENT AREA**

The Fort Worth MD assessment area consists of all 6 counties within the MD. The bank operates 11, or 10.4 percent, of its Texas branch offices in the Fort Worth MD assessment area. The assessment area represents 11.1 percent of the rated area loans and 5.5 percent of rated area deposits. In 2019, the bank removed Hood and Somervell Counties from its assessment area due to OMB MSA Changes. The changes decreased the number of census tracts in the assessment area by 12:1 upper-income census tract, 2 moderate-income census tracts, and 9 middle-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Fort Worth MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	427	11.9	23.4	38.2	26.2	0.2
Population by Geography	2,314,416	9.0	21.9	38.9	30.2	0.0
Housing Units by Geography	891,850	8.9	21.8	39.8	29.4	0.0
Owner-Occupied Units by Geography	518,054	4.7	16.6	41.5	37.3	0.0
Occupied Rental Units by Geography	297,535	14.5	29.9	37.4	18.2	0.0
Vacant Units by Geography	76,261	15.1	26.4	38.2	20.3	0.0
Businesses by Geography	173,924	6.3	19.2	34.8	39.5	0.1
Farms by Geography	3,961	3.5	13.8	42.7	40.0	0.0
Family Distribution by Income Level	572,612	22.6	16.7	19.6	41.1	0.0
Household Distribution by Income Level	815,589	23.6	16.6	18.3	41.5	0.0
Median Family Income MSA - 23104 Fort Worth-Arlington, TX MD	\$69,817	Median Housing Value				\$153,091
		Median Gross Rent				\$942
		Families Below Poverty Level				11.0%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, the unemployment rate in the Fort Worth MD, at 2.9 percent, was below the state and national averages for all years under review.

In 2019, according to Moody's Analytics, the top industries were education and health services, government, and leisure and hospitality services. The top employers were AMR/American Airlines, Lockheed Martin, Texas Health Resources, NAS-Fort Worth-JRB, and Arlington ISD.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 78 FDIC-insured institutions operated 541 branches within this area. Of these institutions, the bank ranked 21st in total deposits with a market share of 0.8 percent. Competitor institutions include JPMorgan Chase Bank, N.A., and Wells Fargo Bank, N.A., and Bank of America, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 39.3 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE FORT WORTH, TX MD ASSESSMENT AREA

LENDING TEST

Truist Bank's Lending Test performance in the Fort Worth MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans were given similar weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with the aggregate lending data, but was below the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. However, performance in moderate-income census tracts was above the aggregate lending and demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the aggregate lending data, and was well below the percent of low-income families even when examiners considered families below the poverty level. Lending to moderate-income borrowers was well below the aggregate lending and demographic data. However, in 2019, lending to moderate-income borrowers improved significantly, but was still below the demographic data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 75.8 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but was below the demographic data.

Community Development Lending

Truist is a leader in making community development loans in the Fort Worth MD assessment area. The bank originated 13 community development loans totaling \$34.8 million. This amount represents 9.9 percent, by number, and 6.3 percent, by dollar volume, of total community development loans originated in Texas. Regarding the community development purpose, 2 loans supported community services, 6 loans supported economic development, and 5 loans supported revitalization or stabilization. Community development loans include a \$3.4 million loan to build an industrial warehouse in a low-income census tract. The development will help revitalize the area and provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$1.4 million loan to build a coffee shop in an Enterprise Zone. The development will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments is significant, and responsiveness to community needs is good. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$8.9 million, or 0.5 percent, of bank wide community development investments that is similar to the percent of deposits, 0.2, and branches, 0.6. Most of the CRA investments, \$6.8 million, went towards affordable housing. Investments also included grants totaling \$168,000. Examples are provided below.

- Invested \$3.7 million in a LIHTC project to rehabilitate 76 units of affordable housing.
- Invested \$2.0 million in a New Market Tax Credit project to finance the acquisition and renovation of a food storage warehouse and distribution facility in a low-income area.
- Donated \$14,000 to a nonprofit affordable housing organization.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include economic development, economic inclusion, and financial literacy. The bank responded to most of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. None of the bank’s investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is below the percent of the population in the respective tracts. However, the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. The bank offers an array of alternative delivery systems for its customers, and five branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank’s branch distribution by tract income level for the Fort Worth MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	197,594	8.8	48	11.6
Moderate	3	27.3	509,611	22.6	101	24.3
Middle	0	0.0	824,701	36.6	148	35.7
Upper	8	72.7	720,731	32.0	117	28.2
NA	0	0.0	0	0.0	1	0.2
Total	11	100.0	2,252,637	100.0	415*	100.0

Source: 2015 ACS Data & Bank Records

**Difference from the total number of census tracts on Page 211 (427) results from the decrease of 12 census tracts in this assessment area (Hood and Somervell Counties were removed).*

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches but two branches were closed: one in a middle-income census tract and one in an upper-income census tract.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Texas.

Community Development Services

The bank provides a relatively high level of community development services. During the evaluation period, bank records show that employees in the Fort Worth MSA assessment area participated in 50 community development services. This performance represents 8.8 percent of all activities in the state, which is slightly below the assessment area's share of statewide branches at 10.4 percent. The types of services provided reflect good responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee provided small business technical assistance to the clients of a community development financial institution in the Fort Worth area.
- Several bank employees provided low- and moderate-income individuals and families with basic financial education through the Bank on Your Success program.
- A bank employee taught first-time homebuyers classes to clients of a nonprofit organization that supports affordable housing for low- and moderate-income individuals and families.

**OTHER TEXAS ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the five Texas assessment areas 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
Austin MSA	Consistent	Consistent	Consistent
San Antonio MSA	Consistent	Consistent	Consistent
College Station MSA	Consistent	Consistent	Consistent
Odessa MSA	Consistent	Below	Consistent
Midland MSA	Consistent	Consistent	Consistent

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas are included in Appendix E.

Austin MSA Assessment Area

The Austin MSA assessment area consists of Bastrop, Caldwell, Hays, Travis, and Williamson Counties. Truist Bank operates 13 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,844	\$112.8 million
Home Mortgage Loans	1,471	\$603.9 million
Small Farm Loans	1	\$40 thousand
Community Development Loans	15	\$138.5 million
Investments (New)	4	\$11 million
Investments (Prior Period)	0	\$0
Donations	34	\$238.9 thousand
CD Services	58	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Austin MSA assessment area are in Appendix D.

San Antonio MSA Assessment Area

The San Antonio MSA assessment area consists of Atascosa, Bandera, Bexar, Comal, Guadalupe, Kendall, Medina, and Wilson Counties. Truist Bank operates 10 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,227	\$77.2 million
Home Mortgage Loans	762	\$283.8 million
Small Farm Loans	0	\$0
Community Development Loans	9	\$43.8 million
Investments (New)	1	\$3 million
Investments (Prior Period)	0	\$0
Donations	48	\$254.8 thousand
CD Services	50	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the San Antonio MSA assessment area are in Appendix D.

College Station MSA Assessment Area

The College Station MSA assessment area consists of Brazos, Burleson, and Robertson Counties. Truist Bank operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	720	\$56.8 million
Home Mortgage Loans	239	\$53.8 million
Small Farm Loans	2	\$106 thousand
Community Development Loans	11	\$23.2 million
Investments (New)	5	\$8.4 million
Investments (Prior Period)	0	\$0
Donations	18	\$83.5 thousand
CD Services	23	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the College Station MSA assessment area are in Appendix D.

Odessa MSA Assessment Area

The Odessa MSA assessment area consists of Ector County. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	162	\$5.4 million
Home Mortgage Loans	41	\$7.3 million
Small Farm Loans	0	\$0
Community Development Loans	1	\$1.3 million
Investments (New)	1	\$517 thousand
Investments (Prior Period)	0	\$0
Donations	4	\$18.7 thousand
CD Services	13	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Odessa MSA assessment area are in Appendix D.

Midland MSA Assessment Area

The Midland MSA assessment area consists of Martin and Midland Counties. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	165	\$5.1 million
Home Mortgage Loans	58	\$13.6 million
Small Farm Loans	0	\$0
Community Development Loans	3	\$20.8 million
Investments (New)	2	\$3.1 million
Investments (Prior Period)	0	\$0
Donations	6	\$39.6 thousand
CD Services	6	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Midland MSA assessment area are in Appendix D.

MARLYLAND

CRA RATING FOR MARYLAND: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MARYLAND

The bank operates 103, or 5.9 percent, of its total branch offices in Maryland. Maryland accounts for 4.8 percent of the bank-wide deposits. Overall, Truist ranks 7th in the state in deposit market share at 6.6 percent. Competitor institutions in the Maryland assessment areas include Bank of America, N.A, Manufacturers and Traders Trust Company, and PNC Bank, N.A.

SCOPE OF EVALUATION – MARYLAND

The evaluation of the Maryland performance considered the operations of Truist Bank in six assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Baltimore-Columbia-Towson (Baltimore) MSA and Silver Spring-Frederick-Rockville (Silver Spring) MD assessment areas. Limited scope areas included the Salisbury MSA, Maryland Non-MSA, California-Lexington Park (California) MSA, and Wilmington MD assessment areas. During the review period, small business loans and home mortgage loans were given equal weight when considering the number and dollar volume of these products in the state. Based on the minimal number of loans, small farm loans were not reviewed during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MARYLAND

LENDING TEST

The Lending Test rating for Maryland is High Satisfactory. The bank's lending levels reflect good responsiveness to the Maryland assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects adequate distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Maryland assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Maryland assessment area. Examiners based conclusions primarily on the performance in the Baltimore MSA and Silver Spring MD assessment areas. Performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment areas. The geographic distribution of small business loans also reflects good penetration throughout the assessment areas. Good performance in the Baltimore MSA and Silver Spring MD assessment areas supports this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans is adequate among borrowers of different income levels in the Baltimore MSA and Silver Spring MD assessment areas. However, the distribution of small business loans is good among business customers of different sizes in the Baltimore MSA and Silver Spring MD assessment areas. Adequate performance in the Baltimore MSA and Silver Spring MD assessment areas supports this conclusion.

Community Development Loans

Truist is a leader in making community development loans in Maryland. During this evaluation period, the bank originated 77 community development loans totaling \$281.4 million. This performance represents 4.3 percent, by number, and 4.4 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 60 community development loans totaling \$217.3 million were originated.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in Maryland. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and complex investments, and occasionally serves in a leadership position. The bank's performance was excellent in both full-scope assessment areas. Performance among the limited-scope assessment areas was generally consistent with the full scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$103.1 million, or 5.8 percent, of bank-wide community development investments that exceeds the percent of deposits, 4.8, and is similar to the percent of branches, 5.9, in the state. By number of investments, the bank had 308 in Maryland, or 5.1 percent of all investments. The bank's investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$1.5 million.

Qualified Investments – Maryland										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Baltimore MSA	42	64,176	115	753	26	9,001	10	58	193	73,988
Silver Spring MD	26	23,977	41	81	3	732	1	6	71	24,796
Limited Scope	8	4,240	32	46	2	7	0	0	42	4,293
Statewide	0	0	2	23	0	0	0	0	2	23
Regional	0	0	0	0	0	0	0	0	0	0
Total	76	92,393	190	903	31	9,740	11	64	308	103,100

Source: Bank Records

On a statewide level, the bank provided \$23,000 in donations to organizations that provide financial literacy for low-income senior citizens and students. Additional examples of the bank’s CRA investments in Maryland are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. A study in March 2019 by the National Low-Income Housing Coalition found that Maryland faces a shortage of 118,910 affordable housing units. Other identified needs include workforce development, small business development, and financial literacy. Regarding workforce development, almost 40 percent of the residents have no more than a high school education resulting in a gap in workforce readiness knowledge and skills. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. Some of the investments were considered innovative, and the bank makes extensive efforts to tailor their investments and grants to identified needs. For example, the bank invested in two new affordable housing funds that benefitted the Baltimore MSA assessment area.

SERVICE TEST

The Service Test rating for Maryland is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 103 branches in Maryland, which represents 5.9 percent of bank-wide branches.

The branch distribution in low-income census tracts is below the percent of the population in low-income census tracts. Further, the branch distribution in moderate-income census tracts is above the percent of the population in moderate-income census tracts. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes 40 branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in Maryland.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	5	4.9	358,196	7.8	112	10.3
Moderate	26	25.2	976,087	21.3	238	22.0
Middle	34	33.0	1,786,828	39.1	399	36.9
Upper	38	36.9	1,419,795	31.1	309	28.5
NA	0	0.0	31,129	0.7	25	2.3
Total	103	100.0	4,572,035	100.0	1,083	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 4 branches, including 1 branch in a low-income and 3 in moderate-income census tracts. Further, the bank closed 20 branches including 1 in a low-income, 2 in moderate-income, 8 in middle-income, and 9 in upper-income census tracts. As a result, the bank had a net change of opening 1 branch in a moderate-income census tract.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Maryland. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in Maryland. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 480 community development services since the last evaluation. This performance represents 5.8 percent of bank-wide activities, which is consistent with the statewide share of branches at 5.9 percent. The types of services provided reflect excellent responsiveness to the rated area needs. In Maryland, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

The bank’s performance was strong in both the full-scope Baltimore and Silver Spring MD assessment areas. Performance in the limited-scope assessment areas was generally consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following three community development services benefit the entire state:

- A bank employee serves on the Board of a nonprofit organization that works with over 180 member organizations across the state to build affordable housing, revitalize communities, stabilize families, and promote small businesses.
- A bank employee serves on the Board of an organization that collaborates with other nonprofit organizations within the state to provide community development services to low- and moderate-income individuals and families.
- A bank employee provided small business technical assistance to 18 clients of a statewide nonprofit organization that engages and promotes small businesses in communities within the state.

Refer to the Community Development Services section in each assessment area for additional examples. The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Baltimore MD	90	83	121	6	300
Silver Spring MD	22	46	29	0	97
Salisbury MSA	5	30	11	0	46
Maryland Non-MSA	0	17	7	0	24
California MD	1	1	1	0	3
Wilmington MD	1	0	3	0	4
Statewide Activities	1	3	2	0	6
Total	120	180	174	6	480

Source: Bank Records

BALTIMORE, MD MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BALTIMORE,
MD MSA ASSESSMENT AREA

The Baltimore MSA assessment area consists of all 7 counties within the MSA. The bank operates 64, or 62.1 percent, of its Maryland branch offices in the assessment area. The assessment area represents 56.1 percent of the rated area loans and 68.2 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Baltimore MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	683	13.0	22.5	33.4	28.7	2.3
Population by Geography	2,769,818	9.0	22.0	35.3	32.8	0.8
Housing Units by Geography	1,145,512	10.7	22.9	35.5	30.6	0.3
Owner-Occupied Units by Geography	687,555	4.9	17.3	38.2	39.5	0.1
Occupied Rental Units by Geography	348,757	16.6	32.8	32.9	17.1	0.5
Vacant Units by Geography	109,200	28.2	26.7	26.7	17.6	0.8
Businesses by Geography	186,057	5.1	15.4	38.2	40.5	0.8
Farms by Geography	4,313	1.2	11.2	39.2	48.4	0.1
Family Distribution by Income Level	675,620	22.3	17.0	19.8	40.8	0.0
Household Distribution by Income Level	1,036,312	25.1	15.4	17.4	42.2	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA	\$87,788	Median Housing Value				\$272,723
		Median Gross Rent				\$1,181
		Families Below Poverty Level				7.6%

Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
() The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019, the unemployment rate for the Baltimore MSA, at 3.0 percent, was below the state and national averages for all years under review.

In 2019, according to D&B, the top industries were education and health services, professional and business services, and government. The top employers were Fort George C. Mead, John Hopkins University, Aberdeen Proving Ground, University of Maryland Medical System, and Johns Hopkins Health System.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 49 FDIC-insured institutions operated 666 branches within this area. Of these institutions, the bank ranked 5th in total deposits with a market share of 7.2 percent. Competitor institutions in the Baltimore MSA assessment area included Bank of America N.A., Manufacturers and Traders Trust Company, and PNC Bank N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 39.3 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BALTIMORE, MD MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Baltimore MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects adequate distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans were given similar weight based on the number and dollar volume of these products.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending performance in low-income census tracts was below the demographic data, but similar to the aggregate lending data. Performance in moderate-income census tracts was similar to both demographic and aggregate lending data. Of note, performance in low-income census tracts was consistent with demographic and aggregate lending data in 2017. In addition, lending performance in moderate-income census tracts was above the demographic and aggregate lending data in 2017.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Bank performance in low-income census tracts was below demographics but consistent with aggregate lending data. Small business lending in moderate-income census tracts was consistent with demographic and aggregate lending data. Of note, in 2017 bank performance in moderate-income census tracts was below the demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered, but was consistent with aggregate lending data. However, performance to moderate-income borrowers was below both demographic and aggregate lending data. Of note, the bank's lending to both low- and moderate-income borrowers increased throughout the evaluation period.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 79.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was slightly below demographic data and significantly above the aggregate lending data. However, the bank's performance was considerably lower in 2017 and 2019.

Community Development Lending

Truist is a leader in making community development loans in the Baltimore MSA assessment area. The bank originated 53 community development loans totaling \$232.5 million. This amount represents 68.8 percent, by number, and 82.6 percent, by dollar volume, of total community development loans originated in Maryland. Regarding the community development purpose, 18 loans each supported affordable housing and community services, 6 loans supported economic development, and 11 loans supported revitalization or stabilization. The loans include a \$15.7 million loan to bridge an equity investment in a LIHTC fund. The bank also funded a \$1.9 million loan to a small business to purchase a building in a moderate-income census tract; the development will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes extensive use of complex and innovative investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$74.0 million, or 4.2 percent, of bank-wide community development investments that exceeds the percent of deposits, 3.3, and branches, 3.6. Most CRA investments, \$64.2 million, were for affordable housing, and \$9.0 million were for economic development. Investments also included grants of \$1.2 million. Examples are provided below.

- Invested \$12.7 million to construct and rehabilitate 190 units of public housing for low- and moderate-income families. This is a new type of LIHTC fund for public housing developments only through a credit guaranty enhancement from the largest insurer of public and affordable housing agencies in the nation.
- Invested \$19.6 million in affordable housing bond investments.
- Invested \$8.8 million in New Market Tax Credit projects that support economic development and revitalization in low-income and distressed neighborhoods.
- Donated \$272,000 to an organization that provides financial literacy programs to expand economic opportunity in underserved areas.
- Donated \$65,000 to a workforce development organization that primarily serves low- and moderate-income people to prepare them for entry-level jobs in banking and other professional careers.
- Donated \$33,500 to an organization that provides housing counseling, financial literacy, and foreclosure prevention services to low- and moderate-income people in a neighborhood that was impacted heavily by predatory lending.
- Provided a \$10,000 grant to a non-profit organization to support a year-long paid internship that assists high school students from low-income areas. The internship provides the students with work experience to build their pathway to self-sufficiency.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include workforce development, economic development, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes extensive use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. In addition, the bank invested \$12.7 million in a new LIHTC fund, and the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has improved the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. To illustrate, the percent of branches in low-income census tracts is below the population demographics. However, the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective geographies. Additionally, the bank offers an array of alternative delivery systems for its customers.

This includes 23 branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Baltimore MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	2	3.1	248,579	9.0	89	13.0
Moderate	15	23.4	610,002	22.0	154	22.6
Middle	19	29.7	979,081	35.4	228	33.4
Upper	28	43.8	908,817	32.8	196	28.7
NA	0	0.0	23,339	0.8	16	2.3
Total	64	100.0	2,769,818	100.0	683	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has improved the accessibility of its delivery systems. During the evaluation period, the bank opened four branches, including one branch in a low-income and three in moderate-income census tracts. Further, the bank closed 15 branches including 1 in a low-income, 5 in middle-income, and 9 in upper-income census tracts. As a result, the bank had a net change of opening three branches in moderate-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Maryland.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 300 community development services. This performance represents 62.5 percent of all activities in the state, which is consistent with the assessment area’s share of statewide branches at 62.1 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves as a Board member and on the Executive and Finance Committees of an organization, which promotes economic development in the assessment area.
- A bank employee serves as a Board member and as chair of the loan committee of a local nonprofit organization, which provides affordable housing for low-income individuals and families.

- A bank employee serves on the Board for a local nonprofit organization that partners with challenged and under-resourced Baltimore City public high schools to provide training and other opportunities for low- and moderate-income college-bound students. Approximately 87.5 percent of the Baltimore City public school students qualify for the free or reduced lunch programs.

SILVER SPRING, MD MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SILVER
SPRING, MD MD ASSESSMENT AREA

The Silver Spring MD assessment area consists of both counties within the MD. The bank operates 23, or 22.3 percent, of its Maryland branch offices in the Silver Spring MD assessment area. The assessment area represents 35.0 percent of the rated area loans and 21.8 percent of rated area deposits. In 2019, the Silver Spring MD became the Frederick MD. Of note, only the name of the MD changed in 2019. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Silver Spring MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	276	6.9	23.6	36.6	32.6	0.4
Population by Geography	1,259,232	7.3	22.4	37.7	32.3	0.3
Housing Units by Geography	475,621	6.8	22.7	39.2	31.0	0.3
Owner-Occupied Units by Geography	307,081	3.2	17.9	40.4	38.5	0.1
Occupied Rental Units by Geography	146,648	14.1	32.3	36.9	16.1	0.6
Vacant Units by Geography	21,892	7.9	26.8	38.5	26.4	0.3
Businesses by Geography	99,835	4.5	20.9	35.8	38.6	0.1
Farms by Geography	2,274	3.2	21.9	43.8	31.0	0.0
Family Distribution by Income Level	317,031	21.7	17.1	20.8	40.5	0.0
Household Distribution by Income Level	453,729	22.9	17.1	18.7	41.3	0.0
Median Family Income MSA - 43524 Silver Spring-Frederick-Rockville, MD		\$112,655	Median Housing Value			\$441,782
			Median Gross Rent			\$1,613
			Families Below Poverty Level			4.6%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, unemployment rates for this assessment area decreased during the evaluation period. As of December 31, 2019, at 2.4 percent, the unemployment rate in the Silver Spring MD assessment area was below the state and national averages.

In 2019, according to D&B, the top industries were professional and business services, government, and education and health services. The top employers were the National Institute of Health, Food and Drug Administration, Naval Support Activity Bethesda, Fort Detrick Campus, and Marriott International.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 35 FDIC-insured institutions operated 349 branches within this area. Of these institutions, the bank ranked 9th in total deposits with a market share of 3.8 percent. Competitor institutions in the Silver Spring MD assessment area included Capital One N.A., Bank of America N.A., and Sandy Spring Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 38.8 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE SILVER SPRING, MD ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Silver Spring MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects adequate distribution. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business and home mortgage loans received similar weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending performance in low- and moderate-income census tracts was consistent with both demographic data and aggregate lending data. Of note, performance in moderate-income census tracts was significantly above both demographic and aggregate lending data in 2017. In 2019, performance in moderate-income census tracts was also above the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. However, performance in moderate-income census tracts was above both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. Performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered, and below the aggregate lending data. Lending to moderate-income borrowers was also below both demographic and aggregate lending data. Of note, the bank's lending to both low- and moderate-income borrowers increased throughout the evaluation period.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 74.0 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but well above aggregate lending data.

Community Development Lending

Truist has made a relatively high level of community development loans in the Silver Spring MD assessment area. The bank originated 14 community development loans totaling \$35.2 million. This amount represents 18.2 percent, by number, and 12.5 percent, by dollar volume, of total community development loans originated in Maryland. Regarding the community development purpose, 3 loans supported affordable housing, 8 supported community services, 2 loans supported economic development, and 1 loan supported revitalization or stabilization. Community development loans include a \$5.0 million line of credit to a community development financial institution to support a low- and moderate-income housing development. The bank also funded a \$15.0 million loan to purchase and renovate an office building located in a moderate-income census tract. The revitalization will help attract new businesses and permanent employment opportunities to the area.

INVESTMENT TEST

The level of investments is excellent, and responsiveness to community needs is good. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$24.8 million, or 1.4 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.0, and branches, 1.3.

Most of the CRA investments, \$24.0 million, went towards affordable housing. Investments also included grants totaling \$164,000. Examples are provided below.

- Invested \$7.8 million to construct a 210-unit affordable housing development.
- Invested \$724 thousand in a SBA bond to finance loans to small businesses, which are unable to obtain financing in the private credit market place.
- Donated \$32,500 to a non-profit organization that acquires, rehabilitates, builds, and manages affordable housing.
- Provided \$20,000 in grants to enable community development practitioners to attend training as part of the bank's capacity building program for community economic development organizations.
- Donated \$5,000 to a program that provides foster care and group home programs for youth and teen mothers.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified need is affordable housing. Other identified needs include workforce development, economic development, and financial literacy. The bank responded to most of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are readily accessible to all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the institution's assessment area. To illustrate, the percent of branches in moderate-income census tracts is significantly higher than the population demographics in the respective census tracts. In addition, the percent of branches in low-income census tracts was consistent with the population demographics. Further, the bank offers an array of alternative delivery systems for its customers and has 15 branches serving as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Silver Spring MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	2	8.7	91,831	7.3	19	6.9
Moderate	9	39.1	281,533	22.4	65	23.5
Middle	6	26.1	475,328	37.7	101	36.6
Upper	6	26.1	407,302	32.3	90	32.6
NA	0	0.0	3,238	0.3	1	0.4
Total	23	100.0	1,259,232	100.0	276	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches, but closed one branch in a moderate-income census tract and three branches in middle-income census tracts. However, another branch office is located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Maryland.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 97 community development services. This performance represents 20.2 percent of all activities in the state, which is consistent with the assessment area’s share of statewide branches at 22.3 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves as a Board member for an organization that collaborates with the Department of Juvenile Services and Department of Social Services to provide social support services to children of low-income families.
- A bank employee serves on a county-level loan review committee and reviews applications for affordable housing developments.
- Several bank employees collaborated with local nonprofit organizations to provide technical financial assistance seminars on topics such cash flow, borrowing solutions, insurance, employee benefits, and separation of business from personal finances.

**OTHER MARYLAND ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the four Maryland assessment areas 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
Salisbury MSA	Consistent	Below	Consistent
Maryland Non-MSA	Consistent	Consistent	Consistent
California MSA	Consistent	Consistent	Below
Wilmington MD	Consistent	Consistent	Below

A summary of Truist Bank’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

Salisbury MSA Assessment Area

The Salisbury MSA assessment area consists of Somerset, Wicomico, and Worcester Counties. Truist Bank operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	631	\$28.3 million
Home Mortgage Loans	446	\$74.4 million
Small Farm Loans	6	\$1.1 million
Community Development Loans	8	\$10.8 million
Investments (New)	2	\$202.8 thousand
Investments (Prior Period)	0	\$0
Donations	17	\$29.5 thousand
CD Services	46	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Salisbury MSA assessment area are in Appendix D.

Maryland Non-MSA Assessment Area

The Maryland Non-MSA assessment area consists of Carolina, Dorchester, Garrett, Kent and Talbot Counties. Truist Bank operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	521	\$26.8 million
Home Mortgage Loans	497	\$104.2 million
Small Farm Loans	4	\$356 thousand
Community Development Loans	0	\$0
Investments (New)	2	\$3.2 million
Investments (Prior Period)	0	\$0
Donations	16	\$22.8 thousand
CD Services	24	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Maryland Non-MSA assessment area are in Appendix D.

California MSA Assessment Area

The California MSA assessment area consists of St. Mary's County. Truist Bank operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	228	\$23.1 million
Home Mortgage Loans	250	\$70.7 million
Small Farm Loans	0	\$0
Community Development Loans	1	\$2.4 million
Investments (New)	1	\$485.8 thousand
Investments (Prior Period)	0	\$0
Donations	2	\$2.9 thousand
CD Services	3	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the California MSA assessment area are in Appendix D.

Wilmington MD Assessment Area

The Wilmington MD assessment area consists of Cecil County. Truist Bank operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	128	\$6.8 million
Home Mortgage Loans	140	\$28.3 million
Small Farm Loans	22	\$2.9 million
Community Development Loans	1	\$514 thousand
Investments (New)	1	\$300 thousand
Investments (Prior Period)		\$0
Donations	1	\$1 thousand
CD Services	4	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Wilmington MD assessment area are in Appendix D.

SOUTH CAROLINA

CRA RATING FOR SOUTH CAROLINA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH CAROLINA

The bank operates 74, or 4.2 percent, of its total branch offices in South Carolina. South Carolina accounts for 4.2 percent of the bank-wide deposits. Overall, Truist ranks 3rd in the state in deposit market share at 9.6 percent. Competitor institutions in the South Carolina assessment areas include Wells Fargo Bank, N.A., Bank of America, N.A., and First-Citizens Bank & Trust Company.

SCOPE OF EVALUATION – SOUTH CAROLINA

The evaluation of the South Carolina performance considered the operations of Truist in eight assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Columbia MSA, Greenville-Anderson-Mauldin (Greenville) MSA, and the Charleston-North Charleston (Charleston) MSA assessment areas. Limited scope areas included the Spartanburg MSA, Hilton Head-Bluffton-Beaufort (Hilton Head) MSA, Florence MSA, Sumter MSA, and the South Carolina Non-MSA assessment areas. During the review period, home mortgage and small business loans were given equal weight when considering the number and dollar volume of these products in the state. Small farm loans were limited and not reviewed.

CONCLUSIONS ON PERFORMANCE CRITERIA IN SOUTH CAROLINA

LENDING TEST

The Lending Test rating for South Carolina is High Satisfactory. The bank's lending levels reflect good responsiveness to the South Carolina assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the South Carolina assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each South Carolina assessment area. Examiners based conclusions primarily on the performance in the Columbia, Greenville, and the Charleston MSA assessment areas. The performance in assessment areas that received limited-scope reviews was generally consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage reflects good penetration in each of the assessment areas that received full-scope reviews. Regarding small business loans, good performance in the Columbia and Charleston MSA assessment areas and excellent performance in the Greenville MSA assessment area primarily supports this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans is good among borrowers of different income levels in the Greenville and Charleston MSAs and adequate in the Columbia MSA. In addition, the borrower distribution of small business loans is good among business customers of different sizes for all three assessment areas that received full-scope reviews.

Community Development Loans

Truist is a leader in making community development loans in South Carolina. During this evaluation period, the bank originated 112 community development loans totaling \$338.6 million. This performance represents 6.3 percent, by number, and 5.4 percent, by dollar volume, of total bank-wide community development loans. Community development has increased since the prior evaluation, when 88 community development loans totaling \$335.3 million were originated.

Since the previous evaluation, Truist has originated 31 loans totaling \$36.1 million outside of the assessment areas, but within South Carolina. Since the bank has been responsive to community development needs and opportunities within its assessment areas, examiners included these loans in the overall analysis. The analysis for each full-scope South Carolina assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrated a High Satisfactory record regarding the Investment Test in South Carolina. The level of investments is significant and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position. Investment Test performance in the Greenville MSA assessment area was excellent and performance in the Charleston MSA and Columbia MSA assessment areas was good. Performance among the limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$70.3 million, or 3.9 percent, of bank-wide community development investments, which is below the 4.2 percent of branches and 4.2 percent of deposits in the state. By number of investments, the bank had 267 in South Carolina, or 4.4 percent of all investments. The bank's investments in South Carolina primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$1.5 million.

Qualified Investments – South Carolina										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Columbia MSA	10	20,044	43	449	9	87	0	0	62	20,580
Greenville MSA	4	21,524	92	303	3	15	0	0	99	21,842
Charleston MSA	10	9,241	18	132	5	115	1	50	34	9,538
Limited Scope	12	16,523	48	152	3	34	0	0	63	16,709
Statewide	0	0	3	95	2	45	1	3	6	143
Regional	3	1,473	0	0	0	0	0	0	3	1,473
Total	39	68,805	204	1,131	22	296	2	53	267	70,285

Source: Bank Records

On a statewide and regional level, the bank provided \$1.6 million in investments and grants to organizations with a purpose consistent with the CRA definition of community development. The bank provided 3 LIHTCs for \$1.5 million that enabled the revitalization of a number of low-income multifamily housing developments across South Carolina. Grants of \$40,000 were provided to a nonprofit foundation that helps low-income workers find jobs with a living wage, and 5 other grants for \$102,500 supports economic development in the state. Additional examples of the bank’s CRA investments in South Carolina are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified credit and community development needs in the state include revitalization and expansion of aging infrastructure, particularly school, power, and water facilities in targeted areas; technical assistance and financial literacy training for small businesses and low- and moderate-income residents; and affordable housing. According to a recent housing needs assessment, the state is in need of over 80,000 additional affordable housing units as the existing supply is only enough to serve 20 percent of low-income renters. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development needs in the form of bonds and housing tax credits. These investments fill funding gaps for affordable housing projects and small businesses that normally would not qualify for conventional financing. Although the bank’s investments are not considered innovative, many are complex and specifically tailored to meet identified needs.

SERVICE TEST

The Service Test rating for South Carolina is High Satisfactory. A Low Satisfactory record of retail banking services and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. Truist operates 74 branches in South Carolina, which represents 4.2 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is below the percent of the population in the respective census tracts. The bank offers an array of alternative delivery systems for its customers, and 17 branches serve as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level in South Carolina.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	1.3	158,949	4.5	53	6.5
Moderate	13	17.6	812,980	23.1	205	25.1
Middle	33	44.6	1,510,616	42.8	327	40.0
Upper	27	36.5	1,019,575	28.9	217	26.6
NA	0	0.0	24,847	0.7	15	1.8
Total	74	100.0	3,526,967	100.0	817*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from total number of census tracts on Page 8 (814) results from an increase of 12 census tracts in the Sumter MSA assessment area (Clarendon County was added) and a decrease of 9 census tracts in the Spartanburg MSA assessment area (Union County was removed).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 3 branches in upper-income census tracts. However, the bank closed 17 branches, including 3 in moderate-income, 6 in middle-income, and 8 in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in South Carolina. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in South Carolina. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank provides a relatively high level of community development services. Bank records show employees participated in 235 community development services since the last evaluation. This performance represents 2.8 percent of bank-wide activities and is slightly lower than the statewide share of branches at 4.2 percent. The services reflect good responsiveness to rated area needs. In South Carolina, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

The bank demonstrated the strongest performance in the full-scope Columbia MSA assessment area. Performance in the limited-scope assessment areas was generally consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following community development services benefited multiple assessment areas in the state:

- A bank employee serves on the Board of a statewide CDFI, whose mission is to facilitate community development financing for South Carolina’s most underserved and undercapitalized communities.
- Two bank employees serve on the Board of a statewide CDFI that provides financing for small businesses. The CDFI focuses on supporting economic development in low- and moderate-income areas as well as underserved areas.
- A bank employee serves on the Board of a statewide small business development center that provides free consulting to entrepreneurs seeking to open new, or expand existing, small businesses in South Carolina. The organization helps more than 6,000 clients each year, and has assisted in bringing more than \$1 billion in government contracts to small businesses in South Carolina in the past 5 years.

Refer to the Community Development Services section in each assessment area for examples. The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Columbia MSA	29	24	16	0	69
Greenville MSA	27	26	5	1	59
Charleston MSA	4	23	5	0	32
Spartanburg MSA	0	9	7	0	16
South Carolina Non-MSA	0	22	5	0	27
Hilton Head MSA	0	7	4	0	11
Florence MSA	0	4	0	0	4
Sumter MSA	6	3	0	0	9
Statewide/Out of AA Activities	0	1	7	0	8
Total	66	119	49	1	235
<i>Source: Bank Records</i>					

COLUMBIA, SC MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE COLUMBIA,
SC MSA ASSESSMENT AREA

The Columbia MSA assessment area consists of all 6 counties within the MSA. The bank operates 20, or 27.0 percent, of its South Carolina branch offices in the Columbia MSA assessment area. The assessment area represents 22.2 percent of the rated area loans and 31.9 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within the moderate-, middle-, or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Columbia MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	191	8.4	29.3	31.4	28.3	2.6
Population by Geography	792,530	5.8	27.2	33.6	31.1	2.2
Housing Units by Geography	339,255	6.5	29.0	34.0	30.5	0.1
Owner-Occupied Units by Geography	199,786	2.7	24.6	36.0	36.7	0.0
Occupied Rental Units by Geography	98,191	13.3	34.6	31.3	20.8	0.0
Vacant Units by Geography	41,278	8.6	36.7	30.7	23.4	0.6
Businesses by Geography	44,815	9.4	24.0	32.4	33.6	0.7
Farms by Geography	1,362	1.9	28.9	38.5	30.7	0.0
Family Distribution by Income Level	192,940	23.1	16.7	19.5	40.8	0.0
Household Distribution by Income Level	297,977	24.3	16.2	17.9	41.6	0.0
Median Family Income MSA - 17900 Columbia, SC MSA		\$62,665	Median Housing Value			\$147,580
			Median Gross Rent			\$855
			Families Below Poverty Level			12.0%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment rates have declined. As of December 31, 2019, the unemployment rate in the Columbia MSA, at 2.2 percent, was below the state and national averages for all years under review.

In 2019, according to Moody's Analytics, the top industries were government, education and health services, and professional and business services. The top employers were Prisma Health, Blue Cross and Blue Shield of South Carolina, University of South Carolina, Lexington Medical Center, and Fort Jackson.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 24 FDIC-insured institutions operated 171 branches within this area. Of these institutions, the bank ranked 3rd in total deposits with a market share of 11.4 percent. Competitor institutions in the assessment area include Wells Fargo Bank, N.A., Bank of America, N.A., and First-Citizens Bank & Trust Company.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 39.8 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE COLUMBIA, SC MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Columbia MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. Performance in moderate-income census tracts was slightly below the aggregate lending data, but it was well below the demographic data. Of note, in 2017 performance was slightly above the aggregate lending data, but still below the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending data, but below the demographic data. Performance in moderate-income census tracts was above the aggregate lending and demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the aggregate lending data, but it was below the percent of low-income families even when examiners considered families below the poverty level. Lending to moderate-income borrowers was well below the aggregate lending data, but it was slightly below the demographic data. Of note, the bank's lending to moderate-income families increased in 2019 to a level consistent with the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 76.4 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but it was slightly below the demographic data. However, the bank's performance was not as strong in 2017 and 2019.

Community Development Lending

Truist is a leader in making community development loans in the Columbia MSA assessment area. The bank originated 16 community development loans totaling \$65.2 million. This amount represents 14.3 percent, by number, and 19.3 percent, by dollar volume, of total community development loans originated in South Carolina. Regarding the community development purpose, 9 loans supported affordable housing, 6 loans supported community services, and 1 loan supported economic development. Community development loans include a \$7.4 million revolving line of credit for a LIHTC project. The bank also funded a \$6.3 million loan for construction financing of a 50-unit LIHTC multifamily apartment complex.

INVESTMENT TEST

The institution has a significant level of qualified investments and is occasionally in a leadership position in the assessment area. Responsiveness to community needs is excellent and the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$20.6 million, or 1.2 percent, of bank-wide community development investments that is comparable to the level of deposits, 1.3, and branches, 1.1, in this assessment area. Most of the CRA investments, \$20.0 million, went towards affordable housing. Investments also included grants totaling \$544,000. Examples are provided below.

- The bank funded 5 LIHTCs for \$10.5 million, which enabled the revitalization of 18 affordable multifamily properties in the assessment area.
- The bank funded an \$8.6 million LIHTC, which enabled the construction of a new 50-unit affordable senior citizen multifamily development.
- The bank funded a \$937,000 bond, which enabled the rehabilitation of a 220-unit affordable multifamily housing development.
- The bank provided grants totaling \$110,000 to a nonprofit organization that supports homeless residents with housing and other essential services.
- The bank provided grants totaling \$159,000 to a nonprofit organization that provides financial education and economic development services in underserved communities.
- The bank provided \$13,000 in grants to a charitable organization that specializes in providing free home repair and revitalization services to low-income residents of the assessment area.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are small business economic development, affordable housing, and financial literacy. The bank's investments in this assessment area are specifically tailored to meet the needs identified.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low- and moderate-income census tracts is consistent with the population demographics. The bank offers an array of alternative delivery systems for its customers, and five branches serve as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Columbia MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	5.0	46,114	5.8	16	8.4
Moderate	5	25.0	215,614	27.2	56	29.3
Middle	8	40.0	266,317	33.6	60	31.4
Upper	6	30.0	246,759	31.1	54	28.3
NA	0	0.0	17,726	2.3	5	2.6
Total	20	100.0	792,530	100.0	191	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches. However, the bank closed three branches, including one in a middle-income census tract and two in upper-income census tracts. Two of the closed branches were located in tracts adjacent to low- and moderate-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in South Carolina.

Community Development Services

The bank is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 69 community development services since the last evaluation. This performance represents 29.4 percent of all activities in the state, which is above the assessment area's share of statewide branches at 27.0 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a housing authority that provides affordable housing and housing assistance programs for low-income families in Richland and Lexington Counties.
- A bank employee serves on the Board and as Chair of a nonprofit economic development alliance, which cultivates economic expansion and job creation in central South Carolina.
- A bank employee serves on the Board of a nonprofit organization whose mission is to provide low- and moderate-income students with financial literacy, entrepreneurship, and workforce development skills.

**GREENVILLE, SC MSA ASSESSMENT AREA
(Full-Scope Review)**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GREENVILLE,
SC MSA ASSESSMENT AREA**

The Greenville MSA assessment area consists of all 4 counties within the MSA. The bank operates 20, or 27.0 percent, of its South Carolina branch offices in the Greenville MSA assessment area. The assessment area represents 28.3 percent of the rated area loans and 26.3 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within the middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Greenville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	195	7.7	27.2	40.5	24.6	0.0
Population by Geography	852,631	5.3	23.6	41.7	29.4	0.0
Housing Units by Geography	367,026	5.7	25.0	42.0	27.3	0.0
Owner-Occupied Units by Geography	220,754	3.1	20.9	43.6	32.4	0.0
Occupied Rental Units by Geography	102,937	10.3	30.7	38.7	20.3	0.0
Vacant Units by Geography	43,335	8.3	32.2	41.4	18.1	0.0
Businesses by Geography	48,037	6.0	18.9	39.8	35.4	0.0
Farms by Geography	1,297	2.5	20.0	49.7	27.8	0.0
Family Distribution by Income Level	218,963	22.9	17.1	18.8	41.2	0.0
Household Distribution by Income Level	323,691	24.9	15.9	16.7	42.4	0.0
Median Family Income MSA - 24860 Greenville-Anderson-Mauldin, SC MSA		\$58,097	Median Housing Value			\$141,154
			Median Gross Rent			\$744
			Families Below Poverty Level			12.3%
<small>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.</small>						

According to the U.S. Bureau of Labor Statistics, unemployment rates declined during the examination period. As of December 31, 2019, the unemployment rate in the Greenville MSA at 2.1 percent was below the state and national averages for all years under review.

In 2019, according to Moody’s Analytics, the top industries were professional and business services, government, and manufacturing. The top employers were Prisma Health, Michelin North America, BI-LO Supermarkets, Clemson University, and GE Power & Water.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 32 FDIC-insured institutions operated 146 branches within this area. Of these institutions, the bank ranked 3rd in total deposits with a market share of 11.4 percent. Competitor institutions in the South Carolina assessment areas include Wells Fargo Bank, N.A., Bank of America, N.A., and TD Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 40.0 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GREENVILLE, SC MSA ASSESSMENT AREA

LENDING TEST

Truist Bank's Lending Test performance in the Greenville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. In addition, the bank used flexible lending practices and originated a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans received equal weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of HMDA and small business loans is good.

The geographic distribution of HMDA loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was similar to the aggregate lending and demographic data. Performance in moderate-income census tracts was consistent with the aggregate lending data, but below the demographic data.

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was above the demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the aggregate lending data and the percent of low-income families, when families below the poverty level are considered. Lending to moderate-income borrowers was slightly below the demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 75.2 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but it was slightly below the demographic data. However, the bank's performance was not as strong in 2017 and 2019.

Community Development Lending

Truist has made a relatively high level of community development loans in the Greenville MSA assessment area. The bank originated 11 community development loans totaling \$72.3 million. This amount represents 9.8 percent, by number, and 21.4 percent, by dollar volume, of total community development loans originated in South Carolina. Regarding the community development purpose, 4 loans supported affordable housing, 3 loans supported community services, and 2 loans each supported economic development and revitalization or stabilization. Community development loans include a \$19.3 million loan for the expansion of an existing manufacturing facility. The facility will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$6.4 million loan for the development of a 48-unit affordable housing LIHTC community.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. The bank often serves in a leadership position in the Greenville MSA assessment area. In addition, the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$21.8 million, or 1.2 percent, of bank-wide community development investments that is similar to the percent of deposits, 1.1, and branches, 1.1, in this assessment area. Most of the CRA investments, \$21.5 million, went towards affordable housing. Investments also included grants totaling \$324,000. Examples are provided below.

- The bank funded a \$10.8 million LIHTC that helped enable the construction of a 200-unit affordable housing development in downtown Greenville.
- The bank funded a \$3.3 million LIHTC, which enabled the rehabilitation of several affordable multifamily housing developments.
- The bank funded a \$7.4 million LIHTC, which enabled the construction of a 48-unit affordable multifamily development.
- The bank provided grants totaling \$50,000 to a nonprofit organization that supports homeless residents with housing and other essential services.

- The bank provided grants totaling \$55,000 to a nonprofit organization that provides financial education training to low-income residents to end the cycle of poverty.
- The bank provided over \$45,000 in grants to food banks and other charitable organization that feed the hungry.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, small business economic development, and safety net programs such as food banks. The bank’s investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing and revitalization projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are accessible to limited portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is below the population demographics. Additionally, the branch distribution in moderate-income census tracts is below the population demographics. The bank offers an array of alternative delivery systems for its customers, and three branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Greenville MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	45,334	5.3	15	7.7
Moderate	3	15.0	201,221	23.6	53	27.2
Middle	10	50.0	355,659	41.7	79	40.5
Upper	7	35.0	250,417	29.4	48	24.6
NA	0	0.0	0	0.0	0	0.0
Total	20	100.0	852,631	100.0	195	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of the bank's delivery systems. During the evaluation period, the bank opened one branch in an upper-income census tract. However, the bank closed seven branches, including one in a moderate-income, three in middle-income, and three in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in South Carolina.

Community Development Services

Truist provided a relatively high level of community development services. During the evaluation period, bank records show that employees in the assessment area participated in 59 community development services. This performance represents 25.1 percent of all activities in the state, which is consistent with the assessment area's share of statewide branches at 27.0 percent. The types of services provided reflect good responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of South Carolina's largest and most comprehensive provider of homeless services. The organization operates four adult homeless shelters, a children's shelter as well as a foster home, and provides addiction recovery services.
- A bank employee serves on the Board of a nonprofit organization that provides essential services to low- and moderate-income individuals. Services provided include a workforce development program, food pantry, emergency housing repairs, and subsidized childcare and transportation expenses.
- Eleven bank employees participated in a Bank Bus event as part of a financial literacy outreach in which bank employees also taught a first-time homebuyer class.

**CHARLESTON, SC MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
CHARLESTON, SC MSA ASSESSMENT AREA**

The Charleston MSA consists of all 3 counties within the MSA. The bank operates 12, or 16.2 percent, of its South Carolina branch offices in the Charleston MSA assessment area. The assessment area represents 23.4 percent of the rated area loans and 13.1 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Charleston MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	9.0	22.4	37.8	28.2	2.6
Population by Geography	712,232	6.7	21.4	41.9	29.2	0.8
Housing Units by Geography	309,113	6.7	21.2	40.2	31.1	0.8
Owner-Occupied Units by Geography	173,999	3.3	19.1	42.4	34.9	0.3
Occupied Rental Units by Geography	94,905	12.5	24.4	40.5	21.3	1.4
Vacant Units by Geography	40,209	8.1	22.9	29.9	37.5	1.7
Businesses by Geography	47,597	7.6	19.4	34.0	37.3	1.6
Farms by Geography	1,151	3.1	19.8	45.5	31.1	0.4
Family Distribution by Income Level	173,525	22.6	16.7	19.9	40.8	0.0
Household Distribution by Income Level	268,904	24.5	15.7	17.6	42.2	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$65,558	Median Housing Value			\$241,873
			Median Gross Rent			\$1,021
			Families Below Poverty Level			11.4%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment rates have declined. As of December 31, 2019, the unemployment rate in the Charleston MSA, at 2.0 percent, was below the state and national averages for all years under review.

In 2019, according to Moody's Analytics, the top industries were government, professional and business services, and leisure and hospitality services. The top employers were Joint Base Charleston, Medical University of South Carolina, Boing Company, Roper St. Francis, and NIWC-Atlantic.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 33 FDIC-insured institutions operated 189 branches within this area. Of these institutions, the bank ranked 4th in total deposits with a market share of 6.7 percent. Competitor institutions in the South Carolina assessment areas include Wells Fargo Bank, N.A., Bank of America, N.A., and South State Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, affordable housing represents a need, as 39.3 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHARLESTON, SC MSA ASSESSMENT AREA

LENDING TEST

Truist Bank's Lending Test performance in the Charleston MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. In addition, the bank used flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans received equal weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. Performance in moderate-income census tracts was consistent with the aggregate lending data, but was below the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with the aggregate lending and demographic data. Performance in moderate-income census was slightly above the aggregate lending data and consistent with the demographic data. However, the bank's performance in moderate-income tracts decreased in 2019 and was slightly below the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the aggregate lending data, but it was below the percent of low-income families even when examiners considered families below the poverty level. Lending to moderate-income borrowers was slightly below the aggregate lending and demographic data. However, in 2019 the bank's performance to moderate-income borrowers increased and was above the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 77.7 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was significantly above the aggregate lending data, but it was slightly below the demographic data. However, the bank's performance was not as strong in 2017 and 2019.

Community Development Lending

Truist is a leader in making community development loans in the Charleston MSA assessment area. The bank originated 15 community development loans totaling \$90.9 million. This amount represents 13.4 percent, by number, and 26.8 percent, by dollar volume, of total community development loans originated in South Carolina. Regarding the community development purpose, 7 loans supported affordable housing, 4 loans supported community services and 2 loans each supported economic development and revitalization or stabilization. Community development loans include a \$24.4 million loan to build a 264-unit multifamily apartment complex in a moderate-income census tract. The apartment complex provides affordable housing for low- and moderate-income families. The bank also funded a \$5.5 million loan to a nonprofit community service organization to purchase two buildings. The organization provides job training and employment services for disadvantaged individuals.

INVESTMENT TEST

The institution has a significant level of qualified investments and is occasionally in a leadership position in the assessment area. Responsiveness to community needs is excellent and the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$9.5 million, or 0.5 percent, of bank-wide community development investments that is similar to the percent of deposits, 0.6, and percent of branches, 0.7, in this assessment area. Most of the CRA investments, \$9.2 million, went towards affordable housing. Investments also included grants totaling \$315,000. Examples are provided below.

- The bank funded an \$8.7 million LIHTC, which enabled the construction of an affordable 60-unit multifamily housing development.
- The bank provided grants totaling \$150,000 to a nonprofit organization that promotes economic development opportunities for low-income families and small businesses.
- The bank provided grants totaling over \$50,000 to nonprofit organizations that provide financial literacy training, after-school programs, and meals to low-income residents.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, after-school programs, and basic subsistence to low- and moderate-income families. The bank's investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts, which is below the population demographics. However, the branch distribution in moderate-income census tracts is above the population demographics. The bank offers an array of alternative delivery systems for its customers, and four branches serve as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Charleston MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	47,435	6.7	14	9.0
Moderate	3	25.0	152,704	21.4	35	22.4
Middle	4	33.3	298,498	41.9	59	37.8
Upper	5	41.7	207,848	29.2	44	28.2
NA	0	0.0	5,747	0.8	4	2.6
Total	12	100.0	712,232	100.0	156	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of the bank's delivery systems. During the evaluation period, the bank opened one branch in a moderate-income census tract and closed two branches in moderate-income census tracts. As a result, the bank had a net change of closing one branch in a moderate-income census tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in South Carolina.

Community Development Services

Truist provides a relatively high level of community development services. During the evaluation period, bank records show that employees in the assessment area participated in 32 community development services. This performance represents 13.6 percent of all activities in the state, which is slightly lower than the assessment area's share of statewide branches at 16.2 percent. The types of services provided reflect good responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an economic development alliance whose mission is to attract new and expand existing businesses in the Charleston MSA.
- A bank employee serves on the Board of a nonprofit organization that provides free services for low- and moderate-income individuals seeking financial stability. Services include financial literacy education, workforce development and employment assistance, free tax preparation, and public assistance application assistance.
- A bank employee serves on the Board of a nonprofit organization that provides free workforce development and job training to low- and moderate-income individuals.

**OTHER SOUTH CAROLINA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the five South Carolina assessment areas 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
Spartanburg MSA	Consistent	Consistent	Consistent
South Carolina Non-MSA	Consistent	Consistent	Consistent
Hilton Head MSA	Consistent	Consistent	Consistent
Florence MSA	Consistent	Exceeds	Consistent
Sumter MSA	Consistent	Below	Consistent

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas are included in Appendix E.

Spartanburg MSA Assessment Area

The Spartanburg MSA assessment area consists of Spartanburg and Union Counties. Truist Bank operates six branches in this assessment area. In 2019, the bank removed Union County from its delineated assessment area due to OMB MSA changes. The changes decreased the number of census tracts in the assessment area by nine: four in moderate-income census tracts and five in middle-income census tracts. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,200	\$113.7 million
Home Mortgage Loans	972	\$144.9 million
Small Farm Loans	5	\$316 thousand
Community Development Loans	18	\$16.9 million
Investments (New)	4	\$5.4 million
Investments (Prior Period)	0	\$0
Donations	23	\$68.9 thousand
CD Services	16	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Spartanburg MSA assessment area are in Appendix D.

South Carolina Non-MSA Assessment Area

The South Carolina Non-MSA assessment area consists of Colleton, Georgetown, Hampton, McCormick, Newberry, Oconee, and Orangeburg Counties. Truist Bank operates nine branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,012	\$40.6 million
Home Mortgage Loans	863	\$166.2 million
Small Farm Loans	6	\$198 thousand
Community Development Loans	5	\$11.6 million
Investments (New)	2	\$5.5 million
Investments (Prior Period)	0	\$0
Donations	4	\$4 thousand
CD Services	27	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the South Carolina Non-MSA assessment area are in Appendix D.

Hilton Head MSA Assessment Area

The Hilton Head MSA assessment area consists of Beaufort and Jasper Counties. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	614	\$30.4 million
Home Mortgage Loans	464	\$178.6 million
Small Farm Loans	0	\$0.0
Community Development Loans	6	\$14.3 million
Investments (New)	1	\$1.9 million
Investments (Prior Period)	0	\$0
Donations	9	\$62.3 thousand
CD Services	11	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Hilton Head MSA assessment area are in Appendix D.

Florence MSA Assessment Area

The Florence MSA assessment area consists of Darlington and Florence Counties. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	560	\$35.7 million
Home Mortgage Loans	374	\$61.0 million
Small Farm Loans	2	\$100 thousand
Community Development Loans	10	\$31.3 million
Investments (New)	1	\$3.5 million
Investments (Prior Period)	0	\$0
Donations	12	\$31.5 thousand
CD Services	4	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Florence MSA assessment area are in Appendix D.

Sumter MSA Assessment Area

The Sumter MSA assessment area consists of Sumter County. Truist Bank operates two branches in this assessment area. In 2019, the bank added Clarendon County to its delineated assessment area due to OMB MSA changes. The changes increased the number of census tracts in the assessment area by 12: Two in moderate-income census tracts, eight in middle-income census tracts, one in an upper-income census tract, and the remaining census tract had no income designation. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	395	\$18.1 million
Home Mortgage Loans	211	\$26.3 million
Small Farm Loans	1	\$126 thousand
Community Development Loans	0	\$0
Investments (New)	1	\$216.9 thousand
Investments (Prior Period)	0	\$0
Donations	6	\$22.9 thousand
CD Services	9	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Sumter MSA assessment area are in Appendix D.

WEST VIRGINIA

CRA RATING FOR WEST VIRGINIA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WEST VIRGINIA

The bank operates 42 or 2.4 percent of its total branch offices in West Virginia. West Virginia accounts for 2.8 percent of the bank-wide deposits. Overall, Truist ranks 1st in the state in deposit market share at 15.4 percent. Competitor institutions in the West Virginia assessment areas include United Bank, WesBanco Bank, Inc., and City National Bank of West Virginia.

SCOPE OF EVALUATION – WEST VIRGINIA

The evaluation of the West Virginia performance considered the operations of Truist in seven assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the West Virginia Non-MSA, Charleston MSA, and the Huntington-Ashland (Huntington) MSA assessment areas. Limited scope areas included the Morgantown, Beckley, Wheeling, and Parkersburg-Vienna (Parkersburg) MSA assessment areas. During the review period, small business loans were given slightly more weight than home mortgage loans when considering the number and dollar volume of these products in the state. Based on the minimal number of loans, small farm loans were not reviewed.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WEST VIRGINIA

LENDING TEST

The Lending Test rating for West Virginia is High Satisfactory. The bank's lending levels reflect good responsiveness to the West Virginia assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the West Virginia assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each West Virginia assessment area. Examiners based conclusions primarily on the performance in the West Virginia Non-MSA, Charleston MSA, and Huntington MSA assessment areas. Performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage and small business reflects good penetration throughout the assessment areas. Good performance in the West Virginia Non-MSA, Huntington MSA, and Charleston MSA assessment areas supports this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of small business loans is good among business customers of different sizes for all full-scope assessment areas. The borrower distribution of home mortgage loans is also good among borrowers of different income levels. The bank's performance was good in the West Virginia Non-MSA and Charleston MSA assessment areas, and adequate in the Huntington MSA assessment area.

Community Development Loans

Truist is a leader in making community development loans in West Virginia. During this evaluation period, the bank originated 97 community development loans totaling \$112.8 million. This performance represents 5.5 percent, by number, and 1.8 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 63 community development loans totaling \$101.1 million were originated.

Since the previous evaluation, Truist originated 5 loans totaling \$2.6 million outside of the assessment areas, but within West Virginia. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans was included. The analysis for each full-scope West Virginia assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in West Virginia. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position. The bank's performance was excellent in each of the three full-scope assessment areas. Performance among the limited-scope assessment areas was consistent with the full-scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$60.5 million, or 3.4 percent, of bank wide community development investments that exceeds the percent of deposits, 2.8, and the percent of branches, 2.4, in the state. By number of investments, the bank had 312 in West Virginia, or 5.2 percent of all investments. The bank's investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$1.2 million.

Qualified Investments – West Virginia										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Non-MSA WV	11	13,506	51	109	5	6,140	1	5	68	19,760
Charleston MSA	15	19,879	92	401	11	790	7	71	125	21,141
Huntington MSA	10	7,128	24	99	4	16	4	16	42	7,259
Limited Scope	9	11,925	38	114	10	34	3	20	60	12,093
Statewide	3	20	4	25	6	125	0	0	13	170
Regional	1	60	3	16	0	0	0	0	4	76
Total	49	52,518	212	764	36	7,105	15	112	312	60,499

Source: Bank Records

On a statewide level, the bank provided \$170,000 in grants to 9 organizations with missions of affordable housing, economic development, or community services for low- and moderate-income people and areas. One example is \$105,000 in donations to an economic development fund that provides affordable, flexible capital and advisory services to small and emerging businesses in economically distressed and underserved rural communities. On a regional level, the bank invested \$60,000 in a mortgage-backed security to a moderate-income borrower, and donated \$15,000 to a church foster care organization. Additional examples of the bank’s CRA investments in West Virginia are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development with particular focus on the tourism, agribusiness, and artisan crafts small businesses, food insecurity, healthcare, revitalization and stabilization of downtown areas with high vacancies, economic inclusion, and financial literacy. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for West Virginia is High Satisfactory. A Low Satisfactory record of retail banking services and an Outstanding record of community development services supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment areas. Truist operates 42 branches in West Virginia, which represents 2.4 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is above the percent of the population in low-income census tracts. However, the branch distribution in moderate-income census tracts is well below the percent of the population in moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers, and two branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in West Virginia.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	7.1	18,374	1.5	9	2.7
Moderate	2	4.8	176,965	14.5	65	19.6
Middle	27	64.3	728,845	58.8	180	54.4
Upper	10	23.8	306,622	25.0	76	23.0
NA	0	0.0	2,815	0.2	1	0.3
Total	42	100.0	1,225,621	100.0	331*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from total number of census tracts on Page 8 (335) results from decreases of 10 census tracts in the West Virginia Non-MSA assessment area (Morgan and Jackson Counties were removed) and 5 census tracts in the Huntington MSA assessment area (Lincoln County was removed) and an increase of 11 census tracts in the Charleston MSA assessment area (Jackson and Lincoln Counties were added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one branch in a low-income census tract. Further, the bank closed 17 branches, including 1 in a low-income, 2 in moderate-income, 10 in middle-income, and 4 in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in West Virginia. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in West Virginia. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 317 community development services since the last evaluation. This performance represents 3.8 percent of bank-wide activities, which is above the statewide share of branches at 2.4 percent. The types of services provided reflect excellent responsiveness to the rated area needs.

In West Virginia, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

The bank’s performance was strongest in the full-scope Charleston and Huntington MSA assessment areas. Performance in the limited-scope assessment areas was generally consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following three community development services benefit the entire state:

- A bank employee serves on the Board and the Finance Committee of a statewide affordable housing trust fund that provides grants and low-interest loans to non-profit organizations and affordable housing developers to rehabilitate lots for housing construction.
- A bank employee serves on the Steering Committee of a statewide nonprofit coalition that revitalizes abandoned and dilapidated buildings in low- and moderate-income areas.
- A bank employee serves on the Board of a statewide child welfare organization that provides services such as emergency shelter, adoption and foster care, day care, and mediation.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
West Virginia Non-MSA	6	63	20	0	89
Charleston MSA	11	42	23	8	84
Huntington MSA	3	29	15	2	49
Morgantown MSA	3	17	4	1	25
Beckley MSA	0	8	11	0	19
Wheeling MSA	2	13	8	0	23
Parkersburg MSA	0	13	4	0	17
Statewide Activities	0	6	3	2	11
Total	25	191	88	13	317

Source: Bank Records

**WEST VIRGINIA NON-MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WEST
VIRGINIA NON-METROPOLITAN ASSESSMENT AREA**

The West Virginia Non-MSA assessment area consists of 11 counties, as noted in the Description of Assessment Area section of this evaluation. The bank operates 15, or 35.7 percent, of its West Virginia branch offices in this assessment area. The assessment area represents 28.4 percent of the rated area loans and 28.5 percent of rated area deposits.

In 2019, Morgan and Jackson Counties were removed from the delineated assessment area due to OMB MSA changes. This decreased the number of census tracts in the assessment area by 10, including 5 middle-income and 5 upper-income census tracts. Additionally, Mason County was removed from the delineated assessment area due to a branch closing. This decreased the number of census tracts in the assessment area by 6: all 6 were middle-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: West Virginia Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	100	1.0	17.0	54.0	28.0	0.0
Population by Geography	374,674	0.4	13.3	54.5	31.9	0.0
Housing Units by Geography	179,886	0.5	13.5	55.6	30.4	0.0
Owner-Occupied Units by Geography	113,633	0.1	12.0	55.6	32.4	0.0
Occupied Rental Units by Geography	38,012	1.6	16.6	52.2	29.7	0.0
Vacant Units by Geography	28,241	0.5	15.6	60.4	23.5	0.0
Businesses by Geography	16,317	1.3	13.8	47.3	37.7	0.0
Farms by Geography	492	0.0	8.7	55.1	36.2	0.0
Family Distribution by Income Level	100,436	20.9	16.8	18.6	43.7	0.0
Household Distribution by Income Level	151,645	23.6	15.9	16.3	44.2	0.0
Median Family Income Non-MSAs – WV		\$48,507	Median Housing Value			\$100,657
			Median Gross Rent			\$628
			Families Below Poverty Level			14.3%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0; (*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates fluctuated for each county in this assessment area. As of December 31, 2019, the overall average unemployment rate for this assessment area was 5.8 percent. All 8 counties had rates above the national average, and 4 counties had rates above the state average. Harrison County recorded the lowest unemployment rate at 4.6 percent and Nicholas County recorded the highest unemployment rate of 7.8 percent, as of December 31, 2019.

In 2019, according to D&B, the top industries were services, retail trade, and non-classifiable establishments. Information regarding top employers is not available.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 30 FDIC-insured institutions operated 135 branches within this area. Of these institutions, the bank ranked 1st in total deposits with a market share of 21.0 percent. Competitor institutions in the West Virginia Non-MSA assessment area included MVB Bank, Inc., First Community Bank, and City National Bank of West Virginia.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 37.7 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WEST VIRGINIA NON-MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the West Virginia Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business and home mortgage loans received equal weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data, but was given little weight since well under one percent of owner-occupied housing units are located in those tracts. The bank's performance in moderate-income census tracts was below the demographic data, but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with both the percent of low-income families, when families below the poverty level are considered, and aggregate lending data. Lending to moderate-income borrowers was below demographic data, but consistent with aggregate lending data. In addition, the bank's lending to moderate-income borrowers increased in 2019.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 82.6 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance noted was above demographic data and almost double the aggregate lending data. However, the bank's performance was considerably lower in 2017 and declined to 55.1 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area remained constant.

Community Development Lending

Truist is a leader in making community development loans in the West Virginia Non-MSA assessment area. The bank originated 39 community development loans totaling \$30.7 million. This amount represents 40.2 percent, by number, and 27.2 percent, by dollar volume, of total community development loans originated in West Virginia. Regarding the community development purpose, 8 loans supported affordable housing, 24 loans supported community services, 4 loans supported economic development, and 3 loans supported revitalization or stabilization. Community development loans include the renewal of a \$2.0 million line of credit to a medical nonprofit organization that primarily serves low- and moderate-income individuals. The bank also funded a \$1.0 million loan for the expansion of a manufacturing facility. The facility will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$19.8 million, or 1.1 percent, of bank wide community development investments, which slightly exceeds the percent of deposits, 0.8, and branches, 0.8. Most of the CRA investments, \$13.5 million, went towards affordable housing, and \$6.1 million went towards economic development. Investments also included grants totaling \$161,000. Examples are provided below.

- Invested \$6.1 million in a new market tax credit investment to fund the redevelopment of a vacant building into a community space in a low-income area. The project will create 29 full time jobs, and 100 construction jobs.
- Invested \$4 million in a LIHTC project to build 20 three-bedroom single-family affordable homes with attached garages and community space.
- Invested \$243,000 in a CRA fund for affordable housing lending.
- Provided grants totaling \$30,000 to support the bank's student Homelessness Outreach Initiative that focuses on supporting long-term solutions for housing for identified students and their families.
- Donated \$5,000 to a new small business incubator program that will provide high-tech business services including prototype development, product design and development, retooling and supply chain assistance.
- Donated \$5,000 to an organization that works to revitalize low- and moderate-income downtown rural areas that are blighted and in need of restoration.
- Donated \$6,500 to programs that provide food for low-income families.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, food insecurity, healthcare, revitalization and stabilization, economic inclusion, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of tax credit investments. These investments fill funding gaps for affordable housing projects and small businesses that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is well above the population demographics. However, the bank does not operate any branches in moderate-income census tracts, which is well below the population demographics. The bank offers an array of alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the West Virginia Non-MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	6.7	1,496	0.4	1	1.1
Moderate	0	0.0	39,547	12.1	14	15.6
Middle	11	73.3	192,360	58.7	52	57.8
Upper	3	20.0	94,540	28.8	23	25.5
NA	0	0.0	0	0.0	0	0.0
Total	15	100.0	327,943	100.0	90*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from the total number of census tracts on Page 266 (100) results from the decrease of 10 census tracts in this assessment area (Morgan and Jackson Counties were removed).*

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of the bank’s delivery systems. During the evaluation period, the bank did not open any branches. However, the bank closed six branches, including four in middle-income census tracts and two in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in West Virginia.

Community Development Services

Truist provided a relatively high level of community development services. During the evaluation period, bank records show that employees in the assessment area participated in 89 community development services. This performance represents 28.1 percent of all activities in the state, which is well below the assessment area’s share of branches at 35.7 percent. However, the types of services provided reflect good responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an economic development authority that provides technical assistance for starting, expanding, and relocating small businesses within Mercer County.

- A bank employee serves on the Board of a nonprofit organization that provides health care, meals, transportation, and in-home services for low- and moderate-income senior citizens in Mason County.
- A bank employee serves on the Board of an economic development authority that recruits and expands businesses in Mason County.

CHARLESTON, WV MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE
CHARLESTON, WV MSA ASSESSMENT AREA

The Charleston MSA assessment area consists of all 3 counties within the MSA. The bank operates 9, or 21.4 percent, of its West Virginia branch offices in the Charleston MSA assessment area. The assessment area represents 22.7 percent of the rated area loans and 36.2 percent of rated area deposits.

In 2019, Jackson and Lincoln Counties in West Virginia were added to the Charleston MSA due to OMB MSA changes. This change increased the number of census tracts in the assessment area by 11, including 2 moderate-income, 8 middle-income, and 1 upper-income census tract.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Charleston MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	64	3.1	25.0	51.6	20.3	0.0
Population by Geography	223,922	1.6	19.1	55.3	24.0	0.0
Housing Units by Geography	108,095	2.1	19.8	55.1	23.0	0.0
Owner-Occupied Units by Geography	67,289	1.0	17.6	56.7	24.7	0.0
Occupied Rental Units by Geography	27,968	3.8	22.0	52.0	22.2	0.0
Vacant Units by Geography	12,838	4.2	25.8	53.6	16.4	0.0
Businesses by Geography	12,127	3.8	14.9	58.5	22.9	0.0
Farms by Geography	190	1.1	19.5	58.9	20.5	0.0
Family Distribution by Income Level	60,078	21.9	17.5	19.5	41.2	0.0
Household Distribution by Income Level	95,257	24.5	15.9	17.7	41.9	0.0
Median Family Income MSA - 16620 Charleston, WV MSA		\$55,786	Median Housing Value			\$107,844
			Median Gross Rent			\$671
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019 at 4.7 percent, the unemployment rate in the Charleston MSA was below the state average, but above the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were government, education and health services, and professional and business services. The top employers were Charleston Area Medical Center, Herbert J. Thomas Memorial Hospital Association, Frontier Communications, Walmart Inc., and MC Junking Corp.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 17 FDIC-insured institutions operated 76 branches within this area. Of these institutions, the bank ranked 1st in total deposits with a market share of 26.6 percent. Competitor institutions in the Charleston MSA assessment area included United Bank, City National Bank of West Virginia, and The Huntington National Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 39.4 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHARLESTON, WV MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Charleston MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data, but was given little weight since only one percent of owner-occupied housing units is located in those tracts. The bank's performance in moderate-income census tracts was below both demographic and aggregate lending data. However, performance in 2017 in moderate-income census tracts was consistent with both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. Small business lending in moderate-income census tracts was slightly below demographics and consistent with aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with both the percent of low-income families when families below the poverty level are considered and aggregate lending data. Lending to moderate-income borrowers was also consistent with the demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 76.6 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above both demographic and aggregate lending data. However, the bank's performance was considerably lower in 2017 and declined to 60.7 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area slightly increased.

Community Development Lending

Truist is a leader in making community development loans in the Charleston MSA assessment area. The bank originated 24 community development loans totaling \$38.3 million. This amount represents 24.7 percent, by number, and 34.0 percent, by dollar volume, of total community development loans originated in West Virginia. Regarding the community development purpose, 3 loans supported affordable housing, 14 loans supported community services, 3 loans supported economic development, and 4 loans supported revitalization or stabilization. Community development loans include a \$10.0 million loan to build a retail development. The development is located in a state designated Economic Opportunity District and will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$2.8 million line of credit to bridge equity investments in a LIHTC fund.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$21.1 million or 1.2 percent of bank wide community development investments that is similar to the percent of deposits, 1.1, and exceeds the percent of branches, 0.5. Most of the CRA investments, \$19.9 million, went towards affordable housing. Investments also included grants totaling \$549,000. Examples are provided below.

- Invested \$7.0 million in affordable housing bonds.
- Invested \$7.0 million in a SBA bond investment to finance loans to small businesses that are unable to obtain financing in the private credit marketplace.
- Invested \$6.1 million in LIHTC projects.
- Donated \$15,000 to an organization working to revitalize vacant buildings in low- and moderate-income areas of downtown Charleston.
- Donated \$17,000 to a medical clinic that provides services to uninsured, underinsured, and medically underserved people.
- Donated \$10,000 to a medical facility focused on treating drug addiction that primarily serves low-income patients.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, food insecurity, healthcare, revitalization and stabilization, economic inclusion, and financial literacy. The bank responded to each of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of tax credits investments. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is well above the population demographics. However, the bank does not operate any branches in moderate-income census tracts, which is well below the population demographics. The bank offers an array of alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the Charleston MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	11.1	3,621	1.3	2	2.7
Moderate	0	0.0	48,860	17.8	17	22.7
Middle	6	66.7	156,320	56.9	40	53.3
Upper	2	22.2	65,937	24.0	16	21.3
NA	0	0.0	0	0.0	0	0.0
Total	9	100.0	274,738	100.0	75*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from the total number of census tracts on Page 272 (64) results from the increase of 11 census tracts in this assessment area (Jackson and Lincoln Counties were added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of the bank’s delivery systems. During the evaluation period, the bank did not open any branches. However, the bank closed three branches, including one each in a moderate-income, middle-income, and upper-income census tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in West Virginia.

Community Development Services

The bank is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 84 community development services since the last evaluation. This performance represents 26.5 percent of all activities in the state, which is above the assessment area’s share of branches at 21.4 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a nonprofit economic development organization that supports workforce development initiatives to meet small business needs in Kanawha County. These programs and services are funded through the Federal government’s Workforce Innovation and Opportunity Act.
- A bank employee serves on the Board of an organization that provides affordable housing for low-income families in Kanawha County. The organization operates a homeless shelter as well as a transitional living program for youth who are in state custody or are homeless.
- A bank employee is a Board member for a foundation that makes investments in community and economic development projects in low- and moderate-income census tracts within all three counties in the assessment area.

HUNTINGTON, WV MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HUNTINGTON,
WV MSA ASSESSMENT AREA

The Huntington MSA assessment area consists of all 4 counties within the MSA. The bank operates 4, or 9.5 percent, of its West Virginia branch offices in this assessment area. The assessment area represents 13.1 percent of the rated area loans and 9.9 percent of rated area deposits.

In 2019, Lincoln County was removed from the bank’s assessment area due to OMB MSA changes. This decreased the number of census tracts in the assessment area by 5, including 2 moderate-income and 3 middle-income tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Huntington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	9.1	23.6	40.0	25.5	1.8
Population by Geography	216,479	5.4	17.0	48.7	27.5	1.3
Housing Units by Geography	99,151	7.0	18.1	48.1	26.3	0.6
Owner-Occupied Units by Geography	61,407	2.9	15.2	51.2	30.7	0.0
Occupied Rental Units by Geography	24,958	14.5	21.8	41.3	20.4	2.0
Vacant Units by Geography	12,786	12.0	24.8	45.9	16.8	0.6
Businesses by Geography	9,845	12.8	11.6	42.9	31.9	0.8
Farms by Geography	272	3.3	11.0	51.8	33.8	0.0
Family Distribution by Income Level	55,308	22.6	16.8	19.4	41.1	0.0
Household Distribution by Income Level	86,365	27.5	14.9	16.0	41.7	0.0
Median Family Income MSA - 26580 Huntington-Ashland, WV-KY-OH MSA		\$55,040	Median Housing Value			\$111,292
			Median Gross Rent			\$637
			Families Below Poverty Level			13.6%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates have declined. As of December 31, 2019 at 4.7 percent, the unemployment rate in the Huntington MSA was below the state average, but above the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were education and health services, government, and retail trade. The top employers were King's Daughters Medical Center, Cabell Huntington Hospital, St. Mary's Medical Center, Marshall University, and Marathon. In 2019, two large hospitals merged, which resulted in significant healthcare job losses.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 27 FDIC-insured institutions operated 117 branches within this area. Of these institutions, the bank ranked 2nd in total deposits with a market share of 8.8 percent. Competitors institutions included City National Bank of West Virginia, Putnam County Bank, and JPMorgan Chase Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 39.4 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE HUNTINGTON, WV MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Huntington MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank used flexible lending practices and originated a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. The bank's performance in moderate-income census tracts was below demographic data, but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was above both demographic and aggregate lending data. Small business lending in moderate-income census tracts was slightly below demographic data, but consistent with aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered, and slightly below aggregate lending data. Lending to moderate-income borrowers was consistent with both demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 77.4 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was consistent with demographic data and significantly above aggregate lending data. However, the bank's performance was considerably lower in 2017 and declined to 55.7 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area remained constant.

Community Development Lending

Truist has made a relatively high level of community development loans in the Huntington MSA assessment area. The bank originated 8 community development loans totaling \$5.7 million. This amount represents 8.3 percent, by number, and 5.0 percent, by dollar volume, of total community development loans originated in West Virginia. Regarding the community development purpose, 1 loan supported affordable housing, 3 loans each support community services and economic development, and 1 loan supported revitalization or stabilization. Community development loans include a \$1.1 million line of credit to bridge equity investments in a LIHTC fund. The bank also funded a \$508,000 loan to a community-based organization that provides support services for individuals with developmental challenges.

INVESTMENT TEST

The level of investments is excellent, and responsiveness to community needs is good. Also, the bank makes significant use of complex investments and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$7.3 million or 0.4 percent of bank wide community development investments that slightly exceeds the percent of deposits, 0.3, and branches, 0.2. Most of the CRA investments, \$7.1 million, went towards affordable housing. Investments also included grants totaling \$146,000. Examples are provided below.

- Invested \$5.2 million in 3 LIHTC projects to produce 109 affordable housing units.

- Provided \$10,000 in donations to an organization that provides food to low-income students in the summer.
- Donated \$16,000 to an economic development organization serving the assessment area.
- Donated \$5,000 to an organization working to revitalize a high poverty area.
- Donated \$5,000 to a nonprofit microenterprise development center and business incubator.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, food insecurity, healthcare, revitalization and stabilization, economic inclusion, and financial literacy. The bank responded to most of these identified needs using CRA qualified investments and grants.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of tax credits investments. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank’s investments are considered innovative; however, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The one branch a in low-income census tract is well above the population demographics. However, the bank does not operate any branches in moderate-income census tracts, which is well below the population demographics. The bank offers an array of alternative delivery systems for its customers, and one branch serves as a multicultural banking center. The following table reflects the bank’s branch distribution by tract income level for the Huntington MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	25.0	11,778	6.0	5	10.0
Moderate	0	0.0	28,971	14.9	11	22.0
Middle	2	50.0	91,754	47.1	19	38.0
Upper	1	25.0	59,601	30.6	14	28.0
NA	0	0.0	2,815	1.4	1	2.0
Total	4	100.0	194,919	100.0	50*	100.0

Source: 2015 ACS Data & Bank Records

**Difference from the total number of census tracts on Page 277 (55) results from the decrease of 5 census tracts in this assessment area (Lincoln County was removed).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of the bank's delivery systems. During the evaluation period, the bank opened one branch in a low-income census tract. Further, the bank closed three branches, including one in a low-income census tract and two in middle-income census tracts. However, both branches in middle-income census tracts border low- and moderate-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in West Virginia.

Community Development Services

The bank is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 49 community development services since the last evaluation. This performance represents 15.5 percent of all activities in the state, which is above the assessment area's share of branches at 9.5 percent. The types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an organization that provides affordable housing for low-income families in Putnam County.
- A bank employee serves on the Board of an economic development organization that attracts, retains, and expands small businesses within Wayne and Cabell Counties.
- A bank employee serves on the Board of a nonprofit economic development organization that engages in public and private partnerships to attract, retain, and expand business operations within an area comprising the Charleston and Huntington MSAs.

**OTHER WEST VIRGINIA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the four West Virginia assessment areas 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
Morgantown MSA	Consistent	Consistent	Consistent
Beckley MSA	Consistent	Consistent	Below
Wheeling MSA	Consistent	Consistent	Consistent
Parkersburg MSA	Consistent	Consistent	Consistent

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is included in Appendix E.

Morgantown MSA Assessment Area

The Morgantown MSA assessment area consists of Monongalia and Preston Counties. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	685	\$42.6 million
Home Mortgage Loans	595	\$95.5 million
Small Farm Loans	0	\$0
Community Development Loans	5	\$11.8 million
Investments (New)	1	\$4.4 million
Investments (Prior Period)	0	\$0
Donations	20	\$82.5 thousand
CD Services	25	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Morgantown MSA assessment area are in Appendix D.

Beckley MSA Assessment Area

The Beckley MSA assessment area consists of Fayette and Raleigh Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	788	\$57.1 million
Home Mortgage Loans	376	\$39.5 million
Small Farm Loans	0	\$0
Community Development Loans	5	\$9.4 million
Investments (New)	1	\$1.9 million
Investments (Prior Period)	0	\$0
Donations	11	\$35.7 thousand
CD Services	19	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Beckley MSA assessment area are in Appendix D.

Wheeling MSA Assessment Area

The Wheeling MSA assessment area consists of Marshall and Ohio Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	246	\$17.4 million
Home Mortgage Loans	379	\$38.4 million
Small Farm Loans	0	\$0
Community Development Loans	9	\$4.5 million
Investments (New)	1	\$3.5 million
Investments (Prior Period)	0	\$0
Donations	17	\$49.5 thousand
CD Services	23	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Wheeling MSA assessment area are in Appendix D.

Parkersburg MSA Assessment Area

The Parkersburg MSA assessment area consists of Wirt and Wood Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	255	\$14.3 million
Home Mortgage Loans	209	\$18.7 million
Small Farm Loans	3	\$1.1 million
Community Development Loans	2	\$9.8 million
Investments (New)	1	\$2.1 million
Investments (Prior Period)	0	\$0
Donations	8	\$17.1 thousand
CD Services	17	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Parkersburg MSA assessment area are in Appendix D.

ALABAMA

CRA RATING FOR ALABAMA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

The bank operates 64, or 3.6 percent, of its total branch offices in Alabama. Alabama accounts for 2.2 percent of the bank-wide deposits. Overall, Truist ranks 6th in the state in deposit market share at 3.3 percent. Competitor institutions in the Alabama assessment areas include Regions Bank, BBVA USA, and Wells Fargo Bank, N.A.

SCOPE OF EVALUATION – ALABAMA

The evaluation of the Alabama performance considered the operations of Truist in eleven assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Birmingham-Hoover MSA (Birmingham), Huntsville MSA, Daphne-Fairhope-Foley (Daphne) MSA, and Alabama Non-MSA. Limited scope areas included the Auburn MSA, Anniston-Oxford-Jacksonville (Anniston) MSA, Montgomery MSA, Mobile MSA, Tuscaloosa MSA, Gadsden MSA, and Dothan MSA assessment areas. During the review period home mortgage and small business loans were given equal weight when considering the number and dollar volume of these products in the state. Based on the number of loans, small farm loans were not reviewed.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA

LENDING TEST

The Lending Test rating for Alabama is High Satisfactory. The bank's lending levels reflect good responsiveness to the Alabama assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Alabama assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Alabama assessment area. Examiners based conclusions primarily on the performance in the Birmingham MSA, Huntsville MSA, Daphne MSA, and Non-MSA assessment areas. Performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment areas. The geographic distribution of small business loans also reflects good penetration throughout the assessment areas. Good performance in each of the full-scope assessment areas supports this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans is good among borrowers of different income levels. Good performance was noted in the Daphne MSA and Alabama Non-MSA assessment areas and adequate performance was noted in the Birmingham and Huntsville MSA assessment areas. The borrower distribution of small business loans is good among business customers of different sizes. Good performance was noted within each of the full-scope assessment areas, with the exception of the Huntsville MSA assessment area where performance was excellent.

Community Development Loans

Truist is a leader in making community development loans in Alabama. During this evaluation period, the bank originated 58 community development loans totaling \$240.7 million. This performance represents 3.3 percent by number and 3.8 percent by dollar volume of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 39 community development loans totaling \$73.8 million were originated.

Since the previous evaluation, Truist originated 1 loan totaling \$1.0 million outside of the assessment areas, but within Alabama. Since the bank has been responsive to community development needs and opportunities within its assessment areas, this loan was included. The analysis for each full-scope Alabama assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrated an Outstanding record regarding the Investment Test in Alabama. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and complex investments, and occasionally serves in a leadership position. Investment Test performance was excellent in each full-scope assessment area. Performance in limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has an excellent level of qualified community development investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$55.5 million, or 3.1 percent, of bank-wide community development investments, which is below the 3.6 percent of branches, but above the 2.2 percent of deposits in the state. By number of investments, the bank had 148 in Alabama, or 2.5 percent of all investments. The bank's investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$638,000.

Qualified Investments – Alabama										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Birmingham MSA	7	18,676	37	477	9	1,997	0	0	53	21,150
Huntsville MSA	1	7,700	20	50	6	317	0	0	27	8,067
Daphne MSA	1	3,650	2	7	0	0	0	0	3	3,657
Non-MSA AL	3	6,006	7	7	0	0	0	0	10	6,013
Limited Scope	13	14,936	31	202	4	1,397	0	0	48	16,535
Statewide	1	2	4	45	2	13	0	0	7	60
Regional	0	0	0	0	0	0	0	0	0	0
Total	26	50,970	101	788	21	3,724	0	0	148	55,482

Source: Bank Records

On a statewide level, the bank provided \$60,000 in grants and donations to organizations with a purpose consistent with the CRA definition of community development. The bank provided grants of \$40,000 to support wealth building and tax preparation, \$5,000 for financial literacy and foreclosure prevention, \$2,500 for affordable housing, and \$12,500 for small business economic development to low- and moderate-income residents and small businesses throughout the state. Additional examples of the bank’s CRA investments in Alabama are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs and challenges in the state include redevelopment of economically depressed downtown locations due to the influx of big box retailers, affordable housing and repair and revitalization of existing affordable housing, low per-capita income, financial literacy, and the high percent of unbanked residents and those that rely on higher cost non-bank financial services. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Alabama ranks near the bottom of all states in regards to the prosperity of its residents. According to CFPB’s scale to measure financial well-being, Alabama performed poorly with the high percent of residents likely to experience financial hardship and lack emergency savings. Alabama also has a high percent of residents without a bank account and those that use other more expensive non-bank financial services for basic transactions and credit needs. Regarding economic development in the state, Main Street Alabama has identified 27 small towns in Alabama where downtown areas have been severely impacted by big box retailers. The organization offers technical assistance workshops, work plans, and market plans to residents and small businesses in affected areas to help implement economic redevelopment strategies. In regards to affordable housing, the Federal Reserve Bank of Atlanta noted that over two-thirds of low-income renter households in Alabama pay more than 30 percent of their income on housing.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of bonds and housing and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. Although the bank’s investments are not considered innovative, many are complex and specifically tailored to meet identified needs.

SERVICE TEST

The Service Test rating for Alabama is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 64 branches in Alabama, which represents 3.6 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is below the percent of the population in low-income census tracts; however, the branch distribution in moderate-income census tracts is above the percent of the population in moderate-income census tracts. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes 17 branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in Alabama.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	1.6	236,071	6.2	86	9.5
Moderate	16	25.0	793,410	21.0	220	24.4
Middle	24	37.5	1,619,358	42.9	363	40.3
Upper	22	34.4	1,108,556	29.3	219	24.3
NA	1	1.5	22,767	0.6	13	1.5
Total	64	100.0	3,780,162	100.0	901*	100.0
<i>Source: 2015 ACS Data & Bank Records</i> <i>*Difference from total number of Alabama census tracts on Page 8 (893) results from the decrease of 18 census tracts in the Birmingham MSA assessment area (Walker County was removed) and increases of 18 census tracts in the Alabama Non-MSA assessment area (Walker County was added), 3 census tracts in the Tuscaloosa MSA assessment area (Greene County was added), and 5 census tracts in the Mobile MSA assessment area (Washington County was added).</i>						

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 1 branch in a middle-income census tract. In addition, the bank closed 15 branches including 2 in moderate-income, 8 in middle-income, and 5 in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Alabama. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 288 community development services since the last evaluation. This performance represents 3.5 percent of bank-wide activities, which is consistent with the bank-wide share of branches at 3.6 percent. The types of services provided reflect good responsiveness to the rated area needs. In Alabama, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, the bank associate served in a qualified leadership capacity with an organization resulting in community development service activities.

The bank demonstrated the strongest performance in the full-scope Birmingham and Alabama Non-MSA assessment areas. Performance in the limited-scope assessment areas was generally consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following community development service benefited the state:

- A bank employee serves on the Board for a statewide micro-enterprise network organization. The organization provides support to Alabama microbusiness service providers and small business owners by helping expand their resources and build capacity.

The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Birmingham MSA	14	55	21	1	91
Huntsville MSA	0	18	9	0	27
Daphne MSA	0	15	5	0	20
Alabama Non-MSA	1	30	9	5	45
Anniston MSA	0	18	5	0	23
Montgomery MSA	15	15	7	0	37
Mobile MSA	3	11	1	0	15
Auburn MSA	0	8	1	0	9
Tuscaloosa MSA	0	3	0	0	3
Gadsden MSA	0	6	3	0	9
Dothan MSA	0	2	0	0	2
Statewide/Out of AA Activities	2	2	3	0	7
Total	35	183	64	6	288

Source: Bank Records

**BIRMINGHAM, AL MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE
BIRMINGHAM, AL MSA ASSESSMENT AREA**

The Birmingham MSA assessment area consists of seven counties, as noted in the Description of Assessment Area section of this evaluation. The bank operates 20, or 31.3 percent, of its Alabama branch offices in the assessment area. The assessment area represents 35.5 percent of the rated area loans and 33.9 percent of rated area deposits. In 2019, Walker County was removed from the bank's assessment area due to OMB MSA changes. This decreased the number of census tracts in the assessment area by 18:10 were moderate-income census tracts, and 8 were middle-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Birmingham MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	264	11.7	28.0	31.8	27.7	0.8
Population by Geography	1,138,476	8.4	25.2	33.7	32.3	0.4
Housing Units by Geography	505,097	9.7	26.6	33.3	30.1	0.3
Owner-Occupied Units by Geography	303,167	4.8	22.6	36.1	36.5	0.0
Occupied Rental Units by Geography	134,957	17.2	31.3	28.2	22.4	0.9
Vacant Units by Geography	66,973	16.9	34.9	31.4	16.4	0.4
Businesses by Geography	67,574	6.9	21.5	31.6	38.7	1.2
Farms by Geography	1,656	3.0	21.9	33.7	41.1	0.3
Family Distribution by Income Level	294,187	24.1	15.9	18.8	41.1	0.0
Household Distribution by Income Level	438,124	25.8	15.7	16.2	42.3	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		\$62,204	Median Housing Value			\$158,097
			Median Gross Rent			\$798
			Families Below Poverty Level			13.0%
<small>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

According to the U.S. Bureau of Labor Statistics, during the examination period, the unemployment rates declined. As of December 31, 2019, at 2.7 percent, the unemployment rate in the Birmingham MSA was consistent with the state rate and below the national average.

In 2019, according to Moody's Analytics, the top industries were government, education and health services, and professional and business services. Top employers for this assessment area are the University of Alabama Birmingham, Regions Financial Corporation, Children's of Alabama, AT&T, and Honda Manufacturing.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 47 FDIC-insured institutions operated 302 branches within this area. Of these institutions, the bank ranked 7th in total deposits with a market share of 3.0 percent. Competitor institutions in the Birmingham MSA assessment area included Regions Bank, BBVA USA, and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 40.0 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BIRMINGHAM, AL MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Birmingham MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans were given more weight than home mortgage loans given the number and dollar volume of these products.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was slightly below demographic data but exceeded aggregate lending data. Performance in moderate-income census tracts was well above aggregate lending data, but consistent with the demographic data. Of note, performance in low-income census tracts was weaker in 2017 and 2019.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was generally consistent with both demographic and aggregate lending data. Small business lending in moderate-income census tracts was consistent with the demographic data and exceeded aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered, and slightly below aggregate lending data. Lending to moderate-income borrowers was below both the demographic and aggregate lending data. Of note, the bank's performance to moderate-income borrowers improved in 2019 and was similar to the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 77.1 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was slightly below demographic data, but significantly above the aggregate lending data. However, the bank's performance was lower in both 2017 and 2019.

Community Development Lending

Truist is a leader in making community development loans in the Birmingham MSA assessment area. The bank originated 14 community development loans totaling \$73.0 million. This amount represents 24.1 percent, by number, and 30.3 percent, by dollar volume, of total community development loans originated in Alabama. Regarding the community development purpose, 5 loans supported affordable housing and 3 loans each supported community services, economic development, and revitalization or stabilization. Community development loans include a \$26.5 million loan to purchase a 431-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also funded a \$13.0 million loan for the acquisition and renovation of a shopping center. The shopping center will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent, and the bank often serves in a leadership position in the Birmingham MSA assessment area. In addition, the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$21.2 million, or 1.2 percent, of bank-wide community development investments that exceeds the percent of deposits, 0.7, and branches, 1.1, in this assessment area. Most of the CRA investments, \$18.7 million, went towards affordable housing. Investments also included grants totaling \$259,000. Examples are provided below.

- Provided an \$8.2 million housing bond investment to help fund the construction of a 130-unit affordable multifamily housing development. The project was directed towards low- and moderate-income senior citizens.
- Provided a \$6.3 million affordable housing tax credit for the construction of a 46-unit affordable housing development.
- Provided \$1.9 million in SBA bond investments that support small business economic development.
- Invested \$306,000 in a new market tax credit project to fund construction of a community center in a low-income area.
- Provided a \$50,000 grant to a nonprofit organization that provides a variety of economic development services to small businesses.
- Provided over \$40,000 in grants to a nonprofit asset building coalition that supports community development services in the assessment area. Some of the programs include Alabama Bank-On, free VITA tax preparation, and FDIC's Alliance for Economic Inclusion to expand basic banking services to poor and underserved populations.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are small business economic development, affordable housing, financial literacy, and the high percent of unbanked residents and those that rely on higher cost non-bank financial services. The bank's investments in this assessment area are specifically tailored to meet the needs identified.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of tax credits in the assessment area. These investments fill funding gaps for affordable housing and revitalization projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution's assessment area. To illustrate, the percent of branches in low-income census tracts is slightly below the population demographics. Further, the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective geographies. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes five branches serving as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Birmingham MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	5.0	95,102	8.9	31	12.6
Moderate	5	25.0	265,388	24.7	66	26.8
Middle	6	30.0	349,431	32.6	76	30.9
Upper	8	40.0	357,884	33.4	71	28.9
NA	0	0.0	4,748	0.4	2	0.8
Total	20	100.0	1,072,553	100.0	246*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from the total number of census tracts on Page 290 (264) results from a decrease of 18 census tracts in this assessment area (Walker County was removed).*

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches and closed one branch each in a middle- and upper-income tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Alabama.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 91 community development services. This performance represents 31.6 percent of all activities in the state, which is consistent with the assessment area’s share of statewide branches at 31.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The bulk of qualifying services were teaching financial literacy to low- and moderate-income residents and providing small business technical assistance. The following are examples of community development services provided in the assessment area.

- One employee serves on the Board and another is the Treasurer of an asset building coalition that teaches financial literacy and provides credit counseling and technical assistance in the assessment area.
- An employee serves on the Board of a nonprofit business organization that supports economic development by providing technical support and other resources to small businesses.
- An employee serves on the Board of a nonprofit organization that provides resources for at-risk children and teens from low- and moderate-income families in the assessment area.

**HUNTSVILLE, AL MSA ASSESSMENT AREA
(Full-Scope Review)**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HUNTSVILLE,
AL MSA ASSESSMENT AREA**

The Huntsville MSA assessment area consists of two counties, as noted in the Description of Assessment Area section of this evaluation. The bank operates 7, or 10.9 percent, of its Alabama branch offices in the assessment area. The assessment area represents 23.6 percent of the rated area loans and 12.4 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate-, middle-, and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Huntsville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	13.5	32.6	29.2	24.7	0.0
Population by Geography	435,243	8.6	26.7	32.4	32.4	0.0
Housing Units by Geography	188,077	10.0	27.8	32.5	29.7	0.0
Owner-Occupied Units by Geography	117,889	4.0	24.5	33.8	37.7	0.0
Occupied Rental Units by Geography	52,091	20.4	34.3	30.0	15.3	0.0
Vacant Units by Geography	18,097	18.7	30.9	31.2	19.2	0.0
Businesses by Geography	25,439	10.5	26.3	29.7	33.6	0.0
Farms by Geography	938	5.5	29.3	38.3	26.9	0.0
Family Distribution by Income Level	112,844	23.8	16.9	17.3	41.9	0.0
Household Distribution by Income Level	169,980	25.2	15.8	15.9	43.0	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$72,576	Median Housing Value			\$160,520
			Median Gross Rent			\$772
			Families Below Poverty Level			10.3%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment rates declined in this assessment area. As of December 31, 2019 at 2.6 percent, the unemployment rate in the Huntsville MSA was below both the state rate and national average.

In 2019, according to Moody's Analytics, the top industries were professional and business services, government, and retail trade. Top employers for the assessment area include US Army/Redstone Arsenal, NASA/Marshall Space Flight Center, Huntsville Hospital, The Boeing Company, and Science Applications International Corporation.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 30 FDIC-insured institutions operated 119 branches within this area. Of these institutions, the bank ranked 8th in total deposits with a market share of 4.7 percent. Competitor institutions included Regions Bank, BBVA USA, and ServisFirst Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 40.7 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE HUNTSVILLE, AL MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Huntsville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage loans were given more weight than small business loans given the number and dollar volume of these products in this assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was slightly below the demographic data, but consistent with the aggregate lending data. Performance in moderate-income census tracts was above the aggregate lending data, but slightly below the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. Small business lending in moderate-income census tracts was consistent with the aggregate lending data, but below the demographic data. Of note, the bank's performance in 2019 in low-income census tracts was well above the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was well below the percent of low-income families, even when families below the poverty level are considered, and below the aggregate lending data. Lending to moderate-income borrowers was below both demographic and aggregate lending data. Of note, the bank's performance to both low- and moderate-income borrowers increased substantially in 2019 and was similar to the demographic data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 85.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above demographic data and significantly above the aggregate lending data. However, the bank's performance declined to 72.2 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area remained constant.

Community Development Lending

Truist has made a relatively high level of community development loans in the Huntsville MSA assessment area. The bank originated 6 community development loans totaling \$33.1 million. This amount represents 10.3 percent, by number, and 13.7 percent, by dollar volume, of total community development loans originated in Alabama. Regarding the community development purpose, 1 loan each supported affordable housing and revitalization or stabilization and 2 loans each supported community services and economic development. Community development loans include a \$17.0 million loan to build a hotel that will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded an \$8.0 million loan to build a 55-unit LIHTC project for low-income elderly individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent and the bank often serves in a leadership position in the Huntsville MSA assessment area. In addition, the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$8.1 million, or 0.5 percent, of bank-wide community development investments that exceeds the percent of deposits, 0.3, and branches, 0.4, in this assessment area.

Most of the CRA investments, \$7.7 million, went towards affordable housing. Investments also included grants totaling \$60,000. Examples are provided below.

- Provided a \$7.7 million affordable housing tax credit investment to help fund the construction of a 56-unit development. The project targeted low- and moderate-income senior citizens.
- Funded \$306,000 in New Market Tax Credits that supports economic development and revitalization in low-income census tracts of the assessment area.
- Provided \$20,000 in grants to a local university that promotes college access to students from low- and moderate-income families.
- Provided \$11,000 in grants to a nonprofit organization in support of financial literacy and free tax preparation for low- and moderate-income families.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, and small business economic development. The bank's investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing and New Market Tax Credits in the assessment area. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. To illustrate, the percent of branches in moderate-income census tracts is consistent with the population demographics in the respective census tracts. However, the bank did not have any branches in low-income census tracts, which is below the population demographics. In addition, the bank offers an array of alternative delivery systems for its customers and three branches served as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Huntsville MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	37,362	8.6	12	13.5
Moderate	2	28.6	116,093	26.7	29	32.6
Middle	2	28.6	140,964	32.4	26	29.2
Upper	3	42.8	140,824	32.3	22	24.7
NA	0	0.0	0	0.0	0	0.0
Total	7	100.0	435,243	100.0	89	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open or close any branches in the assessment area.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Alabama.

Community Development Services

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 27 community development services. This performance represents 9.4 percent of all activities in the state, which is slightly below the assessment area's share of statewide branches at 10.9 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The bulk of qualifying services were teaching financial literacy to low- and moderate-income residents and providing small business technical assistance. The following are examples of community development services provided in the assessment area.

- An employee serves on the Board of a nonprofit business organization that supports economic development for small businesses in the assessment area.
- Several employees participated in Bank Bus events that included financial literacy training and income tax preparation for low- and moderate-income residents.
- Several employees provided financial literacy training at various events to low- and moderate-income residents.

DAPHNE, AL MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DAPHNE, AL
MSA ASSESSMENT AREA

The Daphne MSA assessment area consists of 1 county, as noted in the Description of Assessment Area section of this evaluation. The bank operates 5, or 7.8 percent, of its Alabama branch offices in the assessment area. The assessment area represents 6.4 percent of the rated area loans and 6.1 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Daphne MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	18.8	62.5	15.6	3.1
Population by Geography	195,121	0.0	16.4	64.6	19.0	0.0
Housing Units by Geography	106,422	0.0	19.3	59.9	20.8	0.0
Owner-Occupied Units by Geography	52,997	0.0	14.9	65.0	20.1	0.0
Occupied Rental Units by Geography	21,107	0.0	21.8	61.1	17.1	0.0
Vacant Units by Geography	32,318	0.0	25.0	50.8	24.3	0.0
Businesses by Geography	14,635	0.0	19.3	60.4	20.3	0.0
Farms by Geography	541	0.0	20.3	63.0	16.6	0.0
Family Distribution by Income Level	50,276	20.6	17.7	20.9	40.9	0.0
Household Distribution by Income Level	74,104	24.0	16.2	18.6	41.2	0.0
Median Family Income MSA - 19300 Daphne-Fairhope-Foley, AL MSA		\$62,271	Median Housing Value			\$184,430
			Median Gross Rent			\$894
			Families Below Poverty Level			9.6%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the examination period, the unemployment rate declined in this assessment area. As of December 31, 2019, at 2.7 percent, the unemployment rate in the Daphne MSA was consistent with the state rate and below the national average.

In 2019, according to Moody's Analytics, the top industries were leisure and hospitality services, retail trade, and education and health services. Top employers for this assessment area include Walmart Inc., Tanger Factory Outlet Center, Quality Filters, Thomas Hospital, and UTC Aerospace Systems.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 25 FDIC-insured institutions operated 92 branches within this area. Of these institutions, the bank ranked 8th in total deposits with a market share of 4.8 percent. Competitor institutions in the Daphne MSA assessment area included Regions Bank, Wells Fargo Bank, N.A., and BBVA USA.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 38.3 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE DAPHNE, AL MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Daphne MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and made an adequate level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans were given equal weight given the number and dollar volume of loans in this assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in moderate-income census tracts was slightly above both demographic and aggregate lending data. However, the bank's performance in moderate-income census tracts was slightly below both demographic and aggregate lending data in 2017.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Small business lending in moderate-income census tracts was consistent with the aggregate lending data, but slightly below the demographic data. Of note, the bank's performance in both 2017 and 2019 was consistent with the demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the percent of low-income families, when families below the poverty level are considered, and exceeded aggregate lending data. Lending to moderate-income borrowers was consistent with both demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 90.2 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above demographic data and significantly above the aggregate lending data. However, the bank's performance declined to 67.2 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased slightly.

Community Development Lending

Truist originated an adequate level of community development loans in the Daphne MSA assessment area. The bank originated 2 community development loans totaling \$5.5 million. This amount represents 3.5 percent, by number, and 2.3 percent, by dollar volume, of total community development loans originated in Alabama. Regarding the community development purpose, 1 loan each supported affordable housing and community services. Community development loans include a \$3.9 million loan to bridge an equity investment in a LIHTC fund. The bank also funded a \$1.5 million loan for the permanent financing of a healthcare center that primarily serves low- and moderate-income individuals.

INVESTMENT TEST

The level of investments and responsiveness to community needs is excellent and the bank often serves in a leadership position in the Daphne MSA assessment area. In addition, the bank occasionally uses complex investments.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$3.7 million, or 0.2 percent, of bank-wide community development investments that exceeds the percent of deposits, 0.1, but is below the percent of branches, 0.3, in this assessment area. A \$3.7 million tax credit investment assisted in the construction of an affordable 48-unit multifamily housing development. Also, \$6,500 in grants were provided to a local nonprofit organization that provides financial literacy training and after-school programs for primarily low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, and after-school programs. The bank’s investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. Truist is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. To illustrate, the percent of branches in moderate-income census tracts is above the population demographics in the respective census tracts. The assessment area does not have any low-income census tracts. In addition, the bank offers an array of alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the Daphne MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0
Moderate	1	20.0	32,056	16.4	6	18.8
Middle	2	40.0	126,016	64.6	20	62.5
Upper	2	40.0	37,049	19.0	5	15.6
NA	0	0.0	0	0.0	1	3.1
Total	5	100.0	195,121	100.0	32	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed one branch in a moderate-income census tract. However, another branch office is located in the same census tract as the closed branch, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Alabama.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 20 community development services. This performance represents 6.9 percent of all activities in the state, which is slightly below the assessment area's share of statewide branches at 7.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The bulk of qualifying services were teaching financial literacy to low- and moderate-income residents and providing small business technical assistance. The following are examples of community development services provided in the assessment area.

- An employee serves on the Board of a nonprofit community development corporation that facilitates the production of small business loans and the creation of new jobs for small businesses in the assessment area.
- An employee served on the Board of a nonprofit foundation that provides support services to low- and moderate-income residents including job training, school dropout prevention, and leadership development.
- Several employees provided financial literacy training at various events to low- and moderate-income residents of the assessment area.

**ALABAMA NON-MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ALABAMA
NON-MSA ASSESSMENT AREA**

The Alabama Non-MSA assessment area consists of 12 counties, as noted in the Description of Assessment Area section of this evaluation. The bank operates 13, or 20.3, percent of its Alabama branch offices in the assessment area. In 2019, Walker County was added to the bank's delineated assessment area due to OMB MSA changes. This change resulted in the addition of 18 census tracts: 1 moderate-income tract, 16 middle-income tracts, and 1 upper-income tract. The assessment area represents 4.8 percent of the rated area loans and 8.9 percent of rated area deposits.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	0.0	15.4	55.6	29.1	0.0
Population by Geography	441,946	0.0	12.3	56.6	31.1	0.0
Housing Units by Geography	208,221	0.0	12.3	55.4	32.3	0.0
Owner-Occupied Units by Geography	118,197	0.0	10.6	56.0	33.4	0.0
Occupied Rental Units by Geography	51,043	0.0	16.0	57.0	27.1	0.0
Vacant Units by Geography	38,981	0.0	12.8	51.3	35.8	0.0
Businesses by Geography	20,598	0.0	12.2	54.4	33.4	0.0
Farms by Geography	1,166	0.0	8.0	60.5	31.5	0.0
Family Distribution by Income Level	114,825	21.3	17.5	18.4	42.8	0.0
Household Distribution by Income Level	169,240	24.1	15.5	16.5	43.9	0.0
Median Family Income Non-MSAs – AL		\$45,334	Median Housing Value			\$101,297
			Median Gross Rent			\$602
			Families Below Poverty Level			16.6%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment rates fluctuated for each county in the Alabama Non-MSA. As of December 31, 2019, the overall average unemployment rate of 3.2 percent was above the state rate but below the national average.

In 2019, according to D&B, the top industries were services, retail trade, and non-classifiable establishments. Information regarding top employers is not available.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 55 FDIC-insured institutions operated 147 branches within this area. Of these institutions, the bank ranked 8th in total deposits with a market share of 4.0 percent. Competitor institutions in the Alabama Non-MSA assessment area included Regions Bank, Troy Bank & Trust Company, and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 38.8 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ALABAMA NON-MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Alabama Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects a good distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans were given more weight than home mortgage loans given the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in moderate-income census tracts was slightly below demographic data and slightly above aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Small business lending in moderate-income census tracts was above both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Bank lending to low-income borrowers was consistent with the percent of low-income families, when families below the poverty level are considered, and aggregate lending data.

Lending to moderate-income borrowers was above the aggregate lending data and slightly below demographic data. However, in 2017 the bank's lending to moderate-income borrowers was below both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 84.8 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above the demographic data and significantly above the aggregate lending data. However, the bank's performance was lower in both 2017 and 2019.

Community Development Lending

Truist Bank is a leader in making community development loans in the Alabama Non-MSA assessment area. The bank originated 12 community development loans totaling \$26.2 million. This amount represents 20.7 percent, by number, and 10.9 percent, by dollar volume, of total community development loans originated in Alabama. Regarding the community development purpose, 3 loans each supported affordable housing and economic development, 2 loans supported community services, and 4 loans supported revitalization or stabilization. Community development loans include a \$6.1 million loan to build a 56-unit LIHTC project for low-income elderly individuals. The bank also funded a \$1.2 million loan to an economic development authority for the acquisition and development of land for a warehouse. The development will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The institution has a significant level of qualified investments and is occasionally in a leadership position in the assessment area. Responsiveness to community needs is excellent and the bank occasionally uses complex investments.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$6.0 million, or 0.3 percent, of bank-wide community development investments that exceeds the percent of deposits, 0.2, but is below the percent of branches, 0.8, in this assessment area. Most of the CRA investments went towards affordable housing. Investments also included grants totaling \$13,000. Examples are provided below.

- Provided a \$6.0 million affordable housing tax credit investment to help construct an affordable 56-unit multifamily housing development.
- Provided \$6,000 in grants to a local nonprofit organization that provides free transitional housing to homeless residents while they attempt to achieve self-sufficiency and find permanent housing.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, and programs to address poverty needs. Bank investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives in the form of housing tax credits in the assessment area. This investment fills funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. To illustrate, the percent of branches in moderate-income census tracts is above the population demographics in the respective census tracts. The assessment area does not have any low-income census tracts. In addition, the bank offers an array of alternative delivery systems for its customers and two branches served as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Alabama Non-MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0
Moderate	2	15.4	58,113	11.4	19	14.1
Middle	9	69.2	307,241	60.5	81	60.0
Upper	2	15.4	142,515	28.1	35	25.9
NA	0	0.0	0	0.0	0	0.0
Total	13	100.0	507,869	100.0	135*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from the total number of census tracts on Page 305 (117) results from an increase of 18 census tracts in this assessment area (Walker County was added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed one branch in a moderate-income census tract, four branches in middle-income census tracts, and one branch in an upper-income census tract.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Alabama.

Community Development Services

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 45 community development services. This performance represents 15.6 percent of all activities in the state, which is below the assessment area's share of statewide branches at 20.3 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The bulk of qualifying services were teaching financial literacy to low- and moderate-income residents and providing small business technical assistance. The following are examples of community development services provided in the assessment area.

- Two employees serve on the Board of a nonprofit business organization that supports economic development for small businesses in the assessment area.
- An employee served on the Board of a development authority, which supports economic development in the assessment area.
- Several employees provided financial literacy training at various events to low- and moderate-income residents of the assessment area.

**OTHER ALABAMA ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the seven Alabama assessment areas 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
Anniston MSA	Consistent	Consistent	Consistent
Montgomery MSA	Consistent	Consistent	Below
Mobile MSA	Consistent	Consistent	Consistent
Auburn MSA	Consistent	Consistent	Consistent
Tuscaloosa MSA	Consistent	Consistent	Consistent
Gadsden MSA	Consistent	Below	Consistent
Dothan MSA	Consistent	Consistent	Below

A summary of Truist Bank’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

Anniston MSA Assessment Area

The Anniston MSA assessment area consists of Calhoun County. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	406	\$22.7 million
Home Mortgage Loans	277	\$30.6 million
Small Farm Loans	0	\$0
Community Development Loans	2	\$3.3 million
Investments (New)	1	\$2.3 million
Investments (Prior Period)	0	\$0
Donations	4	\$7 thousand
CD Services	23	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Anniston MSA assessment area are in Appendix D.

Montgomery MSA Assessment Area

The Montgomery MSA assessment area consists of Autauga, Elmore, Lowndes, and Montgomery Counties. Truist operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	543	\$33.3 million
Home Mortgage Loans	251	\$63.2 million
Small Farm Loans	0	\$0
Community Development Loans	3	\$18.7 million
Investments (New)	1	\$10.4 million
Investments (Prior Period)	0	\$0
Donations	13	\$81.3 thousand
CD Services	37	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Montgomery MSA assessment area are in Appendix D.

Mobile MSA Assessment Area

The Mobile MSA assessment area consists of Mobile County. Washington County was added to the assessment area in 2019 due to OMB MSA changes. This change added five middle-income census tracts to the assessment area. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	424	\$34.7 million
Home Mortgage Loans	189	\$82.8 million
Small Farm Loans	1	\$49 thousand
Community Development Loans	10	\$39.5 million
Investments (New)	2	\$2 million
Investments (Prior Period)	0	\$0
Donations	16	\$125 thousand
CD Services	15	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Mobile MSA assessment area are in Appendix D.

Auburn MSA Assessment Area

The Auburn MSA assessment area consists of Lee County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	268	\$24.3 million
Home Mortgage Loans	270	\$61.2 million
Small Farm Loans	0	\$0
Community Development Loans	3	\$5.9 million
Investments (New)	1	\$1.1 million
Investments (Prior Period)	0	\$0
Donations	1	\$3 thousand
CD Services	9	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Auburn MSA assessment area are in Appendix D. market share.

Tuscaloosa MSA Assessment Area

The Tuscaloosa MSA assessment area consists of Hale, Pickens, Greene and Tuscaloosa Counties. Greene County was added to the assessment area in 2019 due to OMB MSA changes. This change resulted in the net addition of three census tracts: low-income tracts increased by two; upper-income tracts increased by two, and middle-income tracts decreased by one. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	229	\$18.0 million
Home Mortgage Loans	77	\$80.2 million
Small Farm Loans	5	\$898 thousand
Community Development Loans	5	\$34.5 million
Investments (New)	3	\$475 thousand
Investments (Prior Period)	0	\$0
Donations	1	\$5.5 thousand
CD Services	3	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Tuscaloosa MSA assessment area are in Appendix D.

Gadsden MSA Assessment Area

The Gadsden MSA assessment area consists of Etowah County. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	212	\$10.3 million
Home Mortgage Loans	69	\$6.4 million
Small Farm Loans	1	\$60 thousand
Community Development Loans	0	\$0
Investments (New)	0	\$0
Investments (Prior Period)	0	\$0
Donations	3	\$11 thousand
CD Services	9	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Gadsden MSA assessment area are in Appendix D.

Dothan MSA Assessment Area

The Dothan MSA assessment area consists of Geneva, Henry and Houston Counties. Truist does not operate any branches in this assessment area, but maintains a deposit taking ATM. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	97	\$4.8 million
Home Mortgage Loans	56	\$23.5 million
Small Farm Loans	0	\$0
Community Development Loans	0	\$0
Investments (New)	0	\$0
Investments (Prior Period)	0	\$0
Donations	2	\$6 thousand
CD Services	2	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Dothan MSA assessment area are in Appendix D.

TENNESSEE

CRA RATING FOR TENNESSEE: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

The bank operates 35, or 2.0 percent, of its total branch offices in Tennessee. Tennessee accounts for 1.6 percent of the bank-wide deposits. Overall, Truist ranks 10th in the state in deposit market share at 1.4 percent. Competitor institutions in the Tennessee assessment areas include First Tennessee Bank, Regions Bank, and Pinnacle Bank.

SCOPE OF EVALUATION – TENNESSEE

The evaluation of the Tennessee performance considered the operations of Truist in seven assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Knoxville and Nashville-Davidson-Murfreesboro-Franklin (Nashville) MSAs, and the Tennessee Non-MSA assessment area. Limited scope areas included the Chattanooga, Johnson City, Cleveland, and Morristown MSA assessment areas. During the review period, equal weighting was given to small business and home mortgage loans considering the number and dollar volume of these products in the state. Based on the minimal number, small farm loans were not reviewed in any of the assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TENNESSEE

LENDING TEST

The Lending Test rating for Tennessee is Low Satisfactory. The bank's lending levels reflect good responsiveness to the Tennessee assessment areas' credit needs. The geographic distribution reflects adequate penetration, and the borrower profile reflects an adequate distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Tennessee assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Tennessee assessment area. Examiners based conclusions primarily on the performance in the full-scope assessment areas. The bank's performance in assessment areas that received limited-scope reviews was generally consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment areas. Adequate performance in the Nashville MSA and the Tennessee Non-MSA assessment areas and good performance in the Knoxville MSA assessment area support this conclusion. The geographic distribution of small business loans reflects adequate penetration throughout the assessment areas. Adequate performance in the Knoxville and Nashville MSA assessment areas and good performance in the Tennessee Non-MSA assessment area support this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans is adequate among borrowers of different income levels. Performance varied in each full-scope assessment area with poor performance in the Nashville MSA, adequate performance in the Knoxville MSA, and good performance in the Tennessee Non-MSA assessment area. Borrower distribution of small business loans is excellent among business customers of different sizes. Good performance in the Knoxville MSA and excellent performance in the Nashville MSA and Tennessee Non-MSA assessment areas support this conclusion.

Community Development Loans

Truist is a leader in making community development loans in Tennessee. During this evaluation period, the bank originated 30 community development loans totaling \$106.0 million. This performance represents 1.7 percent, by number and dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 19 community development loans totaling \$91.0 million were originated.

Since the prior evaluation, Truist originated 5 loans totaling \$19.4 million outside of the assessment areas, but within Tennessee. Since the bank has been responsive to community development needs and opportunities within its assessment areas, this loan was included. The analysis for each full-scope Tennessee assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrated a High Satisfactory record regarding the Investment Test in Tennessee. The level of investments is significant and responsiveness to community needs is good. The bank also makes significant use of innovative or complex investments and occasionally serves in a leadership position. Investment Test performance was excellent in the Knoxville MSA and Tennessee Non-MSA assessment areas and adequate in the Nashville MSA assessment area. Performance among the limited-scope assessment areas was generally consistent with the full-scope areas.

Investment and Grant Activity

The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$21.2 million, or 1.2 percent of bank-wide community development investments, which is below the 2.0 percent of branches and 1.6 percent of deposits in the state. The 129 investments equated to 2.1 percent of all investments. Investments primarily were LIHTCs and bonds to support affordable housing but also included grants totaling \$406,000.

Qualified Investments - Tennessee										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Knoxville MSA	7	14,949	23	111	3	17	0	0	33	15,077
Nashville MSA	1	2,500	19	81	2	13	0	0	22	2,594
Non-MSA TN	1	2,082	11	26	0	0	1	1	13	2,109
Limited Scope	9	1,031	41	99	7	295	2	4	59	1,429
Statewide	0	0	0	0	0	0	0	0	0	0
Regional	0	0	1	2	0	0	1	1	2	3
Total	18	20,562	95	319	12	325	4	6	129	21,212

Source: Bank Records

On a regional level, the bank provided 2 grants for \$2,650 to organizations with a purpose consistent with the CRA definition of community development. The bank provided \$1,650 to a nonprofit organization that provides meals to children when school is not in session and \$1,000 in support of revitalization and stabilization of a targeted area in the state. Additional examples of the bank’s CRA investments in Tennessee are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified needs include affordable housing and homelessness, financial literacy, after-school programs, affordable healthcare, and home repair or renovation for low- and moderate-income families. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The Tennessee Housing Development Agency reports that 70 percent of affordable housing properties in the state are over 15 years old, and 70 percent of low-income families are living in housing over 30 years old. Many of the assessment areas in the state are showing a substantial deficit of affordable housing units and salaries of low- and moderate-income workers are not keeping pace with the rising home values. In addition, the Tennessee Office of Juvenile Justice and Delinquency Prevention identified a critical need of implementing strategies in the state to prevent truancy by offering after-school programs. Over 20 percent of children in the state have no one to care for them after school, particularly among low- and moderate-income families. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of bonds and housing tax credits. These investments fill funding gaps for affordable housing projects and small businesses that normally would not qualify for conventional financing. Although the bank’s investments are not considered innovative, many are complex and specifically tailored to meet identified needs.

SERVICE TEST

The Service Test rating for Tennessee is High Satisfactory. A Low Satisfactory record of retail banking services and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. Truist operates 35 branches in Tennessee, which represents 2.0 percent of bank-wide branches. The bank does not have any branches in low-income census tracts, which is lower than percent of population in these respective tracts. However, the percent of branches in moderate-income census tracts is consistent with the population demographics. The bank also offers an array of alternative delivery systems for customers, which include 5 branches serving as multicultural banking centers. The below table reflects the branch distribution by tract income level in Tennessee.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	197,825	5.4	59	7.3
Moderate	8	22.9	791,747	21.5	185	22.9
Middle	13	37.1	1,685,044	45.9	353	43.7
Upper	14	40.0	987,779	26.9	196	24.3
NA	0	0.0	12,905	0.3	15	1.8
Total	35	100.0	3,675,300	100.0	808*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from total number of Tennessee census tracts on Page 8 (814) results from decreases of 5 census tracts in the Knoxville MSA assessment area (Grainger County was removed) and 6 census tracts in the Nashville MSA assessment area (Hickman County was removed) and an increase of 5 census tracts in the Morristown MSA assessment area (Grainger County was added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches in Tennessee. However, the bank closed eight branches: one in a moderate-income tract, six in middle-income tracts, and one in an upper-income tract. Five of the eight branches closed were located in or bordered low- or moderate-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Tennessee. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

Truist provides a relatively high level of community development services in the state. Bank records show that employees participated in 190 community development services since the last evaluation. This performance represents 2.3 percent of bank-wide activities, which is consistent with the statewide share of branches at 2.0 percent. The types of services provided adequate responsiveness to the rated area needs. In Tennessee, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with an organization resulting in community development service activities.

The bank’s performance was strongest in the full-scope Knoxville MSA and Nashville MSA assessment areas. Performance in the limited-scope assessment areas was consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area.

The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Knoxville MSA	3	41	10	0	54
Nashville MSA	7	22	12	0	41
Tennessee Non-MSA	0	23	8	0	31
Chattanooga MSA	4	12	6	0	22
Johnson City MSA	0	7	3	0	10
Cleveland MSA	0	17	8	0	25
Morristown MSA	3	4	0	0	7
Statewide Activities	0	0	0	0	0
Total	17	126	47	0	190

Source: Bank Records

**KNOXVILLE, TN MSA ASSESSMENT AREA
(Full-Scope Review)**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE KNOXVILLE,
TN MSA ASSESSMENT AREA**

The Knoxville MSA assessment area consists of all nine counties within the MSA. The bank operates 13, or 37.1 percent, of its Tennessee branch offices in the assessment area. The assessment area represents 38.2 percent of the rated area loans and 42.2 percent of rated area deposits. In 2019, Grainger County was removed from the Knoxville MSA assessment area and added to the Morristown MSA due to OMB MSA changes. This decreased the number of census tracts in the assessment area by five (three middle- and two moderate-income).

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate-, middle-, and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Knoxville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	204	5.4	24.5	43.1	24.0	2.9
Population by Geography	852,159	4.3	23.3	46.8	24.9	0.7
Housing Units by Geography	385,454	4.6	25.0	46.9	23.4	0.0
Owner-Occupied Units by Geography	234,048	2.3	19.9	49.9	27.9	0.0
Occupied Rental Units by Geography	107,841	9.6	32.3	41.1	17.0	0.1
Vacant Units by Geography	43,565	4.8	34.2	45.4	15.4	0.2
Businesses by Geography	47,417	4.1	19.5	42.5	33.0	0.9
Farms by Geography	1,466	1.6	19.9	51.8	26.1	0.5
Family Distribution by Income Level	221,154	22.6	17.0	19.9	40.5	0.0
Household Distribution by Income Level	341,889	24.6	16.3	16.5	42.5	0.0
Median Family Income MSA - 28940 Knoxville, TN MSA		\$59,210	Median Housing Value			\$153,542
			Median Gross Rent			\$748
			Families Below Poverty Level			12.1%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to Moody’s Analytics, the top industries in the Knoxville MSA in 2019 were professional and business services, government, and education and health services. The top employers were Covenant Health, University of Tennessee, Walmart, University Health Systems, and Oak Ridge National Laboratory.

During the evaluation period, the unemployment rate declined from 3.6 percent in 2017 to 3.2 percent in 2019, which is comparable to the state level, but below the national rate for all years under review.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 44 FDIC-insured institutions operated 239 branches within this area. Of these institutions, the bank ranked 6th in total deposits with a market share of 6.3 percent. Competitor institutions in the Knoxville MSA assessment area included First Tennessee Bank, Regions Bank, and Pinnacle Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.6 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE KNOXVILLE, TN MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Knoxville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects an adequate distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans were assigned equal weight based on the number and dollar volume of these products.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was similar to both the demographic and aggregate lending data. Performance in moderate-income census tracts was comparable to both demographic and aggregate data. Of note, performance in moderate-income census tracts was weaker in 2017.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. Of note, performance in low-income census tracts was weaker in 2019. Small business lending in moderate-income census tracts was below the demographic data, but consistent with aggregate lending data. Of note, performance in moderate-income census tracts was weaker in 2017 and 2019.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was well below the demographic data, even when adjusted for the percent of families below the poverty level, and was below the aggregate lending data. However, the bank's performance was stronger in 2019. Lending to moderate-income borrowers was also well below both demographic and aggregate lending data. However, the bank's lending levels to moderate-income borrowers improved significantly in 2019 and was only slightly below the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 77.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was comparable to demographic data and significantly above aggregate lending data. Of note, the bank's performance in 2017 and 2019 was weaker.

Community Development Lending

Truist is a leader in making community development loans in the Knoxville MSA assessment area. The bank originated 10 community development loans totaling \$42.7 million. This amount represents 33.3 percent, by number, and 40.3 percent, by dollar volume, of total community development loans originated in Tennessee. Regarding the community development purpose, 4 loans supported affordable housing, 1 loan supported community services, 3 loans supported economic development, and 2 loans supported revitalization or stabilization. Community development loans include a \$1.2 million loan to purchase and renovate an industrial building in a low-income census tract. The development will provide permanent employment opportunities for low- and moderate-income individuals. The bank also funded a \$1.1 million loan to purchase a 34-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments is excellent and responsiveness to community needs is good in the Knoxville MSA assessment area. In addition, the bank makes significant use of complex investments, and occasionally serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$15.1 million, or 0.8 percent, of bank-wide community development investments that is comparable to the percent of deposits, 0.8, and branches, 0.7, in this assessment area. Most of the CRA investments, \$14.9 million, went towards affordable housing. Investments also included grants totaling \$142,000. Examples are provided below.

- Provided a \$7.5 million affordable housing tax credit investment to renovate 15 apartment buildings that contain 150 affordable housing units.
- Provided a \$7.4 million affordable housing tax credit investment to construct 4 buildings containing 60 affordable housing units.
- Provided \$7,500 in grant funds to a nonprofit housing organization that provides financial literacy training in the assessment area. Most of the students come from public housing.
- Provided \$41,000 in grants to a number of nonprofit organizations that provide mentoring and after-school programs for at-risk children and teenagers primarily from low-income families.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, and after-school programs. The bank's investments in this assessment area are specifically tailored to meet the needs identified.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides a relatively high level of community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. The bank does not have any branches in low-income census tracts, which is lower than the percent of population in these respective tracts. However, three branches border low-income census tracts. Further, the percent of branches in moderate-income census tracts is consistent with the population demographics. Additionally, the bank offers an array of alternative delivery systems for its customers. This includes two branches serving as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Knoxville MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	36,398	4.4	11	5.6
Moderate	3	23.1	188,482	22.7	48	24.1
Middle	6	46.1	386,808	46.6	85	42.7
Upper	4	30.8	212,046	25.6	49	24.6
NA	0	0.0	5,689	0.7	6	3.0
Total	13	100.0	829,423	100.0	199*	100.0
<i>Source: 2015 ACS Data & Bank Records</i> <i>*Difference from the total number of census tracts on Page 319 (204) results from a decrease of 5 census tracts in this assessment area (Grainger County was removed).</i>						

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed three branches in middle-income census tracts and one branch in an upper-income census tract. Three of the four branch offices closed bordered low- or moderate-income census tracts. However, other branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Tennessee.

Community Development Services

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 54 community development services. This performance represents 28.4 percent of all activities in the state, which is below the assessment area’s share of statewide branches at 37.1 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. Most qualifying services were teaching financial literacy to low- and moderate-income residents and providing small business technical assistance. The following are examples of community development services provided.

- An employee serves on the Board of a nonprofit housing organization whose mission is to support the production, preservation, and rehabilitation of owner-occupied low-income households and provide programs enhancing rental opportunities for low-income families in the assessment area.
- An employee is a member of a nonprofit housing finance committee that is dedicated toward rehabilitating homes and providing financial literacy and other resources to low-income families in the assessment area to improve or stabilize their housing situation.
- An employee serves on the Board of a nonprofit charity organization that provides job opportunities to disabled low-income workers and other resources to low- and moderate-income families.

**NASHVILLE, TN MSA ASSESSMENT AREA
(Full-Scope Review)**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NASHVILLE,
TN MSA ASSESSMENT AREA**

The Nashville MSA assessment area consists of all 14 counties within the MSA. The bank operates 3, or 8.6 percent, of its Tennessee branch offices in the Nashville MSA assessment area. The assessment area represents 37.3 percent of the rated area loans and 27.5 percent of rated area deposits. In 2019, Hickman County was removed from the Nashville MSA assessment area due to OMB MSA changes. This decreased the number of census tracts in the assessment area by 6 (all middle-income).

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate-, middle-, and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Nashville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	380	8.9	26.1	37.9	25.8	1.3
Population by Geography	1,761,848	6.6	25.8	39.4	27.9	0.3
Housing Units by Geography	723,182	7.1	26.7	39.4	26.8	0.1
Owner-Occupied Units by Geography	436,486	3.3	20.6	42.9	33.1	0.1
Occupied Rental Units by Geography	228,395	13.2	36.6	33.5	16.7	0.0
Vacant Units by Geography	58,301	11.1	34.1	35.8	19.0	0.1
Businesses by Geography	120,394	7.7	22.9	31.1	37.4	0.9
Farms by Geography	3,351	2.8	21.8	45.0	29.8	0.6
Family Distribution by Income Level	438,865	20.9	17.8	20.4	40.9	0.0
Household Distribution by Income Level	664,881	23.0	16.9	18.2	41.9	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreeseboro-- Franklin, TN MSA		\$66,404	Median Housing Value			\$197,140
			Median Gross Rent			\$887
			Families Below Poverty Level			10.1%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to Moody’s Analytics, the top industries in the Nashville MSA in 2019 were professional and business services, education and health services, and leisure and hospitality services. The top employers were Vanderbilt University Medical Center, HCA, Inc., Nissan North America, Saint Thomas Health Services, and Vanderbilt University.

During the evaluation period, the unemployment rate declined from 3.0 percent in 2017 to 2.6 percent in 2019, which is below both state and national rates for all years under review.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 65 FDIC-insured institutions operated 573 branches within this area. Of these institutions, the bank ranked 47th in total deposits with a market share of 0.1 percent. Competitor institutions in the Nashville MSA assessment area included Pinnacle Bank, Bank of America, and Regions Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 38.7 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NASHVILLE, TN MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Nashville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects adequate distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business and home mortgage loans received equal weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was similar to both demographic and aggregate lending data. However, the bank's performance in moderate-income census tracts was significantly below both demographic and aggregate lending data. Of note, the bank's performance in moderate-income census tracts was significantly stronger in 2017, while still below demographic data and comparable to aggregate lending data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Bank lending in low-income census tracts was below both demographic and aggregate lending data. Of note, performance in low-income census tracts was weaker in 2017.

The bank's performance in moderate-income census tracts was below demographic data and slightly below aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans reflects poor penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered, and well below the aggregate lending data. Lending to moderate-income borrowers was significantly below demographic data and aggregate lending data. Performance to moderate-income borrowers was stronger in 2019, but still below demographic data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 87.4 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above demographic data and significantly above aggregate lending data.

Community Development Lending

Truist is a leader in making community development loans in the Nashville MSA assessment area. The bank originated 9 community development loans totaling \$21.5 million. This amount represents 30.0 percent, by number, and 20.3 percent, by dollar volume, of total community development loans originated in Tennessee. Regarding the community development purpose, 3 loans each supported affordable housing, economic development, and revitalization or stabilization. Community development loans include a \$2.3 million loan to bridge an equity investment from investors in a LIHTC fund. The bank also funded a \$2.2 million loan for an industrial building in a moderate-income census tract. The development will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments is adequate and responsiveness is good in the Nashville MSA assessment area. Also, the bank occasionally uses complex investments and serves in a leadership position.

Investment and Grant Activity

The bank has an adequate level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$2.6 million, or 0.1 percent, of bank-wide community development investments that is below the percent of deposits, 0.4, and branches, 0.2, in this assessment area. Most of the CRA investments, \$2.5 million, went towards affordable housing. Investments also included grants totaling \$94,000. Examples are provided below.

- Provided a \$2.5 million affordable housing tax credit investment to help construct 8 apartment buildings that contain 280 affordable housing units.

- Provided \$11,000 in grant funds to a nonprofit healthcare organization that provides services to low- and moderate-income families in the area. Most recipients have no health insurance. Part of the funds went toward the purchase of a mobile clinic.
- Provided \$24,500 in grants to various local nonprofit organizations that provide financial literacy training and meal programs for low-income students in the assessment area.
- Provided \$36,000 in grants to a number of nonprofit organizations that provide mentoring and after-school programs for at-risk children and teenagers from low-income families.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, and after-school programs. The bank’s investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment area. The bank does not operate a branch in a low- or moderate-income census tract in the assessment area. However, one of the three branches borders several low- and moderate-income census tracts in the assessment area. In addition, the bank offers an array of alternative delivery systems for its customers and one branch serves as a multicultural banking center. The following table reflects the branch distribution by tract income level for the Nashville MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	117,017	6.7	34	9.1
Moderate	0	0.0	432,160	24.9	94	25.1
Middle	0	0.0	696,439	40.1	144	38.5
Upper	3	100.0	486,696	28.0	97	26.0
NA	0	0.0	5,253	0.3	5	1.3
Total	3	100.0	1,737,565	100.0	374*	100.0

Source: 2015 ACS Data & Bank Records

**Difference from the total number of census tracts on Page 324 (380) results from a decrease of 6 census tracts in this assessment area (Hickman County was removed).*

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open or close any branches in the assessment area.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Tennessee.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 41 community development services. This performance represents 21.6 percent of all activities in the state, which is significantly higher than the assessment area's share of statewide branches at 8.6 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The bulk of qualifying services were teaching financial literacy to low- and moderate-income residents. The following are examples of community development services provided in the assessment area.

- Two employees serve on the Board of a community service organization that is dedicated to support at-risk children in low- and moderate-income areas.
- An employee served on the Board of a nonprofit organization that provides mentorship and financial literacy training for low- and moderate-income students.
- Three employees provided free income tax services and credit counseling to low- and moderate-income residents of the assessment area.

TENNESSEE NON-MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TENNESSEE
NON-MSA ASSESSMENT AREA

The Tennessee Non-MSA assessment area consists of 4 Non-MSA counties within the state as noted in the Description of Assessment Area section of this evaluation. The bank operates 8, or 22.9 percent, of its Tennessee branch offices in the Tennessee Non-MSA assessment area. The assessment area represents 7.3 percent of the rated area loans and 13.7 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data. There are eight distressed or underserved middle-income census tracts in the Tennessee Non-MSA assessment area. All of these tracts are located within McMinn County.

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)	50	0.0	8.0	76.0	14.0	2.0
Population by Geography	259,992	0.0	7.2	77.6	15.3	0.0
Housing Units by Geography	132,443	0.0	6.8	79.1	14.1	0.0
Owner-Occupied Units by Geography	72,203	0.0	4.3	79.2	16.6	0.0
Occupied Rental Units by Geography	29,746	0.0	13.5	73.4	13.1	0.0
Vacant Units by Geography	30,494	0.0	6.3	84.3	9.4	0.0
Businesses by Geography	14,936	0.0	11.5	73.2	15.3	0.0
Farms by Geography	651	0.0	6.1	83.6	10.3	0.0
Family Distribution by Income Level	70,656	19.4	18.7	20.4	41.6	0.0
Household Distribution by Income Level	101,949	21.9	16.2	18.3	43.6	0.0
Median Family Income Non-MSAs – TN		\$46,254	Median Housing Value			\$132,167
			Median Gross Rent			\$660
			Families Below Poverty Level			13.8%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment rates have generally trended lower in each county in this assessment area. The 2017 average rate for the 4 counties was 4.3 percent compared to 3.9 percent in 2019, which exceeds both the state and national rates.

In 2019, according to D&B, the top industries were services, non-classifiable establishments, and retail trade. Information regarding top employers is not available.

Competition

A significant level of competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 24 FDIC-insured institutions operated 106 branches within this area. Of these institutions, the bank ranked 7th in total deposits with a market share of 6.2 percent. Competitor institutions in the Tennessee Non-MSA assessment area included Citizens National Bank, SmartBank, and First Tennessee Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percent of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Also, affordable housing represents a need as 38.1 percent of the families are low- or moderate-income, although housing is more affordable in this assessment area with a \$132,167 median value.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE TENNESSEE NON-MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Tennessee Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and borrower profile reflects a good distribution. The bank uses flexible lending practices and made an adequate level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business and home mortgage loans received equal weight when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. There are no low-income census tracts in this assessment area. Moderate-income census tracts include only 4 percent of owner-occupied housing units, indicating limited lending opportunities. Bank performance in moderate-income census tracts was well below demographic and aggregate lending data. In 2019, bank lending improved but was slightly below demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in moderate-income census tracts was consistent with both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the percent of low-income families, when families below the poverty level are considered, and was similar to the aggregate lending data. Lending to moderate-income borrowers was consistent with demographic data and exceeded aggregate lending data. Of note, performance to moderate-income borrowers was weaker in 2017 and 2019.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 84.6 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less, which exceeded demographic data and significantly exceeded aggregate lending data. Of note, performance was weaker in 2017 and 2019, but still significantly exceeded aggregate lending data in each year.

Community Development Lending

Truist Bank has made an adequate level of community development loans in the Tennessee Non-MSA assessment area. The bank originated 1 community development loan totaling \$8.0 million. This amount represents 3.3 percent, by number, and 7.5 percent, by dollar volume, of total community development loans originated in Tennessee. The community development loan supported community services and provided permanent financing for a rehabilitation center, which primarily serves low- and moderate-income individuals.

INVESTMENT TEST

The level of investments is significant and responsiveness is good in the TN Non-MSA assessment area. In addition, the bank occasionally makes use of complex investments and serves in a leadership position.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$2.1 million, or 0.1 percent, of bank-wide community development investments that is below the percent of deposits, 0.2, and branches, 0.5, in this assessment area. Most of the CRA investments, \$2.1 million, went towards affordable housing. Investments also included grants totaling \$27,000. Examples are provided below.

- Provided a \$2.1 million affordable housing tax credit investment to help construct an affordable multifamily housing development.
- Provided \$5,000 in grants to various local nonprofit organizations that supported programs to feed displaced or homeless low- and moderate-income residents.
- Provided \$11,000 in grants to a number of nonprofit organizations that provide mentoring, financial literacy training and after-school programs for at-risk children and teenagers primarily from low-income families.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, after-school programs, and feeding the hungry. The bank’s investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are readily accessible to all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank provides an adequate level of community development services.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the institution’s assessment area. To illustrate, the percent of branches in moderate-income census tracts is more than five times the population demographics in the respective census tracts. The assessment area does not have any low-income census tracts. In addition, the bank offers an array of alternative delivery systems for its customers and two branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level for the Non-MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0
Moderate	3	37.5	18,624	7.1	4	8.0
Middle	4	50.0	201,664	77.6	38	76.0
Upper	1	12.5	39,704	15.3	7	14.0
NA	0	0.0	0	0.0	1	2.0
Total	8	100.0	259,992	100.0	50	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches, but closed one branch in a moderate-income census tract and two branches in middle-income census tracts in the assessment area.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Tennessee.

Community Development Services

Truist provides an adequate level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 31 community development services. This performance represents 16.3 percent of all activities in the state, which is below the assessment area's share of statewide branches at 22.9 percent. The types of services reflect adequate responsiveness to the assessment area needs. All of the qualifying services were teaching financial literacy to low- and moderate-income residents or providing small business technical assistance. The following are examples of community development services provided in the assessment area.

- Three employees provided small business technical assistance training at an event, which included topics such as personal and business finances, cash flow, merchant services, and borrowing solutions.
- Two employees provided financial literacy training for high school students in which 61 percent of the students are eligible for the free or reduced lunch program.
- Two other employees provided financial literacy classes for high school students in which 70 percent are eligible for the free or reduced lunch program.

**OTHER TENNESSEE ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the four Tennessee assessment areas 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
Chattanooga MSA	Consistent	Consistent	Consistent
Johnson City MSA	Consistent	Consistent	Consistent
Cleveland MSA	Consistent	Consistent	Consistent
Morristown MSA	Below	Consistent	Consistent

A summary of Truist Bank’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

Chattanooga MSA Assessment Area

The Chattanooga MSA assessment area consists of Hamilton, Marion, and Sequatchie Counties. Truist Bank operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	493	\$44.2 million
Home Mortgage Loans	445	\$88.9 million
Small Farm Loans	5	\$657 thousand
Community Development Loans	1	\$3.6 million
Investments (New)	1	\$484.1 thousand
Investments (Prior Period)	0	\$0
Donations	31	\$84.7 thousand
CD Services	22	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Chattanooga MSA assessment area are in Appendix D.

Johnson City MSA Assessment Area

The Johnson City MSA assessment area consists of Carter, Unicoi, and Washington Counties. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	427	\$22.4 million
Home Mortgage Loans	183	\$26.8 million
Small Farm Loans	0	\$0
Community Development Loans	1	\$455 thousand
Investments (New)	1	\$268.3 thousand
Investments (Prior Period)	0	\$0
Donations	1	\$14.2 thousand
CD Services	10	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Johnson City MSA assessment area are in Appendix D.

Cleveland MSA Assessment Area

The Cleveland MSA assessment area consists of Bradley and Polk Counties. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	306	\$27.3 million
Home Mortgage Loans	208	\$30.0 million
Small Farm Loans	4	\$473 thousand
Community Development Loans	2	\$10.2 million
Investments (New)	2	\$435.4 thousand
Investments (Prior Period)	0	\$0
Donations	15	\$32.3 thousand
CD Services	25	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Cleveland MSA assessment area are in Appendix D.

Morristown MSA Assessment Area

The Morristown MSA assessment area consists of Hamblen and Jefferson Counties. Due to OMB changes, in 2019, Grainger County was added to the Morristown MSA. This increased the number of census tracts in the assessment area by five (2 moderate-income, 1 middle-income, and 2 upper-income). Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	182	\$15.5 million
Home Mortgage Loans	147	\$22.0 million
Small Farm Loans	1	\$18 thousand
Community Development Loans	1	\$100 thousand
Investments (New)	1	\$100 thousand
Investments (Prior Period)	0	\$0
Donations	5	\$10 thousand
CD Services	7	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Morristown MSA assessment area are in Appendix D.

KENTUCKY

CRA RATING FOR KENTUCKY: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KENTUCKY

The bank operates 41, or 2.3 percent, of its total branch offices in Kentucky. Kentucky accounts for 1.9 percent of the bank-wide deposits. Overall, Truist Bank ranks 4th in the state in deposit market share at 6.9 percent. Competitor institutions in the Kentucky assessment areas include PNC Bank, N.A., Fifth Third Bank, and JPMorgan Chase Bank, N.A.

SCOPE OF EVALUATION – KENTUCKY

The evaluation of the Kentucky performance considered the operations of Truist in five assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Kentucky Non-MSA and Bowling Green MSA assessment areas. Limited scope areas included the Lexington-Fayette (Lexington), Owensboro, and Clarksville MSA assessment areas. During the review period small business loans were given slightly more weight than home mortgage loans when considering the number and dollar volume of these products in the state. Based on the number of loans, small farm loans were only reviewed in the Kentucky Non-MSA and Owensboro MSA assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA IN KENTUCKY

LENDING TEST

The Lending Test rating for Kentucky is High Satisfactory. The bank's lending levels reflect good responsiveness to the Kentucky assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and has originated a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the Kentucky assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each Kentucky assessment area. Examiners based conclusions primarily on the performance in the Kentucky Non-MSA and Bowling Green MSA assessment areas. Performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment areas. The geographic distribution of small business loans reflects good penetration throughout the assessment areas. Good performance in the Bowling Green MSA and adequate performance in the Kentucky Non-MSA assessment areas supports this conclusion. The geographic distribution of small farm loans reflects poor penetration based primarily on the conclusions in the Kentucky Non-MSA assessment area.

Borrower Profile

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans is good among borrowers of different income levels. The borrower distribution of small business loans is good among business customers of different sizes. Excellent performance for the Kentucky Non-MSA and good performance for the Bowling Green MSA assessment area supports the conclusion. The borrower distribution of loans is excellent among farm customers of different sizes based primarily on the conclusions in the Kentucky Non-MSA assessment area.

Community Development Loans

Truist has made a relatively high level of community development loans in Kentucky. During this evaluation period, the bank originated 39 community development loans totaling \$95.2 million. This performance represents 2.2 percent, by number, and 1.5 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased, by number, but decreased, by dollar volume, since the prior evaluation, when 25 loans totaling \$166.2 million were originated.

Since the prior evaluation, Truist has originated 11 loans totaling \$28.0 million outside the assessment areas but in Kentucky. Since the bank has been responsive to community development needs and opportunities in its assessment areas, this loan was included. The analysis for each full-scope Kentucky assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrated a High Satisfactory record regarding the Investment Test in Kentucky. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank occasionally uses innovative and complex investments. Investment Test performance was good in both full-scope assessment areas. Performance among the limited-scope assessment areas was consistent with the full-scope areas.

Investment and Grant Activity

The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors. Qualified investments totaled \$25.4 million, or 1.4 percent, of bank-wide community development investments, which is below the 2.3 percent of branches and 1.9 percent of deposits in Kentucky.

By number of investments, the bank had 163 in Kentucky, or 2.7 percent of all investments. The bank’s investments in Kentucky primarily consisted of LIHTCs to support affordable housing. Investments also included grants totaling \$648,000.

Qualified Investments – Kentucky										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Non-MSA KY	4	11,380	43	107	7	38	5	25	59	11,550
Bowling Green MSA	6	4,015	18	83	1	17	3	38	28	4,153
Limited Scope	13	9,440	40	108	6	20	4	10	63	9,578
Statewide	7	119	4	31	1	7	0	0	12	157
Regional	0	0	1	5	0	0	0	0	1	5
Total	30	24,954	106	334	15	82	12	73	163	25,443

Source: Bank Records

On a statewide and regional level, the bank provided \$162,000 in grants to organizations with a purpose consistent with the CRA definition of community development. The bank provided 6 grants totaling \$117,000 to a nonprofit organization that trains community leaders in how to implement affordable housing. The bank also provided a \$20,000 grant to a nonprofit organization that has statewide financial literacy and credit building programs. Additional examples of the bank’s CRA investments in Kentucky are discussed in the assessment areas benefited.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified credit and community development needs in the state include economic development to support higher paying jobs and wealth building, affordable housing, technical assistance and financial literacy training, and access to affordable healthcare and food for low- and moderate-income residents. According to a recent needs assessment, there is a shortage of affordable housing across the state, particularly in the more expensive urban areas of the state. Kentucky ranks toward the bottom of all states for median family income, which also increases the need for affordable healthcare and groceries. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives primarily in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. Although the bank’s investments are not considered innovative, many are specifically tailored to meet identified needs.

SERVICE TEST

The Service Test rating for Kentucky is High Satisfactory. A Low Satisfactory record of retail banking services and an Outstanding record of community development services supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment areas. Truist operates 41 branches in Kentucky, which represents 2.3 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is consistent with the percent of the population in low-income census tracts. However, the branch distribution in moderate-income census tracts is below the percent of the population in moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers, and three branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in Kentucky.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	2.5	63,543	4.5	18	5.0
Moderate	6	14.6	319,872	22.9	83	23.1
Middle	20	48.8	680,953	48.6	176	48.9
Upper	13	31.7	328,905	23.5	76	21.1
NA	1	2.4	6,476	0.5	7	1.9
Total	41	100.0	1,399,749	100.0	360	100.0
<i>Source: 2015 ACS Data & Bank Records</i>						

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed 14 branches, including 2 in moderate-income, 11 in middle-income, and 1 in an upper-income census tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment areas in Kentucky. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout all assessment areas in Kentucky. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 221 community development services since the last evaluation. This performance represents 2.7 percent of bank-wide activities, which is above the statewide share of branches at 2.3 percent. The types of services provided reflect excellent responsiveness to the rated area needs. In Kentucky, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

The bank’s performance was strong in both the full-scope Kentucky Non-MSA and Bowling Green MSA assessment areas. Performance in the limited-scope assessment areas was generally consistent with the bank’s performance in the full-scope assessment areas. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following are two community development examples that benefitted the state:

- The bank collaborated with coalition of 15 regional domestic violence programs serving the state to present 14 sessions on banking, budgeting and credit to 649 Ready-to-Work participants on community college campuses. Ready-to-Work is a program that serves low-income students who are single parent welfare recipients.
- A bank employee serves on the Governor’s Workforce Innovation Board, which creates a statewide workforce training and development plan to expand employment opportunities throughout Kentucky.

Refer to the Community Development Services section in each assessment area for examples. The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Kentucky Non-MSA	4	59	20	2	85
Bowling Green MSA	2	23	14	0	39
Lexington MSA	2	29	3	0	34
Owensboro MSA	3	21	10	0	34
Clarksville MSA	5	19	1	0	25
Statewide Activities	0	4	0	0	4
Total	16	155	48	2	221
<i>Source: Bank Records</i>					

KENTUCKY NON-MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE KENTUCKY
NON-MSA ASSESSMENT AREA

The Kentucky Non-MSA assessment area consists of 15 counties, as noted in the Description of Assessment Area section of this evaluation. The bank operates 21, or 51.2 percent, of its Kentucky branch offices in the assessment area. The assessment area represents 29.6 percent of the rated area loans and 32.8 percent of rated area deposits. In 2019, Estill County was removed from the bank’s delineated assessment area due to a branch closing in this county. This decreased the number of census tracts in the assessment area by 4; all 4 were upper-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Kentucky Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	139	1.4	22.3	59.0	16.5	0.7
Population by Geography	540,954	1.2	20.7	58.7	19.5	0.0
Housing Units by Geography	255,632	1.1	21.2	58.8	18.9	0.0
Owner-Occupied Units by Geography	149,731	0.9	18.7	58.5	21.9	0.0
Occupied Rental Units by Geography	66,365	1.6	25.9	58.5	14.0	0.0
Vacant Units by Geography	39,536	0.9	22.8	60.4	15.9	0.0
Businesses by Geography	29,647	0.7	16.8	59.7	22.7	0.0
Farms by Geography	1,572	0.1	9.4	60.9	29.5	0.0
Family Distribution by Income Level	143,818	24.7	16.6	18.7	40.1	0.0
Household Distribution by Income Level	216,096	27.5	15.0	16.5	41.0	0.0
Median Family Income Non-MSAs – KY		\$45,920	Median Housing Value			\$95,706
			Median Gross Rent			\$573
			Families Below Poverty Level			18.9%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates fluctuated for each county in this assessment area. As of December 31, 2019, the overall average unemployment rate for this assessment area is 5.2 percent. All 15 counties had rates above the national average, and 10 counties had rates above the State average. Calloway and Washington Counties recorded the lowest unemployment rate at 3.6 percent and Harlan County recorded the highest unemployment rate of 11.1 percent, as of December 31, 2019.

In 2019, according to D&B, the top industries were services, retail trade, and non-classifiable establishments. Information regarding top employers is not available.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 51 FDIC-insured institutions operated 222 branches within this area. Of these institutions, the bank ranked 2nd in total deposits with a market share of 10.2 percent. Competitor institutions in the Kentucky Non-MSA assessment area included Community Trust Bank, Inc., U.S Bank N.A, and The Paducah Bank and Trust Company.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 41.3 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE KENTUCKY NON-MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Kentucky Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area and the borrower profile reflects an excellent distribution. In addition, the bank uses flexible lending practices and made an adequate level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Home mortgage and small business loans were given equal weight, and small farm loans were given less weight based on the number and dollar volume of these products.

Geographic Distribution

The overall geographic distribution of home mortgage, small business, and small farm loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data, but was given little weight since less than one percent of owner-occupied housing units are located in those tracts. Performance in moderate-income census tracts was below both demographic and aggregate lending data. Of note, performance in moderate census tracts was consistent with aggregate data in 2017.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data, but was given little weight since less than one percent of business are located in those tracts. Small business lending in moderate-income census tracts was slightly below demographics and consistent with aggregate lending data. Of note, in 2019 performance in low- and moderate income census tracts was consistent with demographic lending.

The geographic distribution of small farm loans reflects poor penetration throughout the assessment area. Although the bank did not make any small farm loans in low-income census tracts, this is not considered unusual given the extremely small percent of farms located in these tracts. The bank did not make any small farm loans in moderate-income census tracts in 2018 or 2019, which is below both demographic and aggregate lending data. However, the bank's performance in 2017 in moderate-income tracts was only slightly below demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was slightly above the percent of low-income families when families below the poverty level are considered and consistent with aggregate lending data. Lending to moderate-income borrowers was consistent with both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 86.0 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was above demographic data and significantly above the aggregate lending data. However, the bank's performance declined to 69.7 percent in 2019, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area remained constant.

The borrower distribution of small farm loans reflects excellent penetration among small farm customer of different sizes. In 2018, the bank originated 80.6 percent of small farm loans to farmers with gross revenues of \$1 million for less. This performance was less than the demographics, but almost double the aggregate lending data.

Community Development Lending

Truist has made an adequate level of community development loans in the Kentucky Non-MSA assessment area. The bank originated 6 community development loans totaling \$9.7 million. This amount represents 15.4 percent, by number, and 10.2 percent, by dollar volume, of total community development loans originated in Kentucky. Regarding the community development purpose, 4 loans supported affordable housing and 1 loan each supported economic development and revitalization or stabilization. Community development loans include a \$3.6 million loan and a \$2.5 million loan to bridge equity investments in LIHTC funds.

INVESTMENT TEST

The institution has a significant level of qualified investments and is occasionally in a leadership position in the assessment area. Responsiveness to community needs is excellent, and the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$11.6 million, or 0.6 percent, of bank-wide community development investments that is comparable to the level of deposits, 0.6 percent, but below the level of branches, 1.1 percent, in this assessment area. Most of the CRA investments, \$11.4 million, went towards affordable housing. Investments also included grants totaling \$175,000. Examples are provided below.

- The bank funded a \$4.4 million LIHTC, which enabled the construction of an affordable senior citizen housing development.
- The bank funded a \$4.5 million LIHTC, which enabled the development of a 68-unit facility that provides shelter for homeless women in the assessment area suffering from alcoholism, drug addiction, and abuse.
- The bank funded a \$2.5 million LIHTC, which enabled the redevelopment of an old high school building into a 27-unit affordable housing complex.
- The bank provided a \$25,000 grant to a nonprofit organization that supports homeless residents with housing and other essential services.
- The bank provided grants totaling \$23,500 to a nonprofit organization that provides economic development and revitalization in underserved census tracts.
- The bank provided grants totaling over \$15,000 to nonprofit organizations that provide free meal services to low-income residents and students who cannot afford a school lunch.
- The bank provided \$25,000 in grants to a nonprofit organization that specializes in providing financial education, including credit and asset building counseling, for low- and moderate-income residents of the assessment area.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are small business economic development, affordable housing, and programs to assist low-income families, including financial literacy training and free meals. The bank's investments in this assessment area are specifically tailored to meet the needs identified.

Community Development Initiatives

The bank makes significant use of complex investments to support community development needs in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the population demographics. The branch distribution in moderate-income census tracts is slightly below population demographics. Additionally, the bank offers an array of alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the Kentucky Non-MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	4.8	6,400	1.2	2	1.5
Moderate	4	19.0	115,113	21.3	32	23.0
Middle	9	42.9	317,500	58.7	82	59.0
Upper	7	33.3	101,941	18.8	22	15.8
NA	0	0.0	0	0.0	1	0.7
Total	21	100.0	540,954	100.0	139	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of the bank’s delivery systems. During the evaluation period, the bank did not open any branches. However, the bank closed seven branches, including one in a moderate-income census tract and six in middle-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Kentucky.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 85 community development services. This performance represents 38.5 percent of all activities in the state, which is below the assessment area’s share of branches at 51.2 percent. However, the types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area.

The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an economic development authority that recruits and expands businesses in northeastern Kentucky.
- A bank employee serves on the Board of a nonprofit organization whose mission is to revitalize an historic downtown district in an effort to create opportunities for economic development.
- A bank employee serves on the Board of an economic development corporation that recruits and retains manufacturing and distribution businesses in central Kentucky.

BOWLING GREEN, KY MSA ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BOWLING
GREEN, KY MSA ASSESSMENT AREA

The Bowling Green MSA assessment area consists of all 4 counties within the MSA. The bank operates 5, or 12.2 percent, of its Kentucky branch offices in the Bowling Green MSA assessment area. The assessment area represents 24.2 percent of the rated area loans and 14.8 percent of rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

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)	39	5.1	25.6	38.5	25.6	5.1
Population by Geography	164,245	4.9	23.4	36.2	34.0	1.5
Housing Units by Geography	70,769	4.6	25.3	38.2	30.3	1.5
Owner-Occupied Units by Geography	39,399	1.9	18.6	42.3	37.0	0.3
Occupied Rental Units by Geography	23,597	9.7	32.5	32.0	22.0	3.7
Vacant Units by Geography	7,773	3.0	36.9	36.8	21.8	1.4
Businesses by Geography	9,914	5.9	21.9	35.6	32.2	4.4
Farms by Geography	605	1.0	15.5	45.0	37.5	1.0
Family Distribution by Income Level	41,939	21.5	17.4	20.0	41.1	0.0
Household Distribution by Income Level	62,996	25.3	14.2	17.9	42.6	0.0
Median Family Income MSA - 14540 Bowling Green, KY MSA		\$55,109	Median Housing Value			\$127,271
			Median Gross Rent			\$675
			Families Below Poverty Level			13.9%

Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

According to the U.S. Bureau of Labor Statistics, during the evaluation period, unemployment rates for this assessment area increased. As of December 31, 2019 at 3.9 percent, the unemployment rate in the Bowling Green MSA was below the state average, but above the national average. However, in 2017 and 2018, the Bowling Green MSA unemployment rate was below both national and state averages.

In 2019, according to Moody's Analytics, the top industries were manufacturing, government, and education and health services. The top employers were Houchens Industries, Inc., Commonwealth Health Corporation, Western Kentucky University, Bowling Green Metalforming, LLC, and Dart Container Corporation.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 20 FDIC-insured institutions operated 68 branches within this area. Of these institutions, the bank ranked 1st in total deposits with a market share of 15.9 percent. Competitor institutions in the Bowling Green MSA assessment area included US Bank N.A., American Bank & Trust Company, Inc., and Independence Bank of Kentucky.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need, as 38.9 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BOWLING GREEN, KY MSA ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Bowling Green MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business loans received more weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. However, the bank's performance in moderate-income census tracts was below both demographic and aggregate lending data. Performance in low- and moderate-income census tracts was consistent with aggregate lending data for 2017.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with demographic and aggregate lending data. Of note, performance in moderate-income census tracts increased and was above demographic data in 2019. However, performance declined in low-income tracts in 2019.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with both the percent of low-income families when families below the poverty level are considered and aggregate lending data. Lending to moderate-income borrowers was slightly below demographic and consistent with aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 61.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but above aggregate lending data.

Community Development Lending

Truist Bank is a leader in making community development loans in the Bowling Green MSA assessment area. The bank originated 12 community development loans totaling \$30.9 million. This amount represents 30.8 percent, by number, and 32.5 percent, by dollar volume, of total community development loans originated in Kentucky. Regarding the community development purpose, 2 loans supported affordable housing, 4 loans supported community services, 5 loans supported economic development, and 1 loan supported revitalization or stabilization. Community development loans include a \$10.3 million loan to a healthcare center for the construction of a new facility. The healthcare center primarily serves low- and moderate-income individuals. The bank also refinanced a \$9.9 million loan for the renovation and expansion of a shopping center. The shopping center will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

The institution has a significant level of qualified investments, although rarely in a leadership position in the assessment area. Responsiveness to community needs is excellent, and the bank occasionally uses complex investments.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$4.2 million, or 0.2 percent, of bank-wide community development investments that is below the percent of deposits, 0.4, and branches, 0.3, in this assessment area. Most of the CRA investments, \$4.0 million, went towards affordable housing. Investments also included grants totaling \$153,000. Examples are provided below.

- The bank funded a \$4.0 million LIHTC that enabled the construction of a 76-unit affordable housing development in the assessment area. Targeted tenants are those with less than 60 percent of the area median family income.
- The bank provided 4 grants totaling \$50,000 that provides for economic development in targeted downtown locations of the assessment area.
- The bank provided 2 grants totaling \$45,000 to a charity that operates programs to provide basic medical and dental healthcare to low-income residents of the assessment area.
- The bank provided over \$10,000 in grants to organizations that provide financial literacy training and offer other support services to low- and moderate-income families in the assessment area.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary identified needs are affordable housing, financial literacy, small business economic development, and healthcare and food programs for low- and moderate-income people. The bank's investments in this assessment area are tailored to meet the needs identified.

Community Development Initiatives

The bank occasionally uses complex investments to support community development needs in the form of housing tax credits in the assessment area. These investments fill funding gaps for affordable housing and revitalization projects that normally would not qualify for conventional financing.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. Although the bank does not operate any branches in low- or moderate-income census tracts, all five branches are located in census tracts adjacent to other low- and moderate-income census tracts in the assessment area. Additionally, the bank offers an array of alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the Bowling Green MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	8,078	4.9	2	5.1
Moderate	0	0.0	38,513	23.4	10	25.6
Middle	1	20.0	59,403	36.2	15	38.5
Upper	3	60.0	55,795	34.0	10	25.7
NA	1	20.0	2,456	1.5	2	5.1
Total	5	100.0	164,245	100.0	39	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of the bank’s delivery systems. During the evaluation period, the bank did not open any branches. The bank closed two branches, including one each in a middle-income census tract and an upper-income census tract. However, both branches that were closed border low- and moderate-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in Kentucky.

Community Development Services

Truist is a leader in providing community development services. During the evaluation period, bank records show that employees in the assessment area participated in 39 community development services. This performance represents 17.6 percent of all activities in the state, which is above the assessment area’s share of branches at 12.2 percent. In addition, the types of services provided reflect excellent responsiveness to the assessment area needs. Bank employees assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a nonprofit economic development authority that facilitates the growth of small businesses in Warren County.
- A bank employee serves on the Board of a nonprofit organization whose mission is to provide low- and moderate-income students with financial literacy, entrepreneurship, and workforce development skills.
- A bank employee serves as Chairman on the Board of a nonprofit agency whose mission is to construct and promote a 4,000-acre state-of-the-art business park and intermodal facility. This business park provides customized workforce training to meet local economic development needs.

**OTHER KENTUCKY ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the three Kentucky assessment areas 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
Lexington MSA	Consistent	Consistent	Below
Owensboro MSA	Consistent	Consistent	Consistent
Clarksville MSA	Consistent	Consistent	Consistent

A summary of Truist’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is included in Appendix E.

Lexington MSA Assessment Area

The Lexington MSA assessment area consists of Bourbon, Clark, Fayette, Jessamine, Scott, and Woodford Counties. Truist Bank operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,060	\$62.9 million
Home Mortgage Loans	809	\$201.4 million
Small Farm Loans	4	\$287 thousand
Community Development Loans	4	\$21.4 million
Investments (New)	5	\$4.2 million
Investments (Prior Period)		\$0
Donations	33	\$117.2 thousand
CD Services	34	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Lexington MSA assessment area are in Appendix D.

Owensboro MSA Assessment Area

The Owensboro MSA assessment area consists of Davies, Hancock, and McLean Counties. Truist Bank operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	724	\$52.3 million
Home Mortgage Loans	457	\$52.0 million
Small Farm Loans	132	\$20.9 million
Community Development Loans	4	\$4.4 million
Investments (New)	1	\$4.0 million
Investments (Prior Period)		\$0
Donations	19	\$33 thousand
CD Services	34	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Owensboro MSA assessment area are in Appendix D.

Clarksville MSA Assessment Area

The Clarksville MSA assessment area consists of Christian and Trigg Counties. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	269	\$11.1 million
Home Mortgage Loans	190	\$17.9 million
Small Farm Loans	38	\$3.1 million
Community Development Loans	2	\$793 thousand
Investments (New)	1	\$1.3 million
Investments (Prior Period)		\$0
Donations	4	\$8 thousand
CD Services	0	--
<i>Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019</i>		

Geographic Distribution and Borrower Profile

Tables containing lending data for the Clarksville MSA assessment area are in Appendix D.

NEW JERSEY

CRA RATING FOR NEW JERSEY: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW JERSEY

The bank operates 26, or 1.6 percent, of its total branch offices in New Jersey. New Jersey accounts for 1.0 percent of the bank-wide deposits. Overall, Truist ranks 26th in the state in deposit market share at 0.5 percent. Competitor institutions in the New Jersey assessment areas include Bank of America, N.A., TD Bank, N.A., and Wells Fargo Bank, N.A.

SCOPE OF EVALUATION – NEW JERSEY

The evaluation of the New Jersey performance considered the operations of Truist in five assessment areas, which are detailed in the Description of Assessment Areas. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the New York-Jersey City-White Plains (New York) and Camden MD assessment areas. Limited scope areas included the Atlantic City-Hammonton (Atlantic City), Trenton, and Vineland-Bridgeton (Vineland) MSA assessment areas. During the review period, small business loans were given more weight than home mortgage when considering the number and dollar volume of these products in the state. Based on the number of loans, small farm loans were not reviewed in any assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NEW JERSEY

LENDING TEST

The Lending Test rating for New Jersey is High Satisfactory. The bank's lending levels reflect good responsiveness to the New Jersey assessment areas' credit needs. The geographic distribution reflects adequate penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the New Jersey assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2018 for each New Jersey assessment area. Examiners based conclusions primarily on the performance in the New York and Camden MD assessment areas. Performance in assessment areas that received limited-scope reviews was consistent with the full-scope review areas.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate. The geographic distribution of home mortgage and small business loans reflects adequate penetration throughout the assessment areas. Adequate performance in the New York MD assessment area and good performance in the Camden MD assessment area support this conclusion.

Borrower Profile

The overall borrower distribution of home mortgage and small business is good. The borrower distribution of home mortgage loans is adequate among borrowers of different income levels. However, the borrower distribution of small business loans is excellent among business customers of different sizes. Adequate performance in the New York MD assessment area and excellent performance in the Camden MD assessment area support this conclusion.

Community Development Loans

Truist made a relatively high level of community development loans in New Jersey. During this evaluation period, the bank originated 19 community development loans totaling \$48.6 million. This performance represents 1.1 percent, by number, and 0.8 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 7 community development loans totaling \$7.7 million were originated.

Since the previous evaluation, Truist originated 2 loans totaling \$8.5 million outside of the assessment areas, but within New Jersey. Since the bank has been responsive to community development needs and opportunities within its assessment areas, this loan was included. The analysis for each full-scope New Jersey assessment area includes a detailed discussion of community development loans.

INVESTMENT TEST

Truist demonstrates a High Satisfactory record regarding the Investment Test in New Jersey. The level of investments is significant, and responsiveness to community needs is good. In addition, the bank occasionally uses complex investments, and occasionally serves in a leadership position. The bank's performance was good in both full-scope assessment areas. Performance among the limited-scope assessment areas was consistent with the full-scope areas.

Investment and Grant Activity

The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$12.9 million, or 0.7 percent, of bank-wide community development investments which is slightly below the percent of deposits, 1.0, and below the percent of branches, 1.6, in the state. By number of investments, the bank had 87 in New Jersey, or 1.5 percent of all investments. The bank's investments primarily consisted of LIHTCs and bonds to support affordable housing. Investments also included grants totaling \$634,000.

Qualified Investments – New Jersey										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
New York MD	1	3,000	6	14	0	0	0	0	7	3,014
Camden MD	12	4,916	28	184	5	1,949	0	0	45	7,049
Limited Scope	7	1,034	14	92	5	1,464	0	0	26	2,590
Statewide	1	55	1	30	2	60	1	55	5	200
Regional	1	3	3	5	0	0	0	0	4	8
Total	22	9,008	52	325	12	3,473	1	55	87	12,861

Source: Bank Records

On a statewide level, the bank provided \$200,000 in grants to statewide organizations with missions consistent with the definition of community development. One example is \$105,000 in donations to a statewide housing and community development organization that supports CDCs to strengthen their capacity to create housing and revitalize distressed neighborhoods. On a regional level, the bank donated \$8,000 to community organizations that support homelessness and affordable housing. Other examples of CRA investments in are discussed in the New Jersey assessment areas.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, and financial literacy. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to most identified needs.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for New Jersey is Low Satisfactory. A Needs to Improve record of retail banking services and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the assessment areas. Truist operates 26 branches in New Jersey, which represents 1.6 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is well below the percent of the population in low- and moderate-income census tracts in New Jersey. The bank offers an array of alternative delivery systems for customers, including 11 branches serving as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in New Jersey.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	355,000	8.0	85	8.5
Moderate	2	7.7	762,598	17.2	182	18.2
Middle	11	42.3	1,962,713	44.3	447	44.8
Upper	13	50.0	1,333,978	30.1	272	27.2
NA	0	0.0	14,725	0.4	13	1.3
Total	26	100.0	4,429,014	100.0	999*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from total number of New Jersey census tracts on Page 9 (1,376) results from a decrease of 377 census tracts in the New York-New Jersey MD (Bergen, Hudson, and Passaic Counties were removed and Somerset County was added).*

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches but closed seven branches as follows: five in middle-income census tracts and two in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

Truist provides a relatively high level of community development services in the state. Bank records show that employees participated in 107 community development services since the last evaluation. This performance represents 1.3 percent of bank-wide activities, which is consistent with the statewide share of branches at 1.6 percent. The types of services provided reflect good responsiveness to the rated area needs. In New Jersey, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities.

Performance was strongest in the full-scope Camden MSA and the limited-scope Vineland MSA. Performance in the other limited-scope assessment areas was lower than the bank’s performance in the state. Examples of qualifying community development services are provided under each full-scope assessment area; however, the following community development service benefits the state:

- A bank employee serves on the Board of a nonprofit council that supports economic development throughout eight counties in southern New Jersey.

The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Camden MSA	6	43	12	0	61
New York MD	0	0	0	0	0
Vineland MSA	4	29	1	0	34
Atlantic City MSA	2	2	2	0	6
Trenton MSA	1	5	0	0	6
Total	13	79	15	0	107

Source: Bank Records

NEW YORK, NJ MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NEW YORK,
NJ MD ASSESSMENT AREA

The New York MD consists of all 6 counties within the MD. The bank operates 1, or 3.8 percent, of its New Jersey branch offices in this assessment area. The assessment area represents 54.0 percent of the rated area loans and 2.1 percent of the rated area deposits.

In 2019, a portion of the New York MD was moved to a newly created New Brunswick MD. As a result, Bergen, Hudson, and Passaic Counties were removed from the bank's assessment area, and Somerset County was added. As a result, the number of census tracts decreased from 890 to 513 tracts. However, the percent of low- and moderate-income census tracts stayed relatively the same. Of note, the population also decreased by 1.8 million people.

Economic and Demographic Data

The 2015 ACS Census shows owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts, with a heavier concentration in the upper-income tracts. The below table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: New York MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	890	5.7	16.3	26.2	50.8	1.0
Population by Geography	4,139,458	5.1	16.4	26.2	52.1	0.1
Housing Units by Geography	1,642,586	4.3	16.2	27.7	51.7	0.1
Owner-Occupied Units by Geography	915,821	1.1	9.6	25.2	64.1	0.0
Occupied Rental Units by Geography	568,288	9.2	26.7	30.9	33.1	0.1
Vacant Units by Geography	158,477	5.1	16.7	31.0	47.0	0.2
Businesses by Geography	291,186	3.4	12.6	23.5	60.5	0.1
Farms by Geography	5,366	1.4	6.7	21.9	69.9	0.0
Family Distribution by Income Level	1,030,902	18.6	13.7	16.6	51.1	0.0
Household Distribution by Income Level	1,484,109	21.9	13.1	15.5	49.5	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD	\$72,047	Median Housing Value				\$369,642
		Median Gross Rent				\$1,323
		Families Below Poverty Level				8.4%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 3.4 percent, the unemployment rate in the New York MD was similar to State rate and the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were education and health services, professional and business services, and government. The top employers were Montefiore Health System, Mount Sinai Health System, JPMorgan Chase & Co., Bank of America, and New York-Presbyterian Healthcare System.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 82 FDIC-insured institutions operated 1,360 branches within the assessment area. Of these institutions, the bank ranked 68th in total deposits with a market share of 0.0 percent. Competitor institutions include Bank of America, N.A., TD Bank, N.A., and PNC Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 32.3 percent of the families are low- or moderate-income and median housing values are high.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NEW YORK, NJ MD ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the New York MD assessment area reflects adequate responsiveness to assessment area credit needs. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects adequate penetration, and the borrower profile reflects an adequate distribution. In addition, the bank uses flexible lending practices and made an adequate level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area. Small business loans were given more weight than home mortgage loans when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Bank performance in low-income census tracts was generally consistent with demographic and aggregate lending data when considering only 1.1 percent of owner-occupied housing units are located in low-income census tracts. However, the bank's performance in moderate-income census tracts was below both demographic and aggregate lending data. Of note, in 2017, while the bank did not originate any loans in low-income census tracts, lending in moderate-income census tracts was consistent with demographic and aggregate lending data. In 2019, performance was below demographic data in low- and moderate-income census tracts.

The geographic distribution of small business loans also reflects adequate penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was below the demographic and aggregate lending data. Of note, in 2017, performance in low-income census tracts was generally consistent with the demographic and aggregate lending data, but below the demographic and aggregate lending data in moderate-income census tracts. In 2019, performance in low-income census tracts was below the demographic data, but consistent with the demographic data in moderate-income census tracts.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans reflects poor penetration among borrowers of different incomes. The bank did not originate any loans to low-income borrowers. However, given the median housing value is \$369,642 and the poverty rate is 8.4 percent, a low-income family would not likely qualify for a conventional home mortgage loan. Lending performance to moderate-income borrowers was also well below both demographic and aggregate lending data. It is important to note bank lending low- and moderate-income borrowers increased throughout the evaluation period. Of note, in 2017, the bank did not make any loans to low- or moderate-income borrowers. In 2019, performance to low-income borrowers was still well below the demographic data, but performance to moderate-income borrowers was above the demographic data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 90.0 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was above the demographic data, but significantly above aggregate lending data. Of note, in 2017, performance was above the demographic data and significantly higher than the aggregate lending data. In 2019, lending performance was consistent with the demographic data.

Community Development Loans

Truist made an adequate level of community development loans in the New York MD assessment area. The bank originated 2 community development loans totaling \$2.9 million. This amount represents 10.5 percent, by number, and 6.0 percent, by dollar volume, of total community development loans originated in New Jersey. Regarding the community development purpose, both loans supported affordable housing. Community development loans include a \$2.8 million loan to bridge an equity investment in a LIHTC fund. The bank also funded a \$181,000 loan to construct affordable housing for low- and moderate-income families.

INVESTMENT TEST

The level of investments is excellent, and responsiveness to community needs is adequate. In addition, the bank occasionally uses complex investments, although rarely in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants. Qualified investments totaled \$3.0 million, or 0.2 percent, of bank-wide community development investments that slightly exceeds the percent of deposits, 0.0, and branches, 0.1. Most of the CRA investments went towards affordable housing. Investments also included grants totaling \$14,000. Examples are provided below.

- Invested \$3 million in a LIHTC project to build a new 100-unit affordable housing apartment complex.
- Donated \$4,000 to make care packages for children from low- and moderate-income families.

Responsiveness to Credit and Community Development Needs

The bank exhibits adequate responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, and financial literacy. The bank responded to the affordable housing need in this assessment area.

Community Development Initiatives

The bank occasionally uses complex investments to support community development needs in the form of tax credits investments. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. None of the bank's investments are considered innovative.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank has not provided any community development services in the assessment area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. The bank's only branch is located in a middle-income census tract, but borders a moderate-income census tract. Additionally, the bank offers an array of alternative delivery systems for its customers. The following table reflects the bank's branching distribution by tract income level for the New York MD assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	179,205	7.5	37	7.2
Moderate	0	0.0	424,770	17.9	93	18.1
Middle	1	100.0	1,065,558	44.9	236	46.0
Upper	0	0.0	703,953	29.7	142	27.7
NA	0	0.0	53	0.0	5	1.0
Total	1	100.0	2,373,539	100.0	513*	100.0

Source: 2015 ACS Data & Bank Records

**Difference from total number of census tracts on Page 360 (890) results from a decrease of 377 census tracts in this assessment area (Bergen, Hudson, and Passaic Counties were removed and Somerset County was added).*

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open or close any branches.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in New Jersey.

Community Development Services

The bank has not provided any community development services in the assessment area.

CAMDEN, NJ MD ASSESSMENT AREA
(Full-Scope Review)
DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CAMDEN, NJ
MD ASSESSMENT AREA

The Camden, NJ Metropolitan Division Area (Camden MD) consists of all 3 counties within the MD. The bank operates 15, or 57.7 percent, of its New Jersey branch offices in this assessment area. The assessment area represents 25.0 percent of the rated area loans and 54.3 percent of the rated area deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Camden MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	304	6.3	17.1	51.3	25.0	0.3
Population by Geography	1,252,852	6.4	14.9	49.6	28.8	0.3
Housing Units by Geography	494,271	6.5	16.3	50.2	26.7	0.3
Owner-Occupied Units by Geography	334,575	3.1	12.5	51.8	32.5	0.0
Occupied Rental Units by Geography	120,453	13.0	25.4	46.7	13.9	1.0
Vacant Units by Geography	39,243	14.9	20.9	47.4	16.1	0.7
Businesses by Geography	73,939	3.4	12.5	49.2	34.8	0.1
Farms by Geography	1,986	0.9	8.7	50.4	40.0	0.0
Family Distribution by Income Level	315,592	21.1	17.1	21.4	40.3	0.0
Household Distribution by Income Level	455,028	24.8	15.7	17.6	41.9	0.0
Median Family Income MSA - 15804 Camden, NJ MD		\$87,133	Median Housing Value			\$218,478
			Median Gross Rent			\$1,082
			Families Below Poverty Level			7.0%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 4.0 percent, the unemployment rate in the Camden MD exceeded the state rate and the national average.

In 2019, according to Moody's Analytics, the top industries were education and health services, government, and professional and business services. The top employers were Virtua Health, McGuire-Dix Air Force Base, Cooper Health System, TD Bank Corporation, and Kennedy Health System.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 32 FDIC-insured institutions operated 308 branches within the assessment area. Of these institutions, the bank ranked 11th in total deposits with a market share of 2.8 percent. Competitor institutions include TD Bank, N.A., PNC Bank, N.A., and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 38.2 percent of the families are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CAMDEN, NJ MD ASSESSMENT AREA

LENDING TEST

Truist's Lending Test performance in the Camden MD assessment area reflects good responsiveness to assessment area credit needs. Lending levels reflect good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects excellent distribution. The bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area. Small business loans were given more weight than home mortgage loans when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank did not originate any loans in low-income census tracts. However, only 3.1 percent of owner-occupied housing units are located in low-income census tracts. Lending performance in moderate-income census tracts was below demographic and aggregate lending data.

Of note, in 2017, while lending performance in low-income census tracts was similar to demographic and aggregate lending data, performance in moderate-income census tracts was significantly higher than the demographic and aggregate lending data. However, in 2019, while lending performance in low-income census tracts was similar to the demographic data, performance in moderate-income census tracts was below the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was similar to the demographic and aggregate lending data. Of note, in 2017, performance in low- and moderate-income census tracts was slightly below the demographic data, but similar to the aggregate lending data. In 2019, performance was below the demographic data in moderate-income census tracts.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending performance to low-income borrowers was consistent with the aggregate data, but below the demographic data. Of note, given the median housing value is \$218,478 and the poverty rate is 7.0 percent, a low-income family would not likely qualify for a conventional home mortgage loan. Lending performance to moderate-income borrowers was consistent with both demographic and aggregate lending data. However, in 2019, performance to low-income borrowers was well below the demographic data, but performance to moderate-income borrowers was above the demographic data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 76.6 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was below the demographic data, but well above aggregate lending data.

Community Development Loans

Truist is a leader in making community development loans in the Camden MD assessment area. The bank originated 9 community development loans totaling \$25.2 million. This amount represents 47.4 percent, by number, and 51.8 percent, by dollar volume, of total community development loans originated in New Jersey. Regarding the community development purpose, 2 loans supported affordable housing, 4 loans supported community services, and 3 loans supported economic development. Community development loans include a \$3.1 million loan to build a 144-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also renewed a \$3.0 million line of credit to a nonprofit organization to purchase group homes. The group homes will provide transitional housing for low- and moderate-income individuals.

INVESTMENT TEST

The level of investments is significant, and responsiveness to community needs is excellent. None of the investments in this assessment area during this evaluation period were considered complex or innovative.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants. Qualified investments totaled \$7 million, or 0.4 percent, of bank-wide community development investments that is slightly below the percent of deposits, 0.5, and branches, 0.9. Most of the CRA investments, \$5.0 million, went towards affordable housing. Investments also included grants totaling \$303,000. Examples are provided below.

- Invested \$4.8 million in an affordable housing bond.
- Invested \$1.9 in SBA bonds to finance loans to small businesses that are unable to obtain financing in the private credit marketplace.
- Donated \$40,000 to an organization that provides homebuyer education to first time low- and moderate-income homebuyers.
- Donated \$5,000 to an organization that provides financial wellness sessions to low-income persons.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, and financial literacy. The bank responded to each of the identified needs in this assessment area.

Community Development Initiatives

None of the bank's investments are considered complex or innovative.

SERVICE TEST

Delivery systems are accessible to limited portions of the Camden MSA assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment area. The bank is a leader in providing community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the institution's assessment area. To illustrate, the bank did not have any branches in low-income census tracts, which is below the population demographics. In addition, the branch distribution in moderate-income census tracts is lower than the percent of the population in the respective geographies. Further, only 3 of the 15 branches are located in or within close proximity to low- or moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers. This includes 4 branches serving as multicultural banking centers. The following table reflects the bank's branch distribution by tract income level for the Camden MSA assessment area.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	80,113	6.4	19	6.3
Moderate	1	6.7	186,678	14.9	52	17.1
Middle	5	33.3	621,721	49.6	156	51.3
Upper	9	60.0	361,160	28.8	76	25.0
NA	0	0.0	3,180	0.3	1	0.3
Total	15	100.0	1,252,852	100.0	304	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank did not open any branches but closed four branches, two branches each in middle- and upper-income census tracts. However, two of the four closed branches border moderate-income census tracts. The other two branch offices are located in relatively close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the assessment area and is consistent with the performance in New Jersey.

Community Development Services

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 61 community development services. This performance represents 57.0 percent of all activities in the state, which is consistent with the assessment area's share of statewide branches at 57.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The majority of qualifying services were financial literacy classes for low- and moderate-income individuals. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board and the finance committee of an organization that provides affordable housing for low-income families in Burlington County.
- A bank employee serves on the Board of an economic development organization that attracts, retains, and expands small businesses within Camden County.
- A bank employee serves on the Board whose mission is to develop workforce development programs through creating partnerships and collaboration with government, private, and nonprofit entities in Camden County.

**OTHER NEW JERSEY ASSESSMENT AREAS
(Limited-Scope Review)**

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

The following table summarizes the conclusions for the three New Jersey assessment areas 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
Vineland MSA	Consistent	Consistent	Exceeds
Atlantic City MSA	Consistent	Consistent	Consistent
Trenton MSA	Consistent	Consistent	Consistent

A summary of Truist Bank’s operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is included in Appendix E.

Vineland MSA Assessment Area

The Vineland MSA assessment area consists of Cumberland County. Truist Bank operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	468	\$36.9 million
Home Mortgage Loans	192	\$18.7 million
Small Farm Loans	1	\$15 thousand
Community Development Loans	5	\$8.6 million
Investments (New)	1	\$500 thousand
Investments (Prior Period)	0	\$0
Donations	9	\$20 thousand
CD Services	34	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Vineland MSA assessment area are in Appendix D.

Atlantic City MSA Assessment Area

The Atlantic City MSA assessment area consists of Atlantic County. Truist Bank operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	419	\$31.9 million
Home Mortgage Loans	153	\$27.5 million
Small Farm Loans	1	\$400 thousand
Community Development Loans	0	\$0
Investments (New)	3	\$1.5 million
Investments (Prior Period)		\$0
Donations	4	\$21.5 thousand
CD Services	6	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Atlantic City MSA assessment area are in Appendix D.

Trenton MSA Assessment Area

The Trenton MSA assessment area consists of Mercer County. Truist Bank operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	231	\$5.8 million
Home Mortgage Loans	45	\$10.8 million
Small Farm Loans	0	0
Community Development Loans	1	\$3.4 million
Investments (New)	3	\$523.4 thousand
Investments (Prior Period)		\$0
Donations	6	\$71.3 thousand
CD Services	6	--

Source: 2017-2019 HMDA and CRA LARs; Bank data from 1/1/2017 to 12/31/2019

Geographic Distribution and Borrower Profile

Tables containing lending data for the Trenton MSA assessment area are in Appendix D.

**WASHINGTON-ARLINGTON-ALEXANDRIA, DC-MD-VA-WV
MULTISTATE METROPOLITAN AREA**

**CRA RATING FOR WASHINGTON-ARLINGTON-ALEXANDRIA, DC-MD-
VA-WV MULTISTATE METROPOLITAN AREA: OUTSTANDING**

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON-
ARLINGTON-ALEXANDRIA, DC-MD-VA-WV MULTISTATE
METROPOLITAN AREA**

The Washington-Arlington-Alexandria, DC-MD-VA-WV Multistate Metropolitan Area (Washington, DC MSA) consists of all 22 counties within the MSA. The bank operates 127 branches in the assessment area, which comprise 7.3 percent of its total branch offices. The assessment area accounts for 11.4 percent and 7.4 percent of the bank-wide loans and deposits, respectively.

In 2019, Madison County, Virginia was added to the Washington, DC MSA due to OMB MSA changes. This change increased the number of census tracts in the assessment area by two, including one low-income and one moderate-income census tract.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Washington, DC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,083	10.3	22.4	34.3	31.3	1.7
Population by Geography	4,690,171	9.3	22.1	35.3	32.7	0.6
Housing Units by Geography	1,808,472	10.0	22.2	34.9	32.5	0.5
Owner-Occupied Units by Geography	1,044,991	4.0	18.7	38.2	39.0	0.2
Occupied Rental Units by Geography	636,937	18.7	27.2	29.9	23.3	0.9
Vacant Units by Geography	126,544	15.5	25.3	32.7	25.9	0.5
Businesses by Geography	377,995	5.1	19.1	35.1	39.8	0.9
Farms by Geography	6,725	3.3	21.7	40.6	34.2	0.2
Family Distribution by Income Level	1,091,409	22.4	16.8	20.2	40.6	0.0
Household Distribution by Income Level	1,681,928	23.4	16.6	18.8	41.3	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV MD		\$106,762	Median Housing Value			\$401,021
			Median Gross Rent			\$1,522
			Families Below Poverty Level			6.1%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 3.0 percent, the unemployment rate in the Washington DC MSA was below the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were Naval Support Activity Washington, Joint Base Andrews-Naval Air Facility, MedStar Health, Marriott International Inc., and Inova Health System.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 75 FDIC-insured institutions operated 1,491 branches within the assessment area. Of these institutions, the bank ranked 6th in total deposits with a market share of 7.2 percent. Competitor institutions include E*Trade Bank, Bank of America, N.A., and Capital One, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.2 percent of the families are low- or moderate-income.

SCOPE OF EVALUATION – WASHINGTON-ARLINGTON-ALEXANDRIA, DC-MD-VA-WV MULTISTATE METROPOLITAN AREA

The evaluation of the Washington, DC MSA performance considered the operations of Truist in the assessment area. Small business loans were given more weight than home mortgage loans when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON- ARLINGTON-ALEXANDRIA, DC-VA-MD-WV MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Washington, DC MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic data and slightly below aggregate lending data. The bank's performance in moderate-income census tracts was slightly below both demographic and aggregate lending data. Of note, performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data in 2017. In addition, the bank's performance was consistent with the demographic data in 2019.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with demographic and aggregate lending data. Of note, performance in moderate-income census tracts was above demographic data in 2019.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was well below the percent of low-income families when families below the poverty level are considered, but slightly below aggregate lending data. Lending to moderate-income borrowers was also below both demographic and aggregate lending data. It is important to note that the bank's performance to both low- and moderate-income borrowers increased significantly throughout the evaluation period. In fact, performance to moderate-income borrowers rose to a level that was consistent with demographic data in 2019.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 73.8 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data. However, in 2019, the bank's performance declined to 61.9 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased.

Community Development Loans

Truist has made a relatively high level of community development loans in the Washington MSA. During this evaluation period, the bank originated 76 community development loans totaling \$453.7 million. This represents 4.3 percent, by number, and 7.2 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 62 community development loans totaling \$380.6 million were originated.

Regarding the community development purpose, 26 loans supported affordable housing, 32 loans supported community services, 11 loans supported economic development, and 7 loans supported revitalization or stabilization. Community development loans include a \$15.0 million loan to refinance a 164-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also renewed a \$4.5 million line of credit to a community based nonprofit organization. The organization provides services to homeless individuals.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in the Washington, DC MSA. The level of investments and responsiveness to community needs is excellent. The bank makes extensive use of innovative and complex investments, and serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$160.9 million, or 9.0 percent, of bank-wide community development investments that exceeds the percent of deposits, 7.4, and branches, 7.3, in this assessment area. By number of investments, the bank had 233 in this assessment area, or 3.9 percent of all investments. The majority of CRA investments, \$153.2 million, were for affordable housing, which resulted in the construction/preservation of more than 2,500 affordable rental units.

The bank used a variety of investment vehicles to serve this area including tax credits, bonds, and investments in SBIC and designated CRA funds. Investments also included grants totaling \$1 million. Examples are provided below.

- Invested \$10 million in a new and innovative organization to provide affordable rental housing. This initiative was the result of a public, private, and nonprofit partnership developed out of the concern for a lack of affordable housing related to the new Amazon headquarters.
- Invested \$8.8 million in a project to acquire and rehabilitate a property priced for residents earning no more than 60 percent of the area median income. This project was a partnership with a regional housing finance agency, a national nonprofit organization that specializes in preserving affordable multi-family housing, and another financial institution.
- Invested \$7 million in a SBIC that provided funding for small businesses in this area.
- Provided \$90,000 in grant funds to a leading affordable housing organization serving this area.
- Provided \$62,500 in grants funds to an organization whose purpose is to help the poor and homeless through providing services focused on improving education and job skills.
- Provided a \$10,000 grant to an organization that offers emergency financial assistance local residents who are homeless or in immediate danger of becoming homeless.
- Grants totaling \$42,500 to 2 organizations which work to reduce barriers to social and economic mobility for residents of low-income minority neighborhoods.
- Provided \$25,000 in grants to a home purchase counseling program whose mission is to drive the economic and social advancement of low- and moderate-income families.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. Identified needs include affordable housing, homelessness, economic development, and financial literacy. These needs were identified by community contacts, demographic data, and bank research presented to examiners in CRA self-assessments. A study by the Urban Institute found that more than a half-million of the region's households spend more than 30 percent of their income on housing. While homelessness is decreasing per a 2019 report by the Metropolitan Washington Council of Governments, the greatest contributing factor to homelessness is the lack of affordable housing and need for social services aimed at preventing homelessness. The Capital Area United Way estimates a quarter of families do not have enough financial resources and knowledge to build financial stability. The bank has addressed the needs through significant investments in affordable housing and community services for homelessness, economic development, and financial literacy.

Community Development Initiatives

The bank makes extensive use of complex and innovative investments to support community development initiatives in this assessment area. During the evaluation period, the bank invested \$74 million in 12 affordable housing tax credit projects. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. Additionally, the bank invested \$10 million in an innovative affordable housing initiative. The ability to maintain affordable rents for this project was dependent upon the unconventional financing structure supported by a new limited liability corporation. Finally, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for the Washington D.C. MSA is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates 127 branches in the Washington D.C. MSA, which represents 7.3 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 71 branches serve as multicultural banking centers, which enhance the accessibility of delivery systems throughout the assessment area. The following table reflects the bank’s branch distribution by tract income level in the Washington D.C. MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	10	7.9	435,039	9.3	112	10.3
Moderate	27	21.3	1,024,779	21.8	238	21.9
Middle	51	40.1	1,673,079	35.6	376	34.7
Upper	39	30.7	1,540,024	32.7	341	31.4
NA	0	0.0	30,397	0.6	18	1.7
Total	127	100.0	4,703,318	100.0	1,085*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from total number of census tracts on Page 9 (1,083) results from an increase of 2 census tracts in the Washington DC-MD-VA-WV MSA assessment area (Madison County, VA was added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed 25 branches, including 1 in a low-income, 1 in a moderate-income, 8 in middle-income, and 15 in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Washington D.C. MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 467 community development services since the last evaluation. This performance represents 5.6 percent of bank-wide activities, which is below the assessment area’s share of branches at 7.3 percent. However, the types of services reflect excellent responsiveness to the rated area needs. In the Washington, D.C. MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities. The following are examples of community development services provided in the Washington, D.C. MSA.

- A bank employee serves as President on the Board of a nonprofit community development corporation whose mission is to revitalize the Forest Heights and Oxon Hill, Maryland areas. The community development corporation supports programs to enhance economic development of small businesses, and provide affordable housing and community services for low- and moderate-income individuals.
- A bank employee serves on the Advisory and Loan Committees of a community development financial institution that supports affordable housing, economic development, and essential community services. The organization provides financing and technical assistance to local partners and developers.
- A bank employee serves on the Advisory Board of a city-appointed affordable housing fund that facilitates the creation and preservation of affordable housing in the District of Columbia through the provision of financial assistance to developers.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Washington D.C. MSA	58	228	179	2	467
<i>Source: Bank Records</i>					

**CHARLOTTE-CONCORD-GASTONIA, NC-SC
MULTISTATE METROPOLITAN AREA**

**CRA RATING FOR CHARLOTTE-CONCORD-GASTONIA, NC-SC
MULTISTATE METROPOLITAN AREA: OUTSTANDING**

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHARLOTTE-
CONCORD-GASTONIA, NC-SC MULTISTATE METROPOLITAN AREA**

The Charlotte-Concord-Gastonia, NC-SC Multistate Metropolitan Area (Charlotte MSA) consists of all 10 counties within the MSA. The bank operates 60 branches in the assessment area, which comprise 3.4 percent of its total branch offices. The assessment area accounts for 5.0 percent and 3.7 percent of the bank-wide loans and deposits, respectively.

In 2019, Anson County, North Carolina was added to the Charlotte MSA due to OMB MSA changes. This change increased the number of census tracts in the assessment area by six; all six are moderate-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Charlotte NC-SC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	539	9.1	28.2	32.1	29.7	0.9
Population by Geography	2,338,792	7.5	26.8	33.4	31.9	0.3
Housing Units by Geography	961,994	7.8	27.5	33.5	31.1	0.1
Owner-Occupied Units by Geography	573,214	3.6	22.7	37.2	36.5	0.0
Occupied Rental Units by Geography	298,305	14.6	34.9	27.1	23.2	0.1
Vacant Units by Geography	90,475	11.9	33.7	31.3	23.0	0.2
Businesses by Geography	161,349	7.3	22.0	28.3	41.7	0.7
Farms by Geography	4,261	3.8	21.2	45.7	29.1	0.2
Family Distribution by Income Level	588,954	22.7	17.1	18.8	41.4	0.0
Household Distribution by Income Level	871,519	23.9	16.2	17.5	42.4	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,993	Median Housing Value			\$183,885
			Median Gross Rent			\$883
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 3.1 percent, the unemployment rate in the Charlotte MSA was below the national average for all years under review.

In 2019, according to Moody’s Analytics, the top industries were professional and business services, government, and leisure and hospitality services. The top employers were Atrium Health, Wells Fargo, Walmart, Bank of America, and Novant Health.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 41 FDIC-insured institutions operated 507 branches within the assessment area. Of these institutions, the bank ranked 3rd in total deposits with a market share of 3.2 percent. Competitor institutions include Bank of America, N.A., Wells Fargo Bank, N.A, and Fifth Third Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.8 percent of the families are low- or moderate-income.

SCOPE OF EVALUATION – CHARLOTTE-CONCORD-GASTONIA, NC-SC MULTISTATE METROPOLITAN AREA

The evaluation of the Charlotte MSA performance considered the operations of Truist in the assessment area. Small business loans were given slightly more weight than home mortgage loans when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CHARLOTTE- CONCORD-GASTONIA, NC-SC MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Charlotte MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of small business and home mortgage loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic data and aggregate lending data. The bank's performance in moderate-income census tracts was below demographic data, but only slightly below aggregate lending data. However, performance in moderate-income census tracts was consistent with aggregate lending data in 2017.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with demographic data and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families when families below the poverty level are considered, but consistent with aggregate lending data. Lending to moderate-income borrowers was consistent with demographic and aggregate lending data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 70.2 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data. However, in 2019, the bank's performance declined to 61.6 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area slightly increased.

Community Development Loans

Truist is a leader in making community development loans in the Charlotte MSA. During this evaluation period, the bank originated 73 community development loans totaling \$287.7 million. This performance represents 4.1 percent, by number, and 4.5 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 32 community development loans totaling \$129.0 million were originated.

Regarding the community development purpose, 38 loans supported affordable housing, 24 loans supported community services, 8 loans supported economic development, and 3 loans supported revitalization or stabilization. Community development loans include a \$26.5 million loan to refinance a 276-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families. The bank also funded a \$1.9 million loan to a nonprofit organization for repairs to a homeless shelter.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in the Charlotte MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes extensive use of complex and innovative investments, and serves in a leadership position.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$84.4 million, or 4.7 percent, of bank-wide community development investments that exceeds the percent of deposits, 3.7, and branches, 3.4, in this assessment area. By number of investments, the bank had 205 in this assessment area, or 3.4 percent of all investments. The vast majority of CRA investments, \$83.6 million, were for affordable housing purposes. The bank used a variety of investment vehicles to serve this area including tax credits, bonds, and investments in SBIC and designated CRA funds. Investments also included grants totaling \$1.9 million. Examples are provided below.

- Invested \$67 million in LIHTC and Affordable Housing Bonds to construct and preserve approximately 1,700 affordable rental units.
- Provided \$1 million grant and \$4 million in fund equity to a \$50 million public/private housing fund that aims to lessen the growing housing affordability gap through the development of mixed income housing that predominantly serves low- and moderate-income families.

- Provided a \$100,000 grant to assist with the development of a new office for a community development organization whose mission is to expand affordable housing, businesses, and jobs, in neighborhoods with low or negative economic growth.
- Provided a \$51,000 grant for a transitional housing program that assists homeless persons find housing of their own. Participants also gain access to community resources and services to complete education, improve life and job skills, and address substance abuse or mental health issues.
- Provided grants totaling \$35,000 to support a job skills program to improve the economic mobility of low- and moderate-income people. The program enables participants to achieve high school equivalency diplomas, pursue certification training in high-demand, low-supply fields and training, and take part in soft skills development, financial literacy, and job placement activities.
- Provided a \$31,000 grant to the only licensed substance abuse aftercare provider serving homeless individuals and families recovering from addiction.

Responsiveness to Credit and Community Development Needs

The bank exhibits excellent responsiveness to credit and community economic development needs. The primary needs include affordable housing and homelessness. These needs were identified by community contacts, demographic data, and the bank's supported research presented to examiners in CRA self-assessments. This area is facing large gaps between the supply of affordable housing and the number of residents who need it due to increasing rents and a tight housing market. This affordable housing shortage is compounded by the low-wage industries of retail, administrative services, accommodations, and food service making up a large and growing share of the economy. Truist utilized LIHTC and affordable housing bond investments to address the need to increase and retain affordable rental housing. The Charlotte-Mecklenburg Housing & Homelessness Dashboard dated October 2019 reported greater than 3,000 persons experienced homelessness in the area and in 2019, 97 percent of emergency shelter beds were occupied. The bank has addressed these needs through significant investments in affordable housing and community services targeted to combat and assist with homelessness.

Community Development Initiatives

The bank makes extensive use of complex and innovative investments to support community development initiatives. The bank's use of LIHTC investments fills funding gaps for affordable housing projects that normally would not qualify for conventional financing. During this evaluation period, the bank invested \$5 million in an innovative affordable housing fund structured to deploy capital at below-market rates to incentivize the construction or preservation of affordable rental housing. The bank's large investment in this new affordable housing fund benefitting the Charlotte MSA provided capital support that further incentivized risk-adverse institutions to consider an investment in the fund.

In addition, the bank makes extensive efforts to tailor their investments and grants to identified needs. For example, given the affordable housing need, the bank uses its investments and grants to help fund affordable housing projects directly, and deploys funds for financial literacy efforts aimed at improving economic mobility and homeownership. In addition, the shortage of affordable housing has resulted in an increase in homelessness and the length of stay at homeless shelters, and thus the bank has tailored its grants to assist homeless shelters and organizations.

SERVICE TEST

The Service Test rating for the Charlotte MSA is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates 60 branches in the Charlotte MSA, which represents 3.4 percent of bank-wide branches. The branch distribution in low-income census tracts is above the percent of the population in the respective census tracts. In addition, the branch distribution in moderate-income census tracts is consistent with the percent of the population in moderate-income census tracts. Further, the bank offers an array of alternative delivery systems for its customers, and 15 branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in the Charlotte MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	7	11.6	160,956	6.8	45	8.3
Moderate	16	26.7	626,298	26.5	154	28.2
Middle	16	26.7	795,457	33.6	176	32.3
Upper	21	35.0	775,041	32.8	165	30.3
NA	0	0.0	7,175	0.3	5	0.9
Total	60	100.0	2,364,927	100.0	545*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from total number of census tracts on Page 9 (539) results from an increase of 6 census tracts in the Charlotte NC-SC MSA assessment area by 6 (Anson County, NC was added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one branch in an upper-income census tract and closed nine branches: one in low-, one in moderate-, three in middle-, and four in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Charlotte MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 240 community development services since the last evaluation. This performance represents 2.9 percent of bank-wide activities, which is below the assessment area’s share of bank-wide branches at 3.4 percent. However, the types of services reflect excellent responsiveness to the rated area needs. In the Charlotte MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities. The following are examples of community development services provided in the Charlotte MSA.

- A bank employee serves on the Board of a small business incubator. The incubator assists small businesses with gaining access to capital by using flexible underwriting guidelines. Additionally, the incubator offers technical assistance to small businesses throughout the Charlotte area.
- A bank employee serves on the Board and the Affordable Housing Committee of a city-appointed housing advisory board whose mission is to end homelessness and ensure a sufficient supply of affordable housing throughout the Charlotte area.
- A bank employee serves on the Board of a nonprofit organization that provides life skills to chemically dependent adults and families. The organization primarily supports the homeless population.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Charlotte MSA	48	126	66	0	240
<i>Source: Bank Records</i>					

**MYRTLE BEACH-CONWAY-NORTH MYRTLE BEACH, SC-NC
MULTISTATE METROPOLITAN AREA**

**CRA RATING FOR MYRTLE BEACH-CONWAY-NORTH MYRTLE
BEACH, SC-NC MULTISTATE METROPOLITAN AREA: SATISFACTORY**

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN MYRTLE BEACH-
CONWAY-NORTH MYRTLE BEACH, SC-NC MULTISTATE
METROPOLITAN AREA**

The Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate Metropolitan Area (Myrtle Beach MSA) consists of Brunswick and Horry Counties. The bank operates 21 branches in the assessment area, which comprise 1.2 percent of its total branch offices. The assessment area accounts for 1.5 percent and 1.2 percent of the bank-wide loans and deposits, respectively. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Myrtle Beach SC-NC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	19.0	56.2	19.0	3.8
Population by Geography	406,656	1.5	19.0	63.6	15.7	0.2
Housing Units by Geography	271,514	1.5	14.4	60.7	23.2	0.1
Owner-Occupied Units by Geography	119,389	0.4	16.1	64.9	18.4	0.2
Occupied Rental Units by Geography	48,542	3.6	20.6	61.7	13.9	0.2
Vacant Units by Geography	103,583	1.7	9.5	55.5	33.2	0.1
Businesses by Geography	27,232	4.3	15.8	57.9	21.5	0.5
Farms by Geography	905	1.1	25.2	59.2	14.0	0.4
Family Distribution by Income Level	110,740	20.1	18.4	21.2	40.3	0.0
Household Distribution by Income Level	167,931	23.1	16.4	19.1	41.4	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$53,695	Median Housing Value			\$194,604
			Median Gross Rent			\$849
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 3.7 percent, the unemployment rate in the Myrtle Beach SC-NC MSA was above the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were leisure and hospitality services, retail trade, and government. The top employers were Walmart Inc., Coastal Carolina University, Conway Medical Center, Grand Strand Regional Medical Center, and Progress Energy.

Competition

Significant competition was noted in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 24 FDIC-insured institutions operated 147 branches within the assessment area. Of these institutions, the bank ranked 1st in total deposits with a market share of 22.6 percent. Competitor institutions include The Conway National Bank, Wells Fargo Bank, N.A., and Bank of America, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 38.5 percent of the families are low- or moderate-income.

SCOPE OF EVALUATION – MYRTLE BEACH-CONWAY-NORTH MYRTLE BEACH, SC-NC MULTISTATE METROPOLITAN AREA

The evaluation of the Myrtle Beach MSA performance considered the operations of Truist in the assessment area. Home mortgage loans and small business loans were given equal weight when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MYRTLE BEACH- CONWAY-NORTH MYRTLE BEACH, SC-NC MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Myrtle Beach MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and made an adequate level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in moderate-income census tracts was consistent with aggregate lending data, but below demographic lending data. Performance in low-income census tracts was consistent with both demographic data and aggregate lending data, but was given little weight since less than 1 percent of owner-occupied housing units are located in those tracts. In 2018, no home mortgage loans were originated in low-income census tracts.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tract was below demographic lending data and aggregate lending data. However, the bank's performance in moderate-income census tracts was above demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was above both aggregate lending data and consistent with the percent of low-income families when families below the poverty level are considered. Lending to moderate-income borrowers was consistent with aggregate lending data and slightly below demographic data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 88.1 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was slightly above demographic data and significantly above aggregate lending data. However, in 2019, the bank's performance declined to 65.5 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area remained consistent.

Community Development Loans

Truist has made an adequate level of community development loans in the Myrtle Beach MSA. During this evaluation period, the bank originated 4 community development loans totaling \$56.3 million. This performance represents 0.2 percent, by number, and 0.9 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 3 community development loans totaling \$10.6 million were made.

Regarding the community development purpose, 1 loan each supported affordable housing, community services, economic development, and revitalization or stabilization. Community development loans include an \$8.9 million loan to bridge an equity investment in a LIHTC fund. The bank also funded a \$1.6 million loan for renovations to a 349-unit condominium complex. The renovations were part of a revitalization project after a major disaster.

INVESTMENT TEST

Truist demonstrates a High Satisfactory record regarding the Investment Test in the Myrtle Beach MSA. The level of investments is significant, and responsiveness to community needs is good. In addition, the bank occasionally uses complex investments.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$10.6 million, or 0.6 percent, of bank-wide community development investments that is below the percent of deposits, 1.2, and branches, 1.2, in this assessment area. By number of investments, the bank had 23 in this assessment area, or 0.4 percent of all investments. The vast majority of CRA investments, \$9.9 million, were for affordable housing purposes. Investments also included grants totaling \$113,000. The bank used a variety of investment vehicles to serve this area including tax credits, bonds, and contributions to organizations with a CRA qualified purpose. Examples are provided below.

- Invested \$8.9 million in a tax credit affordable housing project.
- Invested \$519,000 in a SBA bond that provides funding to small businesses, which are unable to obtain financing in the private credit marketplace.
- Donated \$33,500 to a nonprofit organization that helps low- and moderate-income families buy their first home.
- Donated \$30,000 to an organization that provides parenting classes, and job training and placement to low-income fathers.
- Donated \$10,000 to a medical clinic that serves low-income adults with no medical insurance.

Responsiveness to Credit and Community Development Needs

The bank demonstrated good responsiveness to credit and community economic development needs. Identified needs include affordable housing, activities that support small businesses, and job skills development to support economic stability. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for the Myrtle Beach MSA is High Satisfactory. A Low Satisfactory record of retail banking services and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to all portions of the institution’s assessment area. Truist operates 21 branches in the Myrtle Beach MSA, which represents 1.2 percent of bank-wide branches. Although the bank does not operate any branches in low-income census tracts, only 1.5 percent of the population lives in these census tracts. The branch distribution in moderate-income census tracts is below the percent of the population in moderate-income census tracts. However, the majority of the branches in middle- or upper-income census tracts border low- or moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers, and two branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in the Myrtle Beach MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	6,079	1.5	2	1.9
Moderate	2	9.5	77,161	19.0	20	19.1
Middle	14	66.7	258,497	63.6	59	56.2
Upper	5	23.8	63,954	15.7	20	19.0
NA	0	0.0	965	0.2	4	3.8
Total	21	100.0	406,656	100.0	105	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed six branches: one in a moderate-income, four in middle-income, and one in an upper-income census tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Myrtle Beach MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank provides a relatively high level of community development services. Bank records show that employees participated in 71 community development services since the last evaluation. This performance represents 0.8 percent of bank-wide activities, which is slightly below the assessment area’s share of bank-wide branches at 1.2 percent. The type of services reflect good responsiveness to the rated area needs. In the Myrtle Beach MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. The following are examples of community development services provided in the Myrtle Beach MSA.

- A bank employee serves on the Board of a nonprofit organization whose mission is to attract, retain, and facilitate the expansion of businesses and create job opportunities.
- Several employees provided financial education and free tax returns and credit report counseling to 74 low- and moderate-income individuals during 3 Bank Bus events.
- A bank employee serves on the Board and the Finance Committee for an organization that promotes economic development for the business community.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Myrtle Beach MSA	0	58	13	0	71
<i>Source: Bank Records</i>					

**LOUISVILLE-JEFFERSON COUNTY, KY-IN MULTISTATE
METROPOLITAN AREA**

**CRA RATING FOR LOUISVILLE-JEFFERSON COUNTY, KY-IN
MULTISTATE METROPOLITAN AREA: OUTSTANDING**

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN LOUISVILLE-
JEFFERSON COUNTY, KY-IN MULTISTATE METROPOLITAN AREA**

The Louisville-Jefferson County, KY-IN Multistate Metropolitan Area (Louisville MSA) consists of all 12 counties within the MSA. The bank operates 21 branches in the assessment area, which comprise 1.2 percent of its total branch offices. The assessment area accounts for 1.2 percent and 1.0 percent of the bank-wide loans and deposits, respectively.

In 2019, Scott and Trimble Counties were removed from the Louisville MSA due to OMB MSA changes. This change decreased the number of census tracts in the assessment area by seven, which includes three moderate-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Louisville IN-KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	306	11.4	20.6	40.2	26.8	1.0
Population by Geography	1,261,936	8.3	18.4	44.3	28.7	0.3
Housing Units by Geography	545,868	8.9	19.8	43.7	27.2	0.4
Owner-Occupied Units by Geography	331,060	3.9	15.2	47.0	33.9	0.1
Occupied Rental Units by Geography	161,844	16.6	27.3	38.5	16.8	0.8
Vacant Units by Geography	52,964	17.2	25.0	39.5	17.2	1.1
Businesses by Geography	81,485	7.0	16.1	36.4	36.9	3.6
Farms by Geography	2,878	2.5	11.8	51.6	33.6	0.4
Family Distribution by Income Level	318,274	21.1	17.7	20.5	40.6	0.0
Household Distribution by Income Level	492,904	24.5	15.8	17.9	41.8	0.0
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA		\$64,777	Median Housing Value			\$157,747
			Median Gross Rent			\$747
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS Census and 2018 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>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 3.3 percent, the unemployment rate in the Louisville MSA was below the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were education and health services, professional and business services, manufacturing, and government. The top employers were Fort Knox, Ford Motor Company, Humana Inc., Norton Healthcare, and Baptist Healthcare Systems.

Competition

Significant competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 41 FDIC-insured institutions operated 378 branches within the assessment area. Of these institutions, the bank ranked 6th in total deposits with a market share of 6.3 percent. Competitor institutions include PNC Bank, N.A, JPMorgan Chase Bank, N.A, and Fifth Third Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 38.8 percent of the families are low- or moderate-income.

SCOPE OF EVALUATION – LOUISVILLE-JEFFERSON COUNTY, KY-IN MULTISTATE METROPOLITAN AREA

The evaluation of the Louisville MSA performance considered the operations of Truist in the assessment area. Small business and home mortgage loans were given equal weight when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN LOUISVILLE- JEFFERSON COUNTY, KY-IN MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Louisville MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data. However, performance in moderate-income census tracts was above demographic data in 2019.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families when families below the poverty level are considered and below aggregate lending data. Lending to moderate-income borrowers was also below both demographic and aggregate lending data. It is important to note that the bank's performance to both low- and moderate-income borrowers increased significantly throughout the evaluation period. In fact, performance to moderate-income borrowers rose to a level that was above demographic data in 2019.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 74.4 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was below demographic data, but significantly above aggregate lending data. In 2019, bank performance declined to 63.2 percent, when the percent of businesses with gross annual revenues of \$1.0 million or less increased.

Community Development Loans

Truist has made a relatively high level of community development loans in the Louisville MSA. During this evaluation period, the bank originated 15 community development loans totaling \$34.1 million. This performance represents 0.9 percent, by number, and 0.5 percent, by dollar volume, of total bank-wide community development loans. Since the prior evaluation, when 11 community development loans totaling \$49.5 million were originated, community development lending has increased by number but decreased by dollar volume.

Regarding the community development purpose, 5 loans supported affordable housing, 3 loans supported community services, 6 loans supported economic development, and 1 loan supported revitalization or stabilization. Community development loans include a \$6.9 million loan to bridge an equity investment in a LIHTC fund and a \$1.4 million loan to build a restaurant, which will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in the Louisville MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$26.9 million, or 1.5 percent, of bank-wide community development investments that exceeds the percent of deposits, 1.0, and branches, 1.2, in this assessment area. By number of investments, 98 were in this assessment area, or 1.6 percent of all investments. The majority of CRA investments, \$26.7 million, were for affordable housing. Investments also included grants totaling \$315,000. The bank used a variety of investment vehicles to serve this area including tax credits, bonds, and contributions to organizations with a CRA qualified purpose. Examples are provided below.

- Invested \$7.5 million, representing 25 percent of the total tax credit fund, in a LIHTC development to construct 216 affordable housing rental units.
- Provided grants totaling \$35,000 to a community development organization with a mission to combat deterioration in economically disadvantaged areas of Louisville through community development and revitalization programs focused on affordable housing, micro-enterprise development, and job creation. This grant money is used to establish a loan loss reserve to attract additional investments into the capital pool.
- Provided \$25,000 to support the bank's Homelessness Outreach Initiative, which focuses on solutions to housing for low-income students and their families.

- Provided grants totaling \$33,500 to an organization that provides housing and financial education to low- and moderate-income people.

Responsiveness to Credit and Community Development Needs

The bank demonstrated excellent responsiveness to credit and community economic development needs. The primary identified need is affordable housing as a 2018 housing needs assessment by the Louisville Office of Housing and Community Development determined that there is a shortage in affordable housing estimated at 30,000 units. The bank responded by investing \$26.6 million in LIHTCs to create 1,217 units. Other identified needs include small business development and financial literacy. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits, which fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. While investments were not considered innovative, the bank makes extensive efforts to tailor investments and grants to identified needs.

SERVICE TEST

The Service Test rating for the Louisville MSA is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the institution’s assessment area. Truist operates 21 branches in the Louisville MSA, which represents 1.2 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is above the percent of the population in the respective tracts. The branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. The bank offers an array of alternative delivery systems for its customers, and five branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in the Louisville MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	14.3	104,825	8.5	35	11.7
Moderate	4	19.0	219,413	17.8	61	20.4
Middle	3	14.3	539,150	43.9	118	39.5
Upper	10	47.6	362,360	29.5	82	27.4
NA	1	4.8	3,622	0.3	3	1.0
Total	21	100.0	1,229,370	100.0	299*	100.0

*Source: 2015 ACS Data & Bank Records. *Difference from the total number of census tracts on Page 9 (306) results from a decrease of 7 census tracts in the Louisville KY-IN MSA assessment area (Scott and Trimble Counties were removed).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed five branches: one in a low-income census tract and four in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Louisville MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 131 community development services since the last evaluation. This performance represents 1.6 percent of bank-wide activities, which is above the assessment area’s share of bank-wide branches at 1.2 percent. The types of services reflect excellent responsiveness to the rated area needs. In the Louisville MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities. The following are examples of community development services provided in the Louisville MSA.

- A bank employee serves on the Board of a housing authority that provides affordable housing for low- and moderate-income families.
- A bank employee serves on the Board and the Finance Committee of a nonprofit single-family home developer that provides affordable, energy-efficient homes for low- and moderate-income borrowers.
- A bank employee serves on the Board and the Executive Committee of Bank On Louisville. Bank On provides access to financial education and products for the un-banked and under-banked population, which are predominately low- and moderate-income individuals.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Louisville MSA	9	105	17	0	131
<i>Source: Bank Records</i>					

**CINCINNATI, OH-KY MULTISTATE METROPOLITAN AREA
(Full-Scope Review)**

CRA RATING FOR CINCINNATI, OH-KY MULTISTATE METROPOLITAN AREA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CINCINNATI, OH-KY MULTISTATE METROPOLITAN AREA

The Cincinnati, OH-KY Multistate Metropolitan Area (Cincinnati MSA) consists of all 12 counties in the MSA in Ohio and Kentucky. The bank operates 24 branches, which comprise 1.4 percent of total branch offices. The assessment area accounts for 1.1 percent of bank-wide loans and deposits. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- or upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Cincinnati OH-KY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	484	13.4	24.2	36.0	24.6	1.9
Population by Geography	2,076,455	8.5	21.3	38.9	30.2	1.2
Housing Units by Geography	890,605	10.4	23.0	38.7	27.4	0.5
Owner-Occupied Units by Geography	527,688	4.2	17.9	42.6	35.2	0.1
Occupied Rental Units by Geography	271,005	18.5	30.9	33.0	16.4	1.1
Vacant Units by Geography	91,912	22.3	28.8	32.5	15.2	1.2
Businesses by Geography	121,420	6.9	21.1	35.4	35.6	1.0
Farms by Geography	3,738	3.0	20.0	48.2	28.7	0.2
Family Distribution by Income Level	522,328	22.3	16.7	19.9	41.1	0.0
Household Distribution by Income Level	798,693	25.3	15.4	17.1	42.1	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$70,589	Median Housing Value			\$156,504
			Median Gross Rent			\$764
			Families Below Poverty Level			10.5%

*Source: 2015 ACS Census and 2018 D&B Data;
Due to rounding, totals may not equal 100.0; (*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate for this assessment area declined. As of December 31, 2019, at 3.3 percent, the unemployment rate in the Cincinnati MSA was slightly below the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were professional and business services, education and health services, and leisure and hospitality services. The top employers were Cincinnati Children's Hospital Medical Center, Kroger Company, Cincinnati/Northern Kentucky International Airport, TriHealth Inc., and UC Health.

Competition

Significant competition exists in this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 62 FDIC-insured institutions operated 699 branches within this assessment area. Overall, Truist ranks 7th in deposit market share at 1.4 percent. Competitor institutions include US Bank, N.A., Fifth Third Bank, and PNC Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.0 percent of the families are low- or moderate-income.

SCOPE OF EVALUATION – CINCINNATI, OH-KY MULTISTATE METROPOLITAN AREA

The evaluation of the Cincinnati MSA performance considered the operations of Truist in the assessment area. Small business and home mortgage loans were given equal weight when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CINCINNATI, OH-KY MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test Rating for the Cincinnati MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects an adequate distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2018 HMDA and CRA loans in this assessment area. Small business and home mortgage loans were given equal weight when considering the bank's performance during the evaluation period.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in both low- and moderate-income census tracts was generally consistent with the demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was similar to the demographic and aggregate lending data. Performance in moderate-income tracts was slightly above both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is adequate.

The borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered, and aggregate lending data. Lending to moderate-income borrowers was slightly below demographic data and below aggregate lending data. However, lending to moderate-income borrowers was well below both demographic and aggregate lending data in 2017, but increased significantly in 2019 to a level above the demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 71.0 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data, but well above aggregate lending data.

Community Development Loans

Truist is a leader in making community development loans in the Cincinnati MSA. During this evaluation period, the bank originated 38 community development loans totaling \$59.9 million. This performance represents 2.1 percent, by number, and 1.0 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 6 community development loans totaling \$28.2 million were originated.

Regarding the community development purpose, 4 loans supported affordable housing, 17 loans supported community services, 8 loans supported economic development, and 9 loans supported revitalization or stabilization. Community development loans include a \$1.0 million loan to acquire and renovate a vacant shopping center in a moderate-income census tract. The development will help revitalize and stabilize the area. The bank also funded a \$1.0 million line of credit to a community healthcare clinic that predominately serves low- and moderate-income families.

INVESTMENT TEST

Truist demonstrates an Outstanding record regarding the Investment Test in the Cincinnati MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of complex investments.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$22.9 million, or 1.3 percent, of bank-wide community development investments that is similar to the percent of deposits, 1.1, and branches, 1.4, in this assessment area. By number of investments, the bank had 132 in this assessment area, or 2.2 percent of all investments. Most of the CRA investments, \$14.0 million, were for economic development purposes followed by \$8.4 million for affordable housing purposes. Investments also included grants totaling \$704,000. The bank used a variety of investment vehicles to serve this area including tax credits, bonds, and contributions to organization with a CRA qualified purpose. Examples are provided below.

- Invested \$7.1 million in New Market Tax Credit to finance revitalization projects in areas targeted for redevelopment by government.
- Invested \$4 million in a tax credit affordable housing project to finance the acquisition and rehabilitation of 466 units.
- Provided \$206,000 in grants to organizations with stated missions to support neighborhood revitalization in low- and moderate-income areas.
- Provided \$27,500 in grant funds to an organization that provides programs to economically unstable households. This grant helped fund financial education and Individual Development Accounts for low- and moderate-income families.
- Provided a \$10,000 grant to a community development organization to create a housing strategy for the greater Cincinnati area. This grant helped bring together elected leaders, city officials, developers, residents, property owners, and funders to launch a framework for regional affordable housing efforts.
- Provided a \$10,000 grant to a small business development nonprofit organization that provides education on business basics, guidance from mentors and coaches, and access to capital to enable women to start and sustain a new business.

Responsiveness to Credit and Community Development Needs

The bank demonstrated excellent responsiveness to credit and community economic development needs. The primary identified need is revitalization and economic development of dormant and blighted downtown sections, low- and moderate-income areas, and distressed neighborhoods. Other identified needs include affordable housing, small business development, and financial literacy. These needs were identified by community contacts, demographic data, and the bank's supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank makes significant use of complex investments to support community development initiatives in the form of housing tax credits and new market tax credits. These investments fill funding gaps for affordable housing, economic development, and revitalization projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for the Cincinnati MSA is Outstanding. A High Satisfactory record of retail banking services and an Outstanding record of community development service supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates 24 branches in the Cincinnati MSA, which represents 1.4 percent of bank-wide branches. The branch distribution in low-income census tracts is above the percent of the population in low-income census tracts. However, the branch distribution in moderate-income census tracts is slightly below the percent of the population in moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers, and 7 branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in the Cincinnati MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	3	12.5	171,639	8.3	63	13.0
Moderate	4	16.7	418,223	20.1	112	23.1
Middle	12	50.0	802,040	38.6	176	36.4
Upper	5	20.8	659,056	31.8	124	25.6
NA	0	0.0	25,497	1.2	9	1.9
Total	24	100.0	2,076,455	100.0	484	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one branch in a middle-income census tract. Further, the bank closed nine branches, including two in moderate-income, five in middle-income, and two in upper-income census tracts. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Cincinnati MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank is a leader in providing community development services. Bank records show that employees participated in 155 community development services since the last evaluation. This performance represents 1.9 percent of bank-wide activities, which is above the assessment area’s share of bank-wide branches at 1.4 percent. The types of services reflect excellent responsiveness to the rated area needs. In the Cincinnati MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, in several instances, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities. The following are examples of community development services provided in the Cincinnati MSA.

- A bank employee serves on the Board of an economic development corporation whose mission is to attract, retain, and provide technical assistance to small businesses in Boone, Campbell, and Kenton Counties.
- A bank employee serves on the Board of a nonprofit microenterprise organization that promotes economic development in Cincinnati. The organization provides low- and moderate-income small business owners with access to micro-loans as well as technical assistance.
- A bank employee serves on the Investment Committee of a nonprofit community development financial institution that collaborates with banks and public agencies to support the revitalization of Cincinnati’s low-income communities.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Cincinnati MSA	35	76	39	5	155
<i>Source: Bank Records</i>					

HAGERSTOWN-MARTINSBURG, MD-WV MULTISTATE METROPOLITAN AREA

CRA RATING FOR HAGERSTOWN-MARTINSBURG, MD-WV MULTISTATE METROPOLITAN AREA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN HAGERSTOWN- MARTINSBURG, MD-WV MULTISTATE METROPOLITAN AREA

The Hagerstown-Martinsburg, MD-WV Multistate Metropolitan Area (Hagerstown MSA) consists of both counties within the MSA. The bank operates 13 branches in the assessment area, which comprise 0.7 percent of its total branch offices. The assessment area accounts for 0.3 percent and 0.6 percent of the bank-wide loans and deposits, respectively.

In 2019, Morgan County, West Virginia was added to the Hagerstown MSA due to OMB MSA changes. This change increased the number of census tracts in the assessment area by four, including two moderate-income and two middle-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Hagerstown MD-WV MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	4.3	23.9	52.2	17.4	2.2
Population by Geography	257,994	2.2	17.1	58.6	19.6	2.5
Housing Units by Geography	106,983	2.4	19.5	59.1	18.9	0.0
Owner-Occupied Units by Geography	65,972	0.9	12.6	62.9	23.6	0.0
Occupied Rental Units by Geography	31,086	5.0	31.6	52.5	10.8	0.0
Vacant Units by Geography	9,925	4.3	27.6	54.7	13.4	0.0
Businesses by Geography	12,787	5.3	20.7	53.2	20.8	0.1
Farms by Geography	639	1.3	5.3	59.9	33.5	0.0
Family Distribution by Income Level	66,556	21.1	17.3	22.0	39.6	0.0
Household Distribution by Income Level	97,058	23.6	15.6	19.7	41.1	0.0
Median Family Income MSA - 25180 Hagerstown-Martinsburg, MD-WV MSA		\$65,716	Median Housing Value			\$183,097
			Median Gross Rent			\$889
			Families Below Poverty Level			10.0%
<i>Source: 2015 ACS Census and 2018 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.</i>						

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 3.5 percent, the unemployment rate in the Hagerstown MSA was consistent with the national average for all years under review.

In 2019, according to Moody’s Analytics, the top industries were government, education and health services, and retail trade. The top employers were Meritus Health, Citicorp Credit Services Inc., First Data Corp., Veterans Administration Center, and Quad Graphics Inc.

Competition

Competition was limited in the assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 17 FDIC-insured institutions operated 80 branches within the assessment area. Of these institutions, the bank ranked 1st in total deposits with a market share of 25.1 percent. Competitor institutions include The Columbia Bank, Manufacturers and Traders Trust Company, and CNB Bank, Inc.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 38.4 percent of the families are low- or moderate-income.

SCOPE OF EVALUATION – HAGERSTOWN-MARTINSBURG, MD-WV MULTISTATE METROPOLITAN AREA

The evaluation of the Hagerstown MSA performance considered the operations of Truist in the assessment area. Home mortgage and small business loans were given equal weight when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN HAGERSTOWN- MARTINSBURG, MD-WV MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Hagerstown MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects good distribution. In addition, the bank uses flexible lending practices and made an adequate level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was below demographic data, but generally consistent with aggregate lending data. Small business lending in moderate-income census tracts was consistent with both demographic and aggregate lending data. Of note, performance in moderate-income census tracts was above demographic data in 2019.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with both aggregate lending data and the percent of low-income families when families below the poverty level are considered. Of note, in 2017, performance to low-income borrowers was above demographic data when families below the poverty level are considered and more than double aggregate lending data. Lending to moderate-income borrowers was consistent with demographic data but below aggregate lending data. Of note, in 2019, performance to moderate-income borrowers increased from the prior year, exceeding demographic data.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 77.3 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was comparable to demographic data and significantly above aggregate lending data. However, in 2019, the bank's performance declined to 65.7 percent, whereas the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased.

Community Development Loans

Truist has made an adequate level of community development loans in the Hagerstown MSA. During this evaluation period, the bank originated 18 community development loans totaling \$11.2 million. This performance represents 1.0 percent, by number, and 0.2 percent, by dollar volume, of total bank-wide community development loans. Community development lending has decreased since the prior evaluation, when 3 community development loans totaling \$14.6 million were originated.

Regarding the community development purpose, 2 loans supported affordable housing, 14 loan supported community services, and 2 loans supported economic development. Community development loans include a \$1.3 million line of credit to a nursing facility that primarily serves low- and moderate-income elderly individuals. The bank also renewed a \$1.7 million line of credit to an industrial foundation for improvements to a technology park. The local government designated the area for redevelopment.

INVESTMENT TEST

Truist demonstrates a Low Satisfactory record regarding the Investment Test in the Hagerstown MSA. The level of investments is adequate, and responsiveness to community needs is good. In addition, the bank occasionally uses complex investments.

Investment and Grant Activity

The bank has an adequate level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$4.1 million, or 0.2 percent, of bank-wide community development investments that is below the percent of deposits, 0.6, and branches, 0.7, in this assessment area. By number of investments, the bank had 17 in this assessment area, or 0.3 percent of all investments. The vast majority of CRA investments, \$4.0 million, were for affordable housing purposes. Investments also included grants totaling \$63,000. The bank's CRA investments consisted of 1 tax credit project and contributions to organizations with a CRA qualified purpose. Examples are provided below.

- Invested \$4.0 million in a 94-unit affordable housing tax credit project.
- Donated \$12,500 to a nonprofit organization that offers programs and workshops to low- and moderate-income people on a variety of topics from budgeting and credit to buying a home.
- Provided a \$10,000 grant to an organization that provides free financial education to low-income residents.

Responsiveness to Credit and Community Development Needs

The bank demonstrated good responsiveness to credit and community economic development needs. Identified needs include affordable housing, activities that support small businesses, and financial literacy. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank’s CRA investments in this assessment area responded to the affordable housing and financial literacy needs.

Community Development Initiatives

The bank occasionally makes use of complex investments to support community development initiatives in the form of housing tax credits. These investments fill funding gaps for affordable housing projects that normally would not qualify for conventional financing. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs.

SERVICE TEST

The Service Test rating for the Hagerstown MSA is High Satisfactory. A High Satisfactory record of retail banking services and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the institution’s assessment area. Truist operates 13 branches in the Hagerstown MSA, which represents 0.7 percent of bank-wide branches. Although the bank does not operate any branches in low-income census tracts, only 2.1 percent of the population lives in these census tracts. The branch distribution in moderate-income census tracts is more than twice the percent of the population in moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers, and two branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in the Hagerstown MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	5,623	2.1	2	4.0
Moderate	5	38.5	47,660	17.3	12	24.0
Middle	5	38.5	165,109	59.9	27	54.0
Upper	3	23.0	50,672	18.4	8	16.0
NA	0	0.0	6,405	2.3	1	2.0
Total	13	100.0	275,469	100.0	50*	100.0
<i>Source: 2015 ACS Data & Bank Records</i> <i>*Difference from the total number of census tracts on Page 9 (46) results from an increase of 4 census tracts in the Hagerstown MD-WV MSA assessment area (Morgan County, WV was added).</i>						

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed two branches: one each in a moderate- and an upper-income census tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Hagerstown MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank provides a relatively high level of community development services. Bank records show that employees participated in 47 community development services since the last evaluation. This performance represents 0.6 percent of bank-wide activities, which is consistent with the assessment area’s share of bank-wide branches at 0.7 percent. The types of services reflect good responsiveness to the rated area needs. In the Hagerstown MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities. The following are examples of community development services provided in the Hagerstown MSA.

- A bank employee serves on the Board and as Treasurer of an economic development authority, which facilitates the growth of small businesses through workforce development programs in Berkeley County.
- A bank employee serves on the Board of a nonprofit preschool that provides financial assistance to low- and moderate-income families.
- A bank employee serves on the Board of a nonprofit organization whose mission is to attract, retain, and facilitate the expansion of businesses and create local job opportunities in Washington County.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Hagerstown MSA	10	21	16	0	47

Source: Bank Records

COLUMBUS, GA-AL MULTISTATE METROPOLITAN AREA

CRA RATING FOR COLUMBUS, GA-AL MULTISTATE METROPOLITAN AREA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLUMBUS, GA-AL MULTISTATE METROPOLITAN AREA

The Columbus, GA-AL Multistate Metropolitan Area (Columbus MSA) consists of all 5 counties within the MSA. The bank operates 3 branches in the assessment area, which comprise 0.2 percent of its total branch offices. The assessment area accounts for 0.3 percent and 0.1 percent of the bank-wide loans and deposits, respectively.

In 2019, Stewart and Talbot Counties were added to the Columbus MSA due to OMB MSA changes. This change increased the number of census tracts in the assessment area by five, including one low-income, one moderate-income, and three middle-income census tracts.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within moderate, middle-, and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Columbus, GA-AL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	14.1	30.8	32.1	20.5	2.6
Population by Geography	312,016	7.9	26.8	33.4	31.0	0.9
Housing Units by Geography	130,945	9.1	28.9	31.4	30.6	0.0
Owner-Occupied Units by Geography	61,944	2.9	25.5	30.0	41.5	0.0
Occupied Rental Units by Geography	50,281	15.7	30.7	33.2	20.2	0.0
Vacant Units by Geography	18,720	11.5	34.9	30.9	22.5	0.1
Businesses by Geography	15,888	8.2	22.6	34.7	34.1	0.4
Farms by Geography	505	3.4	22.0	36.2	37.6	0.8
Family Distribution by Income Level	73,734	22.4	18.0	18.1	41.5	0.0
Household Distribution by Income Level	112,225	24.5	15.7	16.6	43.2	0.0
Median Family Income MSA - 17980 Columbus, GA-AL MSA		\$53,554	Median Housing Value			\$130,835
			Median Gross Rent			\$825
			Families Below Poverty Level			14.7%

Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

According to Moody's Analytics, the top industries in the Columbus MSA in 2019 were government, education and health services, and leisure and hospitality services. The top employers were Fort Benning, TSYS, AFLAC Inc., Kia Motors Manufacturing, and Columbus Regional Healthcare System, Inc.

During the evaluation period, the unemployment rate has declined from 5.4 percent in 2017 to 4.0 percent in 2019, but remains slightly elevated above the national rate for all years under review.

Competition

Moderate competition was noted for this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 16 FDIC-insured institutions operated 57 branches within the assessment area. Of these institutions, the bank ranked 8th in total deposits with a market share of 1.5 percent. Competitor institutions include Synovus Bank, Wells Fargo, and Southern States Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 40.4 percent of the families are low- or moderate-income.

SCOPE OF EVALUATION – COLUMBUS, GA-AL MULTISTATE METROPOLITAN AREA

The evaluation of the Columbus MSA performance considered the operations of Truist in the assessment area. Small business loans were given more weight than home mortgage loans, due to much higher loan volume, when considering the bank’s performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN COLUMBUS, GA-AL MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Columbus MSA is High Satisfactory. The bank’s lending levels reflect good responsiveness to the assessment area’s credit needs. The geographic distribution reflects adequate penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area’s credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. The bank’s performance in low-income census tracts was below demographic data, but above aggregate lending data. The bank’s performance in moderate-income census tracts was well below demographic data, but similar to aggregate lending data. Of note, performance was stronger in 2017, but worse in 2019.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Bank performance in low-income census tracts was slightly below demographic and aggregate lending data. In moderate-income census tracts, lending was below demographic and aggregate lending data. Of note, performance in moderate-income census tracts exceeded demographic data in 2019, but lending in low-income census tracts was below demographic data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank’s performance to low-income borrowers was similar to the percent of low-income families when families below the poverty level are considered and above aggregate lending data. Lending to moderate-income borrowers was similar to the aggregate lending data, but below demographic data. Of note, performance was weaker in 2019.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 69.7 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. The bank's lending performance to small businesses with gross annual revenues of \$1.0 million or less was below demographic data, but significantly above aggregate lending data. Performance was stronger in 2017, but weaker in 2019.

Community Development Loans

Truist is a leader in making community development loans in the Columbus MSA. During this evaluation period, the bank originated 4 community development loans totaling \$21.4 million. This performance represents 0.2 percent by number and 0.3 percent by dollar volume of total bank-wide community development loans. Since the prior evaluation, when 5 community development loans totaling \$9.8 million were originated, community development lending has increased by dollar volume but decreased slightly, by one loan.

Regarding the community development purpose, 2 loans each supported affordable housing and revitalization or stabilization. Community development loans include a \$19.0 million loan to refinance a 334-unit multifamily apartment complex that provides affordable housing to low- and moderate-income families. The bank also funded a \$2.1 million loan to purchase a 44-unit multifamily apartment complex that provides affordable housing to low- and moderate-income families.

INVESTMENT TEST

Truist demonstrates a High Satisfactory record regarding the Investment Test in the Columbus MSA. The level of investments is significant, and responsiveness to community needs is good. In addition, the bank occasionally uses complex investments.

Investment and Grant Activity

The bank has an excellent level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$2.1 million, or 0.1 percent, of bank-wide community development investments that is similar to the percent of deposits, 0.1, and branches, 0.2, in this assessment area. By number of investments, the bank had 10 in this assessment area, or 0.2 percent of all investments. The vast majority of CRA investments, \$1.6 million, were for affordable housing purposes. Investments also included grants totaling \$30,000. The bank's CRA investments consisted of 2 bond investments and contributions to organizations with a CRA qualified purpose. Examples are provided below.

- Invested \$1.6 million in a LIHTC multi-family bond.
- Invested \$527 thousand in a SBA bond to finance small businesses, which are unable to qualify for credit in the private marketplace.
- Donated \$18,500 to an organization that provides a safe place for children from low-income families to learn and play.

Responsiveness to Credit and Community Development Needs

The bank demonstrated good responsiveness to credit and community economic development needs. Identified needs include affordable housing, activities that support small businesses, financial literacy, and educational programs for low-income youth. These needs were identified by community contacts, demographic data, and the bank’s supported research presented to examiners in CRA self-assessments. The bank responded to these identified needs.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs. In addition, the bond investments exhibit some complexity due to the underlying collateral.

SERVICE TEST

The Service Test rating for the Columbus MSA is High Satisfactory. A High Satisfactory record of retail banking services and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates 3 branches in the Columbus MSA, which represents 0.2 percent of bank-wide branches. The bank has no branches in moderate-income census tracts, which is well below the percent of the population in the moderate-income census tracts. However, the bank operates 1 branch in a low-income census tract and this distribution is well above the percent of the population in low-income census tracts. The bank offers an array of alternative delivery systems for its customers, and two branches serve as multicultural banking centers. The following table reflects the bank’s branch distribution by tract income level in the Columbus MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	1	33.3	26,733	8.3	12	14.5
Moderate	0	0.0	87,306	26.9	25	30.1
Middle	1	33.3	110,745	34.1	28	33.7
Upper	1	33.4	96,659	29.8	16	19.3
NA	0	0.0	2,931	0.9	2	2.4
Total	3	100.0	324,374	100.0	83*	100.0

Source: 2015 ACS Data & Bank Records
**Difference from total number of census tracts on Page 9 (78) results from an increase of 5 census tracts in the Columbus GA-AL MSA assessment area (Stewart and Talbot Counties were added).*

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches but closed one branch in a moderate-income census tract. A branch office is located in close proximity to the closed branch, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Columbus MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank provides a relatively high level of community development services. Bank records show that employees participated in 20 community development services since the last evaluation. This performance represents 0.2 percent of bank-wide activities, which is consistent with the assessment area’s share of bank-wide branches at 0.2 percent. The types of services reflect good responsiveness to the rated area needs. In the Columbus MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities. Further, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities. The following are examples of community development services provided in the Columbus MSA.

- A bank employee serves on the Board of a nonprofit organization that provides essential services to low- and moderate-income individuals at no cost or significantly reduced cost.
- A bank employee serves on the Board of a nonprofit organization that provides services to low- and moderate-income families, including free after-school care and life skills for at-risk youth.
- A bank employee serves on the Board of a nonprofit organization that provides community services to children of low- and moderate-income families, including donating school supplies and teaching literacy skills.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Columbus MSA	0	11	9	0	20
<i>Source: Bank Records</i>					

KINGSPORT-BRISTOL, TN-VA MULTISTATE METROPOLITAN AREA

CRA RATING FOR KINGSPORT-BRISTOL, TN-VA MULTISTATE METROPOLITAN AREA: SATISFACTORY

The Lending Test is rated: High Satisfactory
 The Investment Test is rated: High Satisfactory
 The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN KINGSPORT-BRISTOL, TN-VA MULTISTATE METROPOLITAN AREA

The Kingsport-Bristol, TN-VA Metropolitan Area (Kingsport MSA) consists of all 5 counties in the MSA. The bank operates 7 branches in the assessment area, which comprises 0.4 percent of its total branch offices. The assessment area accounts for 0.1 percent and 0.4 percent of bank-wide loans and deposits respectively. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily located within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Kingsport TN-VA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	75	0.0	17.3	61.3	21.3	0.0
Population by Geography	308,200	0.0	17.3	61.8	20.9	0.0
Housing Units by Geography	147,259	0.0	18.1	61.7	20.3	0.0
Owner-Occupied Units by Geography	94,955	0.0	14.2	63.1	22.6	0.0
Occupied Rental Units by Geography	34,403	0.0	27.6	56.5	15.9	0.0
Vacant Units by Geography	17,901	0.0	20.0	63.8	16.2	0.0
Businesses by Geography	16,293	0.0	21.0	57.1	21.9	0.0
Farms by Geography	736	0.0	10.1	68.2	21.7	0.0
Family Distribution by Income Level	86,422	21.1	18.5	19.9	40.5	0.0
Household Distribution by Income Level	129,358	23.8	16.6	17.2	42.4	0.0
Median Family Income MSA - 28700 Kingsport-Bristol-Bristol, TN-VA MSA		\$51,210	Median Housing Value			\$120,052
			Median Gross Rent			\$595
			Families Below Poverty Level			13.3%

*Source: 2015 ACS Census and 2018 D&B Data; Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period, the unemployment rate has declined. As of December 31, 2019, at 3.3 percent, the unemployment rate in the Kingsport MSA was below the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were manufacturing, education and health services, and government. The top employers were Eastman Chemical Company, Ballad Health, Brock Group, Pinnacle, and Food City.

Competition

There is a significant level of competition within this assessment area. According to FDIC Deposit Market Share data as of June 30, 2019, 27 FDIC-insured institutions operated 97 branches within the assessment area. Of these institutions, the bank ranked 2nd in total deposits with a market share of 11.8 percent. Competitor institutions include The First Bank and Trust Company, First Tennessee Bank, N.A. and Wells Fargo Bank, N.A.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.6 percent of families are low- or moderate-income.

SCOPE OF EVALUATION – KINGSFORT-BRISTOL, TN-VA MULTISTATE METROPOLITAN AREA

The evaluation of the Kingsport MSA performance considered the operations of Truist in the assessment area. Small business loans were given more weight than home mortgage loans when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN KINGSFORT, TN-VA MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Kingsport MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects excellent distribution. In addition, the bank uses flexible lending practices and made an adequate level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment areas credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's lending performance in moderate-income census tracts was similar to both the demographic and aggregate lending data. However, performance in 2017 was below both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's lending performance in moderate-income census tracts was slightly above both demographic and aggregate lending data.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's lending performance to low-income borrowers was consistent with the percent of low-income families, when families below the poverty level are considered, and the aggregate lending data. Lending to moderate-income borrowers was below both demographic and aggregate lending data. However, the bank's performance in 2017 was above both demographic and aggregate lending data regarding moderate-income borrowers. In addition, performance in 2019 was consistent with the demographic data.

The borrower distribution of small business loans reflects excellent penetration among business customers of different sizes. The bank originated 84.5 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance is above the demographic data and significantly above aggregate lending data. However, the bank's lending performance declined to 63.2 percent, while the percent of businesses with gross annual revenues of \$1.0 million or less increased in 2019.

Community Development Loans

Truist has made an adequate of community development loans in the Kingsport MSA. During this evaluation period, the bank originated 2 community development loans totaling \$7.1 million. This performance represents 0.1 percent, by number and dollar volume, of total bank-wide community development loans. Community development lending has decreased since the prior evaluation, when 3 community development loans totaling \$11.2 million were originated.

Regarding the community development purpose, 1 loan each supported economic development and revitalization or stabilization. Community development loans include a \$4.3 million loan and a \$2.8 million loan for construction of fitness centers. Both developments will provide permanent employment opportunities for low- and moderate-income individuals.

INVESTMENT TEST

Truist demonstrates a High Satisfactory record regarding the Investment Test in the Kingsport MSA. The level of investments is significant, and responsiveness to community needs is good. In addition, the bank occasionally uses complex investments.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$3.5 million, or 0.2 percent, of bank-wide community development investments that is slightly below the percent of deposits, 0.4, and branches, 0.4, in this assessment area. By number of investments, the bank had 20 in this assessment area, or 0.3 percent of all investments. The vast majority of CRA investments, \$3.4 million, were for economic development purposes. Investments also included grants totaling \$85,000. The bank's CRA investments consisted of 1 bond investment, 1 CRA fund investment, and contributions to organization with a CRA qualified purpose. Examples are provided below.

- Invested \$3.3 million in an SBA bond fund for loans to small businesses, which are unable to obtain financing in the private credit marketplace.
- Invested \$63,000 in a targeted CRA fund of debt securities that support affordable housing.
- Provided grants totaling \$48,000 to an organization with a mission to support local agriculture and small farm entrepreneurs.
- Donated \$8,400 to an organization that provides support services to low-income new mothers including financial education and life skills classes.

Responsiveness to Credit and Community Development Needs

The bank demonstrated good responsiveness to credit and community economic development needs. Identified needs include affordable housing, activities that support small businesses and small farms, financial literacy, and food insecurity. These needs were identified by community contacts, demographic data, and the bank's supported research presented to examiners in CRA self-assessments. The bank responded to each of these identified needs.

Community Development Initiatives

The bank occasionally uses complex investments to support community development initiatives. While none of the investments were considered innovative, the bank makes extensive efforts to tailor their investments and grants to identified needs. In addition, the bond investments exhibit some complexity due to the underlying collateral.

SERVICE TEST

The Service Test rating for the Kingsport MSA is High Satisfactory. A High Satisfactory record of retail banking services, and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates 7 branches in the Kingsport MSA, which represents 0.4 percent of bank-wide branches. While the bank operates only 1 branch in a moderate-income census tract, the branch distribution is similar to the percent of the population in moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level in the Kingsport MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0
Moderate	1	14.3	53,270	17.3	13	17.3
Middle	5	71.4	190,427	61.8	46	61.4
Upper	1	14.3	64,503	20.9	16	21.3
NA	0	0.0	0	0.0	0	0.0
Total	7	100.0	308,200	100.0	75	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches. However, the bank closed three branches: one in a middle-income census tract and two in upper-income census tracts.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Kingsport MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank provides a relatively high level of community development services. Bank records show that employees participated in 28 community development services since the last evaluation. This performance represents 0.3 percent of bank-wide activities, which is consistent the assessment area’s share of branches at 0.4 percent. The types of services reflect good responsiveness to the rated area needs. In the Kingsport MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various financial literacy or assistance capacities, particularly for economic development purposes. The following are examples of community development services provided in the Kingsport MSA.

- A bank employee is a committee member for a nonprofit organization that manages an economic development loan fund used to revitalize the downtown areas of Bristol. This area is part of a state-designated Enterprise Zone.

- A bank employee serves on the Board of a nonprofit organization whose mission is to support economic development of small farms. The organization provides small farm owners with technical assistance and resources, and offers a workforce development program.
- Twelve bank employees over the evaluation period participated in several Bank Bus events to provide free income tax services and credit counseling to low- and moderate-income residents of the assessment area. The bank collaborated with an organization whose mission is to provide opportunities for economically disadvantaged people to enhance their lives, families, and communities.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Kingsport MSA	0	19	9	0	28
<i>Source: Bank Records</i>					

**CUMBERLAND, MD-WV
MULTISTATE METROPOLITAN AREA**

CRA RATING FOR CUMBERLAND, MD-WV MULTISTATE METROPOLITAN AREA: SATISFACTORY

The Lending Test is rated: High Satisfactory
 The Investment Test is rated: High Satisfactory
 The Service Test is rated: High Satisfactory

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN CUMBERLAND,
MD-WV MULTISTATE METROPOLITAN AREA**

The Cumberland, MD-WV Multistate Metropolitan Area (Cumberland MSA) consists of the two counties within the MSA. The bank operates 4 branches within the assessment area, which comprise 0.2 percent of its total branch offices. The assessment area accounts for 0.1 percent of bank-wide loans and deposits respectively. There have been no changes to this assessment area over the evaluation period.

Economic and Demographic Data

The 2015 ACS Census indicates that owner-occupied housing units and businesses are primarily located within middle-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2018 D&B data.

Demographic Information of the Assessment Area						
Assessment Area: Cumberland MD-WV MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	0.0	16.7	66.7	16.7	0.0
Population by Geography	101,304	0.0	16.0	65.5	18.5	0.0
Housing Units by Geography	46,338	0.0	16.5	65.3	18.1	0.0
Owner-Occupied Units by Geography	25,937	0.0	12.8	69.0	18.2	0.0
Occupied Rental Units by Geography	13,652	0.0	23.3	58.5	18.1	0.0
Vacant Units by Geography	6,749	0.0	17.2	64.8	18.0	0.0
Businesses by Geography	4,284	0.0	16.1	60.8	23.1	0.0
Farms by Geography	130	0.0	12.3	75.4	12.3	0.0
Family Distribution by Income Level	23,667	21.3	18.2	20.1	40.4	0.0
Household Distribution by Income Level	39,589	25.5	16.0	16.1	42.5	0.0
Median Family Income MSA - 19060 Cumberland, MD-WV MSA	\$53,566	Median Housing Value				\$122,890
		Median Gross Rent				\$592
		Families Below Poverty Level				11.8%

Source: 2015 ACS Census and 2018 D&B Data; Due to rounding, totals may not equal 100.0; ()NA category are geographies not assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the evaluation period the unemployment rate has declined. As of December 31, 2019 at 4.9 percent, the unemployment rate for the Cumberland MSA was above the national average for all years under review.

In 2019, according to Moody's Analytics, the top industries were government, education and health services, and retail trade. The top employers were Western Maryland Health System, Frostburg State University, Orbital Techsystems Inc., Hunter Douglas Northeast, and Verso.

Competition

The assessment area is competitive in the market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2019, 6 FDIC-insured institutions operated 24 branch offices within the assessment area. Of these institutions, the bank ranked 1st in total deposits with a market share of 36.2 percent. Competitor institutions include First United Bank & Trust, Manufacturers and Traders Trust Company, and Standard Bank.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.5 percent of the families are low-or moderate-income.

SCOPE OF EVALUATION – CUMBERLAND, MD-WV MULTISTATE METROPOLITAN AREA

The evaluation of the Cumberland, MD-WVA MSA performance considered the operations of Truist in the assessment area. Small business and home mortgage loans were given equal weight when considering the bank's performance during the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CUMBERLAND, MD-WV MULTISTATE METROPOLITAN AREA

LENDING TEST

The Lending Test rating for the Cumberland MSA is High Satisfactory. The bank's lending levels reflect good responsiveness to the assessment area's credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects a good distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of home mortgage and small business loans in 2018 for the assessment area.

Geographic Distribution

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in moderate-income census tracts was consistent with demographic data and aggregate lending data in 2018. It should be noted that performance in moderate-income census tracts exceeded both demographic and aggregate lending data in 2017, but was slightly below demographic data in 2019.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in moderate-income census tracts exceeded both demographic and aggregate lending data in 2018. The bank's performance was below demographic and aggregate lending data in 2017 and slightly below demographic lending data in 2019.

Borrower Profile

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was consistent with the demographic data, when families below the poverty level are considered, and the aggregate lending data. Lending to moderate-income borrowers was generally consistent with both demographic and aggregate lending data. It is important to note that the bank's performance to moderate-income borrowers rose to a level that was higher than demographic data in 2019.

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank originated 83.6 percent of small business loans to businesses with gross annual revenues of \$1.0 million or less. Performance was above demographic data and significantly above aggregate lending data. In 2017, lending performance was below demographic data, but significantly above aggregate data. In 2019, the bank's performance declined to 73.6 percent, whereas, the percent of businesses with gross annual revenues of \$1.0 million or less in the assessment area increased.

Community Development Loans

Truist is a leader in making community development loans in the Cumberland MSA. During this evaluation period, the bank originated 5 community development loans totaling \$5.9 million. This performance represents 0.3 percent, by number, and 0.1 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the prior evaluation, when 3 community development loans totaling \$1.6 million were originated.

Regarding the community development purpose, 1 loan each supported affordable housing and revitalization or stabilization, and 3 loans supported community services. Community development loans include a \$2.4 million loan for the redevelopment of a warehouse in a moderate-income census tract. The local government has designated the area for redevelopment. The bank also funded a \$1.3 million loan to a nursing home facility that primarily serves low- and moderate-income elderly individuals.

INVESTMENT TEST

Truist demonstrates a High Satisfactory record regarding the Investment Test in the Cumberland MSA. The level of investments is significant, and responsiveness to community needs is good. However, none of the investments were considered complex or innovative.

Investment and Grant Activity

The bank has a significant level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Qualified investments totaled \$974 thousand, or 0.05 percent, of bank-wide community development investments that is slightly less than the percent of deposits, 0.1, and branches, 0.2, in this assessment area. By number of investments, the bank had 9 in this assessment area, or 0.2 percent of all investments. The vast majority of CRA investments, \$963,000, went toward affordable housing. Investments also included grants totaling \$22,000. The bank's CRA investments consisted of 1 bond investment and contributions to organizations with a CRA qualified purpose. Examples are provided below.

- Invested \$953,000 in a bond for an affordable housing project.
- Donated \$8,000 to an organization that provides services to families living in poverty.
- Donated \$8,000 to a nonprofit affordable housing organization.

Responsiveness to Credit and Community Development Needs

The bank demonstrated good responsiveness to credit and community economic development needs. Identified needs include affordable housing, activities that support small businesses, and financial literacy. These needs were identified by community contacts, demographic data, and the bank's supported research presented to examiners in CRA self-assessments. The bank responded primarily to the affordable housing need.

Community Development Initiatives

None of the investments were considered complex or innovative.

SERVICE TEST

The Service Test rating for the Cumberland MSA is High Satisfactory. A Low Satisfactory record of retail banking services and a High Satisfactory record of community development services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to all portions of the institution's assessment area. Truist operates 4 branches in the Cumberland MSA, which represents 0.2 percent of bank-wide branches. While the bank does not operate any branches in low- or moderate-income census tracts, 2 of the 4 branches border moderate-income census tracts. The bank offers an array of alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Cumberland MSA.

Branch Distribution by Geography Income Level						
Tract Income Level	Branches		Population		Census Tracts	
	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	16,206	16.0	5	16.7
Middle	2	50.0	66,320	65.5	20	66.6
Upper	2	50.0	18,778	18.5	5	16.7
NA	0	0.0	0	0.0	0	0.0
Total	4	100.0	101,304	100.0	30	100.0

Source: 2015 ACS Data & Bank Records

Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches, but closed two branches: one each in a moderate- and middle-income census tract. Branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

Reasonableness of Business Hours and Services

Services and business hours are tailored to the convenience and needs of the Cumberland MSA. Further, the bank also offers loan and deposit products through a variety of alternative systems that are effective in delivering retail banking services throughout the assessment area. Specific information regarding these alternative delivery systems is included in the evaluation of overall bank performance.

Community Development Services

The bank provides a relatively high level of community development services. Bank records show that employees participated in 25 community development services since the last evaluation. This performance represents 0.3 percent of bank-wide activities, which is consistent with the assessment area's share of bank-wide branches at 0.2 percent. The types of services reflect good responsiveness to the rated area needs. In the Cumberland MSA, directors, officers, and employees have predominately provided financial expertise as instructors or participants in various literacy or assistance capacities. Further, bank associates served in a qualified leadership capacity with organizations resulting in community development service activities. The following are examples of community development services provided in the Cumberland MSA.

- A bank employee serves on the Board of a housing authority that provides affordable housing to low-income families throughout the Cumberland MSA.
- A bank employee serves on the Board of a nonprofit organization that supports economic development by financing long-term projects to provide job growth and energy efficiencies for small businesses throughout the Greater Cumberland area.
- A bank employee serves on the Board as well as the Microloan and Marketing Committees of an organization whose mission is to move individuals from poverty to self-sufficiency. The organization provides education and job skills to low- and moderate-income individuals.

The following table details the number of community development services by community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Cumberland MSA	3	13	9	0	25
<i>Source: Bank Records</i>					

APPENDIX A: 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.

APPENDIX B: SCOPE OF EVALUATION

Truist Bank	
Scope of Examination: Large bank CRA examination procedures were used for this evaluation. Each state or multi-state MSA (if the bank had branches in more than one state) in which the institution maintains a branch office received analysis and review of its lending, investments, and services activities to arrive at a state-wide or multi-state MSA rating.	
Time Period Reviewed:	01/01/2017 – 12/31/2019
Products Reviewed: Home Mortgage Loans: 01/01/2017 – 12/31/2019 Small Business Loans: 01/01/2017 – 12/31/2019 Small Farm Loans: 01/01/2017 – 12/31/2019	

List of Affiliates and Products Reviewed		
Affiliate(s)	Affiliate Relationship	Products Reviewed
Grandbridge Real Estate Capital, LLC	Subsidiary	Multifamily loans

List of Assessment Areas and Type of Evaluation			
Rated Area/ Assessment Area	Type of Evaluation	Branches Visited	Other Information
North Carolina			
NC Non-MSA	Full-Scope	None	None
Raleigh, NC	Full-Scope	None	None
Winston-Salem, NC	Full-Scope	None	None
Greensboro, NC MSA	Full-Scope	None	None
Durham, NC MSA	Limited-Scope	None	None
Hickory, NC MSA	Limited-Scope	None	None
Wilmington, NC MSA	Limited-Scope	None	None
Fayetteville, NC MSA	Limited-Scope	None	None
Asheville, NC MSA	Limited-Scope	None	None
New Bern, NC MSA	Limited-Scope	None	None
Greenville, NC MSA	Limited-Scope	None	None
Goldsboro, NC MSA	Limited-Scope	None	None
Rocky Mount, NC MSA	Limited-Scope	None	None
Burlington, NC MSA	Limited-Scope	None	None
Jacksonville, NC MSA	Limited-Scope	None	None
Florida			
Tampa, FL MSA	Full-Scope	None	None
Miami, FL MD	Full-Scope	None	None
Fort Lauderdale, FL MD	Full-Scope	None	None
Orlando, FL MSA	Full-Scope	None	None
West Palm Beach, FL MD	Full-Scope	None	None
North Port, FL MSA	Limited-Scope	None	None
Jacksonville, FL MSA	Limited-Scope	None	None
Cape Coral, FL MSA	Limited-Scope	None	None
Palm Bay, FL MSA	Limited-Scope	None	None
Port St Lucie, FL MSA	Limited-Scope	None	None

List of Assessment Areas and Type of Evaluation			
Deltona, FL MSA	Limited-Scope	None	None
Lakeland, FL MSA	Limited-Scope	None	None
Tallahassee, FL MSA	Limited-Scope	None	None
Ocala, FL MSA	Limited-Scope	None	None
Naples, FL MSA	Limited-Scope	None	None
Pensacola, FL MSA	Limited-Scope	None	None
Crestview, FL MSA	Limited-Scope	None	None
Punta Gorda, FL MSA	Limited-Scope	None	None
Homosassa Springs, FL MSA	Limited-Scope	None	None
FL Non-MSA	Limited-Scope	None	None
The Villages, FL MSA	Limited-Scope	None	None
Panama City, FL MSA	Limited-Scope	None	None
Virginia			
Virginia Beach, VA MSA	Full-Scope	None	None
Richmond, VA MSA	Full-Scope	None	None
VA Non-MSA	Full-Scope	None	None
Charlottesville, VA MSA	Limited-Scope	None	None
Lynchburg, VA MSA	Limited-Scope	None	None
Roanoke, VA MSA	Limited-Scope	None	None
Winchester, VA MSA	Limited-Scope	None	None
Harrisonburg, VA MSA	Limited-Scope	None	None
Blacksburg, VA MSA	Limited-Scope	None	None
Staunton, VA MSA	Limited-Scope	None	None
Georgia			
Atlanta, GA MSA	Full-Scope	None	None
GA Non-MSA	Full-Scope	None	None
Savannah, GA MSA	Limited-Scope	None	None
Gainesville, GA MSA	Limited-Scope	None	None
Dalton, GA MSA	Limited-Scope	None	None
Macon, GA MSA	Limited-Scope	None	None
Warner Robins, GA MSA	Limited-Scope	None	None
Athens, GA MSA	Limited-Scope	None	None
Brunswick, GA MSA	Limited-Scope	None	None
Valdosta, GA MSA	Limited-Scope	None	None
Pennsylvania			
Montgomery, PA MD	Full-Scope	None	None
Lancaster, PA MSA	Full-Scope	None	None
Allentown, PA MSA	Full-Scope	None	None
Reading, PA MSA	Full-Scope	None	None
York, PA MSA	Limited-Scope	None	None
PA Non-MSA	Limited-Scope	None	None
Philadelphia, PA MD	Limited-Scope	None	None
Harrisburg, PA MSA	Limited-Scope	None	None
Chambersburg, PA MSA	Limited-Scope	None	None
Williamsport, PA MSA	Limited-Scope	None	None
Scranton, PA MSA	Limited-Scope	None	None
Gettysburg, PA MSA	Limited-Scope	None	None
State College, PA MSA	Limited-Scope	None	None
Lebanon, PA MSA	Limited-Scope	None	None
East Stroudsburg, PA MSA	Limited-Scope	None	None

List of Assessment Areas and Type of Evaluation			
Texas			
Dallas, TX MD	Full-Scope	None	None
Houston, TX MSA	Full-Scope	None	None
Fort Worth, TX MD	Full-Scope	None	None
Austin, TX MSA	Limited-Scope	None	None
San Antonio, TX MSA	Limited-Scope	None	None
College Station, TX MSA	Limited-Scope	None	None
Odessa, TX MSA	Limited-Scope	None	None
Midland, TX MSA	Limited-Scope	None	None
Maryland			
Baltimore, MD MSA	Full-Scope	None	None
Silver Spring, MD MD	Full-Scope	None	None
Salisbury, MD MSA	Limited-Scope	None	None
MD Non-MSA	Limited-Scope	None	None
California, MD MSA	Limited-Scope	None	None
Wilmington, MD MD	Limited-Scope	None	None
South Carolina			
Columbia, SC MSA	Full-Scope	None	None
Greenville, SC MSA	Full-Scope	None	None
Charleston, SC MSA	Full-Scope	None	None
Spartanburg, SC MSA	Limited-Scope	None	None
SC Non-MSA	Limited-Scope	None	None
Hilton Head, SC MSA	Limited-Scope	None	None
Florence, SC MSA	Limited-Scope	None	None
Sumter, SC MSA	Limited-Scope	None	None
West Virginia			
WV Non-MSA	Full-Scope	None	None
Charleston, WV MSA	Full-Scope	None	None
Huntington, WV MSA	Full-Scope	None	None
Morgantown, WV MSA	Limited-Scope	None	None
Beckley, WV MSA	Limited-Scope	None	None
Wheeling, WV MSA	Limited-Scope	None	None
Parkersburg, WV MSA	Limited-Scope	None	None
Alabama			
Birmingham, AL MSA	Full-Scope	None	None
Huntsville, AL MSA	Full-Scope	None	None
Daphne, AL MSA	Full-Scope	None	None
AL Non-MSA	Full-Scope	None	None
Anniston, AL MSA	Limited-Scope	None	None
Montgomery, AL MSA	Limited-Scope	None	None
Mobile, AL MSA	Limited-Scope	None	None
Auburn, AL MSA	Limited-Scope	None	None
Tuscaloosa, AL MSA	Limited-Scope	None	None
Gadsden, AL MSA	Limited-Scope	None	None
Dothan, AL MSA	Limited-Scope	None	None

List of Assessment Areas and Type of Evaluation			
Tennessee			
Knoxville, TN MSA	Full-Scope	None	None
Nashville, TN MSA	Full-Scope	None	None
TN Non-MSA	Full-Scope	None	None
Chattanooga, TN MSA	Limited-Scope	None	None
Johnson City, TN MSA	Limited-Scope	None	None
Cleveland, TN MSA	Limited-Scope	None	None
Morristown, TN MSA	Limited-Scope	None	None
Kentucky			
KY Non-MSA	Full-Scope	None	None
Bowling Green, KY MSA	Full-Scope	None	None
Lexington, KY MSA	Limited-Scope	None	None
Owensboro, KY MSA	Limited-Scope	None	None
Clarksville, KY MSA	Limited-Scope	None	None
New Jersey			
New York, NJ MSA	Full-Scope	None	None
Camden, NJ MSA	Full-Scope	None	None
Vineland, NJ MSA	Limited-Scope	None	None
Atlantic City, NJ MSA	Limited-Scope	None	None
Trenton, NJ MSA	Limited-Scope	None	None
Washington, DC-MD-VA-WV	Full-Scope	None	None
Charlotte, NC-SC	Full-Scope	None	None
Myrtle Beach, SC-NC	Full-Scope	None	None
Louisville, KY-IN	Full-Scope	None	None
Cincinnati, OH-KY	Full-Scope	None	None
Hagerstown, MD-WV	Full-Scope	None	None
Columbus, GA-AL	Full-Scope	None	None
Kingsport, TN-VA	Full-Scope	None	None
Cumberland, MD-WV	Full-Scope	None	None

APPENDIX C: SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
North Carolina	High Satisfactory	Outstanding	Outstanding	Outstanding
Florida	High Satisfactory	Outstanding	Outstanding	Outstanding
Virginia	High Satisfactory	Outstanding	Outstanding	Outstanding
Georgia	High Satisfactory	Outstanding	Outstanding	Outstanding
Pennsylvania	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Texas	High Satisfactory	Outstanding	Outstanding	Outstanding
Maryland	High Satisfactory	Outstanding	Outstanding	Outstanding
South Carolina	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
West Virginia	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Alabama	High Satisfactory	Outstanding	Outstanding	Outstanding
Tennessee	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Kentucky	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
New Jersey	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Washington DC-MD-VA-WV MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Charlotte NC-SC MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Myrtle Beach SC-NC MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Louisville KY-IN MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Cincinnati OH-KY MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Hagerstown MD-WV MSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Columbus GA-AL MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Kingsport TN-VA MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Cumberland MD-WV MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

APPENDIX D: LENDING PERFORMANCE TABLES

North Carolina - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
NC-Asheville MSA	465	101,669	3.9	16,200	1.3	0.9	1.2	12.1	7.7	11.3	64.2	63.4	63.7	22.4	28.0	23.8	0.0	0.0	0.0
NC-Burlington MSA	145	42,382	1.2	4,924	0.0	0.0	0.0	22.9	16.6	19.9	47.8	47.6	50.0	29.3	35.9	30.0	0.0	0.0	0.0
NC-Durham MSA	841	182,873	7.0	18,760	3.6	1.9	3.5	16.8	11.5	14.5	40.7	42.7	39.5	38.9	43.9	42.5	0.0	0.0	0.0
NC-Fayetteville MSA	353	58,595	2.9	10,345	0.4	0.0	0.0	13.5	11.0	9.0	61.9	58.4	61.6	24.2	30.6	29.3	0.0	0.0	0.0
NC-Goldsboro MSA	250	29,281	2.1	2,389	0.0	0.0	0.0	26.7	17.6	22.5	56.0	57.6	56.3	17.3	24.8	21.2	0.0	0.0	0.0
NC-Greensboro MSA	1,141	243,380	9.5	19,303	2.7	1.8	1.6	17.2	10.8	13.2	45.8	39.9	43.0	34.3	47.5	42.3	0.0	0.0	0.0
NC-Greenville MSA	377	57,461	3.1	4,218	4.5	5.8	6.4	19.5	8.8	11.2	40.3	40.6	41.3	35.7	44.8	41.2	0.0	0.0	0.0
NC-Hickory MSA	746	87,886	6.2	9,390	0.0	0.0	0.0	10.5	8.3	9.5	67.5	62.3	61.7	22.0	29.4	28.9	0.0	0.0	0.0

North Carolina - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
NC-Jacksonville MSA	142	21,761	1.2	7,156	0.0	0.0	0.0	3.8	2.1	2.9	76.3	74.6	79.8	19.9	23.2	17.2	0.0	0.0	0.1
NC-New Bern MSA	273	39,541	2.3	3,367	2.1	0.7	2.3	13.3	7.0	6.7	53.7	48.7	47.9	30.9	43.6	43.1	0.0	0.0	0.0
NC-Non-MSA	2,983	440,541	24.8	40,838	0.6	0.2	0.2	19.6	13.4	11.0	57.7	50.5	50.0	22.1	35.9	38.7	0.0	0.0	0.0
NC-Raleigh MSA	2,393	561,444	19.9	55,062	3.0	2.3	2.4	26.6	22.6	22.7	35.2	34.4	38.3	35.2	40.6	36.6	0.0	0.0	0.0
NC-Rocky Mount MSA	219	28,949	1.8	2,669	0.0	0.0	0.0	15.7	4.6	8.1	58.5	49.8	58.0	25.8	45.7	33.9	0.0	0.0	0.0
NC-Wilmington MSA	452	94,535	3.8	12,079	4.9	5.5	4.9	14.4	6.6	8.6	44.4	41.2	47.2	36.3	46.7	39.3	0.0	0.0	0.0
NC-Winston-Salem MSA	1,261	311,207	10.5	18,441	3.3	1.1	2.1	15.8	11.7	13.4	44.9	37.4	42.1	35.9	49.8	42.4	0.0	0.0	0.1
Total	12,041	2,301,506	100.0	225,141	1.9	1.4	1.7	18.2	13.4	14.2	50.7	45.5	47.8	29.1	39.7	36.2	0.0	0.0	0.0

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

North Carolina - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
NC-Asheville MSA	465	101,669	3.9	16,200	20.2	5.6	5.4	18.6	10.8	15.1	20.5	17.8	23.2	40.7	58.1	46.2	0.0	7.7	10.2
NC-Burlington MSA	145	42,382	1.2	4,924	21.8	6.9	4.3	17.8	13.8	15.3	18.3	22.8	23.0	42.1	46.9	43.3	0.0	9.7	14.1
NC-Durham MSA	841	182,873	7.0	18,760	23.3	7.0	6.7	16.7	15.3	16.8	17.8	20.7	20.6	42.2	46.3	45.2	0.0	10.7	10.8
NC-Fayetteville MSA	353	58,595	2.9	10,345	21.7	6.5	3.4	17.7	11.3	9.5	19.5	16.4	21.3	41.1	48.7	38.6	0.0	17.0	27.3
NC-Goldsboro MSA	250	29,281	2.1	2,389	22.8	3.6	4.1	17.9	14.8	16.3	19.4	26.8	25.5	39.9	49.2	34.6	0.0	5.6	19.5
NC-Greensboro MSA	1,141	243,380	9.5	19,303	21.7	5.7	6.0	18.3	16.7	17.4	18.4	15.9	21.0	41.7	46.5	41.3	0.0	15.3	14.4
NC-Greenville MSA	377	57,461	3.1	4,218	24.2	6.4	4.2	16.2	10.6	14.8	17.5	18.3	20.7	42.1	56.0	42.9	0.0	8.8	17.4
NC-Hickory MSA	746	87,886	6.2	9,390	20.8	6.3	5.7	17.8	17.7	17.0	21.1	23.7	21.9	40.3	47.7	41.3	0.0	4.6	14.1

North Carolina - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
NC-Jacksonville MSA	142	21,761	1.2	7,156	18.2	0.7	2.3	18.6	7.0	11.2	23.9	12.0	23.6	39.3	32.4	37.6	0.0	47.9	25.2
NC-New Bern MSA	273	39,541	2.3	3,367	20.1	5.1	5.0	19.2	17.6	16.6	19.3	20.5	22.3	41.3	49.8	41.4	0.0	7.0	14.7
NC-Non-MSA	2,983	440,541	24.8	40,838	22.2	5.7	3.7	17.6	12.6	11.7	19.0	18.5	19.7	41.1	53.4	50.1	0.0	9.7	14.8
NC-Raleigh MSA	2,393	561,444	19.9	55,062	22.3	7.2	7.0	17.4	15.3	17.3	19.2	17.6	22.1	41.2	43.3	40.5	0.0	16.6	13.2
NC-Rocky Mount MSA	219	28,949	1.8	2,669	22.5	5.5	4.6	16.8	15.5	15.9	19.4	19.6	22.4	41.3	50.2	41.2	0.0	9.1	15.9
NC-Wilmington MSA	452	94,535	3.8	12,079	22.7	7.1	5.8	17.6	13.7	16.6	18.4	16.2	19.4	41.3	47.6	42.5	0.0	15.5	15.7
NC-Winston-Salem MSA	1,261	311,207	10.5	18,441	22.4	6.4	6.4	17.6	15.8	18.9	19.0	16.5	22.7	41.1	41.7	38.2	0.0	19.6	13.7
Total	12,041	2,301,506	100.0	225,141	22.0	6.2	5.5	17.7	14.4	15.5	19.2	18.4	21.4	41.2	48.0	42.9	0.0	13.0	14.6

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

North Carolina - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
NC-Asheville MSA	710	43,495	3.2	10,144	2.9	2.8	2.8	15.7	19.6	16.6	53.7	49.4	53.3	27.7	28.2	27.3	0.0	0.0	0.0
NC-Burlington MSA	287	31,544	1.3	2,492	0.0	0.0	0.0	25.7	32.1	23.7	46.9	49.8	49.8	27.4	18.1	26.5	0.0	0.0	0.0
NC-Durham MSA	1,469	80,025	6.7	11,601	7.5	6.9	6.3	17.0	14.8	15.4	34.4	40.1	35.0	39.0	37.8	42.6	2.0	0.4	0.7
NC-Fayetteville MSA	1,050	53,716	4.8	4,675	1.7	2.0	1.8	21.0	23.2	19.1	56.7	50.3	54.4	20.5	24.5	24.7	0.2	0.0	0.0
NC-Goldsboro MSA	493	30,775	2.2	1,539	0.0	0.0	0.0	35.9	35.5	37.0	52.9	48.5	49.3	11.3	16.0	13.7	0.0	0.0	0.0
NC-Greensboro MSA	2,190	147,098	10.0	14,255	4.1	3.3	3.6	21.9	23.7	22.5	36.5	37.4	36.9	37.3	35.5	36.8	0.2	0.0	0.1
NC-Greenville MSA	471	31,313	2.1	2,611	17.7	15.1	14.6	16.9	14.0	15.8	36.6	36.9	37.5	28.8	34.0	32.1	0.0	0.0	0.0
NC-Hickory MSA	1,025	59,455	4.7	5,718	0.0	0.0	0.0	15.2	15.6	16.0	59.4	58.2	56.3	25.3	26.1	27.7	0.0	0.0	0.0

North Carolina - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
NC-Jacksonville MSA	180	10,957	0.8	1,959	0.0	0.0	0.0	12.5	10.0	11.0	67.0	69.4	68.0	19.6	20.6	20.8	0.9	0.0	0.2
NC-New Bern MSA	535	32,053	2.4	1,777	8.5	9.0	7.6	10.2	9.5	11.1	54.2	48.8	50.5	27.0	32.7	30.8	0.0	0.0	0.0
NC-Non-MSA	6,218	303,873	28.3	25,846	1.5	1.0	1.0	19.9	20.3	17.5	52.4	53.5	52.1	26.1	25.2	29.4	0.0	0.0	0.0
NC-Raleigh MSA	3,864	250,455	17.6	31,476	4.3	3.9	4.4	23.7	22.0	21.6	33.0	35.8	33.5	38.8	38.1	40.4	0.2	0.1	0.1
NC-Rocky Mount MSA	301	21,559	1.4	1,668	0.0	0.0	0.0	13.9	10.0	11.7	66.4	62.8	64.0	19.6	27.2	24.3	0.0	0.0	0.0
NC-Wilmington MSA	1,144	50,909	5.2	7,747	13.4	10.8	11.5	12.1	13.0	11.7	34.3	36.7	36.7	40.1	39.5	39.8	0.3	0.0	0.3
NC-Winston-Salem MSA	2,041	124,871	9.3	10,945	6.1	6.2	5.1	17.2	18.4	16.5	39.0	39.0	38.5	37.2	35.9	39.3	0.6	0.5	0.6
Total	21,978	1,272,098	100.0	134,453	4.3	3.6	3.9	19.5	19.8	18.4	43.5	45.2	43.0	32.4	31.3	34.6	0.3	0.1	0.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

North Carolina - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
NC-Asheville MSA	710	43,495	3.2	10,144	86.9	74.8	49.4	4.3	24.5	8.8	0.7	
NC-Burlington MSA	287	31,544	1.3	2,492	80.7	66.2	47.2	6.3	31.7	13.0	2.1	
NC-Durham MSA	1,469	80,025	6.7	11,601	85.1	80.8	51.8	4.8	17.4	10.1	1.8	
NC-Fayetteville MSA	1,050	53,716	4.8	4,675	84.3	83.6	50.1	4.0	15.8	11.6	0.6	
NC-Goldsboro MSA	493	30,775	2.2	1,539	79.8	74.8	47.1	5.7	22.3	14.5	2.8	
NC-Greensboro MSA	2,190	147,098	10.0	14,255	83.2	72.9	49.3	5.6	25.6	11.2	1.6	
NC-Greenville MSA	471	31,313	2.1	2,611	80.8	78.3	45.1	5.4	19.3	13.8	2.3	
NC-Hickory MSA	1,025	59,455	4.7	5,718	80.1	71.9	45.5	6.9	26.8	13.1	1.3	
NC-Jacksonville MSA	180	10,957	0.8	1,959	84.0	79.4	47.9	3.9	18.3	12.1	2.2	
NC-New Bern MSA	535	32,053	2.4	1,777	81.3	80.6	54.2	5.2	18.7	13.5	0.7	
NC-Non-MSA	6,218	303,873	28.3	25,846	81.5	74.9	49.8	5.2	23.7	13.3	1.5	
NC-Raleigh MSA	3,864	250,455	17.6	31,476	85.3	68.6	47.7	4.6	30.0	10.1	1.3	
NC-Rocky Mount MSA	301	21,559	1.4	1,668	78.5	65.8	45.6	6.1	31.6	15.3	2.7	
NC-Wilmington MSA	1,144	50,909	5.2	7,747	84.1	75.1	47.6	5.3	24.0	10.5	1.0	
NC-Winston-Salem MSA	2,041	124,871	9.3	10,945	83.4	76.4	51.2	5.8	22.1	10.8	1.5	
Total	21,978	1,272,098	100.0	134,453	83.5	74.4	49.0	5.1	24.1	11.3	1.4	
<i>Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

North Carolina - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2018
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	
NC-Asheville MSA	1	30	0.3	100	1.2	0.0	1.0	15.7	0.0	17.0	64.5	100.0	68.0	18.5	0.0	14.0	0.0	0.0	0.0	
NC-Burlington MSA	0	0	0.0	44	0.0	0.0	0.0	13.3	0.0	13.6	50.9	0.0	61.4	35.8	0.0	25.0	0.0	0.0	0.0	
NC-Durham MSA	3	145	0.8	133	3.1	0.0	3.8	18.1	66.7	24.8	51.8	33.3	58.6	26.9	0.0	12.8	0.1	0.0	0.0	
NC-Fayetteville MSA	0	0	0.0	41	0.2	0.0	4.9	15.8	0.0	12.2	61.4	0.0	53.7	22.6	0.0	29.3	0.0	0.0	0.0	
NC-Goldsboro MSA	35	6,045	9.9	115	0.0	0.0	0.0	16.8	11.4	15.7	66.5	68.6	67.0	16.8	20.0	17.4	0.0	0.0	0.0	
NC-Greensboro MSA	9	1,369	2.5	189	1.6	0.0	1.6	14.2	11.1	9.5	52.2	44.4	64.0	32.0	44.4	24.9	0.0	0.0	0.0	
NC-Greenville MSA	3	787	0.8	72	4.3	0.0	1.4	16.6	0.0	13.9	45.4	100.0	55.6	33.7	0.0	29.2	0.0	0.0	0.0	
NC-Hickory MSA	2	190	0.6	74	0.0	0.0	0.0	9.0	0.0	9.5	69.7	100.0	85.1	21.3	0.0	5.4	0.0	0.0	0.0	
NC-Jacksonville MSA	2	230	0.6	44	0.0	0.0	0.0	6.4	0.0	2.3	77.3	100.0	90.9	16.3	0.0	6.8	0.0	0.0	0.0	
NC-New Bern MSA	21	2,712	5.9	78	1.4	0.0	0.0	17.8	23.8	29.5	58.7	61.9	62.8	22.1	14.3	7.7	0.0	0.0	0.0	
NC-Non-MSA	231	33,604	65.1	1,643	0.4	0.0	0.0	19.2	20.8	21.6	61.4	69.3	68.6	18.9	10.0	9.8	0.0	0.0	0.0	
NC-Raleigh MSA	27	3,050	7.6	267	4.6	0.0	5.6	27.9	37.0	53.6	40.0	40.7	24.7	27.5	22.2	16.1	0.0	0.0	0.0	
NC-Rocky Mount MSA	12	1,690	3.4	108	0.0	0.0	0.0	8.6	0.0	2.8	67.7	66.7	69.4	23.6	33.3	27.8	0.0	0.0	0.0	
NC-Wilmington MSA	4	500	1.1	52	7.0	0.0	7.7	25.0	50.0	42.3	37.6	0.0	15.4	30.0	50.0	34.6	0.3	0.0	0.0	
NC-Winston-Salem MSA	5	1,019	1.4	138	1.9	0.0	1.4	14.7	0.0	23.2	50.1	60.0	58.0	33.0	40.0	17.4	0.2	0.0	0.0	
Total	355	51,371	100.0	3,098	1.8	0.0	1.1	18.3	20.3	22.4	55.5	65.4	62.7	24.4	14.4	13.9	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

North Carolina - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2018**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
NC-Asheville MSA	1	30	0.3	100	97.1	100.0	40.0	1.5	0.0	1.4	0.0
NC-Burlington MSA	0	0	0.0	44	97.6	0.0	40.9	1.7	0.0	0.7	0.0
NC-Durham MSA	3	145	0.8	133	96.2	100.0	41.4	1.9	0.0	1.9	0.0
NC-Fayetteville MSA	0	0	0.0	41	95.8	0.0	53.7	2.2	0.0	2.0	0.0
NC-Goldsboro MSA	35	6,045	9.9	115	93.5	57.1	41.7	4.3	42.9	2.3	0.0
NC-Greensboro MSA	9	1,369	2.5	189	96.8	66.7	37.0	1.8	33.3	1.4	0.0
NC-Greenville MSA	3	787	0.8	72	94.6	100.0	45.8	3.5	0.0	1.9	0.0
NC-Hickory MSA	2	190	0.6	74	96.9	50.0	58.1	1.8	50.0	1.3	0.0
NC-Jacksonville MSA	2	230	0.6	44	94.9	100.0	45.5	2.2	0.0	2.9	0.0
NC-New Bern MSA	21	2,712	5.9	78	95.9	81.0	50.0	1.9	9.5	2.2	9.5
NC-Non-MSA	231	33,604	65.1	1,643	95.7	58.0	45.0	2.2	41.6	2.1	0.4
NC-Raleigh MSA	27	3,050	7.6	267	94.5	51.9	48.3	2.9	48.1	2.6	0.0
NC-Rocky Mount MSA	12	1,690	3.4	108	92.3	66.7	39.8	5.5	33.3	2.3	0.0
NC-Wilmington MSA	4	500	1.1	52	93.9	50.0	48.1	3.6	50.0	2.5	0.0
NC-Winston-Salem MSA	5	1,019	1.4	138	97.1	60.0	44.2	1.4	40.0	1.4	0.0
Total	355	51,371	100.0	3,098	95.7	60.3	44.7	2.3	38.9	2.0	0.8

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Florida - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
FL-Cape Coral MSA	378	92,836	3.9	30,962	2.1	1.3	1.6	18.6	16.1	20.0	44.2	45.2	45.1	35.1	37.3	33.2	0.0	0.0	0.0
FL-Crestview MSA	180	86,272	1.9	14,264	0.0	0.0	0.0	12.2	1.7	5.4	62.3	49.4	58.4	25.5	48.9	36.2	0.0	0.0	0.0
FL-Deltona MSA	303	101,076	3.1	25,875	0.8	0.7	0.3	12.6	8.9	9.7	62.4	45.5	62.3	24.2	44.9	27.7	0.0	0.0	0.0
FL-Fort Lauderdale MD	866	173,783	8.9	55,067	2.8	2.8	2.3	24.8	26.2	22.8	34.0	27.9	34.3	38.4	43.1	40.6	0.0	0.0	0.0
FL-Homosassa Springs MSA	164	35,463	1.7	5,744	0.0	0.0	0.0	20.1	6.7	19.7	62.7	81.7	60.2	17.3	11.6	20.1	0.0	0.0	0.0
FL-Jacksonville MSA	613	231,232	6.3	57,817	3.4	1.5	1.3	19.7	20.6	15.7	41.3	30.3	40.7	35.6	47.6	42.2	0.0	0.0	0.0
FL-Lakeland MSA	207	62,846	2.1	24,442	1.3	0.0	0.5	17.3	12.1	13.7	58.8	57.5	62.4	22.6	30.4	23.4	0.0	0.0	0.0
FL-Miami MD	608	153,473	6.3	54,158	2.0	2.0	1.6	21.4	20.1	19.1	31.9	22.5	32.0	44.4	55.3	46.5	0.2	0.2	0.7
FL-Naples MSA	124	43,657	1.3	14,305	2.3	0.8	1.2	16.3	14.5	16.2	41.3	41.9	42.1	40.1	42.7	40.5	0.0	0.0	0.0
FL-Non-MSA	77	33,403	0.8	2,639	0.0	0.0	0.0	1.3	0.0	0.8	11.8	9.1	13.0	87.0	90.9	86.3	0.0	0.0	0.0
FL-North Port MSA	678	185,824	7.0	33,485	1.0	0.1	0.6	18.3	10.3	13.7	50.7	49.6	46.9	29.9	40.0	38.8	0.0	0.0	0.0
FL-Ocala MSA	215	32,382	2.2	12,017	0.6	0.0	0.1	14.5	8.4	11.3	69.6	66.5	70.5	15.3	25.1	18.0	0.0	0.0	0.0
FL-Orlando MSA	1,066	247,219	11.0	86,766	1.0	0.6	1.0	21.1	23.4	18.4	39.1	36.7	41.0	38.8	39.3	39.6	0.0	0.1	0.0
FL-Palm Bay MSA	433	90,334	4.5	24,398	1.6	0.7	0.8	21.1	15.0	21.6	43.5	35.6	43.2	33.8	48.7	34.5	0.0	0.0	0.0

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

Florida - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
FL-Panama City MSA	66	14,974	0.7	6,986	1.6	0.0	0.8	13.2	3.0	7.7	55.3	53.0	59.4	30.0	43.9	32.1	0.0	0.0	0.0
FL-Pensacola MSA	189	45,574	2.0	17,970	1.6	0.0	0.4	15.2	9.5	9.5	54.7	47.6	51.2	28.5	42.9	38.9	0.0	0.0	0.0
FL-Port St Lucie MSA	317	51,990	3.3	19,311	1.6	0.0	0.9	13.0	6.6	11.3	54.4	51.1	57.8	30.9	42.3	30.0	0.0	0.0	0.0
FL-Punta Gorda MSA	124	22,466	1.3	8,339	0.0	0.0	0.0	10.7	8.1	12.0	70.6	66.1	70.2	18.6	25.8	17.7	0.0	0.0	0.0
FL-Tallahassee MSA	290	48,099	3.0	9,126	4.9	1.7	3.9	18.0	6.9	13.0	41.9	39.0	42.4	34.7	52.1	39.8	0.6	0.3	1.0
FL-Tampa MSA	1,907	681,349	19.7	114,762	1.9	1.7	1.6	21.9	23.1	18.2	39.7	28.8	38.9	36.5	46.3	41.3	0.1	0.1	0.1
FL-The Villages MSA	110	17,967	1.1	4,952	0.2	0.0	0.1	23.0	20.0	16.1	76.8	80.0	82.9	0.0	0.0	0.0	0.0	0.0	0.8
FL-West Palm Beach MD	777	203,399	8.0	47,776	3.1	2.7	2.6	23.3	25.9	21.2	32.7	27.3	34.7	40.6	44.0	41.4	0.2	0.1	0.2
Total	9,692	2,655,618	100.0	671,161	1.9	1.3	1.3	19.9	18.1	17.0	43.1	37.5	43.7	35.0	43.1	38.0	0.1	0.1	0.1

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

Florida - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
FL-Cape Coral MSA	378	92,836	3.9	30,962	20.7	5.0	4.2	18.5	15.3	15.7	19.7	17.5	21.5	41.1	49.7	42.0	0.0	12.4	16.6
FL-Crestview MSA	180	86,272	1.9	14,264	20.3	0.6	3.0	17.9	3.9	11.5	21.5	5.0	18.4	40.3	63.3	50.0	0.0	27.2	17.1
FL-Deltona MSA	303	101,076	3.1	25,875	19.1	3.0	4.7	19.1	8.6	14.9	21.0	17.5	22.3	40.8	45.9	43.1	0.0	25.1	15.1
FL-Fort Lauderdale MD	866	173,783	8.9	55,067	22.3	4.2	2.9	17.3	10.2	11.6	18.7	13.3	20.2	41.7	44.0	48.3	0.0	28.4	17.1
FL-Homosassa Springs MSA	164	35,463	1.7	5,744	18.2	3.0	6.8	19.4	7.9	16.0	22.5	16.5	22.7	39.9	68.9	38.6	0.0	3.7	16.0
FL-Jacksonville MSA	613	231,232	6.3	57,817	21.8	2.0	5.5	17.4	6.0	16.5	20.0	11.1	21.0	40.9	38.5	39.0	0.0	42.4	17.9
FL-Lakeland MSA	207	62,846	2.1	24,442	20.4	2.9	3.0	18.3	11.6	13.1	21.4	7.2	24.8	39.8	37.7	38.9	0.0	40.6	20.3
FL-Miami MD	608	153,473	6.3	54,158	24.0	1.6	1.4	16.6	3.9	4.9	16.9	8.6	14.9	42.6	63.0	57.5	0.0	22.9	21.3
FL-Naples MSA	124	43,657	1.3	14,305	20.8	4.0	3.5	17.7	12.1	12.5	19.3	11.3	18.2	42.2	54.0	50.5	0.0	18.5	15.3
FL-Non-MSA	77	33,403	0.8	2,639	11.6	0.0	0.8	11.0	0.0	1.3	16.3	5.2	4.6	61.2	71.4	79.4	0.0	23.4	13.9
FL-North Port MSA	678	185,824	7.0	33,485	19.4	5.0	5.7	19.1	14.3	16.6	21.0	17.1	21.5	40.5	50.7	43.7	0.0	12.8	12.5
FL-Ocala MSA	215	32,382	2.2	12,017	19.3	4.2	5.5	19.5	18.6	16.9	21.6	22.8	23.5	39.7	47.4	35.3	0.0	7.0	18.7
FL-Orlando MSA	1,066	247,219	11.0	86,766	21.5	4.1	4.2	18.1	6.8	13.9	19.2	12.7	20.7	41.2	36.3	44.2	0.0	40.1	17.1
FL-Palm Bay MSA	433	90,334	4.5	24,398	20.2	5.1	6.3	18.6	12.9	15.8	20.6	13.2	21.1	40.6	48.3	40.3	0.0	20.6	16.5

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

Florida - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
FL-Panama City MSA	66	14,974	0.7	6,986	21.3	3.0	4.3	18.1	12.1	12.3	19.9	15.2	20.6	40.7	45.5	47.4	0.0	24.2	15.4
FL-Pensacola MSA	189	45,574	2.0	17,970	18.6	2.1	5.7	19.1	14.3	16.2	22.7	15.3	21.3	39.7	41.8	37.0	0.0	26.5	19.8
FL-Port St Lucie MSA	317	51,990	3.3	19,311	19.8	6.6	4.2	18.7	10.7	14.1	19.9	15.8	22.5	41.6	43.5	42.9	0.0	23.3	16.4
FL-Punta Gorda MSA	124	22,466	1.3	8,339	17.3	3.2	4.7	20.7	9.7	16.3	21.8	19.4	21.7	40.2	57.3	43.1	0.0	10.5	14.2
FL-Tallahassee MSA	290	48,099	3.0	9,126	23.4	4.8	4.8	16.7	14.5	16.7	19.6	21.4	18.8	40.2	52.8	38.6	0.0	6.6	21.1
FL-Tampa MSA	1,907	681,349	19.7	114,762	21.6	3.5	5.0	17.9	10.7	16.1	19.1	12.1	19.9	41.4	44.5	41.8	0.0	29.2	17.2
FL-The Villages MSA	110	17,967	1.1	4,952	15.5	5.5	5.3	20.8	10.9	14.0	24.3	29.1	23.1	39.5	46.4	47.9	0.0	8.2	9.7
FL-West Palm Beach MD	777	203,399	8.0	47,776	22.8	4.8	5.3	17.3	8.2	15.3	17.8	12.7	20.1	42.1	35.9	44.2	0.0	38.4	15.0
Total	9,692	2,655,618	100.0	671,161	21.4	3.8	4.4	17.9	9.9	14.0	19.4	13.6	20.3	41.3	45.9	44.2	0.0	26.8	17.1

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

Florida - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018**

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
FL-Cape Coral MSA	728	24,063	4.6	20,091	2.7	2.3	2.3	22.3	24.5	22.3	40.2	39.7	38.9	34.6	33.5	36.5	0.2	0.0	0.0
FL-Crestview MSA	95	3,822	0.6	7,298	0.0	0.0	0.0	10.5	9.5	10.2	53.4	53.7	50.2	36.0	36.8	39.5	0.0	0.0	0.0
FL-Deltona MSA	479	16,367	3.0	15,107	2.2	0.6	2.5	18.8	13.8	19.2	55.5	56.2	53.8	23.5	29.4	24.5	0.0	0.0	0.0
FL-Fort Lauderdale MD	2,152	75,352	13.5	81,531	5.1	6.4	5.7	23.8	27.9	23.0	30.4	30.5	29.3	40.7	35.2	41.9	0.0	0.0	0.0
FL-Homosassa SpringsMSA	82	3,661	0.5	2,953	0.0	0.0	0.0	16.0	20.7	15.4	63.5	58.5	63.9	20.5	20.7	20.7	0.0	0.0	0.0
FL-Jacksonville MSA	622	45,955	3.9	33,369	4.4	4.5	4.2	21.7	18.8	20.8	35.2	35.0	33.6	38.7	41.6	41.4	0.0	0.0	0.0
FL-Lakeland MSA	442	10,891	2.8	11,186	3.6	3.4	4.1	20.6	17.6	20.9	51.6	52.3	50.8	24.3	26.7	24.2	0.0	0.0	0.0
FL-Miami MD	2,325	86,381	14.5	116,107	3.1	2.5	2.9	21.3	19.4	21.0	25.8	27.8	25.2	47.5	48.9	48.4	2.4	1.3	2.5
FL-Naples MSA	265	11,234	1.7	12,624	2.8	1.9	2.6	13.1	13.6	10.9	39.2	41.1	39.8	44.8	43.4	46.8	0.0	0.0	0.0
FL-Non-MSA	161	12,153	1.0	4,166	0.0	0.0	0.0	2.7	4.3	2.4	15.6	18.0	15.8	81.5	77.6	81.9	0.1	0.0	0.0
FL-North Port MSA	1,111	39,336	7.0	23,925	1.3	1.2	1.1	19.3	18.5	18.0	45.4	44.2	43.1	34.0	36.2	37.8	0.0	0.0	0.0
FL-Ocala MSA	226	9,563	1.4	6,838	1.9	0.4	2.1	16.5	19.0	17.2	64.4	69.5	63.9	17.2	11.1	16.8	0.0	0.0	0.0
FL-Orlando MSA	1,670	73,189	10.5	66,523	1.5	1.3	1.4	25.1	23.9	24.3	34.5	36.2	34.1	38.9	38.5	40.2	0.0	0.1	0.0
FL-Palm Bay MSA	550	33,533	3.4	12,893	2.5	2.7	2.2	23.4	24.4	24.1	39.0	33.5	37.8	35.1	39.5	36.0	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Florida - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2018
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	
FL-Panama City MSA	87	5,095	0.5	4,579	2.4	4.6	1.7	18.3	11.5	17.8	55.5	51.7	55.0	23.8	32.2	25.5	0.0	0.0	0.1	
FL-Pensacola MSA	127	6,927	0.8	9,101	2.3	0.8	2.3	20.7	12.6	20.0	50.7	63.8	50.0	26.3	22.8	27.6	0.0	0.0	0.0	
FL-Port St Lucie MSA	496	13,310	3.1	12,728	3.1	1.2	2.9	19.3	21.2	20.7	47.5	43.1	43.3	29.9	34.5	32.9	0.1	0.0	0.2	
FL-Punta Gorda MSA	154	5,768	1.0	4,061	0.0	0.0	0.0	15.8	14.3	16.3	66.7	64.3	65.6	17.5	21.4	18.0	0.0	0.0	0.0	
FL-Tallahassee MSA	175	12,715	1.1	6,983	7.6	2.3	6.1	20.2	13.1	20.2	40.8	46.3	41.7	30.0	38.3	30.9	1.3	0.0	1.0	
FL-Tampa MSA	2,516	99,905	15.7	81,431	4.0	4.2	4.2	20.8	20.5	20.5	35.3	38.9	34.6	39.7	36.4	40.5	0.3	0.0	0.3	
FL-The Villages MSA	69	1,305	0.4	1,562	1.8	1.4	2.1	33.0	34.8	33.5	64.9	63.8	64.4	0.0	0.0	0.0	0.2	0.0	0.0	
FL-West Palm Beach MD	1,448	53,587	9.1	59,241	5.2	5.4	5.4	20.7	21.1	20.3	29.6	32.8	28.9	43.8	40.1	44.8	0.7	0.6	0.6	
Total	15,980	644,112	100.0	594,297	3.4	3.2	3.4	21.2	21.0	20.8	36.1	37.6	34.3	38.8	37.9	40.8	0.5	0.3	0.6	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Florida - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2018**

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
FL-Cape Coral MSA	728	24,063	4.6	20,091	89.8	81.6	45.4	3.6	18.0	6.6	0.4
FL-Crestview MSA	95	3,822	0.6	7,298	88.2	85.3	40.5	3.4	14.7	8.5	0.0
FL-Deltona MSA	479	16,367	3.0	15,107	90.3	86.2	49.5	3.2	13.4	6.5	0.4
FL-Fort Lauderdale MD	2,152	75,352	13.5	81,531	90.7	78.9	46.4	3.9	20.9	5.4	0.2
FL-Homosassa Springs MSA	82	3,661	0.5	2,953	90.3	87.8	53.6	2.9	12.2	6.9	0.0
FL-Jacksonville MSA	622	45,955	3.9	33,369	88.0	75.7	45.2	4.1	24.0	7.8	0.3
FL-Lakeland MSA	442	10,891	2.8	11,186	88.5	83.3	45.1	3.7	16.5	7.8	0.2
FL-Miami MD	2,325	86,381	14.5	116,107	90.6	82.5	46.5	4.3	17.1	5.1	0.4
FL-Naples MSA	265	11,234	1.7	12,624	90.7	83.4	45.9	3.7	16.6	5.7	0.0
FL-Non-MSA	161	12,153	1.0	4,166	88.9	76.4	43.1	3.7	20.5	7.3	3.1
FL-North Port MSA	1,111	39,336	7.0	23,925	90.2	81.2	49.2	3.7	18.5	6.1	0.4
FL-Ocala MSA	226	9,563	1.4	6,838	88.9	83.2	46.7	3.7	15.9	7.4	0.9
FL-Orlando MSA	1,670	73,189	10.5	66,523	89.7	76.4	47.4	3.5	23.4	6.7	0.2
FL-Palm Bay MSA	550	33,533	3.4	12,893	88.6	78.0	48.5	3.9	21.1	7.6	0.9
FL-Panama City MSA	87	5,095	0.5	4,579	86.3	82.8	40.0	4.0	16.1	9.7	1.1
FL-Pensacola MSA	127	6,927	0.8	9,101	88.7	87.4	40.1	3.6	12.6	7.7	0.0
FL-Port St Lucie MSA	496	13,310	3.1	12,728	90.4	89.3	47.0	3.2	10.5	6.4	0.2
FL-Punta Gorda MSA	154	5,768	1.0	4,061	91.6	87.0	50.3	2.7	12.3	5.7	0.6
FL-Tallahassee MSA	175	12,715	1.1	6,983	87.3	80.6	50.2	3.6	17.7	9.1	1.7
FL-Tampa MSA	2,516	99,905	15.7	81,431	89.3	76.4	47.7	3.9	23.1	6.8	0.6
FL-The Villages MSA	69	1,305	0.4	1,562	88.9	78.3	48.5	3.0	21.7	8.1	0.0
FL-West Palm Beach MD	1,448	53,587	9.1	59,241	90.5	79.6	46.1	3.8	19.6	5.7	0.8
Total	15,980	644,112	100.0	594,297	89.8	80.0	46.6	3.8	19.5	6.4	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Florida - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018

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
FL-Cape Coral MSA	1	47	5.3	87	3.0	0.0	0.0	25.9	0.0	17.2	46.4	0.0	56.3	24.6	100.0	26.4	0.0	0.0	0.0
FL-Crestview MSA	1	25	5.3	50	0.0	0.0	0.0	15.8	0.0	42.0	61.0	0.0	40.0	23.2	100.0	18.0	0.0	0.0	0.0
FL-Deltona MSA	0	0	0.0	55	0.8	0.0	0.0	17.2	0.0	16.4	60.1	0.0	49.1	21.8	0.0	34.5	0.0	0.0	0.0
FL-Fort Lauderdale MD	0	0	0.0	99	5.3	0.0	3.0	29.0	0.0	22.2	28.9	0.0	27.3	36.8	0.0	47.5	0.0	0.0	0.0
FL-Homosassa Springs MSA	0	0	0.0	18	0.0	0.0	0.0	18.8	0.0	0.0	64.3	0.0	94.4	17.0	0.0	5.6	0.0	0.0	0.0
FL-Jacksonville MSA	0	0	0.0	117	3.2	0.0	2.6	20.5	0.0	21.4	44.9	0.0	49.6	31.4	0.0	26.5	0.0	0.0	0.0
FL-Lakeland MSA	1	80	5.3	83	2.2	0.0	4.8	16.9	0.0	15.7	58.8	100.0	63.9	22.1	0.0	15.7	0.0	0.0	0.0
FL-Miami MD	1	50	5.3	282	3.4	0.0	1.8	21.9	0.0	12.8	26.6	0.0	16.3	47.3	100.0	68.4	0.8	0.0	0.7
FL-Naples MSA	0	0	0.0	62	5.9	0.0	27.4	19.5	0.0	32.3	44.4	0.0	21.0	30.3	0.0	19.4	0.0	0.0	0.0
FL-Non-MSA	0	0	0.0	30	0.0	0.0	0.0	2.0	0.0	0.0	13.9	0.0	10.0	84.0	0.0	90.0	0.0	0.0	0.0
FL-North Port MSA	2	90	10.5	103	1.9	0.0	1.0	19.3	100.0	19.4	44.6	0.0	23.3	34.2	0.0	56.3	0.0	0.0	0.0
FL-Ocala MSA	1	54	5.3	89	0.9	0.0	0.0	18.0	100.0	18.0	67.3	0.0	64.0	13.9	0.0	18.0	0.0	0.0	0.0
FL-Orlando MSA	0	0	0.0	195	1.1	0.0	1.0	23.5	0.0	12.8	40.7	0.0	44.6	34.5	0.0	41.0	0.1	0.0	0.5
FL-Palm Bay MSA	1	117	5.3	32	2.3	0.0	0.0	25.0	0.0	21.9	42.8	100.0	31.3	29.8	0.0	46.9	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Florida - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2018**

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
FL-Panama City MSA	0	0	0.0	14	2.3	0.0	0.0	12.4	0.0	14.3	57.5	0.0	71.4	27.8	0.0	14.3	0.0	0.0	0.0
FL-Pensacola MSA	5	792	26.3	85	1.9	0.0	0.0	14.9	0.0	0.0	59.6	100.0	92.9	23.5	0.0	7.1	0.0	0.0	0.0
FL-Port St Lucie MSA	0	0	0.0	80	3.1	0.0	2.5	24.3	0.0	25.0	46.2	0.0	36.3	26.3	0.0	36.3	0.0	0.0	0.0
FL-Punta Gorda MSA	0	0	0.0	19	0.0	0.0	0.0	26.1	0.0	57.9	61.8	0.0	42.1	12.1	0.0	0.0	0.0	0.0	0.0
FL-Tallahassee MSA	1	150	5.3	103	4.2	0.0	3.9	16.9	100.0	12.6	47.5	0.0	73.8	31.0	0.0	9.7	0.3	0.0	0.0
FL-Tampa MSA	1	21	5.3	226	2.5	0.0	1.8	24.4	100.0	22.1	39.8	0.0	38.5	33.2	0.0	37.6	0.1	0.0	0.0
FL-The Villages MSA	1	155	5.3	39	0.7	0.0	0.0	55.4	100.0	51.3	43.5	0.0	48.7	0.0	0.0	0.0	0.3	0.0	0.0
FL-West Palm Beach MD	3	129	15.8	189	5.7	0.0	2.6	21.3	0.0	10.1	33.0	0.0	36.0	39.6	100.0	51.3	0.4	0.0	0.0
Total	19	1,710	100.0	2,057	2.8	0.0	2.4	22.1	31.6	17.7	43.0	36.8	42.1	32.0	31.6	37.6	0.1	0.0	0.1

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Florida - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2018**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FL-Cape Coral MSA	1	47	5.3	87	96.8	100.0	44.8	1.9	0.0	1.4	0.0
FL-Crestview MSA	1	25	5.3	50	96.6	100.0	28.0	1.7	0.0	1.7	0.0
FL-Deltona MSA	0	0	0.0	55	97.2	0.0	70.9	1.6	0.0	1.2	0.0
FL-Fort Lauderdale MD	0	0	0.0	99	96.6	0.0	50.5	2.3	0.0	1.1	0.0
FL-Homosassa Springs MSA	0	0	0.0	18	99.2	0.0	55.6	0.5	0.0	0.3	0.0
FL-Jacksonville MSA	0	0	0.0	117	96.7	0.0	49.6	2.0	0.0	1.3	0.0
FL-Lakeland MSA	1	80	5.3	83	95.2	100.0	60.2	3.7	0.0	1.2	0.0
FL-Miami MD	1	50	5.3	282	96.1	100.0	56.7	2.9	0.0	1.0	0.0
FL-Naples MSA	0	0	0.0	62	94.1	0.0	56.5	4.2	0.0	1.7	0.0
FL-Non-MSA	0	0	0.0	30	97.6	0.0	60.0	1.0	0.0	1.4	0.0
FL-North Port MSA	2	90	10.5	103	95.9	0.0	56.3	3.0	100.0	1.1	0.0
FL-Ocala MSA	1	54	5.3	89	97.3	0.0	55.1	1.7	100.0	1.0	0.0
FL-Orlando MSA	0	0	0.0	195	95.7	0.0	53.3	2.7	0.0	1.5	0.0
FL-Palm Bay MSA	1	117	5.3	32	97.6	100.0	59.4	1.7	0.0	0.7	0.0
FL-Panama City MSA	0	0	0.0	14	98.2	0.0	57.1	0.9	0.0	0.9	0.0
FL-Pensacola MSA	5	792	26.3	85	98.4	0.0	24.7	0.8	100.0	0.9	0.0
FL-Port St Lucie MSA	0	0	0.0	80	94.6	0.0	47.5	3.3	0.0	2.1	0.0
FL-Punta Gorda MSA	0	0	0.0	19	97.4	0.0	57.9	0.8	0.0	1.8	0.0
FL-Tallahassee MSA	1	150	5.3	103	96.4	0.0	74.8	1.9	100.0	1.7	0.0
FL-Tampa MSA	1	21	5.3	226	96.3	100.0	54.9	2.3	0.0	1.4	0.0
FL-The Villages MSA	1	155	5.3	39	95.2	0.0	25.6	2.4	100.0	2.4	0.0
FL-West Palm Beach MD	3	129	15.8	189	95.6	100.0	46.6	3.0	0.0	1.4	0.0
Total	19	1,710	100.0	2,057	96.3	47.4	52.5	2.4	52.6	1.3	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Virginia - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

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
VA-Blacksburg MSA	171	21,009	2.9	4,070	0.0	0.0	0.0	1.0	1.2	2.2	79.4	76.6	70.9	19.1	21.6	26.1	0.5	0.6	0.8
VA-Charlottesville MSA	406	73,212	6.8	7,279	2.5	1.2	2.5	20.9	22.2	15.9	47.5	49.3	49.3	29.1	27.3	32.3	0.0	0.0	0.0
VA-Harrisonburg MSA	187	24,998	3.1	3,108	0.4	0.0	1.2	10.0	9.6	12.9	76.9	75.4	68.3	12.7	15.0	17.6	0.0	0.0	0.0
VA-Lynchburg MSA	458	49,561	7.7	6,959	1.5	0.4	1.0	12.2	10.3	14.8	65.1	58.7	58.1	21.2	30.6	26.1	0.0	0.0	0.0
VA-Non-MSA	1,155	122,923	19.3	18,612	0.2	0.0	0.1	16.2	13.5	10.3	64.2	62.9	57.1	19.3	23.6	32.5	0.0	0.0	0.0
VA-Richmond MSA	1,431	335,778	23.9	46,015	4.4	2.8	4.0	16.9	15.6	15.6	43.4	39.7	41.4	35.1	41.7	38.9	0.2	0.2	0.1
VA-Roanoke MSA	411	52,055	6.9	9,438	1.4	0.2	0.9	18.4	16.3	14.3	47.5	44.0	47.5	32.7	39.4	37.2	0.0	0.0	0.0
VA-Staunton MSA	170	22,157	2.8	4,050	0.2	0.0	0.5	9.2	10.6	9.8	83.1	81.2	82.0	7.4	8.2	7.7	0.0	0.0	0.0
VA-Virginia Beach MSA	1,370	267,856	22.9	56,739	2.8	1.5	2.7	18.1	12.3	18.1	39.3	38.7	37.6	39.7	47.4	41.3	0.2	0.1	0.3
VA-Winchester MSA	226	51,735	3.8	4,411	0.0	0.0	0.0	10.7	5.8	9.0	57.9	57.5	60.1	31.5	36.7	30.9	0.0	0.0	0.0
Total	5,985	1,021,284	100.0	160,681	2.2	1.1	2.3	16.1	13.4	15.1	51.1	50.4	46.1	30.4	35.0	36.3	0.1	0.1	0.2

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

Virginia - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
VA-Blacksburg MSA	171	21,009	2.9	4,070	18.1	12.3	7.7	18.6	18.1	20.5	22.0	21.1	20.4	41.2	38.0	36.4	0.0	10.5	15.0
VA-Charlottesville MSA	406	73,212	6.8	7,279	21.0	14.8	8.9	17.2	17.2	17.0	21.2	20.7	19.6	40.7	33.3	38.5	0.0	14.0	15.9
VA-Harrisonburg MSA	187	24,998	3.1	3,108	18.6	11.8	5.8	19.5	20.3	18.0	22.7	21.4	23.5	39.3	40.1	38.9	0.0	6.4	14.0
VA-Lynchburg MSA	458	49,561	7.7	6,959	20.8	9.6	7.5	17.5	17.9	19.9	21.6	18.8	21.8	40.0	48.3	36.1	0.0	5.5	14.9
VA-Non-MSA	1,155	122,923	19.3	18,612	21.3	8.7	5.7	17.9	16.5	16.0	20.1	22.9	21.6	40.7	41.5	39.9	0.0	10.5	16.8
VA-Richmond MSA	1,431	335,778	23.9	46,015	21.1	11.2	9.8	18.0	17.5	21.8	20.1	17.3	20.7	40.8	28.4	31.4	0.0	25.6	16.3
VA-Roanoke MSA	411	52,055	6.9	9,438	19.9	10.0	7.8	17.5	19.7	20.0	22.4	20.7	21.0	40.2	39.9	34.4	0.0	9.7	16.9
VA-Staunton MSA	170	22,157	2.8	4,050	19.7	8.8	8.6	18.4	22.4	23.5	22.7	21.2	23.9	39.2	39.4	31.8	0.0	8.2	12.1
VA-Virginia Beach MSA	1,370	267,856	22.9	56,739	21.4	8.2	5.4	17.6	17.7	18.7	20.3	20.9	22.0	40.8	38.3	31.8	0.0	14.9	22.1
VA-Winchester MSA	226	51,735	3.8	4,411	19.7	10.6	5.7	16.3	12.4	15.1	19.5	15.9	20.2	44.5	46.0	39.6	0.0	15.0	19.4
Total	5,985	1,021,284	100.0	160,681	20.9	10.0	7.3	17.8	17.6	19.4	20.6	20.1	21.4	40.7	37.4	33.7	0.0	14.9	18.2

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

Virginia - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
VA-Blacksburg MSA	245	8,541	2.2	1,806	0.0	0.0	0.0	1.3	0.4	1.9	75.3	78.8	74.0	21.8	16.7	22.8	1.6	4.1	1.4
VA-Charlottesville MSA	838	28,287	7.6	4,727	3.1	2.0	3.9	17.8	20.0	17.9	39.0	45.2	39.8	39.6	32.7	38.4	0.5	0.0	0.0
VA-Harrisonburg MSA	327	12,961	3.0	1,934	2.2	1.2	2.8	20.4	19.0	20.1	62.6	67.9	61.2	14.7	11.9	15.9	0.0	0.0	0.0
VA-Lynchburg MSA	808	36,502	7.3	3,955	1.2	1.1	1.4	20.2	17.5	18.6	56.8	59.9	54.4	21.8	21.5	25.6	0.0	0.0	0.0
VA-Non-MSA	2,260	77,770	20.4	10,562	0.2	0.1	0.2	14.2	13.4	13.1	63.7	63.9	63.7	21.7	22.5	22.9	0.2	0.1	0.1
VA-Richmond MSA	2,556	99,241	23.1	25,026	5.9	4.8	5.2	21.2	19.7	18.6	36.1	39.8	36.0	36.2	35.4	39.8	0.6	0.4	0.3
VA-Roanoke MSA	566	24,121	5.1	5,384	2.7	3.4	2.9	15.6	19.1	15.1	50.5	51.9	51.0	31.3	25.6	31.0	0.0	0.0	0.0
VA-Staunton MSA	276	10,749	2.5	1,772	4.7	3.6	3.6	6.3	8.3	5.9	81.0	79.0	81.4	8.0	9.1	9.1	0.0	0.0	0.0
VA-Virginia Beach MSA	2,828	157,671	25.6	25,499	4.2	3.6	3.4	22.7	20.5	21.1	37.0	37.3	35.7	34.8	37.5	38.2	1.3	1.0	1.6
VA-Winchester MSA	362	20,346	3.3	2,044	0.0	0.0	0.0	18.6	16.6	17.0	56.5	59.4	58.2	24.9	24.0	24.8	0.0	0.0	0.0
Total	11,066	476,189	100.0	82,709	3.6	2.6	3.3	19.2	17.6	17.8	45.4	49.9	44.5	31.2	29.4	33.9	0.7	0.5	0.6

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Virginia - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
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
VA-Blacksburg MSA	245	8,541	2.2	1,806	80.7	79.2	52.9	5.0	20.0	14.3	0.8
VA-Charlottesville MSA	838	28,287	7.6	4,727	84.8	76.9	50.8	5.1	22.4	10.1	0.7
VA-Harrisonburg MSA	327	12,961	3.0	1,934	82.2	92.4	55.2	5.5	7.3	12.4	0.3
VA-Lynchburg MSA	808	36,502	7.3	3,955	83.3	77.0	53.9	5.3	22.8	11.4	0.2
VA-Non-MSA	2,260	77,770	20.4	10,562	81.3	88.3	55.1	5.0	11.2	13.8	0.5
VA-Richmond MSA	2,556	99,241	23.1	25,026	84.0	72.7	50.3	5.2	26.4	10.8	0.8
VA-Roanoke MSA	566	24,121	5.1	5,384	81.8	78.4	52.0	5.8	21.0	12.5	0.5
VA-Staunton MSA	276	10,749	2.5	1,772	82.0	79.7	55.3	5.6	18.8	12.4	1.4
VA-Virginia Beach MSA	2,828	157,671	25.6	25,499	83.8	82.2	50.3	5.0	17.1	11.2	0.6
VA-Winchester MSA	362	20,346	3.3	2,044	82.7	75.7	50.1	5.1	23.5	12.2	0.8
Total	11,066	476,189	100.0	82,709	83.2	80.2	51.5	5.1	19.1	11.6	0.6

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Virginia - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
VA-Blacksburg MSA	0	0	0.0	119	0.0	0.0	0.0	0.6	0.0	0.0	79.7	0.0	88.2	18.5	0.0	11.8	1.2	0.0	0.0
VA-Charlottesville MSA	1	42	2.2	100	1.2	0.0	0.0	20.8	0.0	37.0	49.3	100.0	48.0	28.7	0.0	15.0	0.0	0.0	0.0
VA-Harrisonburg MSA	2	173	4.3	143	0.1	0.0	0.0	3.7	0.0	1.4	84.4	100.0	84.6	11.7	0.0	14.0	0.0	0.0	0.0
VA-Lynchburg MSA	6	435	13.0	84	0.8	0.0	0.0	6.9	0.0	0.0	72.9	83.3	84.5	19.4	16.7	15.5	0.0	0.0	0.0
VA-Non-MSA	25	2,474	54.3	1,045	0.0	0.0	0.0	9.3	12.0	12.9	70.4	84.0	76.3	20.3	4.0	10.8	0.0	0.0	0.0
VA-Richmond MSA	6	702	13.0	213	2.0	0.0	0.5	14.3	50.0	19.7	49.4	33.3	53.1	34.3	16.7	26.8	0.1	0.0	0.0
VA-Roanoke MSA	0	0	0.0	97	1.3	0.0	0.0	18.9	0.0	27.8	46.4	0.0	49.5	33.3	0.0	22.7	0.0	0.0	0.0
VA-Staunton MSA	2	521	4.3	145	1.0	0.0	0.0	3.9	0.0	13.8	91.1	50.0	84.1	3.9	50.0	2.1	0.0	0.0	0.0
VA-Virginia Beach MSA	2	660	4.3	137	2.3	0.0	0.7	15.5	50.0	4.4	39.9	0.0	47.4	41.9	50.0	47.4	0.4	0.0	0.0
VA-Winchester MSA	2	200	4.3	58	0.0	0.0	0.0	11.1	0.0	1.7	62.5	50.0	63.8	26.4	50.0	34.5	0.0	0.0	0.0
Total	46	5,207	100.0	2,141	1.2	0.0	0.1	12.0	15.2	12.6	58.6	71.7	71.3	28.1	13.0	16.0	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Virginia - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
VA-Blacksburg MSA	0	0	0.0	119	97.7	0.0	61.3	1.0	0.0	1.2	0.0
VA-Charlottesville MSA	1	42	2.2	100	96.6	100.0	33.0	2.1	0.0	1.2	0.0
VA-Harrisonburg MSA	2	173	4.3	143	96.9	100.0	76.2	1.4	0.0	1.8	0.0
VA-Lynchburg MSA	6	435	13.0	84	97.5	16.7	50.0	1.1	83.3	1.4	0.0
VA-Non-MSA	25	2,474	54.3	1,045	97.3	72.0	56.0	1.1	20.0	1.6	8.0
VA-Richmond MSA	6	702	13.0	213	96.2	83.3	36.6	2.2	16.7	1.6	0.0
VA-Roanoke MSA	0	0	0.0	97	95.7	0.0	40.2	2.8	0.0	1.5	0.0
VA-Staunton MSA	2	521	4.3	145	97.1	50.0	79.3	2.3	50.0	0.6	0.0
VA-Virginia Beach MSA	2	660	4.3	137	95.7	50.0	43.1	2.4	50.0	1.9	0.0
VA-Winchester MSA	2	200	4.3	58	95.0	100.0	36.2	4.3	0.0	0.7	0.0
Total	46	5,207	100.0	2,141	96.5	67.4	53.9	1.9	28.3	1.6	4.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Georgia - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2018**

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
GA-Athens MSA	82	14,384	1.8	5,930	6.4	3.7	6.2	14.7	8.5	10.5	41.1	39.0	39.7	37.8	48.8	43.5	0.0	0.0	0.0
GA-Atlanta MSA	3,024	916,884	67.7	217,352	3.2	3.2	3.0	20.8	24.3	19.5	37.3	30.1	37.6	38.7	42.4	39.9	0.0	0.0	0.0
GA-Brunswick MSA	57	15,834	1.3	3,507	1.3	0.0	0.6	19.6	7.0	10.3	42.2	26.3	34.5	36.8	66.7	54.6	0.0	0.0	0.0
GA-Dalton MSA	159	18,133	3.6	2,817	0.0	0.0	0.0	16.1	13.8	11.3	50.2	47.2	47.8	33.8	39.0	40.9	0.0	0.0	0.0
GA-Gainesville MSA	179	33,030	4.0	6,768	1.2	0.0	0.5	12.4	8.4	13.4	44.6	44.1	42.4	41.8	47.5	43.7	0.0	0.0	0.0
GA-Macon MSA	92	9,428	2.1	4,604	8.7	0.0	2.5	17.0	12.0	12.2	28.2	22.8	24.3	46.2	65.2	61.1	0.0	0.0	0.0
GA-Non-MSA	508	69,027	11.4	14,781	0.9	0.2	0.6	11.5	11.0	7.4	61.4	56.9	59.4	26.2	31.9	32.6	0.0	0.0	0.0
GA-Savannah MSA	273	55,037	6.1	13,817	4.0	1.1	1.7	16.9	14.7	12.4	41.2	33.3	39.1	37.9	50.9	46.7	0.0	0.0	0.0
GA-Valdosta MSA	23	3,401	0.5	3,731	4.5	8.7	2.6	14.8	21.7	14.2	46.9	26.1	38.5	33.7	43.5	44.8	0.0	0.0	0.0
GA-Warner Robins MSA	67	30,283	1.5	6,515	2.2	7.5	1.4	20.4	10.4	12.9	50.6	50.7	48.9	26.7	31.3	36.8	0.0	0.0	0.0
Total	4,464	1,165,442	100.0	279,822	3.1	2.5	2.7	19.2	20.2	17.6	40.3	34.8	39.1	37.4	42.5	40.6	0.0	0.0	0.0

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

Georgia - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
GA-Athens MSA	82	14,384	1.8	5,930	25.2	1.2	3.6	15.0	9.8	12.4	17.8	24.4	18.8	42.0	50.0	48.5	0.0	14.6	16.7
GA-Atlanta MSA	3,024	916,884	67.7	217,352	23.1	4.7	7.0	16.8	9.9	17.0	18.2	12.3	20.3	41.9	40.4	37.8	0.0	32.7	17.8
GA-Brunswick MSA	57	15,834	1.3	3,507	22.5	1.8	3.5	16.0	5.3	8.4	19.6	7.0	15.5	41.8	68.4	54.5	0.0	17.5	18.2
GA-Dalton MSA	159	18,133	3.6	2,817	20.4	5.0	7.3	19.5	30.8	24.2	20.0	23.9	20.8	40.2	39.6	29.1	0.0	0.6	18.6
GA-Gainesville MSA	179	33,030	4.0	6,768	20.6	2.8	5.2	18.0	14.5	15.6	20.3	22.9	20.5	41.0	45.3	40.4	0.0	14.5	18.2
GA-Macon MSA	92	9,428	2.1	4,604	26.2	7.6	4.0	14.6	13.0	11.5	17.0	15.2	20.4	42.2	54.3	44.0	0.0	9.8	20.1
GA-Non-MSA	508	69,027	11.4	14,781	23.0	4.3	3.4	16.9	10.2	10.7	17.8	17.5	17.2	42.3	57.7	49.5	0.0	10.2	19.2
GA-Savannah MSA	273	55,037	6.1	13,817	22.9	9.5	3.9	16.3	12.5	13.3	20.5	19.0	21.1	40.3	42.9	38.7	0.0	16.1	23.0
GA-Valdosta MSA	23	3,401	0.5	3,731	24.1	4.3	3.4	16.6	17.4	8.4	17.1	4.3	17.7	42.2	65.2	42.2	0.0	8.7	28.4
GA-Warner Robins MSA	67	30,283	1.5	6,515	23.4	16.4	5.5	15.9	9.0	14.3	20.5	10.4	22.5	40.2	38.8	34.8	0.0	25.4	22.9
Total	4,464	1,165,442	100.0	279,822	23.1	5.0	6.4	16.7	11.0	16.1	18.4	14.3	20.1	41.8	43.6	39.0	0.0	26.1	18.4

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

Georgia - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
GA-Athens MSA	146	8,416	1.7	3,649	11.2	6.2	9.7	10.1	17.1	12.0	35.4	43.2	33.7	41.9	33.6	44.4	1.4	0.0	0.2
GA-Atlanta MSA	5,855	365,370	67.5	157,241	5.5	4.6	4.6	22.5	22.0	20.6	31.2	34.3	29.6	40.2	38.9	44.8	0.6	0.2	0.4
GA-Brunswick MSA	89	5,356	1.0	2,262	6.2	2.2	4.7	29.0	27.0	24.4	25.2	22.5	23.7	39.5	48.3	47.2	0.0	0.0	0.0
GA-Dalton MSA	299	23,191	3.4	1,693	0.0	0.0	0.0	16.8	18.1	15.7	51.6	55.5	53.0	31.6	26.4	31.3	0.0	0.0	0.0
GA-Gainesville MSA	368	16,590	4.2	4,401	9.6	6.8	9.2	16.9	15.8	14.8	41.1	48.4	44.4	32.4	29.1	31.6	0.0	0.0	0.0
GA-Macon MSA	318	13,115	3.7	3,963	13.9	13.5	11.8	16.9	15.4	15.6	27.0	34.3	26.6	42.3	36.8	46.0	0.0	0.0	0.0
GA-Non-MSA	909	34,483	10.5	9,363	2.5	1.2	2.5	16.7	15.1	16.3	59.4	62.8	57.6	21.3	20.9	23.6	0.0	0.0	0.0
GA-Savannah MSA	373	26,206	4.3	7,752	7.3	9.9	8.6	19.9	13.7	18.3	37.8	42.9	37.7	34.6	33.5	35.3	0.3	0.0	0.1
GA-Valdosta MSA	64	2,957	0.7	2,307	9.3	6.3	7.9	29.2	9.4	26.4	28.3	40.6	31.5	33.1	43.8	34.2	0.0	0.0	0.0
GA-Warner Robins MSA	250	18,800	2.9	2,287	4.6	4.8	5.1	24.7	22.4	22.6	53.9	53.6	52.6	16.9	19.2	19.8	0.0	0.0	0.0
Total	8,671	514,484	100.0	194,918	5.8	4.8	5.0	21.7	20.2	20.0	33.8	39.6	32.1	38.2	35.3	42.6	0.5	0.1	0.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Georgia - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
GA-Athens MSA	146	8,416	1.7	3,649	83.3	74.0	44.1	4.5	26.0	12.2	0.0
GA-Atlanta MSA	5,855	365,370	67.5	157,241	87.4	70.5	46.7	4.5	28.6	8.0	0.8
GA-Brunswick MSA	89	5,356	1.0	2,262	83.3	70.8	43.9	4.8	27.0	11.9	2.2
GA-Dalton MSA	299	23,191	3.4	1,693	78.8	68.9	43.4	7.6	29.1	13.7	2.0
GA-Gainesville MSA	368	16,590	4.2	4,401	85.1	78.5	44.8	5.9	20.7	9.0	0.8
GA-Macon MSA	318	13,115	3.7	3,963	81.7	70.1	46.2	5.5	28.9	12.7	0.9
GA-Non-MSA	909	34,483	10.5	9,363	82.1	85.1	45.7	4.9	14.1	13.0	0.8
GA-Savannah MSA	373	26,206	4.3	7,752	82.9	70.5	43.5	5.3	27.9	11.8	1.6
GA-Valdosta MSA	64	2,957	0.7	2,307	80.9	78.1	43.0	5.5	21.9	13.6	0.0
GA-Warner Robins MSA	250	18,800	2.9	2,287	83.0	65.2	46.7	3.9	34.0	13.1	0.8
Total	8,671	514,484	100.0	194,918	86.4	72.3	46.3	4.7	26.8	9.0	0.9

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Georgia - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2018**

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
GA-Athens MSA	0	0	0.0	82	3.0	0.0	0.0	16.3	0.0	19.5	37.2	0.0	62.2	43.0	0.0	18.3	0.6	0.0	0.0
GA-Atlanta MSA	5	360	10.6	502	3.4	0.0	1.0	21.2	40.0	25.3	40.4	60.0	44.6	34.9	0.0	28.9	0.1	0.0	0.2
GA-Brunswick MSA	1	107	2.1	20	2.7	0.0	5.0	18.0	100.0	30.0	36.9	0.0	40.0	42.4	0.0	25.0	0.0	0.0	0.0
GA-Dalton MSA	1	237	2.1	44	0.0	0.0	0.0	6.9	0.0	9.1	61.4	100.0	81.8	31.7	0.0	9.1	0.0	0.0	0.0
GA-Gainesville MSA	0	0	0.0	34	3.6	0.0	0.0	14.4	0.0	5.9	43.6	0.0	58.8	38.4	0.0	35.3	0.0	0.0	0.0
GA-Macon MSA	0	0	0.0	52	4.4	0.0	1.9	14.4	0.0	19.2	31.2	0.0	34.6	50.0	0.0	44.2	0.0	0.0	0.0
GA-Non-MSA	31	4,106	66.0	569	0.9	0.0	0.4	12.2	3.2	12.5	60.2	80.6	60.5	26.7	16.1	26.7	0.0	0.0	0.0
GA-Savannah MSA	6	471	12.8	32	3.5	0.0	3.1	17.2	0.0	0.0	44.8	16.7	50.0	34.5	83.3	46.9	0.0	0.0	0.0
GA-Valdosta MSA	0	0	0.0	55	3.2	0.0	0.0	13.0	0.0	14.5	57.5	0.0	63.6	26.3	0.0	21.8	0.0	0.0	0.0
GA-Warner Robins MSA	3	368	6.4	63	1.2	0.0	1.6	34.8	0.0	28.6	47.7	100.0	58.7	16.3	0.0	11.1	0.0	0.0	0.0
Total	47	5,649	100.0	1,453	2.9	0.0	0.8	19.1	8.5	18.0	43.9	70.2	54.3	33.9	21.3	26.8	0.1	0.0	0.1

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Georgia - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= IMM			Farms with Revenues > IMM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
GA-Athens MSA	0	0	0.0	82	95.9	0.0	29.3	1.7	0.0	2.3	0.0
GA-Atlanta MSA	5	360	10.6	502	95.5	20.0	38.4	2.5	80.0	2.0	0.0
GA-Brunswick MSA	1	107	2.1	20	96.9	100.0	25.0	1.2	0.0	2.0	0.0
GA-Dalton MSA	1	237	2.1	44	92.1	0.0	11.4	5.4	100.0	2.5	0.0
GA-Gainesville MSA	0	0	0.0	34	95.0	0.0	44.1	3.4	0.0	1.7	0.0
GA-Macon MSA	0	0	0.0	52	96.3	0.0	30.8	0.7	0.0	3.0	0.0
GA-Non-MSA	31	4,106	66.0	569	96.0	90.3	43.6	2.4	9.7	1.5	0.0
GA-Savannah MSA	6	471	12.8	32	95.8	0.0	15.6	2.4	100.0	1.7	0.0
GA-Valdosta MSA	0	0	0.0	55	93.9	0.0	34.5	4.7	0.0	1.5	0.0
GA-Warner Robins MSA	3	368	6.4	63	96.1	100.0	34.9	2.7	0.0	1.2	0.0
Total	47	5,649	100.0	1,453	95.6	70.2	38.0	2.5	29.8	1.9	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Pennsylvania - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
PA-Allentown MSA	613	98,793	12.8	21,280	3.5	6.5	4.4	14.9	13.7	17.0	46.5	43.7	44.2	35.1	36.1	34.4	0.0	0.0	0.0
PA-Chambersburg MSA	205	25,282	4.3	4,939	1.4	0.0	2.5	6.5	10.7	7.5	82.7	79.5	79.9	9.4	9.8	10.2	0.0	0.0	0.0
PA-East Stroudsburg MSA	43	4,023	0.9	5,042	0.0	0.0	0.0	8.0	7.0	8.6	86.4	81.4	87.0	5.6	11.6	4.3	0.0	0.0	0.0
PA-Gettysburg MSA	85	11,738	1.8	3,679	0.0	0.0	0.0	2.2	2.4	3.0	83.9	82.4	82.4	13.9	15.3	14.6	0.0	0.0	0.0
PA-Harrisburg MSA	260	49,950	5.4	18,511	2.7	1.2	2.3	12.2	8.5	11.3	58.5	58.8	55.7	26.6	31.5	30.7	0.0	0.0	0.0
PA-Lancaster MSA	1,026	120,830	21.4	15,671	1.6	2.4	2.3	8.8	6.9	10.6	76.1	79.5	73.5	13.5	11.1	13.6	0.0	0.0	0.0
PA-Lebanon MSA	52	7,516	1.1	4,048	1.3	0.0	1.0	12.1	11.5	13.5	67.8	67.3	64.7	18.8	21.2	20.8	0.0	0.0	0.0
PA-Montgomery County MD	858	143,066	17.9	67,483	1.6	1.5	1.8	16.4	17.8	16.7	49.9	51.2	49.6	32.2	29.5	31.9	0.0	0.0	0.0

Pennsylvania - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
PA-Non-MSA	366	31,104	7.6	6,212	0.0	0.0	0.0	8.9	6.6	5.5	77.0	86.9	77.2	14.1	6.6	17.3	0.0	0.0	0.0
PA-Philadelphia MD	206	101,113	4.3	52,717	7.0	5.8	4.3	24.3	16.0	22.2	23.5	15.0	23.8	45.1	63.1	49.7	0.0	0.0	0.0
PA-Reading MSA	365	37,258	7.6	11,504	7.1	2.7	5.6	4.1	2.5	4.5	61.1	61.6	61.4	27.7	33.2	28.5	0.0	0.0	0.0
PA-Scranton MSA	117	12,371	2.4	11,935	1.6	2.6	1.5	14.2	24.8	13.2	56.5	26.5	52.2	27.6	46.2	33.0	0.0	0.0	0.1
PA-State College MSA	48	9,744	1.0	3,591	0.0	0.0	0.0	16.0	8.3	17.3	51.7	37.5	47.9	31.5	50.0	33.8	0.8	4.2	1.1
PA-Williamsport MSA	139	11,530	2.9	3,066	1.4	2.2	1.4	7.2	5.8	8.1	84.3	81.3	82.5	7.0	10.8	8.0	0.0	0.0	0.0
PA-York MSA	412	68,257	8.6	15,701	3.3	1.7	2.3	6.2	6.6	6.0	70.9	68.4	70.3	19.6	23.3	21.3	0.0	0.0	0.0
Total	4,795	732,575	100.0	245,379	3.2	2.4	2.7	14.6	10.4	14.7	52.6	62.5	50.8	29.6	24.7	31.8	0.0	0.0	0.0

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

Pennsylvania -Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
PA-Allentown MSA	613	98,793	12.8	21,280	21.3	12.9	8.7	18.5	15.7	19.7	21.4	20.4	22.1	38.8	33.9	33.2	0.0	17.1	16.3
PA-Chambersburg MSA	205	25,282	4.3	4,939	18.6	10.2	8.1	19.9	18.0	22.7	22.3	22.9	23.8	39.2	34.6	30.1	0.0	14.1	15.2
PA-East Stroudsburg MSA	43	4,023	0.9	5,042	20.7	18.6	6.9	18.1	11.6	18.5	21.3	16.3	23.0	39.9	37.2	33.2	0.0	16.3	18.3
PA-Gettysburg MSA	85	11,738	1.8	3,679	17.9	7.1	8.1	18.6	24.7	20.0	24.3	12.9	24.6	39.3	34.1	32.1	0.0	21.2	15.2
PA-Harrisburg MSA	260	49,950	5.4	18,511	19.7	6.5	9.0	18.3	20.8	22.3	22.0	20.0	22.6	40.0	29.2	35.1	0.0	23.5	11.0
PA-Lancaster MSA	1,026	120,830	21.4	15,671	18.3	9.3	6.7	19.2	21.1	22.2	23.1	23.3	23.9	39.4	35.6	35.7	0.0	10.8	11.5
PA-Lebanon MSA	52	7,516	1.1	4,048	18.0	9.6	8.1	19.0	15.4	21.3	24.8	19.2	22.7	38.1	44.2	32.7	0.0	11.5	15.3
PA-Montgomery County MD	858	143,066	17.9	67,483	20.0	12.6	9.9	18.3	21.1	21.3	22.0	21.2	23.1	39.7	28.4	34.2	0.0	16.7	11.5

Pennsylvania - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
PA-Non-MSA	366	31,104	7.6	6,212	19.0	8.5	7.5	18.9	19.4	20.1	21.6	27.3	24.1	40.5	38.5	35.5	0.0	6.3	12.8
PA-Philadelphia MD	206	101,113	4.3	52,717	25.2	2.4	6.1	15.9	8.3	13.5	16.3	12.1	18.9	42.7	44.2	45.3	0.0	33.0	16.1
PA-Reading MSA	365	37,258	7.6	11,504	21.4	11.0	8.2	17.2	16.7	22.1	21.4	27.1	22.7	40.1	34.2	32.3	0.0	11.0	14.7
PA-Scranton MSA	117	12,371	2.4	11,935	21.3	14.5	10.2	17.6	12.8	19.2	20.5	19.7	22.3	40.6	30.8	34.8	0.0	22.2	13.6
PA-State College MSA	48	9,744	1.0	3,591	19.6	2.1	8.4	18.5	14.6	18.7	21.5	16.7	24.7	40.3	45.8	40.2	0.0	20.8	8.0
PA-Williamsport MSA	139	11,530	2.9	3,066	20.0	15.8	9.4	18.7	20.9	20.3	22.1	23.7	24.0	39.2	36.0	35.7	0.0	3.6	10.6
PA-York MSA	412	68,257	8.6	15,701	19.5	12.4	8.5	18.4	20.9	20.3	22.3	23.3	24.4	39.9	31.6	31.0	0.0	11.9	15.7
Total	4,795	732,575	100.0	245,379	21.1	10.6	8.3	17.8	18.9	19.4	20.7	22.0	22.2	40.3	33.9	36.4	0.0	14.6	13.7

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

Pennsylvania - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
PA-Allentown MSA	601	51,275	10.5	13,307	7.0	6.7	6.2	17.1	14.5	16.9	42.0	51.7	41.3	34.0	27.1	35.6	0.0	0.0	0.0
PA-Chambersburg MSA	204	16,726	3.6	2,079	4.7	2.0	4.0	8.4	11.8	6.2	79.6	76.5	82.7	7.3	9.8	7.1	0.0	0.0	0.0
PA-East Stroudsburg MSA	37	1,138	0.6	2,979	0.0	0.0	0.0	20.8	8.1	16.0	74.2	75.7	77.0	5.0	16.2	7.0	0.0	0.0	0.0
PA-Gettysburg MSA	94	7,636	1.6	1,492	0.0	0.0	0.0	11.7	2.1	10.4	77.3	91.5	79.3	11.0	6.4	10.3	0.0	0.0	0.0
PA-Harrisburg MSA	247	12,983	4.3	8,068	5.5	2.0	4.1	18.9	15.4	15.7	53.9	55.1	55.5	21.7	27.5	24.6	0.0	0.0	0.0
PA-Lancaster MSA	1,229	124,485	21.6	11,030	4.2	1.2	3.1	11.5	6.3	9.3	72.3	84.6	75.3	12.0	7.8	12.3	0.0	0.0	0.0
PA-Lebanon MSA	78	7,047	1.4	1,787	1.3	2.6	0.9	20.0	5.1	15.0	60.0	67.9	66.3	18.6	24.4	17.9	0.0	0.0	0.0
PA-Montgomery County MD	1,457	138,882	25.5	54,825	2.5	2.7	2.1	14.9	17.5	15.0	48.3	52.1	48.5	34.2	27.7	34.4	0.1	0.0	0.0

Pennsylvania - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
PA-Non-MSA	322	18,136	5.6	4,333	0.0	0.0	0.0	11.1	8.1	8.4	74.4	84.2	74.0	14.4	7.8	17.5	0.1	0.0	0.0
PA-Philadelphia MD	278	27,845	4.9	34,760	6.2	2.5	6.0	21.4	13.0	18.8	18.5	14.4	17.5	52.4	66.5	56.5	1.6	3.6	1.2
PA-Reading MSA	533	43,683	9.3	6,603	10.2	3.4	7.6	5.2	3.0	4.0	58.3	55.5	59.5	26.2	38.1	28.9	0.0	0.0	0.0
PA-Scranton MSA	93	4,764	1.6	9,485	2.7	8.6	2.4	19.1	25.8	17.9	51.9	46.2	51.7	24.2	19.4	26.0	2.1	0.0	1.8
PA-State College MSA	77	3,935	1.4	2,085	2.3	0.0	0.0	18.8	13.0	19.2	38.5	40.3	42.4	30.3	33.8	30.7	10.1	13.0	7.6
PA-Williamsport MSA	101	6,544	1.8	1,633	5.7	3.0	4.1	17.1	12.9	14.4	71.1	69.3	74.1	6.1	14.9	7.4	0.0	0.0	0.0
PA-York MSA	352	26,323	6.2	6,373	8.8	5.7	7.2	6.6	6.0	6.2	66.9	67.3	66.7	17.7	21.0	19.9	0.0	0.0	0.0
Total	5,703	491,402	100.0	160,839	4.5	2.8	3.8	16.1	11.2	14.7	46.4	62.4	47.1	32.3	23.3	33.9	0.7	0.4	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Pennsylvania - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
PA-Allentown MSA	601	51,275	10.5	13,307	83.6	78.5	47.6	5.6	19.3	10.8	2.2
PA-Chambersburg MSA	204	16,726	3.6	2,079	83.7	74.0	46.2	5.1	23.0	11.2	2.9
PA-East Stroudsburg MSA	37	1,138	0.6	2,979	86.1	91.9	45.7	4.3	8.1	9.6	0.0
PA-Gettysburg MSA	94	7,636	1.6	1,492	86.3	86.2	53.8	4.7	12.8	9.0	1.1
PA-Harrisburg MSA	247	12,983	4.3	8,068	79.7	79.8	45.6	6.0	19.8	14.4	0.4
PA-Lancaster MSA	1,229	124,485	21.6	11,030	83.6	68.8	50.0	6.8	28.8	9.5	2.4
PA-Lebanon MSA	78	7,047	1.4	1,787	82.8	71.8	48.3	5.9	26.9	11.2	1.3
PA-Montgomery County MD	1,457	138,882	25.5	54,825	85.6	72.5	45.4	6.4	26.9	8.0	0.6
PA-Non-MSA	322	18,136	5.6	4,333	80.4	88.2	45.8	5.8	11.5	13.8	0.3
PA-Philadelphia MD	278	27,845	4.9	34,760	86.6	75.9	45.1	5.0	23.7	8.4	0.4
PA-Reading MSA	533	43,683	9.3	6,603	83.0	75.6	47.9	6.5	23.8	10.4	0.6
PA-Scranton MSA	93	4,764	1.6	9,485	81.9	86.0	42.2	6.0	12.9	12.0	1.1
PA-State College MSA	77	3,935	1.4	2,085	79.7	76.6	46.0	5.5	22.1	14.7	1.3
PA-Williamsport MSA	101	6,544	1.8	1,633	79.9	83.2	40.2	6.0	16.8	14.1	0.0
PA-York MSA	352	26,323	6.2	6,373	83.2	79.3	48.3	6.0	19.3	10.8	1.4
Total	5,703	491,402	100.0	160,839	84.3	75.3	45.9	5.9	23.5	9.8	1.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Pennsylvania - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
PA-Allentown MSA	4	653	1.0	100	2.2	25.0	1.0	8.3	0.0	7.0	50.3	50.0	57.0	39.1	25.0	35.0	0.0	0.0	0.0
PA-Chambersburg MSA	3	380	0.8	172	1.2	0.0	0.0	2.2	0.0	0.6	90.3	100.0	95.3	6.2	0.0	4.1	0.0	0.0	0.0
PA-East Stroudsburg MSA	0	0	0.0	18	0.0	0.0	0.0	5.4	0.0	0.0	84.6	0.0	72.2	10.0	0.0	27.8	0.0	0.0	0.0
PA-Gettysburg MSA	2	61	0.5	113	0.0	0.0	0.0	0.9	0.0	0.0	82.3	50.0	85.0	16.8	50.0	15.0	0.0	0.0	0.0
PA-Harrisburg MSA	7	555	1.8	234	0.9	0.0	0.4	8.8	0.0	6.0	69.9	71.4	80.8	20.5	28.6	12.8	0.0	0.0	0.0
PA-Lancaster MSA	204	29,614	53.3	1,306	0.6	0.0	0.0	3.1	0.0	0.1	85.5	99.0	94.9	10.8	1.0	5.1	0.0	0.0	0.0
PA-Lebanon MSA	4	1,076	1.0	226	0.0	0.0	0.0	3.9	0.0	0.4	78.1	100.0	88.9	18.1	0.0	10.6	0.0	0.0	0.0
PA-Montgomery County MD	123	14,031	32.1	472	1.4	0.0	0.4	15.5	45.5	31.1	53.4	46.3	51.3	29.8	8.1	17.2	0.0	0.0	0.0

Pennsylvania - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
PA-Non-MSA	10	1,839	2.6	244	0.0	0.0	0.0	1.3	0.0	0.0	80.7	100.0	89.8	18.0	0.0	10.2	0.0	0.0	0.0
PA-Philadelphia MD	0	0	0.0	17	2.9	0.0	5.9	11.0	0.0	0.0	15.1	0.0	5.9	70.1	0.0	88.2	0.9	0.0	0.0
PA-Reading MSA	4	932	1.0	323	1.2	0.0	0.0	0.6	0.0	0.3	70.4	75.0	87.9	27.9	25.0	11.8	0.0	0.0	0.0
PA-Scranton MSA	0	0	0.0	54	1.2	0.0	0.0	10.3	0.0	0.0	54.6	0.0	66.7	33.8	0.0	33.3	0.0	0.0	0.0
PA-State College MSA	0	0	0.0	146	0.5	0.0	0.0	15.3	0.0	47.9	55.2	0.0	37.7	27.7	0.0	14.4	1.3	0.0	0.0
PA-Williamsport MSA	3	690	0.8	63	0.3	0.0	0.0	3.7	0.0	0.0	91.3	100.0	98.4	4.7	0.0	1.6	0.0	0.0	0.0
PA-York MSA	19	2,674	5.0	212	1.5	0.0	0.0	3.5	5.3	2.4	75.1	94.7	89.2	19.9	0.0	8.5	0.0	0.0	0.0
Total	383	52,505	100.0	3,700	1.2	0.3	0.1	8.4	14.9	6.7	62.9	80.4	82.4	27.4	4.4	10.8	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Pennsylvania - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
PA-Allentown MSA	4	653	1.0	100	95.9	75.0	56.0	2.2	25.0	1.9	0.0
PA-Chambersburg MSA	3	380	0.8	172	95.8	100.0	61.6	3.0	0.0	1.2	0.0
PA-East Stroudsburg MSA	0	0	0.0	18	97.9	0.0	61.1	0.8	0.0	1.3	0.0
PA-Gettysburg MSA	2	61	0.5	113	95.0	100.0	54.0	3.5	0.0	1.5	0.0
PA-Harrisburg MSA	7	555	1.8	234	96.5	100.0	56.4	1.9	0.0	1.6	0.0
PA-Lancaster MSA	204	29,614	53.3	1,306	95.5	91.2	85.1	3.4	6.9	1.1	2.0
PA-Lebanon MSA	4	1,076	1.0	226	97.3	75.0	74.3	1.2	25.0	1.4	0.0
PA-Montgomery County MD	123	14,031	32.1	472	94.2	81.3	62.3	4.0	13.8	1.8	4.9
PA-Non-MSA	10	1,839	2.6	244	97.1	100.0	62.3	2.2	0.0	0.7	0.0
PA-Philadelphia MD	0	0	0.0	17	94.6	0.0	52.9	2.9	0.0	2.5	0.0
PA-Reading MSA	4	932	1.0	323	95.7	75.0	67.2	2.9	25.0	1.5	0.0
PA-Scranton MSA	0	0	0.0	54	96.6	0.0	50.0	2.4	0.0	1.0	0.0
PA-State College MSA	0	0	0.0	146	96.9	0.0	78.8	1.6	0.0	1.6	0.0
PA-Williamsport MSA	3	690	0.8	63	97.8	66.7	58.7	1.6	33.3	0.6	0.0
PA-York MSA	19	2,674	5.0	212	96.7	78.9	70.8	1.5	21.1	1.7	0.0
Total	383	52,505	100.0	3,700	95.6	87.2	71.5	2.9	10.2	1.6	2.6

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Texas - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
TX-Austin MSA	432	168,663	12.3	79,578	3.8	4.2	3.6	18.1	11.3	15.7	40.3	28.9	43.0	37.6	54.9	37.5	0.2	0.7	0.2	
TX-College Station MSA	94	22,100	2.7	5,452	2.4	0.0	4.1	21.4	11.7	20.2	36.8	30.9	31.0	39.3	57.4	44.7	0.0	0.0	0.0	
TX-Dallas MD	1,346	402,870	38.4	157,727	5.4	4.5	3.3	20.4	16.1	13.4	28.9	23.6	30.7	45.2	55.6	52.5	0.1	0.2	0.1	
TX-Fort Worth MD	486	121,582	13.9	81,659	4.7	1.0	2.3	16.6	10.1	12.9	41.5	35.6	42.1	37.3	53.3	42.7	0.0	0.0	0.0	
TX-Houston MSA	906	275,132	25.9	177,339	5.2	5.4	2.8	21.3	25.9	14.2	29.4	17.6	28.6	44.1	51.1	54.4	0.1	0.0	0.0	
TX-Midland MSA	13	2,926	0.4	6,295	2.7	0.0	1.3	12.9	0.0	7.3	43.7	30.8	37.7	40.6	69.2	53.8	0.0	0.0	0.0	
TX-Odessa MSA	17	2,672	0.5	3,989	1.6	0.0	1.0	21.4	5.9	9.4	42.7	35.3	26.6	34.3	58.8	63.1	0.0	0.0	0.0	
TX-San Antonio MSA	209	79,092	6.0	72,674	4.1	1.0	1.3	22.3	9.6	13.0	31.9	25.4	32.9	41.6	64.1	52.7	0.0	0.0	0.0	
Total	3,503	1,075,037	100.0	584,713	4.8	3.8	2.8	20.1	16.6	13.8	32.8	24.7	33.7	42.2	54.7	49.7	0.1	0.2	0.1	

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

Texas - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
TX-Austin MSA	432	168,663	12.3	79,578	22.5	1.4	3.8	16.9	4.2	15.3	19.8	6.3	21.9	40.8	29.9	44.8	0.0	58.3	14.3
TX-College Station MSA	94	22,100	2.7	5,452	24.3	4.3	3.4	16.3	10.6	14.1	17.7	18.1	18.5	41.8	58.5	47.1	0.0	8.5	16.9
TX-Dallas MD	1,346	402,870	38.4	157,727	23.7	1.7	3.7	16.5	5.2	12.6	17.6	9.0	19.3	42.2	35.0	47.0	0.0	49.1	17.4
TX-Fort Worth MD	486	121,582	13.9	81,659	22.6	1.6	4.4	16.7	5.1	14.4	19.6	9.1	21.9	41.1	28.0	40.6	0.0	56.2	18.7
TX-Houston MSA	906	275,132	25.9	177,339	24.4	0.7	3.8	16.1	2.0	14.2	17.1	4.3	19.5	42.4	21.0	43.3	0.0	72.1	19.2
TX-Midland MSA	13	2,926	0.4	6,295	21.9	7.7	7.2	17.5	7.7	18.3	20.2	7.7	24.0	40.4	30.8	33.3	0.0	46.2	17.1
TX-Odessa MSA	17	2,672	0.5	3,989	21.8	0.0	4.6	17.3	29.4	18.1	20.5	0.0	25.7	40.4	41.2	32.8	0.0	29.4	18.8
TX-San Antonio MSA	209	79,092	6.0	72,674	22.3	1.4	3.3	17.3	6.7	12.1	19.2	5.7	21.4	41.2	16.7	42.2	0.0	69.4	21.0
Total	3,503	1,075,037	100.0	584,713	23.5	1.5	3.8	16.5	4.6	13.8	18.1	7.5	20.4	41.8	29.3	43.8	0.0	57.2	18.2

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

Texas - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
TX-Austin MSA	600	38,233	12.3	55,327	6.8	9.5	7.1	14.3	13.5	14.6	33.8	36.7	34.2	43.8	39.2	43.4	1.3	1.2	0.8
TX-College Station MSA	256	18,278	5.2	4,287	7.8	3.1	4.3	23.7	30.1	23.0	34.4	33.6	34.2	33.7	33.2	38.5	0.4	0.0	0.0
TX-Dallas MD	1,922	95,283	39.3	121,564	7.3	9.1	7.1	18.8	20.1	18.6	26.2	27.4	24.9	46.9	42.2	48.4	0.8	1.2	1.0
TX-Fort Worth MD	538	26,799	11.0	52,434	6.3	5.2	6.2	19.2	23.2	18.7	34.8	34.9	34.1	39.5	36.4	40.8	0.1	0.2	0.1
TX-Houston MSA	1,018	56,359	20.8	166,512	9.8	10.7	9.8	19.1	24.5	18.4	23.6	26.2	23.3	47.3	38.5	48.3	0.2	0.1	0.2
TX-Midland MSA	39	1,225	0.8	4,675	1.5	2.6	2.2	23.4	20.5	18.4	37.7	46.2	41.2	36.7	30.8	37.6	0.8	0.0	0.5
TX-Odessa MSA	50	3,038	1.0	3,376	1.4	0.0	1.2	22.5	20.0	20.9	34.1	38.0	35.9	42.0	42.0	42.0	0.0	0.0	0.0
TX-San Antonio MSA	468	27,567	9.6	38,751	4.4	6.0	3.8	20.1	18.6	18.7	31.4	32.5	30.9	43.9	42.5	46.3	0.2	0.4	0.2
Total	4,891	266,782	100.0	446,926	7.6	8.3	7.6	18.6	20.9	18.1	28.1	30.2	27.4	45.2	39.9	46.4	0.5	0.7	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Texas - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
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
TX-Austin MSA	600	38,233	12.3	55,327	86.3	77.2	42.8	4.5	21.7	9.2	1.2
TX-College Station MSA	256	18,278	5.2	4,287	80.2	75.4	39.0	5.2	22.7	14.7	2.0
TX-Dallas MD	1,922	95,283	39.3	121,564	85.9	76.5	42.1	5.2	22.8	9.0	0.7
TX-Fort Worth MD	538	26,799	11.0	52,434	85.6	75.8	42.4	4.6	23.8	9.8	0.4
TX-Houston MSA	1,018	56,359	20.8	166,512	85.4	78.8	40.7	5.8	20.7	8.8	0.5
TX-Midland MSA	39	1,225	0.8	4,675	80.4	87.2	28.8	7.4	10.3	12.3	2.6
TX-Odessa MSA	50	3,038	1.0	3,376	78.4	90.0	24.3	7.4	8.0	14.2	2.0
TX-San Antonio MSA	468	27,567	9.6	38,751	84.8	75.6	42.7	4.8	23.9	10.4	0.4
Total	4,891	266,782	100.0	446,926	85.5	77.1	41.4	5.2	22.2	9.3	0.7

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Texas - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
TX-Austin MSA	0	0	0.0	422	4.6	0.0	2.8	18.0	0.0	23.9	40.4	0.0	46.0	36.8	0.0	27.0	0.2	0.0	0.2
TX-College Station MSA	0	0	0.0	200	4.6	0.0	2.0	13.0	0.0	9.0	46.1	0.0	62.0	36.2	0.0	27.0	0.2	0.0	0.0
TX-Dallas MD	3	183	75.0	852	5.4	0.0	1.3	17.7	100.0	18.9	32.2	0.0	45.4	44.0	0.0	34.4	0.6	0.0	0.0
TX-Fort Worth MD	1	30	25.0	624	3.5	0.0	0.6	13.8	100.0	8.0	42.7	0.0	54.5	40.0	0.0	36.9	0.0	0.0	0.0
TX-Houston MSA	0	0	0.0	921	5.3	0.0	1.4	17.1	0.0	17.9	31.6	0.0	41.9	45.9	0.0	38.8	0.1	0.0	0.0
TX-Midland MSA	0	0	0.0	70	0.5	0.0	0.0	13.1	0.0	4.3	47.4	0.0	61.4	38.7	0.0	34.3	0.3	0.0	0.0
TX-Odessa MSA	0	0	0.0	9	2.3	0.0	0.0	7.6	0.0	11.1	29.0	0.0	11.1	61.1	0.0	77.8	0.0	0.0	0.0
TX-San Antonio MSA	0	0	0.0	338	2.0	0.0	0.6	13.0	0.0	7.4	37.5	0.0	49.7	47.5	0.0	42.3	0.1	0.0	0.0
Total	4	213	100.0	3,436	4.5	0.0	1.3	16.2	100.0	15.3	35.8	0.0	47.8	43.3	0.0	35.6	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Texas - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2018**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
TX-Austin MSA	0	0	0.0	422	96.0	0.0	41.2	2.2	0.0	1.8	0.0
TX-College Station MSA	0	0	0.0	200	95.4	0.0	55.0	1.5	0.0	3.1	0.0
TX-Dallas MD	3	183	75.0	852	94.9	0.0	52.3	2.6	100.0	2.5	0.0
TX-Fort Worth MD	1	30	25.0	624	95.3	100.0	47.4	2.4	0.0	2.3	0.0
TX-Houston MSA	0	0	0.0	921	95.0	0.0	51.9	2.7	0.0	2.4	0.0
TX-Midland MSA	0	0	0.0	70	98.2	0.0	28.6	1.3	0.0	0.5	0.0
TX-Odessa MSA	0	0	0.0	9	96.9	0.0	11.1	0.8	0.0	2.3	0.0
TX-San Antonio MSA	0	0	0.0	338	95.9	0.0	48.8	2.2	0.0	2.0	0.0
Total	4	213	100.0	3,436	95.3	25.0	49.2	2.4	75.0	2.2	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data. "--" data not available.
 Due to rounding, totals may not equal 100.0

Maryland - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
MD-Baltimore MSA	2,277	541,920	58.9	89,323	4.9	2.5	3.4	17.3	17.6	15.6	38.2	31.4	40.4	39.5	48.4	40.5	0.1	0.1	0.1
MD-California MD	64	14,997	1.7	3,822	2.7	1.6	5.2	8.6	17.2	7.5	67.7	64.1	68.6	21.0	17.2	18.7	0.0	0.0	0.0
MD-Non-MSA	201	35,636	5.2	4,606	1.0	0.5	0.6	11.7	5.5	11.2	74.8	86.1	73.7	12.4	8.0	14.5	0.0	0.0	0.0
MD-Salisbury MSA	166	24,560	4.3	6,073	1.6	1.2	0.7	14.2	7.2	10.2	46.5	45.2	44.8	37.6	45.8	44.2	0.0	0.6	0.1
MD-Silver Spring MD	1,113	372,863	28.8	40,412	3.2	3.1	3.5	17.9	16.5	17.9	40.4	40.2	43.5	38.5	40.2	35.0	0.1	0.1	0.1
MD-Wilmington MD	48	9,091	1.2	3,180	2.3	0.0	2.2	3.3	0.0	3.6	75.7	83.3	76.1	18.8	16.7	18.1	0.0	0.0	0.0
Total	3,869	999,066	100.0	147,416	4.1	2.5	3.3	16.6	16.0	15.4	42.1	38.5	44.0	37.2	42.9	37.3	0.1	0.1	0.1

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

Maryland - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
MD-Baltimore MSA	2,277	541,920	58.9	89,323	22.3	7.0	8.9	17.0	11.0	19.1	19.8	15.2	20.4	40.8	26.1	32.1	0.0	40.8	19.6
MD-California MD	64	14,997	1.7	3,822	20.1	1.6	9.0	16.9	15.6	21.7	24.6	37.5	23.7	38.3	23.4	24.7	0.0	21.9	20.8
MD-Non-MSA	201	35,636	5.2	4,606	21.1	7.5	6.9	17.5	14.9	17.1	21.2	20.9	18.3	40.2	46.3	40.1	0.0	10.4	17.5
MD-Salisbury MSA	166	24,560	4.3	6,073	22.1	6.0	6.3	17.3	10.8	14.6	20.1	21.7	17.8	40.5	48.8	45.2	0.0	12.7	16.1
MD-Silver Spring MD	1,113	372,863	28.8	40,412	21.7	7.5	10.6	17.1	12.8	19.6	20.8	12.8	21.7	40.5	21.5	32.8	0.0	45.5	15.4
MD-Wilmington MD	48	9,091	1.2	3,180	20.9	6.3	11.0	18.1	6.3	21.5	22.4	8.3	21.7	38.5	25.0	23.6	0.0	54.2	22.2
Total	3,869	999,066	100.0	147,416	22.0	7.1	9.2	17.1	11.7	19.1	20.3	15.3	20.7	40.6	26.7	32.7	0.0	39.2	18.3

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

Maryland - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
MD-Baltimore MSA	2,872	170,556	58.0	62,142	5.1	3.0	4.2	15.4	14.5	13.9	38.2	35.4	37.3	40.5	46.8	44.2	0.8	0.2	0.5
MD-California MD	87	7,552	1.8	1,636	6.2	3.4	4.1	9.9	4.6	8.3	63.2	75.9	66.3	20.8	16.1	21.3	0.0	0.0	0.0
MD-Non-MSA	202	8,544	4.1	3,037	1.4	2.0	1.0	17.8	12.9	14.1	66.1	75.7	69.6	14.7	9.4	15.3	0.0	0.0	0.0
MD-Salisbury MSA	253	9,165	5.1	3,941	1.1	3.2	1.8	15.8	11.5	14.5	51.0	36.0	47.8	31.9	49.0	35.8	0.1	0.4	0.2
MD-Silver Spring MD	1,490	70,734	30.1	34,343	4.5	4.3	4.1	20.9	24.5	21.8	35.8	42.6	35.7	38.6	28.4	38.4	0.1	0.2	0.1
MD-Wilmington MD	46	1,933	0.9	1,586	9.8	13.0	8.1	5.2	0.0	3.5	70.8	71.7	72.5	14.2	15.2	15.9	0.0	0.0	0.0
Total	4,950	268,484	100.0	106,685	4.8	3.5	4.0	17.0	17.0	16.2	39.9	40.3	39.0	37.9	39.0	40.4	0.5	0.2	0.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Maryland - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MD-Baltimore MSA	2,872	170,556	58.0	62,142	83.8	79.5	45.5	6.1	20.0	10.1	0.6
MD-California MD	87	7,552	1.8	1,636	81.8	70.1	49.6	4.9	28.7	13.3	1.1
MD-Non-MSA	202	8,544	4.1	3,037	81.3	80.2	43.1	6.2	19.8	12.4	0.0
MD-Salisbury MSA	253	9,165	5.1	3,941	81.3	85.4	45.9	5.6	14.2	13.1	0.4
MD-Silver Spring MD	1,490	70,734	30.1	34,343	86.0	74.0	47.1	5.7	25.4	8.2	0.6
MD-Wilmington MD	46	1,933	0.9	1,586	84.6	80.4	45.6	4.2	19.6	11.2	0.0
Total	4,950	268,484	100.0	106,685	84.3	78.0	46.0	5.9	21.5	9.8	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Maryland - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
MD-Baltimore MSA	1	153	8.3	364	1.2	0.0	0.3	11.2	0.0	6.3	39.2	100.0	46.4	48.4	0.0	47.0	0.1	0.0	0.0
MD-California MD	0	0	0.0	63	1.4	0.0	0.0	7.3	0.0	4.8	72.6	0.0	87.3	18.7	0.0	7.9	0.0	0.0	0.0
MD-Non-MSA	0	0	0.0	199	0.2	0.0	0.0	7.2	0.0	5.5	82.7	0.0	90.5	9.9	0.0	4.0	0.0	0.0	0.0
MD-Salisbury MSA	3	622	25.0	132	0.3	0.0	0.0	14.7	0.0	6.1	47.9	100.0	65.9	36.5	0.0	26.5	0.7	0.0	1.5
MD-Silver Spring MD	1	330	8.3	157	3.2	0.0	0.6	21.9	0.0	19.1	43.8	0.0	62.4	31.0	100.0	17.8	0.0	0.0	0.0
MD-Wilmington MD	7	883	58.3	70	2.4	0.0	0.0	2.4	0.0	0.0	70.0	71.4	78.6	25.3	28.6	21.4	0.0	0.0	0.0
Total	12	1,988	100.0	985	1.6	0.0	0.2	13.4	0.0	7.6	47.6	75.0	65.4	37.3	25.0	26.6	0.1	0.0	0.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Maryland - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MD-Baltimore MSA	1	153	8.3	364	94.3	0.0	37.1	3.5	100.0	2.2	0.0
MD-California MD	0	0	0.0	63	95.0	0.0	58.7	1.8	0.0	3.2	0.0
MD-Non-MSA	0	0	0.0	199	97.0	0.0	32.7	1.6	0.0	1.4	0.0
MD-Salisbury MSA	3	622	25.0	132	95.5	0.0	46.2	1.8	100.0	2.6	0.0
MD-Silver Spring MD	1	330	8.3	157	93.6	100.0	23.6	3.8	0.0	2.6	0.0
MD-Wilmington MD	7	883	58.3	70	93.9	57.1	41.4	4.4	42.9	1.7	0.0
Total	12	1,988	100.0	985	94.5	41.7	37.0	3.2	58.3	2.2	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

South Carolina - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2018**

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
SC-Charleston MSA	632	224,091	17.4	32,040	3.3	2.1	2.4	19.1	10.8	11.9	42.4	32.0	45.6	34.9	54.7	39.7	0.3	0.5	0.4
SC-Columbia MSA	810	179,232	22.3	25,623	2.7	1.4	1.4	24.6	12.0	15.6	36.0	29.9	32.3	36.7	56.8	50.7	0.0	0.0	0.0
SC-Florence MSA	125	17,410	3.4	3,501	1.3	0.8	0.3	16.5	2.4	12.1	51.9	25.6	43.1	30.3	71.2	44.5	0.0	0.0	0.0
SC-Greenville MSA	1,122	242,967	30.9	29,013	3.1	2.2	2.4	20.9	13.5	15.6	43.6	40.4	42.0	32.4	43.9	40.1	0.0	0.0	0.0
SC-Hilton Head MSA	147	52,892	4.0	9,781	0.0	0.0	0.0	27.1	15.6	17.1	45.1	53.7	54.8	27.8	30.6	28.0	0.0	0.0	0.0
SC-Non-MSA	324	60,436	8.9	6,988	0.0	0.0	0.0	7.5	0.9	4.9	59.5	37.7	41.8	33.0	61.4	53.2	0.0	0.0	0.0
SC-Spartanburg MSA	388	61,385	10.7	10,536	2.0	0.5	1.1	18.8	11.9	11.1	47.6	39.7	46.1	31.5	47.9	41.7	0.0	0.0	0.0
SC-Sumter MSA	86	8,990	2.4	2,363	0.0	0.0	0.0	15.4	10.5	7.4	64.1	65.1	62.7	20.5	24.4	29.9	0.0	0.0	0.0
Total	3,634	847,401	100.0	119,845	2.3	1.4	1.6	19.7	11.0	13.5	44.9	36.9	42.7	33.1	50.6	42.1	0.1	0.1	0.1

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

South Carolina - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
SC-Charleston MSA	632	224,091	17.4	32,040	22.6	5.9	6.1	16.7	14.6	17.9	19.9	16.1	21.8	40.8	47.5	39.3	0.0	16.0	14.8
SC-Columbia MSA	810	179,232	22.3	25,623	23.1	7.3	8.0	16.7	13.1	20.1	19.5	20.6	20.8	40.8	45.8	32.4	0.0	13.2	18.6
SC-Florence MSA	125	17,410	3.4	3,501	23.5	4.0	4.7	16.2	9.6	16.3	19.9	10.4	21.5	40.4	64.0	40.8	0.0	12.0	16.8
SC-Greenville MSA	1,122	242,967	30.9	29,013	22.9	7.8	7.0	17.1	14.6	18.6	18.8	17.9	22.0	41.2	41.7	37.9	0.0	17.9	14.5
SC-Hilton Head MSA	147	52,892	4.0	9,781	20.1	2.0	3.9	19.5	10.2	12.9	20.0	12.2	18.8	40.4	67.3	51.8	0.0	8.2	12.6
SC-Non-MSA	324	60,436	8.9	6,988	19.8	2.2	2.8	17.2	7.7	10.4	17.7	15.1	16.8	45.3	68.5	55.7	0.0	6.5	14.3
SC-Spartanburg MSA	388	61,385	10.7	10,536	21.8	5.4	6.0	17.6	17.8	21.0	19.0	21.6	24.5	41.6	45.1	33.3	0.0	10.1	15.1
SC-Sumter MSA	86	8,990	2.4	2,363	20.1	4.7	2.9	19.8	17.4	11.9	19.3	16.3	25.1	40.7	48.8	43.6	0.0	12.8	16.5
Total	3,634	847,401	100.0	119,845	22.3	6.2	6.3	17.1	13.7	17.8	19.2	17.8	21.4	41.4	48.3	39.1	0.0	14.0	15.4

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

South Carolina - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
SC-Charleston MSA	728	39,807	15.8	16,841	7.6	8.9	7.2	19.4	20.6	16.7	34.0	30.6	31.1	37.3	39.6	43.2	1.6	0.3	1.8
SC-Columbia MSA	1,354	70,910	29.3	13,765	9.4	5.5	6.4	24.0	27.9	22.6	32.4	36.3	32.9	33.6	30.2	37.9	0.7	0.1	0.1
SC-Florence MSA	182	14,861	3.9	2,215	3.9	6.6	3.0	24.9	16.5	21.4	40.3	37.9	41.8	30.8	39.0	33.9	0.1	0.0	0.0
SC-Greenville MSA	1,123	76,189	24.3	16,236	6.0	7.9	5.4	18.9	22.3	15.6	39.8	35.8	39.3	35.4	34.0	39.6	0.0	0.0	0.0
SC-Hilton Head MSA	231	11,462	5.0	5,193	0.0	0.0	0.0	25.9	27.3	25.0	48.7	51.1	46.3	25.4	21.6	28.6	0.0	0.0	0.0
SC-Non-MSA	368	14,740	8.0	4,338	0.0	0.0	0.0	9.3	8.4	7.2	53.9	49.7	48.8	36.8	41.8	44.0	0.0	0.0	0.0
SC-Spartanburg MSA	468	42,985	10.1	4,771	2.3	1.7	1.5	24.4	21.8	20.1	40.7	36.8	41.8	32.5	39.7	36.6	0.0	0.0	0.0
SC-Sumter MSA	163	7,190	3.5	1,153	0.0	0.0	0.0	35.5	44.2	41.8	51.6	45.4	46.7	12.8	10.4	11.4	0.0	0.0	0.0
Total	4,617	278,144	100.0	64,512	5.7	5.4	4.8	21.0	23.3	18.6	39.0	37.5	37.4	33.8	33.7	38.7	0.5	0.1	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

South Carolina - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
SC-Charleston MSA	728	39,807	15.8	16,841	83.0	77.7	44.5	5.4	21.4	11.6	0.8
SC-Columbia MSA	1,354	70,910	29.3	13,765	80.8	76.4	45.3	5.6	22.7	13.6	1.0
SC-Florence MSA	182	14,861	3.9	2,215	78.9	66.5	44.2	6.2	30.8	14.9	2.7
SC-Greenville MSA	1,123	76,189	24.3	16,236	80.9	75.2	46.8	6.2	22.3	12.9	2.6
SC-Hilton Head MSA	231	11,462	5.0	5,193	84.9	74.9	46.0	5.3	23.8	9.9	1.3
SC-Non-MSA	368	14,740	8.0	4,338	80.7	87.0	47.1	5.1	11.7	14.2	1.4
SC-Spartanburg MSA	468	42,985	10.1	4,771	79.4	74.4	46.3	6.7	23.7	13.9	1.9
SC-Sumter MSA	163	7,190	3.5	1,153	82.6	69.9	42.3	4.8	29.4	12.7	0.6
Total	4,617	278,144	100.0	64,512	81.4	76.2	45.6	5.8	22.2	12.8	1.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

South Carolina - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
SC-Charleston MSA	0	0	0.0	63	3.1	0.0	0.0	19.8	0.0	22.2	45.5	0.0	60.3	31.1	0.0	17.5	0.4	0.0	0.0
SC-Columbia MSA	4	112	40.0	227	1.9	0.0	1.8	28.9	25.0	38.3	38.5	75.0	46.7	30.7	0.0	13.2	0.0	0.0	0.0
SC-Florence MSA	0	0	0.0	84	0.3	0.0	0.0	14.9	0.0	20.2	57.8	0.0	53.6	27.0	0.0	26.2	0.0	0.0	0.0
SC-Greenville MSA	1	25	10.0	137	2.5	0.0	1.5	20.0	0.0	29.2	49.7	100.0	46.0	27.8	0.0	23.4	0.0	0.0	0.0
SC-Hilton Head MSA	0	0	0.0	24	0.0	0.0	0.0	36.8	0.0	58.3	47.1	0.0	29.2	16.0	0.0	12.5	0.0	0.0	0.0
SC-Non-MSA	3	53	30.0	194	0.0	0.0	0.0	6.8	0.0	10.3	67.2	33.3	71.6	25.9	66.7	18.0	0.0	0.0	0.0
SC-Spartanburg MSA	2	148	20.0	31	1.1	0.0	0.0	19.7	50.0	12.9	47.9	0.0	67.7	31.4	50.0	19.4	0.0	0.0	0.0
SC-Sumter MSA	0	0	0.0	27	0.0	0.0	0.0	15.5	0.0	11.1	72.5	0.0	74.1	11.9	0.0	14.8	0.0	0.0	0.0
Total	10	338	100.0	787	1.7	0.0	0.8	20.9	20.0	25.3	49.6	50.0	55.8	27.7	30.0	18.2	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

South Carolina - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
SC-Charleston MSA	0	0	0.0	63	93.9	0.0	44.4	3.8	0.0	2.3	0.0
SC-Columbia MSA	4	112	40.0	227	96.0	75.0	38.8	2.9	25.0	1.1	0.0
SC-Florence MSA	0	0	0.0	84	97.8	0.0	27.4	0.8	0.0	1.4	0.0
SC-Greenville MSA	1	25	10.0	137	96.8	100.0	42.3	1.5	0.0	1.8	0.0
SC-Hilton Head MSA	0	0	0.0	24	92.1	0.0	50.0	5.7	0.0	2.2	0.0
SC-Non-MSA	3	53	30.0	194	95.9	66.7	36.6	2.9	33.3	1.2	0.0
SC-Spartanburg MSA	2	148	20.0	31	95.7	100.0	41.9	1.9	0.0	2.4	0.0
SC-Sumter MSA	0	0	0.0	27	96.9	0.0	33.3	2.6	0.0	0.5	0.0
Total	10	338	100.0	787	95.6	80.0	38.4	2.8	20.0	1.7	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

West Virginia - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
WV-Beckley MSA	132	12,300	8.4	1,931	0.0	0.0	0.0	7.9	4.5	5.4	81.3	74.2	77.5	10.7	21.2	17.0	0.0	0.0	0.0
WV-Charleston MSA	264	27,710	16.9	3,927	1.0	1.5	1.0	17.6	12.9	17.2	56.7	53.4	49.0	24.7	32.2	32.8	0.0	0.0	0.0
WV-Huntington MSA	172	19,600	11.0	4,198	2.9	2.3	2.1	15.2	8.1	8.0	51.2	38.4	47.7	30.7	51.2	41.7	0.0	0.0	0.5
WV-Morgantown MSA	222	32,996	14.2	3,162	0.0	0.0	0.2	21.7	15.8	14.7	50.1	41.0	46.9	28.2	43.2	38.2	0.0	0.0	0.0
WV-Non-MSA	530	50,864	33.9	6,320	0.1	0.0	0.2	12.0	7.5	7.7	55.6	44.9	48.7	32.4	47.5	43.4	0.0	0.0	0.0
WV-Parkersburg MSA	97	8,363	6.2	1,771	0.0	0.0	0.0	7.9	6.2	5.8	69.7	70.1	67.3	22.4	23.7	26.9	0.0	0.0	0.0
WV-Wheeling MSA	146	13,587	9.3	1,351	0.0	0.0	0.0	8.4	0.7	6.0	65.3	74.7	60.3	26.2	24.7	33.7	0.0	0.0	0.0
Total	1,563	165,420	100.0	22,660	0.7	0.5	0.6	13.5	8.7	9.9	58.9	51.9	52.9	26.9	38.9	36.4	0.0	0.0	0.1

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

West Virginia - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
WV-Beckley MSA	132	12,300	8.4	1,931	20.7	6.1	5.9	18.2	9.8	14.6	20.7	25.8	21.1	40.5	55.3	45.5	0.0	3.0	12.9
WV-Charleston MSA	264	27,710	16.9	3,927	21.9	9.1	8.0	17.5	18.6	17.7	19.5	15.5	22.4	41.2	47.3	40.2	0.0	9.5	11.6
WV-Huntington MSA	172	19,600	11.0	4,198	22.6	3.5	5.9	16.8	15.7	15.3	19.4	23.8	23.3	41.1	47.7	44.2	0.0	9.3	11.3
WV-Morgantown MSA	222	32,996	14.2	3,162	22.1	8.1	6.5	16.5	18.5	18.0	22.0	24.8	21.3	39.4	42.8	45.3	0.0	5.9	8.9
WV-Non-MSA	530	50,864	33.9	6,320	20.9	7.0	5.1	16.8	12.1	12.9	18.6	20.6	22.2	43.7	55.3	47.3	0.0	5.1	12.6
WV-Parkersburg MSA	97	8,363	6.2	1,771	20.5	4.1	7.7	17.5	12.4	16.2	20.6	30.9	24.1	41.3	49.5	43.5	0.0	3.1	8.5
WV-Wheeling MSA	146	13,587	9.3	1,351	19.4	13.0	10.3	18.7	25.3	22.7	20.6	19.2	21.5	41.2	34.2	34.7	0.0	8.2	10.9
Total	1,563	165,420	100.0	22,660	21.3	7.4	6.5	17.2	15.5	15.9	19.7	21.6	22.3	41.7	49.0	44.0	0.0	6.4	11.3

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

West Virginia - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
WV-Beckley MSA	355	21,577	13.5	1,623	0.0	0.0	0.0	4.4	5.6	4.6	86.1	83.7	83.2	9.5	10.7	12.3	0.0	0.0	0.0
WV-Charleston MSA	610	49,150	23.2	3,174	3.8	3.9	4.0	14.9	12.5	12.5	58.5	60.2	55.5	22.9	23.4	28.0	0.0	0.0	0.0
WV-Huntington MSA	292	24,602	11.1	2,329	12.8	17.8	13.5	11.6	8.9	7.5	42.9	38.4	43.2	31.9	34.9	35.5	0.8	0.0	0.3
WV-Morgantown MSA	331	16,848	12.6	2,159	0.3	0.6	0.1	23.2	19.9	22.3	44.3	39.3	43.4	32.2	40.2	34.2	0.0	0.0	0.0
WV-Non-MSA	811	45,230	30.8	4,790	1.3	0.4	0.8	13.8	14.8	13.2	47.3	43.0	45.8	37.7	41.8	40.1	0.0	0.0	0.0
WV-Parkersburg MSA	143	6,949	5.4	1,187	0.0	0.0	0.0	11.5	10.5	9.3	71.6	70.6	72.5	16.9	18.9	18.2	0.0	0.0	0.0
WV-Wheeling MSA	89	8,396	3.4	808	0.0	0.0	0.0	26.9	25.8	31.9	54.5	64.0	47.6	18.6	10.1	20.4	0.0	0.0	0.0
Total	2,631	172,752	100.0	16,070	3.3	3.1	3.0	14.8	13.2	13.2	54.2	53.7	52.9	27.7	30.1	30.8	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

West Virginia - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
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
WV-Beckley MSA	355	21,577	13.5	1,623	74.3	76.6	46.8	6.9	21.7	18.9	1.7
WV-Charleston MSA	610	49,150	23.2	3,174	73.2	76.6	45.2	7.5	22.5	19.3	1.0
WV-Huntington MSA	292	24,602	11.1	2,329	76.4	77.4	44.5	7.0	20.5	16.5	2.1
WV-Morgantown MSA	331	16,848	12.6	2,159	79.9	81.0	43.6	5.8	18.4	14.2	0.6
WV-Non-MSA	811	45,230	30.8	4,790	76.5	82.6	44.0	6.6	16.4	16.9	1.0
WV-Parkersburg MSA	143	6,949	5.4	1,187	76.4	79.7	38.0	6.7	19.6	17.0	0.7
WV-Wheeling MSA	89	8,396	3.4	808	76.4	69.7	36.8	7.8	27.0	15.8	3.4
Total	2,631	172,752	100.0	16,070	76.0	79.0	43.7	6.9	19.8	17.1	1.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

West Virginia - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
WV-Beckley MSA	0	0	0.0	28	0.0	0.0	0.0	2.3	0.0	3.6	88.7	0.0	82.1	9.0	0.0	14.3	0.0	0.0	0.0
WV-Charleston MSA	0	0	0.0	6	1.1	0.0	0.0	19.5	0.0	50.0	58.9	0.0	33.3	20.5	0.0	16.7	0.0	0.0	0.0
WV-Huntington MSA	1	50	33.3	10	3.3	0.0	0.0	11.0	100.0	20.0	51.8	0.0	30.0	33.8	0.0	50.0	0.0	0.0	0.0
WV-Morgantown MSA	0	0	0.0	35	0.0	0.0	0.0	19.8	0.0	34.3	54.5	0.0	60.0	25.7	0.0	5.7	0.0	0.0	0.0
WV-Non-MSA	1	36	33.3	134	0.0	0.0	0.0	8.7	0.0	2.2	55.1	100.0	66.4	36.2	0.0	31.3	0.0	0.0	0.0
WV-Parkersburg MSA	1	500	33.3	11	0.0	0.0	0.0	1.9	0.0	0.0	86.8	100.0	100.0	11.3	0.0	0.0	0.0	0.0	0.0
WV-Wheeling MSA	0	0	0.0	7	0.0	0.0	0.0	11.9	0.0	0.0	65.3	0.0	85.7	22.8	0.0	14.3	0.0	0.0	0.0
Total	3	586	100.0	231	0.7	0.0	0.0	11.2	33.3	9.1	60.8	66.7	67.1	27.3	0.0	23.8	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

West Virginia - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
WV-Beckley MSA	0	0	0.0	28	95.5	0.0	21.4	0.8	0.0	3.8	0.0
WV-Charleston MSA	0	0	0.0	6	95.3	0.0	83.3	2.1	0.0	2.6	0.0
WV-Huntington MSA	1	50	33.3	10	94.9	100.0	40.0	1.8	0.0	3.3	0.0
WV-Morgantown MSA	0	0	0.0	35	98.5	0.0	34.3	0.5	0.0	1.0	0.0
WV-Non-MSA	1	36	33.3	134	98.4	100.0	41.0	0.8	0.0	0.8	0.0
WV-Parkersburg MSA	1	500	33.3	11	98.1	100.0	18.2	0.9	0.0	0.9	0.0
WV-Wheeling MSA	0	0	0.0	7	97.0	0.0	85.7	1.0	0.0	2.0	0.0
Total	3	586	100.0	231	97.0	100.0	39.0	1.1	0.0	1.9	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Alabama - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
AL-Anniston MSA	100	10,965	7.1	2,458	3.2	0.0	0.5	15.2	8.0	12.3	69.3	84.0	72.9	11.8	8.0	13.7	0.5	0.0	0.6
AL-Auburn MSA	69	15,553	4.9	4,847	1.8	0.0	0.4	12.5	15.9	15.1	70.9	63.8	69.6	14.3	18.8	13.6	0.5	1.4	1.3
AL-Birmingham MSA	490	134,595	34.8	34,801	4.8	3.1	1.6	22.6	22.4	13.8	36.1	29.0	34.5	36.5	45.5	50.0	0.0	0.0	0.0
AL-Daphne MSA	146	24,772	10.4	10,933	0.0	0.0	0.0	14.9	18.5	15.6	65.0	58.2	59.0	20.1	23.3	25.4	0.0	0.0	0.0
AL-Dothan MSA	21	15,039	1.5	3,958	1.3	0.0	0.8	14.1	19.0	11.2	62.2	42.9	58.4	22.5	38.1	29.6	0.0	0.0	0.0
AL-Gadsden MSA	25	2,094	1.8	2,254	4.0	4.0	1.6	19.7	0.0	10.4	43.5	40.0	39.9	32.9	56.0	48.1	0.0	0.0	0.0
AL-Huntsville MSA	273	116,372	19.4	18,653	4.0	1.8	2.3	24.5	22.3	18.2	33.8	38.8	34.6	37.7	37.0	44.9	0.0	0.0	0.0
AL-Mobile MSA	44	14,120	3.1	9,398	5.7	0.0	1.2	15.0	2.3	7.6	38.5	50.0	37.2	40.9	47.7	54.0	0.0	0.0	0.0
AL-Montgomery MSA	65	9,885	4.6	8,705	6.4	0.0	1.6	19.2	16.9	12.0	37.2	36.9	36.6	37.1	46.2	49.7	0.0	0.0	0.2
AL-Non-MSA	145	16,587	10.3	8,356	0.0	0.0	0.0	10.6	8.3	6.3	56.0	52.4	51.4	33.4	39.3	42.3	0.0	0.0	0.0
AL-Tuscaloosa MSA	30	37,142	2.1	6,535	1.0	0.0	0.1	20.9	3.3	13.6	46.2	26.7	44.2	31.5	70.0	41.3	0.4	0.0	0.7
Total	1,408	397,122	100.0	110,898	3.6	1.5	1.2	18.7	17.5	13.3	44.3	43.3	42.5	33.4	37.6	42.8	0.1	0.1	0.1

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

Alabama - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
AL-Anniston MSA	100	10,965	7.1	2,458	22.9	8.0	7.4	16.2	27.0	19.8	20.9	22.0	22.3	40.0	41.0	32.2	0.0	2.0	18.3
AL-Auburn MSA	69	15,553	4.9	4,847	24.8	4.3	4.9	15.2	11.6	15.8	18.6	14.5	20.7	41.4	46.4	41.7	0.0	23.2	16.9
AL-Birmingham MSA	490	134,595	34.8	34,801	24.1	5.7	7.5	15.9	8.4	19.2	18.8	11.8	20.1	41.1	25.9	35.6	0.0	48.2	17.6
AL-Daphne MSA	146	24,772	10.4	10,933	20.6	8.9	5.9	17.7	16.4	16.3	20.9	19.9	19.6	40.9	35.6	41.5	0.0	19.2	16.8
AL-Dothan MSA	21	15,039	1.5	3,958	22.5	4.8	5.8	17.0	0.0	14.3	18.8	9.5	18.9	41.7	28.6	38.5	0.0	57.1	22.5
AL-Gadsden MSA	25	2,094	1.8	2,254	24.6	8.0	7.1	16.1	24.0	16.6	19.2	12.0	22.9	40.1	48.0	34.2	0.0	8.0	19.2
AL-Huntsville MSA	273	116,372	19.4	18,653	23.8	3.3	10.0	16.9	8.4	17.2	17.3	9.5	20.2	41.9	16.1	32.6	0.0	62.6	19.9
AL-Mobile MSA	44	14,120	3.1	9,398	24.0	2.3	6.5	15.6	9.1	17.6	19.0	9.1	22.8	41.4	52.3	35.2	0.0	27.3	18.1
AL-Montgomery MSA	65	9,885	4.6	8,705	24.5	4.6	6.8	16.1	13.8	17.7	18.2	15.4	19.7	41.2	43.1	35.4	0.0	23.1	20.3
AL-Non-MSA	145	16,587	10.3	8,356	21.3	4.8	4.8	17.5	16.6	12.6	18.5	24.8	20.8	42.8	37.2	43.5	0.0	16.6	18.3
AL-Tuscaloosa MSA	30	37,142	2.1	6,535	24.2	3.3	5.0	15.9	6.7	16.3	17.9	6.7	21.1	42.0	40.0	37.0	0.0	43.3	20.6
Total	1,408	397,122	100.0	110,898	23.5	5.4	7.1	16.3	11.9	17.3	18.7	14.3	20.5	41.5	30.6	36.6	0.0	37.7	18.6

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

Alabama - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
AL-Anniston MSA	177	7,625	8.0	1,078	5.0	6.2	3.8	31.4	27.1	30.1	54.0	61.6	56.6	7.7	5.1	8.3	1.9	0.0	1.2
AL-Auburn MSA	92	9,150	4.1	2,410	1.9	1.1	0.7	33.9	20.7	28.2	51.9	71.7	55.8	11.2	6.5	14.5	1.1	0.0	0.9
AL-Birmingham MSA	848	49,096	38.2	21,410	6.9	6.0	7.2	21.5	21.7	18.5	31.6	33.8	28.9	38.7	38.0	44.6	1.2	0.5	0.8
AL-Daphne MSA	173	8,259	7.8	5,695	0.0	0.0	0.0	19.3	15.6	16.5	60.4	70.5	57.3	20.3	13.9	26.2	0.0	0.0	0.0
AL-Dothan MSA	35	1,379	1.6	2,620	7.7	0.0	8.1	17.4	17.1	15.5	46.5	60.0	44.6	28.4	22.9	31.8	0.0	0.0	0.0
AL-Gadsden MSA	63	2,731	2.8	1,151	4.6	1.6	3.6	21.0	14.3	18.9	48.3	39.7	44.4	26.0	44.4	33.1	0.0	0.0	0.0
AL-Huntsville MSA	166	5,869	7.5	7,260	10.5	11.4	11.9	26.3	20.5	20.8	29.7	35.5	30.6	33.6	32.5	36.7	0.0	0.0	0.0
AL-Mobile MSA	157	11,254	7.1	8,322	7.2	5.1	6.6	20.5	23.6	18.3	31.4	28.7	31.2	40.8	42.7	43.8	0.2	0.0	0.0
AL-Montgomery MSA	228	11,559	10.3	5,536	7.1	6.1	6.3	19.1	18.4	16.9	36.9	29.4	31.7	33.1	44.3	41.9	3.9	1.8	3.3
AL-Non-MSA	197	8,189	8.9	4,897	0.0	0.0	0.0	12.2	15.7	11.7	54.4	58.4	55.1	33.4	25.9	33.2	0.0	0.0	0.0
AL-Tuscaloosa MSA	83	5,038	3.7	3,431	1.4	0.0	0.8	31.3	32.5	30.8	41.3	34.9	41.8	23.4	32.5	25.5	2.6	0.0	1.0
Total	2,219	120,149	100.0	63,810	5.7	4.7	5.7	21.7	20.9	19.0	39.0	42.6	37.3	32.6	31.4	37.4	1.0	0.4	0.7

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Alabama - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
AL-Anniston MSA	177	7,625	8.0	1,078	77.0	81.4	48.4	6.1	18.6	16.9	0.0
AL-Auburn MSA	92	9,150	4.1	2,410	81.0	77.2	43.3	5.1	22.8	13.9	0.0
AL-Birmingham MSA	848	49,096	38.2	21,410	80.4	77.1	41.4	7.0	22.1	12.6	0.8
AL-Daphne MSA	173	8,259	7.8	5,695	84.4	90.2	45.7	4.9	9.2	10.7	0.6
AL-Dothan MSA	35	1,379	1.6	2,620	78.4	85.7	42.1	6.9	14.3	14.7	0.0
AL-Gadsden MSA	63	2,731	2.8	1,151	78.6	84.1	35.7	6.4	14.3	15.0	1.6
AL-Huntsville MSA	166	5,869	7.5	7,260	81.8	85.5	45.6	5.8	12.7	12.4	1.8
AL-Mobile MSA	157	11,254	7.1	8,322	78.9	69.4	40.6	7.1	29.3	14.0	1.3
AL-Montgomery MSA	228	11,559	10.3	5,536	78.1	83.8	44.4	6.4	15.8	15.5	0.4
AL-Non-MSA	197	8,189	8.9	4,897	78.2	84.8	40.8	5.6	15.2	16.2	0.0
AL-Tuscaloosa MSA	83	5,038	3.7	3,431	80.4	75.9	44.2	6.3	24.1	13.3	0.0
Total	2,219	120,149	100.0	63,810	80.1	80.2	42.7	6.4	19.1	13.6	0.7
<i>Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Alabama - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2018**

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
AL-Anniston MSA	0	0	0.0	19	1.9	0.0	0.0	14.7	0.0	5.3	73.1	0.0	63.2	9.6	0.0	26.3	0.6	0.0	5.3
AL-Auburn MSA	0	0	0.0	23	2.2	0.0	0.0	23.2	0.0	21.7	61.6	0.0	73.9	12.9	0.0	4.3	0.0	0.0	0.0
AL-Birmingham MSA	3	265	50.0	221	3.0	0.0	0.5	21.9	33.3	33.9	33.7	0.0	45.2	41.1	66.7	20.4	0.3	0.0	0.0
AL-Daphne MSA	0	0	0.0	75	0.0	0.0	0.0	20.3	0.0	29.3	63.0	0.0	53.3	16.6	0.0	17.3	0.0	0.0	0.0
AL-Dothan MSA	0	0	0.0	272	1.5	0.0	0.0	15.0	0.0	9.2	63.9	0.0	68.0	19.7	0.0	22.8	0.0	0.0	0.0
AL-Gadsden MSA	0	0	0.0	27	0.6	0.0	0.0	14.3	0.0	48.1	51.3	0.0	51.9	33.8	0.0	0.0	0.0	0.0	0.0
AL-Huntsville MSA	1	50	16.7	195	5.5	0.0	0.5	29.3	0.0	46.2	38.3	100.0	37.9	26.9	0.0	15.4	0.0	0.0	0.0
AL-Mobile MSA	0	0	0.0	40	4.2	0.0	0.0	9.2	0.0	5.0	42.5	0.0	60.0	43.9	0.0	35.0	0.2	0.0	0.0
AL-Montgomery MSA	0	0	0.0	113	3.9	0.0	0.9	18.8	0.0	35.4	41.3	0.0	46.9	35.5	0.0	16.8	0.5	0.0	0.0
AL-Non-MSA	2	226	33.3	476	0.0	0.0	0.0	8.0	0.0	11.1	60.5	100.0	66.8	31.5	0.0	22.1	0.0	0.0	0.0
AL-Tuscaloosa MSA	0	0	0.0	142	0.4	0.0	0.0	31.9	0.0	60.6	40.2	0.0	32.4	27.0	0.0	7.0	0.4	0.0	0.0
Total	6	541	100.0	1,603	2.4	0.0	0.2	19.1	16.7	25.7	47.4	50.0	55.1	31.0	33.3	19.0	0.2	0.0	0.1

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Alabama - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
AL-Anniston MSA	0	0	0.0	19	96.2	0.0	21.1	1.3	0.0	2.6	0.0
AL-Auburn MSA	0	0	0.0	23	94.2	0.0	56.5	2.2	0.0	3.6	0.0
AL-Birmingham MSA	3	265	50.0	221	95.0	100.0	32.6	3.0	0.0	2.0	0.0
AL-Daphne MSA	0	0	0.0	75	93.7	0.0	24.0	3.7	0.0	2.6	0.0
AL-Dothan MSA	0	0	0.0	272	95.8	0.0	54.4	1.3	0.0	2.9	0.0
AL-Gadsden MSA	0	0	0.0	27	97.4	0.0	22.2	1.3	0.0	1.3	0.0
AL-Huntsville MSA	1	50	16.7	195	94.8	100.0	50.3	2.9	0.0	2.3	0.0
AL-Mobile MSA	0	0	0.0	40	94.0	0.0	35.0	4.4	0.0	1.6	0.0
AL-Montgomery MSA	0	0	0.0	113	94.1	0.0	37.2	3.1	0.0	2.8	0.0
AL-Non-MSA	2	226	33.3	476	97.2	100.0	45.4	1.2	0.0	1.6	0.0
AL-Tuscaloosa MSA	0	0	0.0	142	96.4	0.0	67.6	2.0	0.0	1.6	0.0
Total	6	541	100.0	1,603	95.3	100.0	45.4	2.5	0.0	2.2	0.0
<i>Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Tennessee - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
TN-Chattanooga MSA	159	30,828	10.2	13,591	3.7	1.9	2.9	14.0	13.2	11.4	41.2	33.3	39.5	41.1	51.6	46.2	0.0	0.0	0.0
TN-Cleveland MSA	77	8,736	4.9	3,633	3.9	2.6	4.1	8.1	7.8	6.6	49.6	50.6	49.4	38.4	39.0	39.9	0.0	0.0	0.0
TN-Johnson City MSA	60	7,731	3.8	5,245	0.0	0.0	0.0	23.8	13.3	19.0	54.0	48.3	51.2	22.2	38.3	29.9	0.0	0.0	0.0
TN-Knoxville MSA	644	135,616	41.2	30,744	2.3	2.5	1.8	19.9	17.5	16.0	49.9	41.8	49.2	27.9	38.2	32.9	0.0	0.0	0.0
TN-Morristown MSA	51	7,395	3.3	3,224	1.0	0.0	1.2	14.6	2.0	12.2	73.8	92.2	76.7	10.6	5.9	10.0	0.0	0.0	0.0
TN-Nashville MSA	363	153,909	23.2	85,143	3.3	4.4	4.2	20.6	8.8	17.5	42.9	37.7	43.0	33.1	49.0	35.1	0.1	0.0	0.1
TN-Non-MSA	211	25,051	13.5	7,803	0.0	0.0	0.0	4.3	0.9	3.8	79.2	81.0	77.0	16.6	18.0	19.1	0.0	0.0	0.0
Total	1,565	369,266	100.0	149,383	2.6	2.4	3.2	18.1	11.7	15.6	49.0	47.6	46.9	30.2	38.3	34.2	0.0	0.0	0.1

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

Tennessee - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
TN-Chattanooga MSA	159	30,828	10.2	13,591	20.9	1.9	5.1	17.4	8.8	15.4	19.1	8.2	19.5	42.7	43.4	42.4	0.0	37.7	17.6
TN-Cleveland MSA	77	8,736	4.9	3,633	22.4	10.4	6.9	17.3	14.3	17.9	18.7	35.1	21.9	41.5	33.8	33.9	0.0	6.5	19.5
TN-Johnson City MSA	60	7,731	3.8	5,245	21.9	8.3	6.9	17.0	8.3	14.9	21.6	15.0	19.5	39.6	51.7	43.7	0.0	16.7	15.0
TN-Knoxville MSA	644	135,616	41.2	30,744	22.6	3.1	7.5	17.0	7.6	17.2	19.9	8.9	18.9	40.5	27.3	36.3	0.0	53.1	20.1
TN-Morristown MSA	51	7,395	3.3	3,224	22.1	2.0	5.4	18.1	13.7	15.4	19.8	15.7	22.3	40.0	51.0	39.5	0.0	17.6	17.4
TN-Nashville MSA	363	153,909	23.2	85,143	20.9	0.6	6.4	17.8	2.5	18.4	20.4	6.1	20.9	40.9	26.4	39.0	0.0	64.5	15.2
TN-Non-MSA	211	25,051	13.5	7,803	19.4	6.2	4.6	18.7	19.4	13.6	20.4	16.6	19.2	41.6	46.4	44.5	0.0	11.4	18.1
Total	1,565	369,266	100.0	149,383	21.3	3.3	6.4	17.6	8.7	17.5	20.1	10.9	20.3	40.9	33.4	39.1	0.0	43.7	16.7

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

Tennessee - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
TN-Chattanooga MSA	207	9,877	10.2	7,178	7.7	4.3	9.0	16.5	19.8	14.9	37.6	33.3	37.0	38.0	42.5	38.9	0.3	0.0	0.2
TN-Cleveland MSA	143	8,192	7.0	1,485	7.7	7.0	7.1	14.3	16.1	12.7	50.1	40.6	44.4	27.8	36.4	35.7	0.0	0.0	0.0
TN-Johnson City MSA	185	5,243	9.1	2,463	0.0	0.0	0.0	23.2	19.5	21.7	44.8	44.3	42.4	31.7	36.2	35.9	0.3	0.0	0.0
TN-Knoxville MSA	608	44,191	29.8	13,003	4.1	4.3	3.6	19.5	15.5	15.6	42.5	39.8	41.8	33.0	39.6	38.5	0.9	0.8	0.5
TN-Morristown MSA	69	1,870	3.4	1,239	7.9	0.0	7.2	23.2	4.3	21.1	63.1	82.6	64.6	5.9	13.0	7.0	0.0	0.0	0.0
TN-Nashville MSA	468	21,728	23.0	38,108	7.7	5.1	8.1	22.9	18.8	20.3	31.1	35.0	29.6	37.4	40.4	41.3	0.9	0.6	0.7
TN-Non-MSA	358	9,114	17.6	3,189	0.0	0.0	0.0	11.5	10.1	9.9	73.2	72.9	73.2	15.3	16.8	16.9	0.0	0.3	0.0
Total	2,038	100,215	100.0	66,665	6.1	3.4	6.6	20.5	15.8	18.2	38.8	45.8	36.3	33.9	34.6	38.4	0.7	0.4	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Tennessee - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
TN-Chatanooga MSA	207	9,877	10.2	7,178	82.4	79.2	42.2	5.8	19.8	11.7	1.0
TN-Cleveland MSA	143	8,192	7.0	1,485	81.2	78.3	49.8	5.7	21.0	13.1	0.7
TN-Johnson City MSA	185	5,243	9.1	2,463	80.8	88.6	52.1	5.2	11.4	13.9	0.0
TN-Knoxville MSA	608	44,191	29.8	13,003	79.9	77.5	46.9	6.6	20.7	13.5	1.8
TN-Morristown MSA	69	1,870	3.4	1,239	78.6	82.6	47.5	5.6	14.5	15.9	2.9
TN-Nashville MSA	468	21,728	23.0	38,108	82.6	87.4	46.5	5.9	11.1	11.6	1.5
TN-Non-MSA	358	9,114	17.6	3,189	80.7	84.6	48.9	5.1	15.1	14.2	0.3
Total	2,038	100,215	100.0	66,665	81.7	82.4	46.5	5.9	16.4	12.4	1.2

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Tennessee - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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-Chattanooga MSA	2	461	20.0	35	4.2	0.0	0.0	14.2	0.0	14.3	43.1	50.0	45.7	38.5	50.0	40.0	0.0	0.0	0.0
TN-Cleveland MSA	2	200	20.0	50	1.2	0.0	0.0	6.6	0.0	2.0	49.4	0.0	46.0	42.7	100.0	52.0	0.0	0.0	0.0
TN-Johnson City MSA	0	0	0.0	66	0.0	0.0	0.0	16.9	0.0	3.0	59.8	0.0	87.9	23.3	0.0	9.1	0.0	0.0	0.0
TN-Knoxville MSA	0	0	0.0	96	1.6	0.0	1.0	19.9	0.0	25.0	51.8	0.0	59.4	26.1	0.0	14.6	0.5	0.0	0.0
TN-Morristown MSA	0	0	0.0	32	2.6	0.0	3.1	9.7	0.0	6.3	76.4	0.0	81.3	11.3	0.0	9.4	0.0	0.0	0.0
TN-Nashville MSA	0	0	0.0	688	2.8	0.0	0.4	21.8	0.0	35.5	45.0	0.0	51.9	29.8	0.0	11.5	0.6	0.0	0.7
TN-Non-MSA	6	268	60.0	102	0.0	0.0	0.0	6.1	0.0	1.0	83.6	100.0	92.2	10.3	0.0	6.9	0.0	0.0	0.0
Total	10	929	100.0	1,069	2.2	0.0	0.5	18.1	0.0	26.1	51.7	70.0	59.0	27.7	30.0	13.9	0.4	0.0	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Tennessee - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
TN-Chattanooga MSA	2	461	20.0	35	96.5	0.0	31.4	1.4	100.0	2.0	0.0
TN-Cleveland MSA	2	200	20.0	50	95.4	100.0	40.0	2.1	0.0	2.5	0.0
TN-Johnson City MSA	0	0	0.0	66	91.6	0.0	75.8	2.0	0.0	6.5	0.0
TN-Knoxville MSA	0	0	0.0	96	94.1	0.0	49.0	2.0	0.0	4.0	0.0
TN-Morristown MSA	0	0	0.0	32	90.8	0.0	34.4	1.0	0.0	8.2	0.0
TN-Nashville MSA	0	0	0.0	688	95.4	0.0	57.3	2.2	0.0	2.4	0.0
TN-Non-MSA	6	268	60.0	102	94.3	16.7	46.1	0.8	83.3	4.9	0.0
Total	10	929	100.0	1,069	94.8	30.0	54.3	1.9	70.0	3.3	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kentucky - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
KY-Bowling Green MSA	230	31,328	19.0	5,096	1.9	3.0	2.8	18.6	8.3	15.3	42.3	30.0	36.3	37.0	57.8	44.9	0.3	0.9	0.6	
KY-Clarksville MSA	62	5,271	5.1	1,762	4.8	3.2	2.6	8.4	9.7	5.6	64.8	62.9	71.0	22.0	24.2	20.8	0.0	0.0	0.0	
KY-Lexington MSA	273	53,546	22.5	17,040	4.4	1.8	3.5	19.5	11.7	18.0	42.0	33.7	41.2	34.1	52.7	37.4	0.0	0.0	0.0	
KY-Non-MSA	477	42,608	39.4	8,991	0.9	1.3	0.5	18.7	9.2	13.3	58.5	57.7	58.7	21.9	31.9	27.6	0.0	0.0	0.0	
KY-Owensboro MSA	169	16,800	14.0	3,216	1.5	0.0	1.0	14.9	16.6	15.7	59.4	55.6	56.8	24.1	27.8	26.4	0.0	0.0	0.0	
Total	1,211	149,553	100.0	36,105	2.4	1.7	2.4	18.1	10.7	15.6	51.8	47.0	47.7	27.7	40.5	34.2	0.0	0.2	0.1	

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

Kentucky - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
KY-Bowling Green MSA	230	31,328	19.0	5,096	21.5	5.7	7.0	17.4	14.8	16.1	20.0	18.7	19.3	41.1	43.5	38.9	0.0	17.4	18.6
KY-Clarksville MSA	62	5,271	5.1	1,762	24.6	3.2	4.5	20.1	22.6	15.2	20.9	24.2	24.4	34.5	48.4	35.4	0.0	1.6	20.5
KY-Lexington MSA	273	53,546	22.5	17,040	23.5	5.1	9.1	16.3	19.4	17.6	19.2	12.1	19.1	41.1	50.9	35.4	0.0	12.5	18.9
KY-Non-MSA	477	42,608	39.4	8,991	24.7	8.4	6.4	16.6	16.6	15.4	18.7	19.3	21.1	40.1	50.3	41.1	0.0	5.5	16.0
KY-Owensboro MSA	169	16,800	14.0	3,216	22.2	8.9	8.1	17.8	19.5	20.2	19.8	16.0	23.9	40.2	38.5	30.9	0.0	17.2	16.8
Total	1,211	149,553	100.0	36,105	23.7	6.9	7.8	16.9	17.6	16.9	19.3	17.3	20.3	40.2	47.4	36.9	0.0	10.7	18.0

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

Kentucky - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
KY-Bowling Green MSA	488	32,324	23.3	2,768	5.9	5.5	5.2	21.9	21.5	21.3	35.6	29.3	31.5	32.2	41.6	39.3	4.4	2.0	2.7
KY-Clarksville MSA	80	2,260	3.8	728	12.7	12.5	15.0	20.3	23.8	16.8	49.2	47.5	47.3	16.0	16.3	20.5	1.8	0.0	0.5
KY-Lexington MSA	391	20,665	18.7	10,365	5.7	5.4	5.2	20.0	19.4	20.3	43.5	41.7	43.1	30.7	33.5	31.4	0.0	0.0	0.0
KY-Non-MSA	799	28,423	38.2	6,516	0.7	0.9	1.1	16.8	14.1	15.1	59.7	61.3	59.7	22.7	23.7	24.1	0.0	0.0	0.0
KY-Owensboro MSA	333	18,666	15.9	1,975	2.9	3.3	2.3	27.6	21.9	25.4	47.2	47.1	46.5	22.4	27.6	25.8	0.0	0.0	0.0
Total	2,091	102,338	100.0	22,352	4.1	3.6	4.0	19.7	18.5	19.3	48.8	47.4	46.9	26.7	30.0	29.4	0.6	0.5	0.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kentucky - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
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
KY-Bowling Green MSA	488	32,324	23.3	2,768	80.8	61.5	48.7	5.4	36.7	13.8	1.8
KY-Clarksville MSA	80	2,260	3.8	728	79.0	88.8	41.8	4.6	10.0	16.4	1.3
KY-Lexington MSA	391	20,665	18.7	10,365	82.6	80.3	43.9	5.7	18.7	11.7	1.0
KY-Non-MSA	799	28,423	38.2	6,516	79.2	86.0	45.6	5.6	13.4	15.2	0.6
KY-Owensboro MSA	333	18,666	15.9	1,975	78.8	81.7	49.5	6.3	15.6	14.9	2.7
Total	2,091	102,338	100.0	22,352	80.7	78.6	45.4	5.6	20.0	13.6	1.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kentucky - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
KY-Bowling Green MSA	13	1,767	10.0	225	1.0	0.0	0.4	15.5	30.8	22.7	45.0	23.1	51.1	37.5	46.2	25.8	1.0	0.0	0.0
KY-Clarksville MSA	14	951	10.8	99	4.3	0.0	0.0	3.5	0.0	3.0	62.7	78.6	68.7	28.9	21.4	27.3	0.5	0.0	1.0
KY-Lexington MSA	1	10	0.8	493	3.1	0.0	1.4	12.7	0.0	10.5	48.2	100.0	60.0	36.0	0.0	28.0	0.0	0.0	0.0
KY-Non-MSA	62	9,113	47.7	375	0.1	0.0	0.0	9.4	0.0	5.3	60.9	67.7	65.1	29.5	32.3	29.6	0.0	0.0	0.0
KY-Owensboro MSA	40	6,680	30.8	397	0.0	0.0	0.0	7.7	5.0	2.3	64.3	65.0	74.8	28.0	30.0	22.9	0.0	0.0	0.0
Total	130	18,521	100.0	1,589	1.7	0.0	0.5	10.8	4.6	8.5	54.6	63.8	64.2	32.8	31.5	26.7	0.2	0.0	0.1

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kentucky - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues													2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
KY-Bowling Green MSA	13	1,767	10.0	225	97.4	61.5	26.7	0.5	38.5	2.1	0.0		
KY-Clarksville MSA	14	951	10.8	99	97.3	92.9	46.5	0.8	0.0	1.9	7.1		
KY-Lexington MSA	1	10	0.8	493	95.2	100.0	55.6	3.2	0.0	1.6	0.0		
KY-Non-MSA	62	9,113	47.7	375	97.3	80.6	42.9	1.0	16.1	1.7	3.2		
KY-Owensboro MSA	40	6,680	30.8	397	97.3	75.0	65.0	1.7	25.0	1.0	0.0		
Total	130	18,521	100.0	1,589	96.5	78.5	50.3	1.8	19.2	1.7	2.3		

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

New Jersey - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
NJ-Atlantic City MSA	64	10,800	10.4	7,617	3.4	0.0	2.1	16.3	4.7	14.0	39.3	48.4	38.1	40.1	46.9	44.5	1.0	0.0	1.3
NJ-Camden MD	212	28,400	34.4	38,059	3.1	0.0	1.5	12.5	4.2	12.1	51.8	53.8	53.2	32.5	42.0	33.2	0.0	0.0	0.0
NJ-New York MD	238	118,728	38.6	109,964	1.1	0.4	1.7	9.6	3.8	10.6	25.2	14.3	25.1	64.1	81.5	62.6	0.0	0.0	0.1
NJ-Trenton MSA	21	5,154	3.4	7,939	7.3	0.0	3.6	16.9	9.5	15.2	32.3	28.6	35.2	43.5	61.9	46.1	0.0	0.0	0.0
NJ-Vineland MSA	81	7,472	13.1	2,657	2.2	1.2	0.9	7.7	6.2	7.2	55.5	63.0	52.4	34.7	29.6	39.6	0.0	0.0	0.0
Total	616	170,554	100.0	166,236	2.1	0.3	1.7	11.0	4.5	11.2	33.2	38.3	33.0	53.7	56.8	53.9	0.1	0.0	0.1

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

New Jersey - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018
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	
NJ-Atlantic City MSA	64	10,800	10.4	7,617	22.8	4.7	4.6	17.0	14.1	16.5	18.5	18.8	18.8	41.7	50.0	40.1	0.0	12.5	20.0	
NJ-Camden MD	212	28,400	34.4	38,059	21.1	10.4	9.1	17.1	18.9	20.7	21.4	23.6	21.4	40.3	35.4	27.4	0.0	11.8	21.4	
NJ-New York MD	238	118,728	38.6	109,964	18.6	0.0	2.5	13.7	2.5	9.6	16.6	3.4	17.7	51.1	8.4	53.4	0.0	85.7	16.9	
NJ-Trenton MSA	21	5,154	3.4	7,939	23.9	19.0	8.8	16.6	9.5	18.9	18.5	19.0	18.9	41.1	38.1	37.4	0.0	14.3	16.0	
NJ-Vineland MSA	81	7,472	13.1	2,657	21.2	4.9	5.6	17.6	22.2	16.1	19.5	29.6	25.4	41.8	42.0	28.0	0.0	1.2	24.9	
Total	616	170,554	100.0	166,236	19.7	5.4	4.4	14.8	12.2	13.0	17.8	15.9	18.7	47.7	27.4	45.7	0.0	39.1	18.2	

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

New Jersey - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
NJ-Atlantic City MSA	148	11,473	9.6	6,267	10.7	2.0	9.3	17.6	10.1	18.1	32.8	45.3	31.3	38.1	42.6	40.1	0.8	0.0	1.1
NJ-Camden MD	487	33,805	31.7	26,296	3.4	3.3	2.2	12.5	12.3	11.6	49.2	50.1	48.3	34.8	34.3	37.9	0.1	0.0	0.0
NJ-New York MD	671	15,702	43.7	142,563	3.4	0.7	2.9	12.6	4.9	14.7	23.5	21.5	22.8	60.5	72.9	59.5	0.1	0.0	0.1
NJ-Trenton MSA	68	746	4.4	9,390	8.7	0.0	6.1	16.6	23.5	14.0	31.5	44.1	30.6	43.2	32.4	49.3	0.0	0.0	0.0
NJ-Vineland MSA	160	16,329	10.4	2,396	4.8	5.6	18.3	16.6	10.0	11.6	51.6	54.4	45.5	26.8	30.0	24.5	0.1	0.0	0.1
Total	1,534	78,055	100.0	186,912	4.0	2.2	3.4	13.0	9.1	14.3	29.4	37.3	27.4	53.4	51.4	54.8	0.1	0.0	0.1

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

New Jersey - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
NJ-Atlantic City MSA	148	11,473	9.6	6,267	83.5	76.4	39.0	5.3	22.3	11.3	1.4	
NJ-Camden MD	487	33,805	31.7	26,296	82.8	76.6	43.8	6.5	22.8	10.7	0.6	
NJ-New York MD	671	15,702	43.7	142,563	85.0	90.0	42.0	6.7	10.0	8.3	0.0	
NJ-Trenton MSA	68	746	4.4	9,390	80.4	94.1	41.3	7.5	5.9	12.1	0.0	
NJ-Vineland MSA	160	16,329	10.4	2,396	79.8	70.0	34.3	7.7	28.1	12.6	1.9	
Total	1,534	78,055	100.0	186,912	84.2	82.5	42.0	6.7	16.9	9.2	0.5	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

New Jersey - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
NJ-Atlantic City MSA	1	400	25.0	34	1.3	0.0	0.0	10.2	0.0	2.9	42.3	100.0	41.2	45.5	0.0	55.9	0.8	0.0	0.0
NJ-Camden MD	1	92	25.0	100	0.9	0.0	0.0	8.7	0.0	4.0	50.4	100.0	39.0	40.0	0.0	57.0	0.0	0.0	0.0
NJ-New York MD	2	193	50.0	184	1.4	0.0	0.0	6.7	0.0	6.0	21.9	0.0	17.9	69.9	100.0	76.1	0.0	0.0	0.0
NJ-Trenton MSA	0	0	0.0	26	6.2	0.0	0.0	15.6	0.0	7.7	32.4	0.0	30.8	45.8	0.0	61.5	0.0	0.0	0.0
NJ-Vineland MSA	0	0	0.0	29	1.0	0.0	0.0	2.4	0.0	0.0	49.0	0.0	31.0	47.6	0.0	69.0	0.0	0.0	0.0
Total	4	685	100.0	373	1.6	0.0	0.0	7.8	0.0	4.8	31.2	50.0	27.6	59.3	50.0	67.6	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

New Jersey - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
NJ-Atlantic City MSA	1	400	25.0	34	95.3	0.0	44.1	4.3	100.0	0.4	0.0	
NJ-Camden MD	1	92	25.0	100	95.0	0.0	34.0	3.3	100.0	1.7	0.0	
NJ-New York MD	2	193	50.0	184	95.5	0.0	46.7	3.0	100.0	1.6	0.0	
NJ-Trenton MSA	0	0	0.0	26	95.7	0.0	65.4	2.4	0.0	1.9	0.0	
NJ-Vineland MSA	0	0	0.0	29	92.8	0.0	24.1	5.2	0.0	2.1	0.0	
Total	4	685	100.0	373	95.3	0.0	42.6	3.2	100.0	1.6	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Washington DC Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
Washington DC-MD-VA-WV MD	5,446	1,981,773	100.0	171,114	4.0	3.7	4.9	18.7	15.4	18.2	38.2	33.5	38.1	39.0	47.2	38.7	0.2	0.2	0.2	
Total	5,446	1,981,773	100.0	171,114	4.0	3.7	4.9	18.7	15.4	18.2	38.2	33.5	38.1	39.0	47.2	38.7	0.2	0.2	0.2	

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

Washington DC Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018
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	
Washington DC-MD-VA-WV MD	5,446	1,981,773	100.0	171,114	22.4	6.4	9.0	16.8	10.1	19.1	20.2	11.5	21.9	40.6	20.0	32.2	0.0	52.0	17.8	
Total	5,446	1,981,773	100.0	171,114	22.4	6.4	9.0	16.8	10.1	19.1	20.2	11.5	21.9	40.6	20.0	32.2	0.0	52.0	17.8	

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

Washington DC Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Washington DC-MD-VA-WV MD	9,240	460,413	100.0	115,074	5.1	3.7	4.4	19.1	19.3	18.4	35.1	37.6	34.8	39.8	39.2	41.9	0.9	0.3	0.4
Total	9,240	460,413	100.0	115,074	5.1	3.7	4.4	19.1	19.3	18.4	35.1	37.6	34.8	39.8	39.2	41.9	0.9	0.3	0.4

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Washington DC Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues													2018
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		
Washington DC -MD-VA-WV MD	9,240	460,413	100.0	115,074	84.5	73.8	49.1	5.9	25.3	9.6	0.8		
Total	9,240	460,413	100.0	115,074	84.5	73.8	49.1	5.9	25.3	9.6	0.8		

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Washington DC Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Washington DC-MD-VA-WV MD	13	1,504	100.0	411	3.3	7.7	1.5	21.7	23.1	22.9	40.6	53.8	47.0	34.2	15.4	28.7	0.2	0.0	0.0
Total	13	1,504	100.0	411	3.3	7.7	1.5	21.7	23.1	22.9	40.6	53.8	47.0	34.2	15.4	28.7	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Washington DC Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Washington DC -MD-VA-WV MD	13	1,504	100.0	411	94.7	92.3	40.6	3.1	7.7	2.2	0.0	
Total	13	1,504	100.0	411	94.7	92.3	40.6	3.1	7.7	2.2	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Charlotte Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
Charlotte NC-SC MSA	3,166	750,021	100.0	96,688	3.6	2.3	2.9	22.7	15.9	18.2	37.2	34.7	34.6	36.5	47.1	44.2	0.0	0.0	0.0
Total	3,166	750,021	100.0	96,688	3.6	2.3	2.9	22.7	15.9	18.2	37.2	34.7	34.6	36.5	47.1	44.2	0.0	0.0	0.0

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

Charlotte Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
Charlotte NC-SC MSA	3,166	750,021	100.0	96,688	22.7	8.0	6.5	17.1	15.7	17.0	18.8	19.1	20.1	41.4	46.8	41.4	0.0	10.3	15.1
Total	3,166	750,021	100.0	96,688	22.7	8.0	6.5	17.1	15.7	17.0	18.8	19.1	20.1	41.4	46.8	41.4	0.0	10.3	15.1

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

Charlotte Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Charlotte NC-SC MSA	5,424	319,395	100.0	53,830	7.3	8.0	6.8	22.0	20.2	19.1	28.3	32.2	29.2	41.7	39.0	44.5	0.7	0.5	0.5
Total	5,424	319,395	100.0	53,830	7.3	8.0	6.8	22.0	20.2	19.1	28.3	32.2	29.2	41.7	39.0	44.5	0.7	0.5	0.5

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Charlotte Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Charlotte NC-SC MSA	5,424	319,395	100.0	53,830	83.8	70.2	46.9	5.6	28.6	10.6	1.2	
Total	5,424	319,395	100.0	53,830	83.8	70.2	46.9	5.6	28.6	10.6	1.2	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Charlotte Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Charlotte NC-SC MSA	15	1,604	100.0	329	3.8	0.0	0.9	21.2	13.3	19.5	45.7	66.7	60.5	29.1	20.0	19.1	0.2	0.0	0.0
Total	15	1,604	100.0	329	3.8	0.0	0.9	21.2	13.3	19.5	45.7	66.7	60.5	29.1	20.0	19.1	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Charlotte Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Charlotte NC-SC MSA	15	1,604	100.0	329	95.6	60.0	34.3	2.7	40.0	1.7	0.0	
Total	15	1,604	100.0	329	95.6	60.0	34.3	2.7	40.0	1.7	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Myrtle Beach Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
Myrtle Beach NC-SC MSA	1,596	286,683	100.0	23,615	0.4	0.0	0.6	16.1	9.6	10.5	64.9	60.3	65.0	18.4	29.9	23.6	0.2	0.1	0.2	
Total	1,596	286,683	100.0	23,615	0.4	0.0	0.6	16.1	9.6	10.5	64.9	60.3	65.0	18.4	29.9	23.6	0.2	0.1	0.2	

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

Myrtle Beach Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018
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	
Myrtle Beach NC-SC MSA	1,596	286,683	100.0	23,615	20.1	6.0	5.0	18.4	16.1	15.8	21.3	20.6	21.0	40.3	53.3	45.9	0.0	4.1	12.4	
Total	1,596	286,683	100.0	23,615	20.1	6.0	5.0	18.4	16.1	15.8	21.3	20.6	21.0	40.3	53.3	45.9	0.0	4.1	12.4	

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

Myrtle Beach Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2018
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	
Myrtle Beach NC-SC MSA	1,744	49,037	100.0	11,031	4.3	1.5	4.1	15.8	17.8	15.7	57.9	56.3	59.0	21.5	24.2	21.0	0.5	0.2	0.3	
Total	1,744	49,037	100.0	11,031	4.3	1.5	4.1	15.8	17.8	15.7	57.9	56.3	59.0	21.5	24.2	21.0	0.5	0.2	0.3	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Myrtle Beach Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Myrtle Beach NC-SC MSA	1,744	49,037	100.0	11,031	84.5	88.1	54.8	4.6	11.0	10.9	0.9	
Total	1,744	49,037	100.0	11,031	84.5	88.1	54.8	4.6	11.0	10.9	0.9	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Myrtle Beach Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Myrtle Beach NC-SC MSA	8	1,669	100.0	120	1.1	0.0	0.0	25.2	0.0	25.8	59.2	75.0	68.3	14.0	25.0	5.0	0.4	0.0	0.8
Total	8	1,669	100.0	120	1.1	0.0	0.0	25.2	0.0	25.8	59.2	75.0	68.3	14.0	25.0	5.0	0.4	0.0	0.8

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Myrtle Beach Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Myrtle Beach NC-SC MSA	8	1,669	100.0	120	97.3	37.5	61.7	1.7	62.5	1.0	0.0	
Total	8	1,669	100.0	120	97.3	37.5	61.7	1.7	62.5	1.0	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Louisville Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
Louisville IN-KY MSA	869	197,116	100.0	45,519	3.9	4.0	2.9	15.2	13.6	13.3	47.0	45.6	45.7	33.9	36.7	38.0	0.1	0.1	0.1	
Total	869	197,116	100.0	45,519	3.9	4.0	2.9	15.2	13.6	13.3	47.0	45.6	45.7	33.9	36.7	38.0	0.1	0.1	0.1	

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

Louisville Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018
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	
Louisville IN-KY MSA	869	197,116	100.0	45,519	21.2	8.1	14.5	17.7	14.0	19.4	20.5	14.8	19.5	40.6	30.3	30.7	0.0	32.8	15.9	
Total	869	197,116	100.0	45,519	21.2	8.1	14.5	17.7	14.0	19.4	20.5	14.8	19.5	40.6	30.3	30.7	0.0	32.8	15.9	

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

Louisville Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Louisville IN-KY MSA	1,333	62,498	100.0	22,692	7.0	5.5	6.6	16.1	18.8	16.2	36.4	36.1	34.1	36.9	37.7	40.2	3.6	1.9	2.8
Total	1,333	62,498	100.0	22,692	7.0	5.5	6.6	16.1	18.8	16.2	36.4	36.1	34.1	36.9	37.7	40.2	3.6	1.9	2.8

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Louisville Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Louisville IN-KY MSA	1,333	62,498	100.0	22,692	82.3	74.4	46.8	6.3	24.8	11.4	0.8	
Total	1,333	62,498	100.0	22,692	82.3	74.4	46.8	6.3	24.8	11.4	0.8	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Louisville Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Louisville IN-KY MSA	0	0	0.0	313	2.5	0.0	0.3	11.8	0.0	8.3	51.6	0.0	61.7	33.6	0.0	29.4	0.4	0.0	0.3
Total	0	0	0.0	313	2.5	0.0	0.3	11.8	0.0	8.3	51.6	0.0	61.7	33.6	0.0	29.4	0.4	0.0	0.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Louisville Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Louisville IN-KY MSA	0	0	0.0	313	97.2	0.0	34.5	1.6	0.0	1.2	0.0
Total	0	0	0.0	313	97.2	0.0	34.5	1.6	0.0	1.2	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Cincinnati Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
Cincinnati KY-OH MSA	733	146,115	100.0	72,764	4.2	2.6	3.3	17.9	18.4	15.6	42.6	42.2	42.7	35.2	36.6	38.3	0.1	0.3	0.1
Total	733	146,115	100.0	72,764	4.2	2.6	3.3	17.9	18.4	15.6	42.6	42.2	42.7	35.2	36.6	38.3	0.1	0.3	0.1

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

Cincinnati Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
Cincinnati KY-OH MSA	733	146,115	100.0	72,764	22.3	6.5	10.0	16.7	14.5	20.0	19.9	11.7	20.7	41.1	20.1	35.7	0.0	47.2	13.7
Total	733	146,115	100.0	72,764	22.3	6.5	10.0	16.7	14.5	20.0	19.9	11.7	20.7	41.1	20.1	35.7	0.0	47.2	13.7

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

Cincinnati Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Cincinnati KY-OH MSA	914	79,246	100.0	37,009	6.9	7.1	7.0	21.1	23.7	20.2	35.4	43.0	33.7	35.6	25.6	38.2	1.0	0.5	0.8
Total	914	79,246	100.0	37,009	6.9	7.1	7.0	21.1	23.7	20.2	35.4	43.0	33.7	35.6	25.6	38.2	1.0	0.5	0.8

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Cincinnati Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Cincinnati KY-OH MSA	914	79,246	100.0	37,009	80.6	71.0	48.3	6.8	28.3	12.6	0.7	
Total	914	79,246	100.0	37,009	80.6	71.0	48.3	6.8	28.3	12.6	0.7	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Cincinnati Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Cincinnati KY-OH MSA	5	418	100.0	339	3.0	0.0	0.3	20.0	40.0	29.2	48.2	60.0	49.3	28.7	0.0	21.2	0.2	0.0	0.0
Total	5	418	100.0	339	3.0	0.0	0.3	20.0	40.0	29.2	48.2	60.0	49.3	28.7	0.0	21.2	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Cincinnati Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati KY-OH MSA	5	418	100.0	339	96.3	100.0	52.5	1.8	0.0	2.0	0.0
Total	5	418	100.0	339	96.3	100.0	52.5	1.8	0.0	2.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Hagerstown Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
Hagerstown MD-WV MSA	416	47,989	100.0	9,430	0.9	1.4	0.9	12.6	12.5	12.1	62.9	61.3	64.9	23.6	24.8	22.1	0.0	0.0	0.0
Total	416	47,989	100.0	9,430	0.9	1.4	0.9	12.6	12.5	12.1	62.9	61.3	64.9	23.6	24.8	22.1	0.0	0.0	0.0

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

Hagerstown Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
Hagerstown MD-WV MSA	416	47,989	100.0	9,430	21.1	9.1	7.4	17.3	16.1	19.1	22.0	22.4	22.0	39.6	36.3	29.2	0.0	16.1	22.3
Total	416	47,989	100.0	9,430	21.1	9.1	7.4	17.3	16.1	19.1	22.0	22.4	22.0	39.6	36.3	29.2	0.0	16.1	22.3

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

Hagerstown Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Hagerstown MD-WV MSA	419	26,246	100.0	3,674	5.3	1.9	3.4	20.7	19.3	18.6	53.2	54.9	52.5	20.8	23.9	25.4	0.1	0.0	0.0
Total	419	26,246	100.0	3,674	5.3	1.9	3.4	20.7	19.3	18.6	53.2	54.9	52.5	20.8	23.9	25.4	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Hagerstown Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Hagerstown MD-WV MSA	419	26,246	100.0	3,674	80.9	77.3	48.5	5.7	21.7	13.4	1.0	
Total	419	26,246	100.0	3,674	80.9	77.3	48.5	5.7	21.7	13.4	1.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Hagerstown Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Hagerstown MD-WV MSA	2	335	100.0	95	1.3	0.0	0.0	5.3	50.0	3.2	59.9	50.0	58.9	33.5	0.0	37.9	0.0	0.0	0.0
Total	2	335	100.0	95	1.3	0.0	0.0	5.3	50.0	3.2	59.9	50.0	58.9	33.5	0.0	37.9	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Hagerstown Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Hagerstown MD-WV MSA	2	335	100.0	95	97.2	100.0	40.0	2.2	0.0	0.6	0.0	
Total	2	335	100.0	95	97.2	100.0	40.0	2.2	0.0	0.6	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Columbus Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
Columbus AL-GA MSA	60	59,092	100.0	6,682	2.9	1.7	1.0	25.5	13.3	14.8	30.0	18.3	25.9	41.5	66.7	58.3	0.0	0.0	0.0	
Total	60	59,092	100.0	6,682	2.9	1.7	1.0	25.5	13.3	14.8	30.0	18.3	25.9	41.5	66.7	58.3	0.0	0.0	0.0	

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

Columbus Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018
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	
Columbus AL-GA MSA	60	59,092	100.0	6,682	22.4	6.7	4.8	18.0	11.7	12.6	18.1	11.7	19.8	41.5	40.0	40.9	0.0	30.0	21.8	
Total	60	59,092	100.0	6,682	22.4	6.7	4.8	18.0	11.7	12.6	18.1	11.7	19.8	41.5	40.0	40.9	0.0	30.0	21.8	

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

Columbus Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Columbus AL-GA MSA	241	14,444	100.0	3,867	8.2	6.6	7.1	22.6	17.4	20.9	34.7	29.0	32.6	34.1	46.9	39.4	0.4	0.0	0.0
Total	241	14,444	100.0	3,867	8.2	6.6	7.1	22.6	17.4	20.9	34.7	29.0	32.6	34.1	46.9	39.4	0.4	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Columbus Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Columbus AL-GA MSA	241	14,444	100.0	3,867	81.6	69.7	44.7	5.2	28.6	13.2	1.7	
Total	241	14,444	100.0	3,867	81.6	69.7	44.7	5.2	28.6	13.2	1.7	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Columbus Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Columbus AL-GA MSA	0	0	0.0	37	3.4	0.0	0.0	22.0	0.0	16.2	36.2	0.0	51.4	37.6	0.0	32.4	0.8	0.0	0.0
Total	0	0	0.0	37	3.4	0.0	0.0	22.0	0.0	16.2	36.2	0.0	51.4	37.6	0.0	32.4	0.8	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Columbus Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Columbus AL-GA MSA	0	0	0.0	37	95.2	0.0	45.9	2.4	0.0	2.4	0.0	
Total	0	0	0.0	37	95.2	0.0	45.9	2.4	0.0	2.4	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kingsport Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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
Kingsport TN-VA MSA	170	15,723	100.0	7,448	0.0	0.0	0.0	14.2	15.9	15.6	63.1	46.5	57.0	22.6	37.6	27.4	0.0	0.0	0.0
Total	170	15,723	100.0	7,448	0.0	0.0	0.0	14.2	15.9	15.6	63.1	46.5	57.0	22.6	37.6	27.4	0.0	0.0	0.0

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

Kingsport Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
Kingsport TN-VA MSA	170	15,723	100.0	7,448	21.1	9.4	8.0	18.5	13.5	17.9	19.9	22.4	22.5	40.5	44.7	37.7	0.0	10.0	14.0
Total	170	15,723	100.0	7,448	21.1	9.4	8.0	18.5	13.5	17.9	19.9	22.4	22.5	40.5	44.7	37.7	0.0	10.0	14.0

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

Kingsport Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Kingsport TN-VA MSA	362	14,197	100.0	3,457	0.0	0.0	0.0	21.0	22.7	19.1	57.1	53.0	53.5	21.9	24.3	27.4	0.0	0.0	0.0
Total	362	14,197	100.0	3,457	0.0	0.0	0.0	21.0	22.7	19.1	57.1	53.0	53.5	21.9	24.3	27.4	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kingsport Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Kingsport TN-VA MSA	362	14,197	100.0	3,457	79.4	84.5	53.1	5.6	15.5	14.9	0.0	
Total	362	14,197	100.0	3,457	79.4	84.5	53.1	5.6	15.5	14.9	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kingsport Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Kingsport TN-VA MSA	0	0	0.0	203	0.0	0.0	0.0	10.1	0.0	3.0	68.2	0.0	81.3	21.7	0.0	15.8	0.0	0.0	0.0
Total	0	0	0.0	203	0.0	0.0	0.0	10.1	0.0	3.0	68.2	0.0	81.3	21.7	0.0	15.8	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Kingsport Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kingsport TN-VA MSA	0	0	0.0	203	94.6	0.0	76.8	1.5	0.0	3.9	0.0
Total	0	0	0.0	203	94.6	0.0	76.8	1.5	0.0	3.9	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Cumberland Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
Cumberland MD-WV MSA	91	7,638	100.0	2,067	0.0	0.0	0.0	12.8	12.1	10.8	69.0	53.8	69.8	18.2	34.1	19.4	0.0	0.0	0.0	
Total	91	7,638	100.0	2,067	0.0	0.0	0.0	12.8	12.1	10.8	69.0	53.8	69.8	18.2	34.1	19.4	0.0	0.0	0.0	

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

Cumberland Multistate - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018
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	
Cumberland MD-WV MSA	91	7,638	100.0	2,067	21.3	9.9	8.5	18.2	15.4	17.1	20.1	31.9	22.1	40.4	41.8	34.5	0.0	1.1	17.8	
Total	91	7,638	100.0	2,067	21.3	9.9	8.5	18.2	15.4	17.1	20.1	31.9	22.1	40.4	41.8	34.5	0.0	1.1	17.8	

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

Cumberland Multistate - Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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
Cumberland MD-WV MSA	67	3,722	100.0	855	0.0	0.0	0.0	16.1	22.4	11.3	60.8	58.2	66.7	23.1	19.4	22.0	0.0	0.0	0.0
Total	67	3,722	100.0	855	0.0	0.0	0.0	16.1	22.4	11.3	60.8	58.2	66.7	23.1	19.4	22.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Cumberland Multistate - Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018
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	
Cumberland MD-WV MSA	67	3,722	100.0	855	77.8	83.6	43.3	6.1	16.4	16.1	0.0	
Total	67	3,722	100.0	855	77.8	83.6	43.3	6.1	16.4	16.1	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Cumberland Multistate - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
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
Cumberland MD-WV MSA	0	0	0.0	30	0.0	0.0	0.0	12.3	0.0	3.3	75.4	0.0	96.7	12.3	0.0	0.0	0.0	0.0	0.0
Total	0	0	0.0	30	0.0	0.0	0.0	12.3	0.0	3.3	75.4	0.0	96.7	12.3	0.0	0.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Cumberland Multistate - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Cumberland MD-WV MSA	0	0	0.0	30	98.5	0.0	3.3	1.5	0.0	0.0	0.0	
Total	0	0	0.0	30	98.5	0.0	3.3	1.5	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

APPENDIX E: DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

NORTH CAROLINA

Durham MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Durham MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	108	12.0	22.2	29.6	32.4	3.7
Population by Geography	534,154	9.8	21.9	35.2	31.7	1.3
Housing Units by Geography	229,797	10.3	21.2	36.0	32.4	0.0
Owner-Occupied Units by Geography	125,403	3.6	16.8	40.7	38.9	0.0
Occupied Rental Units by Geography	84,758	19.0	26.1	29.8	25.0	0.1
Vacant Units by Geography	19,636	16.0	28.3	33.3	22.4	0.0
Businesses by Geography	38,574	7.5	17.0	34.4	39.0	2.0
Farms by Geography	1,297	3.1	18.1	51.8	26.9	0.1
Family Distribution by Income Level	128,281	23.3	16.7	17.8	42.2	0.0
Household Distribution by Income Level	210,161	24.9	15.3	17.2	42.7	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$69,840	Median Housing Value			\$216,297
			Median Gross Rent			\$891
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 18 financial institutions operated 112 branches within the assessment area. Of these institutions, Truist ranked 4th with a 9.2 percent deposit market share.

Hickory MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Hickory MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	0.0	13.7	68.5	17.8	0.0
Population by Geography	363,074	0.0	12.9	67.4	19.7	0.0
Housing Units by Geography	162,341	0.0	13.4	66.4	20.2	0.0
Owner-Occupied Units by Geography	97,673	0.0	10.5	67.5	22.0	0.0
Occupied Rental Units by Geography	40,295	0.0	19.9	64.8	15.3	0.0
Vacant Units by Geography	24,373	0.0	14.0	64.6	21.4	0.0
Businesses by Geography	18,418	0.0	15.2	59.4	25.3	0.0
Farms by Geography	670	0.0	9.0	69.7	21.3	0.0
Family Distribution by Income Level	92,771	20.8	17.8	21.1	40.3	0.0
Household Distribution by Income Level	137,968	23.5	16.6	18.0	42.0	0.0
Median Family Income MSA - 25860 Hickory- Lenoir-Morganton, NC MSA		\$51,281	Median Housing Value			\$127,437
			Median Gross Rent			\$633
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 17 financial institutions operated 77 branches within the assessment area. Of these institutions, Truist ranked 1st with a 23.8 percent deposit market share.

Wilmington MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Wilmington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	61	14.8	18.0	29.5	32.8	4.9
Population by Geography	268,257	13.2	17.0	40.1	29.7	0.0
Housing Units by Geography	131,212	12.6	15.5	37.6	34.3	0.0
Owner-Occupied Units by Geography	66,128	4.9	14.4	44.4	36.3	0.0
Occupied Rental Units by Geography	42,405	25.8	18.8	34.0	21.5	0.0
Vacant Units by Geography	22,679	10.6	12.3	24.5	52.6	0.0
Businesses by Geography	21,867	13.4	12.1	34.3	40.1	0.3
Farms by Geography	603	7.0	25.0	37.6	30.0	0.3
Family Distribution by Income Level	65,424	22.7	17.6	18.4	41.3	0.0
Household Distribution by Income Level	108,533	25.1	15.5	17.5	41.9	0.0
Median Family Income MSA - 48900 Wilmington, NC MSA		\$64,357	Median Housing Value			\$222,834
			Median Gross Rent			\$917
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 21 financial institutions operated 70 branches within the assessment area. Of these institutions, Truist ranked 3rd with a 9.8 percent deposit market share.

Fayetteville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Fayetteville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	1.3	26.0	53.2	13.0	6.5
Population by Geography	375,678	0.6	19.1	60.4	19.0	1.0
Housing Units by Geography	161,648	0.7	19.0	63.1	17.2	0.0
Owner-Occupied Units by Geography	75,727	0.4	13.5	61.9	24.2	0.0
Occupied Rental Units by Geography	63,906	1.1	24.7	64.3	10.0	0.0
Vacant Units by Geography	22,015	0.6	21.4	63.8	14.2	0.0
Businesses by Geography	19,207	1.7	21.0	56.7	20.5	0.2
Farms by Geography	552	0.2	15.8	61.4	22.6	0.0
Family Distribution by Income Level	92,857	21.7	17.7	19.5	41.1	0.0
Household Distribution by Income Level	139,633	22.8	17.1	18.4	41.8	0.0
Median Family Income MSA - 22180 Fayetteville, NC MSA		\$51,775	Median Housing Value			\$128,641
			Median Gross Rent			\$870
			Families Below Poverty Level			14.6%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 18 financial institutions operated 83 branches within the assessment area. Of these institutions, Truist ranked 1st with a 29.7 percent deposit market share.

Asheville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Asheville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	16.2	59.0	21.0	1.9
Population by Geography	437,252	1.6	14.0	63.9	20.5	0.0
Housing Units by Geography	216,383	1.9	14.2	63.2	20.7	0.0
Owner-Occupied Units by Geography	123,308	1.3	12.1	64.2	22.4	0.0
Occupied Rental Units by Geography	59,192	3.1	18.7	59.3	18.9	0.0
Vacant Units by Geography	33,883	2.1	13.9	66.3	17.8	0.0
Businesses by Geography	35,416	2.9	15.7	53.7	27.7	0.0
Farms by Geography	1,316	1.2	15.7	64.5	18.5	0.0
Family Distribution by Income Level	113,150	20.2	18.6	20.5	40.7	0.0
Household Distribution by Income Level	182,500	23.5	16.5	18.2	41.9	0.0
Median Family Income MSA - 11700 Asheville, NC MSA		\$57,243	Median Housing Value			\$192,460
			Median Gross Rent			\$790
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 19 financial institutions operated 109 branches within the assessment area. Of these institutions, Truist ranked 8th with a 6.6 percent deposit market share.

New Bern MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: New Bern MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	6.9	13.8	55.2	20.7	3.4
Population by Geography	127,598	4.4	15.4	53.4	26.9	0.0
Housing Units by Geography	58,177	5.1	15.5	54.2	25.2	0.0
Owner-Occupied Units by Geography	32,022	2.1	13.3	53.7	30.9	0.0
Occupied Rental Units by Geography	17,482	9.0	17.6	56.3	17.1	0.0
Vacant Units by Geography	8,673	8.4	19.6	51.7	20.4	0.0
Businesses by Geography	6,699	8.5	10.2	54.2	27.0	0.0
Farms by Geography	366	1.4	17.8	58.7	22.1	0.0
Family Distribution by Income Level	34,009	20.1	19.2	19.3	41.3	0.0
Household Distribution by Income Level	49,504	23.0	16.1	19.5	41.4	0.0
Median Family Income MSA - 35100 New Bern, NC MSA		\$55,158	Median Housing Value			\$145,650
			Median Gross Rent			\$870
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 9 financial institutions operated 23 branches within the assessment area. Of these institutions, Truist ranked 1st with a 39.4 percent deposit market share.

Greenville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Greenville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	12.5	25.0	34.4	28.1	0.0
Population by Geography	173,798	10.8	22.5	38.5	28.3	0.0
Housing Units by Geography	76,269	12.5	22.7	38.7	26.0	0.0
Owner-Occupied Units by Geography	35,626	4.5	19.5	40.3	35.7	0.0
Occupied Rental Units by Geography	31,876	20.3	26.4	36.7	16.6	0.0
Vacant Units by Geography	8,767	17.1	22.6	39.7	20.6	0.0
Businesses by Geography	8,914	17.7	16.9	36.6	28.8	0.0
Farms by Geography	368	4.3	16.6	45.4	33.7	0.0
Family Distribution by Income Level	40,239	24.2	16.2	17.5	42.1	0.0
Household Distribution by Income Level	67,502	26.5	15.4	15.8	42.3	0.0
Median Family Income MSA - 24780 Greenville, NC MSA		\$56,239	Median Housing Value			\$128,235
			Median Gross Rent			\$737
			Families Below Poverty Level			16.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 16 financial institutions operated 40 branches within the assessment area. Of these institutions, Truist ranked 1st with a 21.4 percent deposit market share.

Goldsboro MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Goldsboro MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	38.5	50.0	11.5	0.0
Population by Geography	124,355	0.0	31.6	56.0	12.4	0.0
Housing Units by Geography	53,141	0.0	34.8	53.8	11.4	0.0
Owner-Occupied Units by Geography	28,479	0.0	26.7	56.0	17.3	0.0
Occupied Rental Units by Geography	19,051	0.0	42.8	52.2	5.1	0.0
Vacant Units by Geography	5,611	0.0	48.7	48.0	3.3	0.0
Businesses by Geography	5,398	0.0	35.9	52.9	11.3	0.0
Farms by Geography	352	0.0	16.8	66.5	16.8	0.0
Family Distribution by Income Level	31,600	22.8	17.9	19.4	39.9	0.0
Household Distribution by Income Level	47,530	23.8	16.9	16.3	42.9	0.0
Median Family Income MSA - 24140 Goldsboro, NC MSA		\$50,552	Median Housing Value			\$110,634
			Median Gross Rent			\$710
			Families Below Poverty Level			16.7%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 10 financial institutions operated 25 branches within the assessment area. Of these institutions, Truist ranked 1st with a 40.4 percent deposit market share.

Rocky Mount MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Rocky Mount MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	21.9	59.4	18.8	0.0
Population by Geography	150,002	0.0	20.5	58.1	21.4	0.0
Housing Units by Geography	67,094	0.0	21.4	59.4	19.2	0.0
Owner-Occupied Units by Geography	36,218	0.0	15.7	58.5	25.8	0.0
Occupied Rental Units by Geography	21,519	0.0	26.9	61.8	11.4	0.0
Vacant Units by Geography	9,357	0.0	30.6	57.7	11.7	0.0
Businesses by Geography	7,178	0.0	13.9	66.4	19.6	0.0
Farms by Geography	440	0.0	8.6	67.7	23.6	0.0
Family Distribution by Income Level	38,088	22.5	16.8	19.4	41.3	0.0
Household Distribution by Income Level	57,737	24.9	16.3	16.8	42.0	0.0
Median Family Income MSA - 40580 Rocky Mount, NC MSA		\$48,812	Median Housing Value			\$106,006
			Median Gross Rent			\$676
			Families Below Poverty Level			16.5%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 11 financial institutions operated 34 branches within the assessment area. Of these institutions, Truist ranked 2nd with a 17.6 percent deposit market share.

Burlington MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Burlington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	0.0	25.0	47.2	27.8	0.0
Population by Geography	155,258	0.0	28.9	46.0	25.0	0.0
Housing Units by Geography	67,804	0.0	28.9	45.7	25.3	0.0
Owner-Occupied Units by Geography	40,273	0.0	22.9	47.8	29.3	0.0
Occupied Rental Units by Geography	21,272	0.0	39.2	41.8	19.0	0.0
Vacant Units by Geography	6,259	0.0	33.1	45.5	21.3	0.0
Businesses by Geography	8,026	0.0	25.7	46.9	27.4	0.0
Farms by Geography	293	0.0	13.3	50.9	35.8	0.0
Family Distribution by Income Level	40,938	21.8	17.8	18.3	42.1	0.0
Household Distribution by Income Level	61,545	23.8	17.2	17.3	41.8	0.0
Median Family Income MSA - 15500 Burlington, NC MSA		\$53,234	Median Housing Value			\$139,707
			Median Gross Rent			\$764
			Families Below Poverty Level			14.4%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 16 financial institutions operated 38 branches within the assessment area. Of these institutions, Truist ranked 4th with an 11.8 percent deposit market share.

Jacksonville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Jacksonville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	18.8	56.3	15.6	9.4
Population by Geography	183,753	0.0	12.0	68.5	15.0	4.4
Housing Units by Geography	74,206	0.0	10.9	70.1	18.9	0.0
Owner-Occupied Units by Geography	33,428	0.0	3.8	76.3	19.9	0.0
Occupied Rental Units by Geography	28,757	0.0	20.4	67.6	12.0	0.0
Vacant Units by Geography	12,021	0.0	8.0	59.1	33.0	0.0
Businesses by Geography	7,600	0.0	12.5	67.0	19.6	0.9
Farms by Geography	313	0.0	6.4	77.3	16.3	0.0
Family Distribution by Income Level	44,838	18.2	18.6	23.9	39.3	0.0
Household Distribution by Income Level	62,185	21.1	17.6	21.6	39.7	0.0
Median Family Income MSA - 27340 Jacksonville, NC MSA		\$51,012	Median Housing Value			\$153,933
			Median Gross Rent			\$950
			Families Below Poverty Level			11.9%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 11 financial institutions operated 25 branches within the assessment area. Of these institutions, Truist ranked 5th with an 8.5 percent deposit market share.

FLORIDA

North Port MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: North Port MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	174	2.3	24.7	45.4	26.4	1.1
Population by Geography	735,767	2.8	23.7	47.5	26.0	0.0
Housing Units by Geography	407,196	1.8	22.5	47.5	28.2	0.0
Owner-Occupied Units by Geography	221,993	1.0	18.3	50.7	29.9	0.0
Occupied Rental Units by Geography	87,917	4.5	33.8	43.7	18.1	0.0
Vacant Units by Geography	97,286	1.2	21.6	43.5	33.7	0.0
Businesses by Geography	87,479	1.3	19.3	45.4	34.0	0.0
Farms by Geography	2,615	1.9	19.3	44.6	34.2	0.0
Family Distribution by Income Level	194,874	19.4	19.1	21.0	40.5	0.0
Household Distribution by Income Level	309,910	23.1	17.1	18.1	41.7	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$62,814	Median Housing Value			\$210,725
			Median Gross Rent			\$1,020
			Families Below Poverty Level			8.4%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 36 financial institutions operated 265 branches within the assessment area. Of these institutions, Truist ranked 5th with 5.1 percent deposit market share.

Jacksonville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Jacksonville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	262	7.6	26.3	37.8	26.7	1.5
Population by Geography	1,401,600	5.1	23.6	40.9	30.4	0.0
Housing Units by Geography	610,600	5.9	23.8	39.4	31.0	0.0
Owner-Occupied Units by Geography	339,445	3.4	19.7	41.3	35.6	0.0
Occupied Rental Units by Geography	183,261	8.3	30.5	38.4	22.8	0.0
Vacant Units by Geography	87,894	10.2	25.9	34.0	29.9	0.0
Businesses by Geography	139,862	4.4	21.7	35.2	38.7	0.0
Farms by Geography	3,708	3.2	20.5	44.9	31.4	0.0
Family Distribution by Income Level	343,061	21.8	17.4	20.0	40.9	0.0
Household Distribution by Income Level	522,706	23.7	16.5	17.7	42.2	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA		\$64,042	Median Housing Value			\$173,807
			Median Gross Rent			\$989
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 32 financial institutions operated 277 branches within the assessment area. Of these institutions, Truist ranked 11th with 1.0 percent deposit market share.

Cape Coral MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Cape Coral MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	4.2	25.1	35.9	33.5	1.2
Population by Geography	663,675	4.7	27.1	42.3	25.9	0.0
Housing Units by Geography	374,333	3.5	21.3	40.9	34.4	0.0
Owner-Occupied Units by Geography	174,162	2.1	18.6	44.2	35.1	0.0
Occupied Rental Units by Geography	78,125	8.5	32.9	38.0	20.5	0.0
Vacant Units by Geography	122,046	2.3	17.6	38.0	42.1	0.0
Businesses by Geography	74,027	2.7	22.3	40.2	34.6	0.2
Farms by Geography	2,466	3.0	25.9	46.4	24.6	0.0
Family Distribution by Income Level	165,635	20.7	18.5	19.7	41.1	0.0
Household Distribution by Income Level	252,287	22.6	17.2	18.8	41.4	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA		\$57,627	Median Housing Value			\$192,233
			Median Gross Rent			\$970
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 32 financial institutions operated 187 branches within the assessment area. Of these institutions, Truist ranked 6th with 5.7 percent deposit market share.

Palm Bay MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Palm Bay MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	114	5.3	22.8	41.2	28.1	2.6
Population by Geography	553,591	3.4	23.5	43.2	29.9	0.0
Housing Units by Geography	271,654	3.7	24.7	42.7	28.8	0.0
Owner-Occupied Units by Geography	159,654	1.6	21.1	43.5	33.8	0.0
Occupied Rental Units by Geography	63,137	8.5	32.5	38.2	20.7	0.0
Vacant Units by Geography	48,863	4.6	26.5	46.0	22.9	0.0
Businesses by Geography	52,738	2.5	23.4	39.0	35.1	0.1
Farms by Geography	1,704	2.3	25.0	42.8	29.8	0.0
Family Distribution by Income Level	141,695	20.2	18.6	20.6	40.6	0.0
Household Distribution by Income Level	222,791	23.1	16.8	18.6	41.5	0.0
Median Family Income MSA - 37340 Palm Bay-Melbourne-Titusville, FL MSA		\$60,408	Median Housing Value			\$147,917
			Median Gross Rent			\$932
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 19 financial institutions operated 104 branches within the assessment area. Of these institutions, Truist ranked 6th with 6.7 percent deposit market share.

Port St. Lucie MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Port St Lucie MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	4.9	21.0	40.7	28.4	4.9
Population by Geography	439,592	3.6	19.7	51.8	25.0	0.0
Housing Units by Geography	215,909	3.4	17.0	49.6	30.0	0.0
Owner-Occupied Units by Geography	125,375	1.6	13.0	54.4	30.9	0.0
Occupied Rental Units by Geography	44,475	8.4	32.5	41.9	17.1	0.0
Vacant Units by Geography	46,059	3.4	12.7	44.0	39.9	0.0
Businesses by Geography	45,149	3.1	19.3	47.5	29.9	0.1
Farms by Geography	1,690	3.1	24.3	46.2	26.3	0.0
Family Distribution by Income Level	110,529	19.8	18.7	19.9	41.6	0.0
Household Distribution by Income Level	169,850	23.8	16.0	18.2	41.9	0.0
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$56,570	Median Housing Value			\$159,862
			Median Gross Rent			\$1,004
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 17 financial institutions operated 100 branches within the assessment area. Of these institutions, Truist ranked 11th with 3.6 percent deposit market share.

Deltona MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Deltona MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	3.0	17.8	55.6	22.2	1.5
Population by Geography	604,502	1.9	16.6	61.2	20.3	0.0
Housing Units by Geography	304,710	1.7	17.0	58.3	23.0	0.0
Owner-Occupied Units by Geography	168,828	0.8	12.6	62.4	24.2	0.0
Occupied Rental Units by Geography	68,302	3.9	27.7	54.5	14.0	0.0
Vacant Units by Geography	67,580	1.9	17.3	51.9	28.9	0.0
Businesses by Geography	58,539	2.2	18.8	55.5	23.5	0.0
Farms by Geography	2,193	0.8	17.2	60.1	21.8	0.0
Family Distribution by Income Level	149,233	19.1	19.1	21.0	40.8	0.0
Household Distribution by Income Level	237,130	22.4	17.1	19.0	41.4	0.0
Median Family Income MSA - 19660 Deltona-Daytona Beach-Ormond Beach, FL MSA		\$52,220	Median Housing Value			\$148,623
			Median Gross Rent			\$950
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 22 financial institutions operated 141 branches within the assessment area. Of these institutions, Truist ranked 8th with 3.1 percent deposit market share.

Lakeland MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Lakeland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	154	4.5	22.7	51.3	20.8	0.6
Population by Geography	626,676	2.5	22.4	55.6	19.5	0.0
Housing Units by Geography	282,248	2.3	21.5	57.8	18.3	0.0
Owner-Occupied Units by Geography	152,336	1.3	17.3	58.8	22.6	0.0
Occupied Rental Units by Geography	69,045	4.9	30.2	51.6	13.3	0.0
Vacant Units by Geography	60,867	2.0	22.1	62.5	13.4	0.0
Businesses by Geography	46,497	3.6	20.6	51.6	24.3	0.0
Farms by Geography	1,966	2.2	16.9	58.8	22.1	0.0
Family Distribution by Income Level	153,115	20.4	18.3	21.4	39.8	0.0
Household Distribution by Income Level	221,381	22.1	17.1	18.8	42.0	0.0
Median Family Income MSA - 29460 Lakeland-Winter Haven, FL MSA		\$50,986	Median Housing Value			\$106,344
			Median Gross Rent			\$884
			Families Below Poverty Level			13.4%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 19 financial institutions operated 103 branches within the assessment area. Of these institutions, Truist ranked 7th with 4.6 percent deposit market share.

Tallahassee MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Tallahassee MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	16.3	24.4	32.6	22.1	4.7
Population by Geography	374,690	14.1	22.3	35.9	24.0	3.6
Housing Units by Geography	164,810	14.9	22.6	37.5	22.7	2.3
Owner-Occupied Units by Geography	82,146	4.9	18.0	41.9	34.7	0.6
Occupied Rental Units by Geography	61,754	26.7	26.5	31.7	10.3	4.8
Vacant Units by Geography	20,910	19.6	29.1	37.3	12.0	2.0
Businesses by Geography	36,418	7.6	20.2	40.8	30.0	1.3
Farms by Geography	1,211	4.2	16.9	47.5	31.0	0.3
Family Distribution by Income Level	83,490	23.4	16.7	19.6	40.2	0.0
Household Distribution by Income Level	143,900	25.6	15.1	16.7	42.6	0.0
Median Family Income MSA - 45220 Tallahassee, FL MSA		\$64,055	Median Housing Value			\$152,385
			Median Gross Rent			\$896
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 18 financial institutions operated 81 branches within the assessment area. Of these institutions, Truist ranked 5th with 9.7 percent deposit market share.

Ocala MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Ocala MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	3.2	23.8	54.0	15.9	3.2
Population by Geography	336,811	2.3	18.5	63.6	15.7	0.0
Housing Units by Geography	163,687	2.0	17.9	66.6	13.6	0.0
Owner-Occupied Units by Geography	99,961	0.6	14.5	69.6	15.3	0.0
Occupied Rental Units by Geography	32,326	5.6	26.3	56.5	11.6	0.0
Vacant Units by Geography	31,400	2.6	20.0	67.3	10.1	0.0
Businesses by Geography	27,987	1.9	16.5	64.4	17.2	0.0
Farms by Geography	1,797	0.9	18.0	67.3	13.9	0.0
Family Distribution by Income Level	86,114	19.3	19.5	21.6	39.7	0.0
Household Distribution by Income Level	132,287	21.4	17.5	19.4	41.7	0.0
Median Family Income MSA - 36100 Ocala, FL MSA		\$48,128	Median Housing Value			\$115,544
			Median Gross Rent			\$802
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 21 financial institutions operated 76 branches within the assessment area. Of these institutions, Truist ranked 9th with 2.3 percent deposit market share.

Naples MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Naples MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	8.1	20.3	35.1	35.1	1.4
Population by Geography	341,091	7.2	23.5	38.0	31.3	0.0
Housing Units by Geography	201,582	3.6	18.3	38.0	40.0	0.0
Owner-Occupied Units by Geography	93,733	2.3	16.3	41.3	40.1	0.0
Occupied Rental Units by Geography	36,155	9.5	28.3	37.8	24.5	0.0
Vacant Units by Geography	71,694	2.4	15.9	33.8	47.8	0.0
Businesses by Geography	46,737	2.8	13.1	39.2	44.8	0.0
Farms by Geography	1,262	5.9	19.5	44.4	30.3	0.0
Family Distribution by Income Level	87,665	20.8	17.7	19.3	42.2	0.0
Household Distribution by Income Level	129,888	22.3	17.1	18.4	42.2	0.0
Median Family Income MSA - 34940 Naples- Immokalee-Marco Island, FL MSA		\$66,264	Median Housing Value			\$347,465
			Median Gross Rent			\$1,087
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 35 financial institutions operated 146 branches within the assessment area. Of these institutions, Truist ranked 17th with 1.4 percent deposit market share.

Pensacola MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Pensacola MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	98	4.1	21.4	52.0	20.4	2.0
Population by Geography	467,348	2.5	18.6	54.8	24.1	0.0
Housing Units by Geography	204,964	2.5	20.0	51.9	25.6	0.0
Owner-Occupied Units by Geography	112,276	1.6	15.2	54.7	28.5	0.0
Occupied Rental Units by Geography	60,038	3.7	29.0	49.8	17.5	0.0
Vacant Units by Geography	32,650	3.5	20.1	46.3	30.2	0.0
Businesses by Geography	42,309	2.3	20.7	50.7	26.3	0.0
Farms by Geography	1,467	1.9	14.9	59.6	23.5	0.0
Family Distribution by Income Level	111,232	18.6	19.1	22.7	39.7	0.0
Household Distribution by Income Level	172,314	22.5	17.4	19.4	40.7	0.0
Median Family Income MSA - 37860 Pensacola-Ferry Pass-Brent, FL MSA		\$60,705	Median Housing Value			\$141,126
			Median Gross Rent			\$944
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 22 financial institutions operated 85 branches within the assessment area. Of these institutions, Truist ranked 11th with 2.0 percent deposit market share.

Crestview MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Crestview MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	16.4	56.4	21.8	5.5
Population by Geography	251,724	0.0	14.8	63.3	21.8	0.0
Housing Units by Geography	141,156	0.0	12.6	53.5	33.9	0.0
Owner-Occupied Units by Geography	64,419	0.0	12.2	62.3	25.5	0.0
Occupied Rental Units by Geography	33,955	0.0	17.4	63.3	19.4	0.0
Vacant Units by Geography	42,782	0.0	9.3	32.6	58.1	0.0
Businesses by Geography	28,917	0.0	10.5	53.4	36.0	0.0
Farms by Geography	759	0.0	15.8	61.0	23.2	0.0
Family Distribution by Income Level	64,717	20.3	17.9	21.5	40.3	0.0
Household Distribution by Income Level	98,374	22.8	17.5	18.1	41.6	0.0
Median Family Income MSA - 18880 Crestview-Fort Walton Beach-Destin, FL MSA		\$63,539	Median Housing Value			\$224,687
			Median Gross Rent			\$1,065
			Families Below Poverty Level			10.4%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 26 financial institutions operated 97 branches within the assessment area. Of these institutions, Truist ranked 16th with 1.3 percent deposit market share.

Punta Gorda MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Punta Gorda MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	15.4	59.0	23.1	2.6
Population by Geography	165,783	0.0	14.4	69.7	15.8	0.0
Housing Units by Geography	101,195	0.0	13.1	66.8	20.1	0.0
Owner-Occupied Units by Geography	56,019	0.0	10.7	70.6	18.6	0.0
Occupied Rental Units by Geography	15,837	0.0	23.5	66.1	10.4	0.0
Vacant Units by Geography	29,339	0.0	12.1	59.9	28.1	0.0
Businesses by Geography	18,521	0.0	15.8	66.7	17.5	0.0
Farms by Geography	610	0.0	26.1	61.8	12.1	0.0
Family Distribution by Income Level	46,876	17.3	20.7	21.8	40.2	0.0
Household Distribution by Income Level	71,856	21.4	17.9	19.3	41.4	0.0
Median Family Income MSA - 39460 Punta Gorda, FL MSA		\$54,478	Median Housing Value			\$160,661
			Median Gross Rent			\$912
			Families Below Poverty Level			8.3%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 15 financial institutions operated 51 branches within the assessment area. Of these institutions, Truist ranked 8th with 4.3 percent deposit market share.

Homosassa Springs MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Homosassa Springs MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	21.4	60.7	14.3	3.6
Population by Geography	139,654	0.0	21.9	59.8	18.3	0.0
Housing Units by Geography	77,819	0.0	21.5	60.9	17.6	0.0
Owner-Occupied Units by Geography	49,534	0.0	20.1	62.7	17.3	0.0
Occupied Rental Units by Geography	11,478	0.0	28.2	54.9	16.9	0.0
Vacant Units by Geography	16,807	0.0	21.0	59.8	19.1	0.0
Businesses by Geography	11,420	0.0	16.0	63.5	20.5	0.0
Farms by Geography	607	0.0	18.8	64.3	17.0	0.0
Family Distribution by Income Level	39,016	18.2	19.4	22.5	39.9	0.0
Household Distribution by Income Level	61,012	21.6	18.4	18.2	41.8	0.0
Median Family Income MSA - 26140 Homosassa Springs, FL MSA		\$47,829	Median Housing Value			\$118,117
			Median Gross Rent			\$812
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 11 financial institutions operated 37 branches within the assessment area. Of these institutions, Truist ranked 7th with 3.7 percent deposit market share.

FL Non-MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA FL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	0.0	3.2	9.7	77.4	9.7
Population by Geography	75,901	0.0	2.3	16.9	80.8	0.0
Housing Units by Geography	52,913	0.0	2.0	12.5	85.5	0.0
Owner-Occupied Units by Geography	17,675	0.0	1.3	11.8	87.0	0.0
Occupied Rental Units by Geography	11,235	0.0	2.5	22.5	75.0	0.0
Vacant Units by Geography	24,003	0.0	2.2	8.3	89.4	0.1
Businesses by Geography	12,543	0.0	2.7	15.6	81.5	0.1
Farms by Geography	294	0.0	2.0	13.9	84.0	0.0
Family Distribution by Income Level	16,480	11.6	11.0	16.3	61.2	0.0
Household Distribution by Income Level	28,910	15.8	10.9	13.0	60.4	0.0
Median Family Income Non-MSAs - FL		\$46,600	Median Housing Value			\$466,864
			Median Gross Rent			\$1,418
			Families Below Poverty Level			8.1%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 9 financial institutions operated 43 branches within the assessment area. Of these institutions, Truist ranked 6th with 6.6 percent deposit market share.

The Villages MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: The Villages MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	42.1	36.8	0.0	15.8
Population by Geography	108,501	0.9	25.4	65.2	0.0	8.5
Housing Units by Geography	61,171	0.7	26.1	73.2	0.0	0.1
Owner-Occupied Units by Geography	43,312	0.2	23.0	76.8	0.0	0.0
Occupied Rental Units by Geography	4,727	3.5	40.2	55.8	0.0	0.5
Vacant Units by Geography	13,132	1.0	31.4	67.4	0.0	0.2
Businesses by Geography	6,173	1.8	33.0	64.9	0.0	0.2
Farms by Geography	294	0.7	55.4	43.5	0.0	0.3
Family Distribution by Income Level	32,883	15.5	20.8	24.3	39.5	0.0
Household Distribution by Income Level	48,039	21.1	18.1	20.4	40.5	0.0
Median Family Income MSA - 45540 The Villages, FL MSA		\$60,099	Median Housing Value			\$194,761
			Median Gross Rent			\$819
			Families Below Poverty Level			6.4%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 10 financial institutions operated 28 branches within the assessment area. Of these institutions, Truist ranked 6th with 4.1 percent deposit market share.

Panama City MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Panama City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	2.1	18.8	52.1	22.9	4.2
Population by Geography	191,138	2.5	15.6	56.0	25.9	0.0
Housing Units by Geography	109,266	2.2	13.9	57.4	26.5	0.0
Owner-Occupied Units by Geography	45,660	1.6	13.2	55.3	30.0	0.0
Occupied Rental Units by Geography	27,611	4.0	21.5	53.2	21.3	0.0
Vacant Units by Geography	35,995	1.6	9.1	63.2	26.1	0.0
Businesses by Geography	18,074	2.4	18.3	55.5	23.8	0.0
Farms by Geography	442	2.3	12.4	57.5	27.8	0.0
Family Distribution by Income Level	47,280	21.3	18.1	19.9	40.7	0.0
Household Distribution by Income Level	73,271	22.7	16.8	19.0	41.5	0.0
Median Family Income MSA - 37460 Panama City, FL MSA		\$56,988	Median Housing Value			\$159,432
			Median Gross Rent			\$953
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS Census and 2018 D&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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 17 financial institutions operated 49 branches within the assessment area. Of these institutions, Truist ranked 11th with 2.6 percent deposit market share.

VIRGINIA

Charlottesville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Charlottesville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	4.5	27.3	43.2	22.7	2.3
Population by Geography	208,002	4.4	22.8	47.0	23.9	1.8
Housing Units by Geography	91,983	4.3	23.3	48.9	23.4	0.1
Owner-Occupied Units by Geography	51,220	2.7	16.9	54.5	26.0	0.0
Occupied Rental Units by Geography	28,726	7.7	31.8	38.5	21.8	0.1
Vacant Units by Geography	12,037	3.3	30.5	50.2	16.0	0.0
Businesses by Geography	19,943	3.6	16.4	43.2	36.4	0.5
Farms by Geography	845	1.3	18.0	57.9	22.8	0.0
Family Distribution by Income Level	49,042	19.8	16.8	21.0	42.4	0.0
Household Distribution by Income Level	79,946	23.9	15.9	17.8	42.4	0.0
Median Family Income MSA - 16820 Charlottesville, VA MSA		\$76,610	Median Housing Value			\$286,065
			Median Gross Rent			\$1,027
			Families Below Poverty Level			7.3%

*Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 16 financial institutions operated 63 branches within the assessment area. Of these institutions, Truist ranked 3rd with 14.5 percent deposit market share.

Lynchburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Lynchburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	1.7	23.3	60.0	15.0	0.0
Population by Geography	256,989	1.9	18.4	61.1	18.6	0.0
Housing Units by Geography	114,007	2.1	18.8	62.3	16.9	0.0
Owner-Occupied Units by Geography	70,208	1.5	12.2	65.1	21.2	0.0
Occupied Rental Units by Geography	29,135	3.2	33.9	51.1	11.7	0.0
Vacant Units by Geography	14,664	2.7	19.8	70.9	6.5	0.0
Businesses by Geography	17,529	1.1	19.3	56.9	22.7	0.0
Farms by Geography	807	0.9	7.1	72.0	20.1	0.0
Family Distribution by Income Level	66,286	20.8	17.5	21.6	40.0	0.0
Household Distribution by Income Level	99,343	24.3	16.0	18.0	41.8	0.0
Median Family Income MSA - 31340 Lynchburg, VA MSA		\$60,256	Median Housing Value			\$166,909
			Median Gross Rent			\$746
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS Census and 2019 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 16 financial institutions operated 86 branches within the assessment area. Of these institutions, Truist ranked 2nd with 16.2 percent deposit market share.

Roanoke MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Roanoke MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	65	4.6	20.0	49.2	26.2	0.0
Population by Geography	312,216	3.4	21.6	46.6	28.4	0.0
Housing Units by Geography	145,649	3.1	21.7	47.1	28.2	0.0
Owner-Occupied Units by Geography	88,893	1.4	18.4	47.5	32.7	0.0
Occupied Rental Units by Geography	39,871	6.5	28.4	45.5	19.6	0.0
Vacant Units by Geography	16,885	4.3	22.9	48.2	24.6	0.0
Businesses by Geography	24,761	2.7	15.2	50.2	31.9	0.0
Farms by Geography	866	1.4	19.7	47.9	30.9	0.0
Family Distribution by Income Level	83,580	19.9	17.5	22.4	40.2	0.0
Household Distribution by Income Level	128,764	24.1	16.1	19.1	40.8	0.0
Median Family Income MSA - 40220 Roanoke, VA MSA		\$61,791	Median Housing Value			\$179,442
			Median Gross Rent			\$749
			Families Below Poverty Level			10.0%
<i>Source: 2015 ACS Census and 2019 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 16 financial institutions operated 107 branches within the assessment area. Of these institutions, Truist ranked 3rd with 11.7 percent deposit market share.

Winchester MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Winchester MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	15.8	57.9	26.3	0.0
Population by Geography	108,508	0.0	17.4	55.7	26.9	0.0
Housing Units by Geography	44,055	0.0	16.4	57.2	26.4	0.0
Owner-Occupied Units by Geography	27,768	0.0	10.7	57.9	31.5	0.0
Occupied Rental Units by Geography	12,295	0.0	28.5	54.7	16.8	0.0
Vacant Units by Geography	3,992	0.0	19.0	59.8	21.2	0.0
Businesses by Geography	9,236	0.0	18.1	56.3	25.6	0.0
Farms by Geography	338	0.0	9.8	64.2	26.0	0.0
Family Distribution by Income Level	27,783	19.7	16.3	19.5	44.5	0.0
Household Distribution by Income Level	40,063	18.6	16.3	16.2	48.9	0.0
Median Family Income MSA - 49020 Winchester, VA-WV MSA		\$69,817	Median Housing Value			\$216,463
			Median Gross Rent			\$1,003
			Families Below Poverty Level			5.9%
<i>Source: 2015 ACS Census and 2019 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 14 financial institutions operated 48 branches within the assessment area. Of these institutions, Truist ranked 1st with 27.0 percent deposit market share.

Harrisonburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Harrisonburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	3.3	13.3	70.0	13.3	0.0
Population by Geography	129,173	4.6	15.1	66.3	14.0	0.0
Housing Units by Geography	52,211	3.5	15.2	69.2	12.1	0.0
Owner-Occupied Units by Geography	28,375	0.4	10.0	76.9	12.7	0.0
Occupied Rental Units by Geography	17,659	7.2	24.7	59.7	8.4	0.0
Vacant Units by Geography	6,177	7.1	12.0	61.4	19.5	0.0
Businesses by Geography	8,780	2.1	20.1	62.7	15.1	0.0
Farms by Geography	789	0.1	3.8	83.3	12.8	0.0
Family Distribution by Income Level	29,592	18.6	19.5	22.7	39.3	0.0
Household Distribution by Income Level	46,034	22.9	16.7	19.0	41.4	0.0
Median Family Income MSA - 25500 Harrisonburg, VA MSA		\$60,539	Median Housing Value			\$208,004
			Median Gross Rent			\$884
			Families Below Poverty Level			9.6%
<i>Source: 2015 ACS Census and 2019 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 17 financial institutions operated 49 branches within the assessment area. Of these institutions, Truist ranked 2nd with 18.4 percent deposit market share.

Blacksburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Blacksburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	3.0	66.7	18.2	12.1
Population by Geography	164,959	0.0	4.6	65.8	21.1	8.6
Housing Units by Geography	71,128	0.0	3.8	72.6	21.6	2.0
Owner-Occupied Units by Geography	37,403	0.0	1.1	76.7	21.6	0.6
Occupied Rental Units by Geography	25,122	0.0	7.8	64.5	23.8	3.9
Vacant Units by Geography	8,603	0.0	3.9	78.1	15.3	2.7
Businesses by Geography	9,575	0.0	1.7	70.7	25.7	1.9
Farms by Geography	372	0.0	0.8	71.2	26.3	1.6
Family Distribution by Income Level	36,114	18.4	18.1	21.7	41.9	0.0
Household Distribution by Income Level	62,525	27.3	13.3	17.9	41.5	0.0
Median Family Income MSA - 13980 Blacksburg-Christiansburg, VA MSA		\$60,503	Median Housing Value			\$179,995
			Median Gross Rent			\$780
			Families Below Poverty Level			9.2%
<i>Source: 2015 ACS Census and 2019 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 14 financial institutions operated 60 branches within the assessment area. Of these institutions, Truist ranked 4th with 8.8 percent deposit market share.

Staunton MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Staunton MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	12.5	75.0	8.3	0.0
Population by Geography	119,396	1.1	12.0	79.6	7.4	0.0
Housing Units by Geography	53,374	1.2	11.0	81.0	6.8	0.0
Owner-Occupied Units by Geography	33,456	0.2	9.2	83.1	7.4	0.0
Occupied Rental Units by Geography	14,112	3.4	13.6	77.7	5.4	0.0
Vacant Units by Geography	5,806	1.1	15.2	77.1	6.6	0.0
Businesses by Geography	7,997	4.2	6.2	81.8	7.8	0.0
Farms by Geography	534	0.7	4.3	90.6	4.3	0.0
Family Distribution by Income Level	32,221	19.7	18.4	22.7	39.2	0.0
Household Distribution by Income Level	47,568	22.9	17.4	18.9	40.8	0.0
Median Family Income MSA - 44420 Staunton, VA MSA		\$60,603	Median Housing Value			\$184,989
			Median Gross Rent			\$800
			Families Below Poverty Level			8.9%
<i>Source: 2015 ACS Census and 2019 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 14 financial institutions operated 39 branches within the assessment area. Of these institutions, Truist ranked 4th with 12.7 percent deposit market share.

Georgia

Savannah MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Savannah MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	11.2	31.5	30.3	22.5	4.5
Population by Geography	367,071	7.7	24.1	37.3	31.0	0.0
Housing Units by Geography	154,914	7.7	24.7	36.4	31.1	0.0
Owner-Occupied Units by Geography	79,241	4.0	16.9	41.2	37.9	0.0
Occupied Rental Units by Geography	55,544	11.5	34.9	30.6	23.0	0.0
Vacant Units by Geography	20,129	11.6	27.5	33.6	27.2	0.1
Businesses by Geography	26,137	7.3	19.9	37.8	34.6	0.3
Farms by Geography	576	3.5	17.2	44.8	34.5	0.0
Family Distribution by Income Level	87,366	22.9	16.3	20.5	40.3	0.0
Household Distribution by Income Level	134,785	24.9	15.7	17.3	42.1	0.0
Median Family Income MSA - 42340 Savannah, GA MSA		\$61,754	Median Housing Value			\$182,813
			Median Gross Rent			\$961
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 23 financial institutions operated 93 branches within the assessment area. Of these institutions, Truist ranked 6th with 6.9 percent deposit market share.

Gainesville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Gainesville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	5.6	19.4	41.7	33.3	0.0
Population by Geography	187,916	6.1	18.9	42.3	32.8	0.0
Housing Units by Geography	69,302	5.4	16.2	45.4	33.0	0.0
Owner-Occupied Units by Geography	41,434	1.2	12.4	44.6	41.8	0.0
Occupied Rental Units by Geography	20,558	13.1	25.1	43.7	18.1	0.0
Vacant Units by Geography	7,310	7.3	12.4	55.0	25.3	0.0
Businesses by Geography	12,976	9.6	16.9	41.1	32.4	0.0
Farms by Geography	417	3.6	14.4	43.6	38.4	0.0
Family Distribution by Income Level	45,810	20.6	18.0	20.3	41.0	0.0
Household Distribution by Income Level	61,992	22.5	17.0	18.8	41.7	0.0
Median Family Income MSA - 23580 Gainesville, GA MSA		\$58,558	Median Housing Value			\$161,600
			Median Gross Rent			\$908
			Families Below Poverty Level			14.3%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 18 financial institutions operated 44 branches within the assessment area. Of these institutions, Truist ranked 2nd with 13.3 percent deposit market share.

Dalton MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Dalton MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	19.2	53.8	26.9	0.0
Population by Geography	142,857	0.0	19.2	49.8	30.9	0.0
Housing Units by Geography	55,549	0.0	18.2	50.1	31.7	0.0
Owner-Occupied Units by Geography	31,866	0.0	16.1	50.2	33.8	0.0
Occupied Rental Units by Geography	16,945	0.0	21.1	49.6	29.3	0.0
Vacant Units by Geography	6,738	0.0	20.8	50.9	28.3	0.0
Businesses by Geography	7,073	0.0	16.8	51.6	31.6	0.0
Farms by Geography	202	0.0	6.9	61.4	31.7	0.0
Family Distribution by Income Level	35,878	20.4	19.5	20.0	40.2	0.0
Household Distribution by Income Level	48,811	21.9	18.0	17.8	42.2	0.0
Median Family Income MSA - 19140 Dalton, GA MSA		\$47,062	Median Housing Value			\$113,247
			Median Gross Rent			\$664
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 11 financial institutions operated 29 branches within the assessment area. Of these institutions, Truist ranked 1st with 18.7 percent deposit market share.

Macon MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Macon MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	23.3	18.3	25.0	33.3	0.0
Population by Geography	231,517	16.2	20.8	24.6	38.5	0.0
Housing Units by Geography	102,025	16.8	20.8	25.6	36.8	0.0
Owner-Occupied Units by Geography	51,821	8.7	17.0	28.2	46.2	0.0
Occupied Rental Units by Geography	32,757	25.1	23.7	21.8	29.4	0.0
Vacant Units by Geography	17,447	25.3	26.6	25.2	22.9	0.0
Businesses by Geography	15,385	13.9	16.9	27.0	42.3	0.0
Farms by Geography	430	4.4	14.4	31.2	50.0	0.0
Family Distribution by Income Level	56,013	26.2	14.6	17.0	42.2	0.0
Household Distribution by Income Level	84,578	26.6	15.2	14.8	43.4	0.0
Median Family Income MSA - 31420 Macon-Bibb County, GA MSA		\$51,727	Median Housing Value			\$115,380
			Median Gross Rent			\$726
			Families Below Poverty Level			19.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 21 financial institutions operated 49 branches within the assessment area. Of these institutions, Truist ranked 4th with 12.1 percent deposit market share.

Warner Robins MSA Assessment Area

The Warner Robins MSA assessment area consists of Houston, Peach, and Pulaski Counties. Due to OMB changes, in 2019, Pulaski County was removed from the Warner Robins MSA. As a result, the number of census tracts decreased to 29.

Demographic Information of the Assessment Area						
Assessment Area: Warner Robins MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	6.3	31.3	50.0	12.5	0.0
Population by Geography	186,246	5.3	25.0	49.2	20.5	0.0
Housing Units by Geography	76,056	5.9	25.2	49.8	19.1	0.0
Owner-Occupied Units by Geography	44,013	2.2	20.4	50.6	26.7	0.0
Occupied Rental Units by Geography	23,646	10.6	31.2	50.4	7.8	0.0
Vacant Units by Geography	8,397	12.2	33.2	44.2	10.4	0.0
Businesses by Geography	9,744	4.6	24.7	53.9	16.9	0.0
Farms by Geography	411	1.2	34.8	47.7	16.3	0.0
Family Distribution by Income Level	47,443	23.4	15.9	20.5	40.2	0.0
Household Distribution by Income Level	67,659	24.7	15.9	17.9	41.5	0.0
Median Family Income MSA - 47580 Warner Robins, GA MSA		\$61,022	Median Housing Value			\$124,374
			Median Gross Rent			\$813
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 12 financial institutions operated 31 branches within the assessment area. Of these institutions, Truist ranked 5th with 9.2 percent deposit market share.

Athens MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Athens MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	15.2	17.4	34.8	30.4	2.2
Population by Geography	198,225	13.4	14.7	37.0	30.9	3.9
Housing Units by Geography	82,615	13.8	15.4	40.0	30.4	0.4
Owner-Occupied Units by Geography	38,534	6.4	14.7	41.1	37.8	0.0
Occupied Rental Units by Geography	32,439	21.1	15.1	39.3	23.7	0.9
Vacant Units by Geography	11,642	18.0	18.6	38.4	24.4	0.5
Businesses by Geography	12,954	11.2	10.1	35.4	41.9	1.4
Farms by Geography	640	3.0	16.3	37.2	43.0	0.6
Family Distribution by Income Level	41,405	25.2	15.0	17.8	42.0	0.0
Household Distribution by Income Level	70,973	27.6	14.4	15.1	43.0	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$57,116	Median Housing Value			\$161,774
			Median Gross Rent			\$799
			Families Below Poverty Level			15.6%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 17 financial institutions operated 53 branches within the assessment area. Of these institutions, Truist ranked 9th with 3.5 percent deposit market share.

Brunswick MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Brunswick MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	20.8	33.3	29.2	12.5
Population by Geography	114,202	3.6	24.0	44.0	28.4	0.0
Housing Units by Geography	58,738	3.0	21.9	38.3	36.8	0.0
Owner-Occupied Units by Geography	29,079	1.3	19.6	42.2	36.8	0.0
Occupied Rental Units by Geography	15,109	6.5	33.8	37.9	21.7	0.0
Vacant Units by Geography	14,550	2.5	14.1	31.0	52.4	0.0
Businesses by Geography	8,176	6.2	29.0	25.2	39.5	0.0
Farms by Geography	255	2.7	18.0	36.9	42.4	0.0
Family Distribution by Income Level	30,332	22.5	16.0	19.6	41.8	0.0
Household Distribution by Income Level	44,188	25.1	15.3	17.6	42.0	0.0
Median Family Income MSA - 15260 Brunswick, GA MSA		\$52,987	Median Housing Value			\$162,653
			Median Gross Rent			\$804
			Families Below Poverty Level			14.9%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 14 financial institutions operated 37 branches within the assessment area. Of these institutions, Truist ranked 8th with 8.1 percent deposit market share.

Valdosta MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Valdosta MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	8.8	23.5	41.2	26.5	0.0
Population by Geography	143,291	7.6	24.7	39.9	27.8	0.0
Housing Units by Geography	59,022	8.0	26.0	39.9	26.1	0.0
Owner-Occupied Units by Geography	28,036	4.5	14.8	46.9	33.7	0.0
Occupied Rental Units by Geography	22,997	11.8	38.7	30.9	18.7	0.0
Vacant Units by Geography	7,989	9.4	28.9	41.2	20.5	0.0
Businesses by Geography	7,891	9.3	29.2	28.3	33.1	0.0
Farms by Geography	407	3.2	13.0	57.5	26.3	0.0
Family Distribution by Income Level	32,277	24.1	16.6	17.1	42.2	0.0
Household Distribution by Income Level	51,033	25.9	15.7	16.1	42.3	0.0
Median Family Income MSA - 46660 Valdosta, GA MSA		\$47,592	Median Housing Value			\$116,564
			Median Gross Rent			\$735
			Families Below Poverty Level			19.5%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 19 financial institutions operated 43 branches within the assessment area. Of these institutions, Truist ranked 15th with 1.4 percent deposit market share.

PENNSYLVANIA

York MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: York MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	90	14.4	7.8	61.1	16.7	0.0
Population by Geography	439,660	7.9	6.5	68.0	17.6	0.0
Housing Units by Geography	180,237	8.3	7.0	68.5	16.2	0.0
Owner-Occupied Units by Geography	124,269	3.3	6.2	70.9	19.6	0.0
Occupied Rental Units by Geography	43,147	19.8	9.2	63.9	7.0	0.0
Vacant Units by Geography	12,821	17.9	7.4	60.6	14.1	0.0
Businesses by Geography	24,994	8.8	6.6	66.9	17.7	0.0
Farms by Geography	1,101	1.5	3.5	75.1	19.9	0.0
Family Distribution by Income Level	116,539	19.5	18.4	22.3	39.9	0.0
Household Distribution by Income Level	167,416	22.6	16.9	19.6	40.9	0.0
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$69,846	Median Housing Value			\$165,790
			Median Gross Rent			\$845
			Families Below Poverty Level			7.8%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 13 financial institutions operated 129 branches within the assessment area. Of these institutions, Truist ranked 4th with 9.1 percent deposit market share.

Pennsylvania Non-MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Pennsylvania Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	0.0	14.0	73.3	11.6	1.2
Population by Geography	344,192	0.0	10.7	76.3	12.5	0.6
Housing Units by Geography	161,328	0.0	12.8	75.2	12.0	0.0
Owner-Occupied Units by Geography	103,325	0.0	8.9	77.0	14.1	0.0
Occupied Rental Units by Geography	35,006	0.0	19.2	71.8	8.9	0.1
Vacant Units by Geography	22,997	0.0	20.3	72.3	7.4	0.0
Businesses by Geography	17,469	0.0	11.1	74.4	14.4	0.1
Farms by Geography	1,113	0.0	1.3	80.7	18.0	0.0
Family Distribution by Income Level	91,483	19.0	18.9	21.6	40.5	0.0
Household Distribution by Income Level	138,331	23.1	17.0	17.7	42.1	0.0
Median Family Income Non-MSAs - PA		\$56,172	Median Housing Value			\$109,240
			Median Gross Rent			\$635
			Families Below Poverty Level			9.2%
<p style="text-align: center;"><i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 29 financial institutions operated 118 branches within the assessment area. Of these institutions, Truist ranked 2nd with 13.0 percent deposit market share.

Philadelphia MD Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Philadelphia MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	528	10.0	29.0	21.0	37.3	2.7
Population by Geography	2,116,755	10.5	30.2	22.7	36.2	0.5
Housing Units by Geography	892,478	10.2	30.4	22.2	37.0	0.3
Owner-Occupied Units by Geography	448,432	7.0	24.3	23.5	45.1	0.0
Occupied Rental Units by Geography	336,435	12.8	34.6	21.4	30.5	0.7
Vacant Units by Geography	107,611	15.1	42.6	18.8	23.4	0.2
Businesses by Geography	132,901	6.2	21.4	18.5	52.4	1.6
Farms by Geography	1,361	2.9	11.0	15.1	70.1	0.9
Family Distribution by Income Level	446,201	25.2	15.9	16.3	42.7	0.0
Household Distribution by Income Level	784,867	27.2	14.5	15.1	43.2	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$56,411	Median Housing Value			\$187,814
			Median Gross Rent			\$974
			Families Below Poverty Level			16.9%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 45 financial institutions operated 448 branches within the assessment area. Of these institutions, Truist ranked 13th with 1.1 percent deposit market share.

Harrisburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Harrisburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	8.9	21.8	49.2	18.5	1.6
Population by Geography	558,198	6.0	16.4	53.9	22.5	1.1
Housing Units by Geography	244,105	6.7	17.8	54.2	21.2	0.0
Owner-Occupied Units by Geography	151,653	2.7	12.2	58.5	26.6	0.0
Occupied Rental Units by Geography	72,005	12.7	26.6	47.6	13.1	0.0
Vacant Units by Geography	20,447	15.7	28.4	46.1	9.9	0.0
Businesses by Geography	38,903	5.5	18.9	53.9	21.7	0.0
Farms by Geography	1,256	0.9	8.8	69.9	20.5	0.0
Family Distribution by Income Level	144,257	19.7	18.3	22.0	40.0	0.0
Household Distribution by Income Level	223,658	22.1	17.0	19.5	41.4	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$71,723	Median Housing Value			\$168,004
			Median Gross Rent			\$858
			Families Below Poverty Level			7.5%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 27 financial institutions operated 181 branches within the assessment area. Of these institutions, Truist ranked 10th with 3.1 percent deposit market share.

Chambersburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Chambersburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	3.7	14.8	74.1	7.4	0.0
Population by Geography	152,285	3.7	9.0	78.4	8.9	0.0
Housing Units by Geography	63,947	3.5	9.9	78.5	8.2	0.0
Owner-Occupied Units by Geography	42,014	1.4	6.5	82.7	9.4	0.0
Occupied Rental Units by Geography	16,556	8.1	18.0	67.7	6.2	0.0
Vacant Units by Geography	5,377	5.0	11.6	78.7	4.7	0.0
Businesses by Geography	8,572	4.7	8.4	79.6	7.3	0.0
Farms by Geography	641	1.2	2.2	90.3	6.2	0.0
Family Distribution by Income Level	40,598	18.6	19.9	22.3	39.2	0.0
Household Distribution by Income Level	58,570	21.3	17.6	19.7	41.4	0.0
Median Family Income MSA - 16540 Chambersburg-Waynesboro, PA MSA		\$64,527	Median Housing Value			\$174,521
			Median Gross Rent			\$805
			Families Below Poverty Level			8.6%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 6 financial institutions operated 45 branches within the assessment area. Of these institutions, Truist ranked 2nd with 22.9 percent deposit market share.

Williamsport MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Williamsport MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	6.9	13.8	72.4	6.9	0.0
Population by Geography	116,656	5.8	11.7	75.9	6.6	0.0
Housing Units by Geography	52,641	5.2	11.5	76.8	6.4	0.0
Owner-Occupied Units by Geography	32,187	1.4	7.2	84.3	7.0	0.0
Occupied Rental Units by Geography	13,719	12.9	19.7	61.3	6.2	0.0
Vacant Units by Geography	6,735	7.9	15.6	72.9	3.7	0.0
Businesses by Geography	7,190	5.7	17.1	71.1	6.1	0.0
Farms by Geography	322	0.3	3.7	91.3	4.7	0.0
Family Distribution by Income Level	29,537	20.0	18.7	22.1	39.2	0.0
Household Distribution by Income Level	45,906	23.7	16.5	17.6	42.1	0.0
Median Family Income MSA - 48700 Williamsport, PA MSA		\$60,191	Median Housing Value			\$135,328
			Median Gross Rent			\$719
			Families Below Poverty Level			10.2%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 12 financial institutions operated 47 branches within the assessment area. Of these institutions, Truist ranked 5th with 9.6 percent deposit market share.

Scranton MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Scranton MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	3.5	24.7	51.2	19.4	1.2
Population by Geography	561,701	3.2	20.5	52.2	23.6	0.5
Housing Units by Geography	258,782	3.1	20.3	54.5	21.8	0.4
Owner-Occupied Units by Geography	152,184	1.6	14.2	56.5	27.5	0.0
Occupied Rental Units by Geography	72,436	6.0	31.3	48.8	12.9	1.0
Vacant Units by Geography	34,162	3.0	24.1	57.4	14.9	0.6
Businesses by Geography	35,503	2.7	19.1	51.9	24.2	2.1
Farms by Geography	804	1.2	10.3	54.6	33.8	0.0
Family Distribution by Income Level	141,530	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	224,620	25.1	15.9	16.9	42.2	0.0
Median Family Income MSA - 42540 Scranton- -Wilkes-Barre--Hazleton, PA MSA		\$59,887	Median Housing Value			\$130,472
			Median Gross Rent			\$710
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 22 financial institutions operated 203 branches within the assessment area. Of these institutions, Truist ranked 11th with 3.2 percent deposit market share.

Gettysburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Gettysburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	4.3	82.6	13.0	0.0
Population by Geography	101,767	0.0	4.1	83.7	12.2	0.0
Housing Units by Geography	41,235	0.0	4.8	83.2	12.0	0.0
Owner-Occupied Units by Geography	29,536	0.0	2.2	83.9	13.9	0.0
Occupied Rental Units by Geography	8,657	0.0	13.2	81.2	5.7	0.0
Vacant Units by Geography	3,042	0.0	6.2	81.8	12.0	0.0
Businesses by Geography	6,035	0.0	11.7	77.3	11.0	0.0
Farms by Geography	457	0.0	0.9	82.3	16.8	0.0
Family Distribution by Income Level	27,376	17.9	18.6	24.3	39.3	0.0
Household Distribution by Income Level	38,193	22.2	17.0	21.3	39.5	0.0
Median Family Income MSA - 23900 Gettysburg, PA MSA		\$70,344	Median Housing Value			\$195,911
			Median Gross Rent			\$834
			Families Below Poverty Level			5.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 4 financial institutions operated 25 branches within the assessment area. Of these institutions, Truist ranked 3rd with 8.9 percent deposit market share.

State College MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: State College MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	19.4	38.7	25.8	12.9
Population by Geography	157,823	3.3	20.9	40.6	22.9	12.2
Housing Units by Geography	64,489	0.2	24.5	44.4	24.0	6.9
Owner-Occupied Units by Geography	34,606	0.0	16.0	51.7	31.5	0.8
Occupied Rental Units by Geography	22,577	0.5	36.1	33.4	15.0	15.1
Vacant Units by Geography	7,306	0.4	28.6	43.3	16.5	11.1
Businesses by Geography	8,852	2.3	18.8	38.5	30.3	10.1
Farms by Geography	386	0.5	15.3	55.2	27.7	1.3
Family Distribution by Income Level	32,532	19.6	18.5	21.5	40.3	0.0
Household Distribution by Income Level	57,183	25.5	15.5	16.4	42.5	0.0
Median Family Income MSA - 44300 State College, PA MSA		\$74,118	Median Housing Value			\$208,908
			Median Gross Rent			\$927
			Families Below Poverty Level			6.5%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 17 financial institutions operated 55 branches within the assessment area. Of these institutions, Truist ranked 4th with 8.5 percent deposit market share.

Lebanon MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Lebanon MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	19.4	64.5	12.9	0.0
Population by Geography	135,776	3.5	17.9	62.3	16.3	0.0
Housing Units by Geography	56,017	3.0	19.4	61.0	16.6	0.0
Owner-Occupied Units by Geography	36,836	1.3	12.1	67.8	18.8	0.0
Occupied Rental Units by Geography	15,431	6.6	36.1	44.7	12.6	0.0
Vacant Units by Geography	3,750	5.4	23.1	60.4	11.1	0.0
Businesses by Geography	6,978	1.3	20.0	60.0	18.6	0.0
Farms by Geography	415	0.0	3.9	78.1	18.1	0.0
Family Distribution by Income Level	35,976	18.0	19.0	24.8	38.1	0.0
Household Distribution by Income Level	52,267	22.0	17.1	20.7	40.3	0.0
Median Family Income MSA - 30140 Lebanon, PA MSA		\$65,676	Median Housing Value			\$159,492
			Median Gross Rent			\$793
			Families Below Poverty Level			8.2%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 12 financial institutions operated 41 branches within the assessment area. Of these institutions, Truist ranked 8th with 2.9 percent deposit market share.

East Stroudsburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: East Stroudsburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	15.2	78.8	6.1	0.0
Population by Geography	167,881	0.0	11.2	83.4	5.3	0.0
Housing Units by Geography	80,632	0.0	13.8	81.8	4.4	0.0
Owner-Occupied Units by Geography	44,899	0.0	8.0	86.4	5.6	0.0
Occupied Rental Units by Geography	12,398	0.0	26.6	69.5	3.9	0.0
Vacant Units by Geography	23,335	0.0	18.1	79.5	2.4	0.0
Businesses by Geography	8,790	0.0	20.8	74.2	5.0	0.0
Farms by Geography	240	0.0	5.4	84.6	10.0	0.0
Family Distribution by Income Level	41,743	20.7	18.1	21.3	39.9	0.0
Household Distribution by Income Level	57,297	23.1	16.4	19.4	41.1	0.0
Median Family Income MSA - 20700 East Stroudsburg, PA MSA		\$66,783	Median Housing Value			\$177,261
			Median Gross Rent			\$1,029
			Families Below Poverty Level			9.4%

Source: 2015 ACS Census and 2018 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 15 financial institutions operated 48 branches within the assessment area. Of these institutions, Truist ranked 11th with 1.7 percent deposit market share.

Texas

Austin MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Austin MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	350	10.6	22.3	36.6	28.9	1.7
Population by Geography	1,889,094	10.1	22.3	37.3	29.2	1.1
Housing Units by Geography	747,159	10.1	20.6	38.2	30.1	0.9
Owner-Occupied Units by Geography	399,483	3.8	18.1	40.3	37.6	0.2
Occupied Rental Units by Geography	289,795	18.4	23.8	35.5	20.5	1.7
Vacant Units by Geography	57,881	12.0	22.1	37.9	26.6	1.5
Businesses by Geography	168,087	6.8	14.3	33.8	43.8	1.3
Farms by Geography	3,676	4.6	18.0	40.4	36.8	0.2
Family Distribution by Income Level	428,451	22.5	16.9	19.8	40.8	0.0
Household Distribution by Income Level	689,278	23.6	16.6	18.0	41.7	0.0
Median Family Income MSA - 12420 Austin-Round Rock, TX MSA		\$78,997	Median Housing Value			\$233,705
			Median Gross Rent			\$1,067
			Families Below Poverty Level			9.5%

Source: 2015 ACS Census and 2018 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 67 financial institutions operated 444 branches within the assessment area. Of these institutions, Truist ranked 14th with 1.2 percent deposit market share.

San Antonio MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: San Antonio MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	457	7.4	30.9	30.0	30.9	0.9
Population by Geography	2,286,702	6.2	28.8	31.4	33.6	0.0
Housing Units by Geography	857,732	5.8	28.4	32.4	33.4	0.0
Owner-Occupied Units by Geography	486,051	4.1	22.3	31.9	41.6	0.0
Occupied Rental Units by Geography	293,330	8.0	37.4	32.0	22.7	0.0
Vacant Units by Geography	78,351	8.5	32.2	36.8	22.5	0.0
Businesses by Geography	143,287	4.4	20.1	31.4	43.9	0.2
Farms by Geography	3,744	2.0	13.0	37.5	47.5	0.1
Family Distribution by Income Level	539,835	22.3	17.3	19.2	41.2	0.0
Household Distribution by Income Level	779,381	24.3	15.9	17.8	42.0	0.0
Median Family Income MSA - 41700 San Antonio-New Braunfels, TX MSA		\$62,228	Median Housing Value			\$151,851
			Median Gross Rent			\$895
			Families Below Poverty Level			12.5%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 61 financial institutions operated 411 branches within the assessment area. Of these institutions, Truist ranked 20th with 0.2 percent deposit market share.

College Station MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: College Station MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	52	11.5	25.0	34.6	25.0	3.8
Population by Geography	239,096	10.4	29.7	30.4	25.7	3.8
Housing Units by Geography	99,298	12.2	28.5	33.6	25.7	0.0
Owner-Occupied Units by Geography	42,528	2.4	21.4	36.8	39.3	0.0
Occupied Rental Units by Geography	43,796	21.4	37.0	27.1	14.6	0.0
Vacant Units by Geography	12,974	13.2	23.5	44.8	18.5	0.0
Businesses by Geography	13,157	7.8	23.7	34.4	33.7	0.4
Farms by Geography	610	4.6	13.0	46.1	36.2	0.2
Family Distribution by Income Level	49,315	24.3	16.3	17.7	41.8	0.0
Household Distribution by Income Level	86,324	27.1	14.1	15.0	43.8	0.0
Median Family Income MSA - 17780 College Station-Bryan, TX MSA		\$60,756	Median Housing Value			\$143,645
			Median Gross Rent			\$865
			Families Below Poverty Level			14.0%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

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

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 23 financial institutions operated 70 branches within the assessment area. Of these institutions, Truist ranked 3rd with 14.1 percent deposit market share.

Odessa MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Odessa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.6	21.4	42.9	32.1	0.0
Population by Geography	149,557	2.2	22.3	40.7	34.8	0.0
Housing Units by Geography	55,357	2.3	22.3	39.1	36.3	0.0
Owner-Occupied Units by Geography	33,733	1.6	21.4	42.7	34.3	0.0
Occupied Rental Units by Geography	17,135	3.5	23.5	31.8	41.1	0.0
Vacant Units by Geography	4,489	3.0	24.8	39.7	32.5	0.0
Businesses by Geography	8,687	1.4	22.5	34.1	42.0	0.0
Farms by Geography	131	2.3	7.6	29.0	61.1	0.0
Family Distribution by Income Level	36,204	21.8	17.3	20.5	40.4	0.0
Household Distribution by Income Level	50,868	24.1	16.3	17.5	42.0	0.0
Median Family Income MSA - 36220 Odessa, TX MSA		\$64,450	Median Housing Value			\$112,941
			Median Gross Rent			\$901
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 17 financial institutions operated 37 branches within the assessment area. Of these institutions, Truist ranked 10th with 4.3 percent deposit market share.

Midland MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Midland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	3.4	17.2	48.3	27.6	3.4
Population by Geography	156,542	3.0	16.7	47.0	33.3	0.0
Housing Units by Geography	58,621	2.6	13.8	47.4	36.1	0.0
Owner-Occupied Units by Geography	36,680	2.7	12.9	43.7	40.6	0.0
Occupied Rental Units by Geography	17,820	1.8	15.4	54.9	27.9	0.0
Vacant Units by Geography	4,121	5.2	14.8	48.2	31.9	0.0
Businesses by Geography	13,600	1.5	23.4	37.7	36.7	0.8
Farms by Geography	390	0.5	13.1	47.4	38.7	0.3
Family Distribution by Income Level	37,873	21.9	17.5	20.2	40.4	0.0
Household Distribution by Income Level	54,500	23.4	16.8	17.5	42.3	0.0
Median Family Income MSA - 33260 Midland, TX MSA		\$82,297	Median Housing Value			\$175,383
			Median Gross Rent			\$1,075
			Families Below Poverty Level			6.6%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 18 financial institutions operated 47 branches within the assessment area. Of these institutions, Truist ranked 13th with 1.9 percent deposit market share.

MARYLAND

Salisbury MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Salisbury MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	2.3	20.5	40.9	27.3	9.1
Population by Geography	178,681	1.8	24.1	41.7	29.9	2.5
Housing Units by Geography	108,615	1.6	17.1	45.4	35.9	0.0
Owner-Occupied Units by Geography	44,124	1.6	14.2	46.5	37.6	0.0
Occupied Rental Units by Geography	22,023	2.7	40.7	40.4	16.1	0.0
Vacant Units by Geography	42,468	1.1	7.8	46.7	44.3	0.0
Businesses by Geography	12,125	1.1	15.8	51.0	31.9	0.1
Farms by Geography	606	0.3	14.7	47.9	36.5	0.7
Family Distribution by Income Level	43,154	22.1	17.3	20.1	40.5	0.0
Household Distribution by Income Level	66,147	25.5	16.6	16.8	41.1	0.0
Median Family Income MSA - 41540 Salisbury, MD-DE MSA		\$63,091	Median Housing Value			\$217,196
			Median Gross Rent			\$961
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 14 financial institutions operated 81 branches within the assessment area. Of these institutions, Truist ranked 6th with 8.5 percent deposit market share.

Maryland Non-MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Maryland Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	14.0	65.1	11.6	7.0
Population by Geography	152,730	2.6	15.6	71.6	10.3	0.0
Housing Units by Geography	79,906	2.4	13.9	72.6	11.1	0.0
Owner-Occupied Units by Geography	42,557	1.0	11.7	74.8	12.4	0.0
Occupied Rental Units by Geography	18,346	6.7	24.3	61.0	8.0	0.0
Vacant Units by Geography	19,003	1.4	8.6	78.8	11.1	0.0
Businesses by Geography	11,065	1.4	17.8	66.1	14.7	0.0
Farms by Geography	937	0.2	7.2	82.7	9.9	0.0
Family Distribution by Income Level	41,320	21.1	17.5	21.2	40.2	0.0
Household Distribution by Income Level	60,903	24.6	15.9	17.3	42.2	0.0
Median Family Income Non-MSAs – MD		\$63,535	Median Housing Value			\$241,947
			Median Gross Rent			\$884
			Families Below Poverty Level			9.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 16 financial institutions operated 71 branches within the assessment area. Of these institutions, Truist ranked 4th with 9.4 percent deposit market share.

California MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: California MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	5.6	16.7	55.6	16.7	5.6
Population by Geography	109,614	4.7	12.7	65.5	17.0	0.0
Housing Units by Geography	42,762	5.1	13.0	63.3	18.6	0.0
Owner-Occupied Units by Geography	27,650	2.7	8.6	67.7	21.0	0.0
Occupied Rental Units by Geography	10,593	11.3	23.0	52.8	12.8	0.0
Vacant Units by Geography	4,519	5.4	16.5	61.1	17.0	0.0
Businesses by Geography	5,198	6.2	9.9	63.2	20.8	0.0
Farms by Geography	219	1.4	7.3	72.6	18.7	0.0
Family Distribution by Income Level	27,741	20.1	16.9	24.6	38.3	0.0
Household Distribution by Income Level	38,243	23.4	15.0	22.0	39.5	0.0
Median Family Income MSA - 15680 California-Lexington Park, MD MSA		\$98,260	Median Housing Value			\$296,234
			Median Gross Rent			\$1,279
			Families Below Poverty Level			6.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 8 financial institutions operated 18 branches within the assessment area. Of these institutions, Truist ranked 6th with 6.3 percent deposit market share.

Wilmington MD Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Wilmington MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	5.3	73.7	15.8	0.0
Population by Geography	101,960	5.3	3.7	75.3	15.6	0.0
Housing Units by Geography	42,030	4.7	3.4	77.4	14.6	0.0
Owner-Occupied Units by Geography	27,019	2.3	3.3	75.7	18.8	0.0
Occupied Rental Units by Geography	9,709	11.7	4.8	79.4	4.2	0.0
Vacant Units by Geography	5,302	4.2	1.3	82.4	12.1	0.0
Businesses by Geography	5,124	9.8	5.2	70.8	14.2	0.0
Farms by Geography	297	2.4	2.4	70.0	25.3	0.0
Family Distribution by Income Level	26,327	20.9	18.1	22.4	38.5	0.0
Household Distribution by Income Level	36,728	23.2	15.5	19.7	41.7	0.0
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$80,707	Median Housing Value			\$237,015
			Median Gross Rent			\$1,003
			Families Below Poverty Level			6.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 7 financial institutions operated 18 branches within the assessment area. Of these institutions, Truist ranked 6th with 3.4 percent deposit market share.

SOUTH CAROLINA

Spartanburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Spartanburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	7.7	26.9	42.3	23.1	0.0
Population by Geography	319,365	4.4	23.5	44.0	28.0	0.0
Housing Units by Geography	137,980	4.8	24.4	44.4	26.4	0.0
Owner-Occupied Units by Geography	83,799	2.0	18.8	47.6	31.5	0.0
Occupied Rental Units by Geography	37,759	9.7	33.8	38.7	17.8	0.0
Vacant Units by Geography	16,422	7.5	31.6	41.1	19.8	0.0
Businesses by Geography	16,692	2.3	24.4	40.7	32.5	0.0
Farms by Geography	468	1.1	19.7	47.9	31.4	0.0
Family Distribution by Income Level	84,274	21.8	17.6	19.0	41.6	0.0
Household Distribution by Income Level	121,558	24.5	15.8	17.3	42.4	0.0
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$52,792	Median Housing Value			\$117,294
			Median Gross Rent			\$688
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 19 financial institutions operated 65 branches within the assessment area. Of these institutions, Truist ranked 2nd with 14.7 percent deposit market share.

South Carolina Non-MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: South Carolina Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	76	0.0	10.5	57.9	28.9	2.6
Population by Geography	332,158	0.0	9.8	60.9	29.3	0.0
Housing Units by Geography	167,404	0.0	8.5	57.3	34.2	0.0
Owner-Occupied Units by Geography	93,875	0.0	7.5	59.5	33.0	0.0
Occupied Rental Units by Geography	34,251	0.0	14.3	59.5	26.2	0.0
Vacant Units by Geography	39,278	0.0	5.9	49.8	44.2	0.0
Businesses by Geography	16,819	0.0	9.3	53.9	36.8	0.0
Farms by Geography	803	0.0	6.8	67.2	25.9	0.0
Family Distribution by Income Level	86,164	19.8	17.2	17.7	45.3	0.0
Household Distribution by Income Level	128,126	22.5	15.0	16.8	45.7	0.0
Median Family Income Non-MSAs – SC		\$44,547	Median Housing Value			\$136,686
			Median Gross Rent			\$685
			Families Below Poverty Level			16.0%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 27 financial institutions operated 93 branches within the assessment area. Of these institutions, Truist ranked 5th with 9.4 percent deposit market share.

Hilton Head MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Hilton Head MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	0.0	32.6	34.8	28.3	4.3
Population by Geography	197,969	0.0	36.4	43.6	20.0	0.0
Housing Units by Geography	104,587	0.0	29.6	40.5	29.8	0.0
Owner-Occupied Units by Geography	52,635	0.0	27.1	45.1	27.8	0.0
Occupied Rental Units by Geography	22,435	0.0	42.1	43.2	14.7	0.0
Vacant Units by Geography	29,517	0.0	24.7	30.4	45.0	0.0
Businesses by Geography	13,937	0.0	25.9	48.7	25.4	0.0
Farms by Geography	418	0.0	36.8	47.1	16.0	0.0
Family Distribution by Income Level	51,146	20.1	19.5	20.0	40.4	0.0
Household Distribution by Income Level	75,070	22.3	17.5	18.3	41.9	0.0
Median Family Income MSA - 25940 Hilton Head Island-Bluffton-Beaufort, SC MSA		\$63,345	Median Housing Value			\$292,927
			Median Gross Rent			\$1,026
			Families Below Poverty Level			9.7%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 20 financial institutions operated 61 branches within the assessment area. Of these institutions, Truist ranked 7th with 5.8 percent deposit market share.

Florence MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Florence MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	4.1	22.4	46.9	24.5	2.0
Population by Geography	206,252	2.9	20.3	49.3	27.5	0.0
Housing Units by Geography	89,255	3.3	21.0	48.1	27.6	0.0
Owner-Occupied Units by Geography	52,231	1.3	16.5	51.9	30.3	0.0
Occupied Rental Units by Geography	26,033	5.9	27.1	41.7	25.3	0.0
Vacant Units by Geography	10,991	6.3	27.9	45.6	20.2	0.0
Businesses by Geography	10,170	3.9	24.9	40.3	30.8	0.1
Farms by Geography	370	0.3	14.9	57.8	27.0	0.0
Family Distribution by Income Level	53,667	23.5	16.2	19.9	40.4	0.0
Household Distribution by Income Level	78,264	25.8	15.6	16.4	42.2	0.0
Median Family Income MSA - 22500 Florence, SC MSA		\$50,944	Median Housing Value			\$108,979
			Median Gross Rent			\$646
			Families Below Poverty Level			16.4%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

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

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 15 financial institutions operated 53 branches within the assessment area. Of these institutions, Truist ranked 4th with 10.3 percent deposit market share.

Sumter MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Sumter MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	30.4	56.5	13.0	0.0
Population by Geography	107,777	0.0	22.3	62.2	15.5	0.0
Housing Units by Geography	46,698	0.0	24.3	61.4	14.3	0.0
Owner-Occupied Units by Geography	26,485	0.0	15.4	64.1	20.5	0.0
Occupied Rental Units by Geography	14,086	0.0	36.6	56.7	6.7	0.0
Vacant Units by Geography	6,127	0.0	34.2	60.7	5.1	0.0
Businesses by Geography	5,215	0.0	35.5	51.6	12.8	0.0
Farms by Geography	193	0.0	15.5	72.5	11.9	0.0
Family Distribution by Income Level	27,769	20.1	19.8	19.3	40.7	0.0
Household Distribution by Income Level	40,571	22.9	16.7	18.9	41.5	0.0
Median Family Income MSA - 44940 Sumter, SC MSA		\$49,962	Median Housing Value			\$104,250
			Median Gross Rent			\$768
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 8 financial institutions operated 22 branches within the assessment area. Of these institutions, Truist ranked 5th with 11.8 percent deposit market share.

WEST VIRGINIA

Morgantown MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Morgantown MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	3.1	25.0	46.9	25.0	0.0
Population by Geography	135,477	1.1	23.3	47.7	27.9	0.0
Housing Units by Geography	59,227	0.5	25.6	48.3	25.7	0.0
Owner-Occupied Units by Geography	31,116	0.0	21.7	50.1	28.2	0.0
Occupied Rental Units by Geography	18,391	1.0	31.7	43.5	23.8	0.0
Vacant Units by Geography	9,720	1.0	26.4	51.3	21.3	0.0
Businesses by Geography	7,255	0.3	23.2	44.3	32.2	0.0
Farms by Geography	202	0.0	19.8	54.5	25.7	0.0
Family Distribution by Income Level	28,075	22.1	16.5	22.0	39.4	0.0
Household Distribution by Income Level	49,507	28.2	13.5	15.4	42.9	0.0
Median Family Income MSA - 34060 Morgantown, WV MSA		\$63,745	Median Housing Value			\$156,244
			Median Gross Rent			\$741
			Families Below Poverty Level			10.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 11 financial institutions operated 48 branches within the assessment area. Of these institutions, Truist ranked 3rd with 15.8 percent deposit market share.

Beckley MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Beckley MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	0.0	10.3	79.3	10.3	0.0
Population by Geography	124,027	0.0	8.4	81.8	9.8	0.0
Housing Units by Geography	57,540	0.0	8.1	81.8	10.0	0.0
Owner-Occupied Units by Geography	36,348	0.0	7.9	81.3	10.7	0.0
Occupied Rental Units by Geography	12,595	0.0	8.9	79.5	11.6	0.0
Vacant Units by Geography	8,597	0.0	7.6	87.4	4.9	0.0
Businesses by Geography	5,254	0.0	4.4	86.1	9.5	0.0
Farms by Geography	133	0.0	2.3	88.7	9.0	0.0
Family Distribution by Income Level	32,877	20.6	18.2	20.7	40.5	0.0
Household Distribution by Income Level	48,943	24.1	16.3	18.0	41.6	0.0
Median Family Income MSA - 13220 Beckley, WV MSA		\$47,856	Median Housing Value			\$96,054
			Median Gross Rent			\$606
			Families Below Poverty Level			14.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 12 financial institutions operated 41 branches within the assessment area. Of these institutions, Truist ranked 4th with 12.8 percent deposit market share.

Wheeling MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Wheeling MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	25.9	51.9	22.2	0.0
Population by Geography	76,117	0.0	11.6	64.3	24.1	0.0
Housing Units by Geography	36,952	0.0	14.6	63.0	22.5	0.0
Owner-Occupied Units by Geography	23,084	0.0	8.4	65.3	26.2	0.0
Occupied Rental Units by Geography	8,893	0.0	24.6	58.9	16.5	0.0
Vacant Units by Geography	4,975	0.0	25.2	59.1	15.7	0.0
Businesses by Geography	4,392	0.0	26.9	54.5	18.6	0.0
Farms by Geography	101	0.0	11.9	65.3	22.8	0.0
Family Distribution by Income Level	19,929	19.4	18.7	20.6	41.2	0.0
Household Distribution by Income Level	31,977	25.2	16.2	16.3	42.3	0.0
Median Family Income MSA - 48540 Wheeling, WV-OH MSA		\$56,853	Median Housing Value			\$101,743
			Median Gross Rent			\$566
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 14 financial institutions operated 59 branches within the assessment area. Of these institutions, Truist ranked 6th with 6.2 percent deposit market share.

Parkersburg MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Parkersburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	17.9	60.7	21.4	0.0
Population by Geography	92,400	0.0	9.5	70.8	19.7	0.0
Housing Units by Geography	43,508	0.0	10.3	71.0	18.7	0.0
Owner-Occupied Units by Geography	27,772	0.0	7.9	69.7	22.4	0.0
Occupied Rental Units by Geography	10,850	0.0	14.4	72.8	12.8	0.0
Vacant Units by Geography	4,886	0.0	14.6	74.9	10.5	0.0
Businesses by Geography	4,209	0.0	11.5	71.6	16.9	0.0
Farms by Geography	106	0.0	1.9	86.8	11.3	0.0
Family Distribution by Income Level	24,932	20.5	17.5	20.6	41.3	0.0
Household Distribution by Income Level	38,622	23.7	17.1	17.9	41.3	0.0
Median Family Income MSA - 37620 Parkersburg-Vienna, WV MSA		\$51,552	Median Housing Value			\$105,543
			Median Gross Rent			\$621
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 12 financial institutions operated 30 branches within the assessment area. Of these institutions, Truist ranked 3rd with 13.5 percent deposit market share.

ALABAMA

Anniston MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Anniston MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	9.7	22.6	45.2	9.7	12.9
Population by Geography	116,648	5.1	17.5	63.8	10.3	3.2
Housing Units by Geography	53,296	6.7	19.2	61.2	10.3	2.7
Owner-Occupied Units by Geography	31,179	3.2	15.2	69.3	11.8	0.5
Occupied Rental Units by Geography	13,975	10.4	26.6	48.5	7.7	6.8
Vacant Units by Geography	8,142	13.9	22.0	51.7	8.5	3.9
Businesses by Geography	5,571	5.0	31.4	54.0	7.7	1.9
Farms by Geography	156	1.9	14.7	73.1	9.6	0.6
Family Distribution by Income Level	30,581	22.9	16.2	20.9	40.0	0.0
Household Distribution by Income Level	45,154	25.5	15.7	16.8	41.9	0.0
Median Family Income MSA - 11500 Anniston-Oxford-Jacksonville, AL MSA		\$52,300	Median Housing Value			\$104,880
			Median Gross Rent			\$620
			Families Below Poverty Level			16.5%

Source: 2015 ACS Census and 2018 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 9 financial institutions operated 32 branches within the assessment area. Of these institutions, Truist ranked 3rd with 14.3 percent deposit market share.

Montgomery MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Montgomery MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	96	12.5	25.0	33.3	28.1	1.0
Population by Geography	374,864	9.5	21.7	36.1	32.5	0.1
Housing Units by Geography	163,883	9.7	23.3	35.9	31.0	0.2
Owner-Occupied Units by Geography	92,690	6.4	19.2	37.2	37.1	0.0
Occupied Rental Units by Geography	50,171	13.7	28.3	34.5	23.2	0.4
Vacant Units by Geography	21,022	14.9	29.2	33.2	22.4	0.3
Businesses by Geography	21,285	7.1	19.1	36.9	33.1	3.9
Farms by Geography	639	3.9	18.8	41.3	35.5	0.5
Family Distribution by Income Level	94,544	24.5	16.1	18.2	41.2	0.0
Household Distribution by Income Level	142,861	25.4	15.2	16.9	42.6	0.0
Median Family Income MSA - 33860 Montgomery, AL MSA		\$59,161	Median Housing Value			\$133,960
			Median Gross Rent			\$805
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 25 financial institutions operated 103 branches within the assessment area. Of these institutions, Truist ranked 6th with 7.3 percent deposit market share.

Mobile MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Mobile MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	115	16.5	23.5	32.2	26.1	1.7
Population by Geography	414,251	9.3	18.2	36.5	35.8	0.2
Housing Units by Geography	180,932	9.2	19.3	36.7	34.9	0.0
Owner-Occupied Units by Geography	102,608	5.7	15.0	38.5	40.9	0.0
Occupied Rental Units by Geography	51,580	13.1	24.8	33.4	28.7	0.0
Vacant Units by Geography	26,744	14.9	25.0	36.3	23.8	0.0
Businesses by Geography	22,634	7.2	20.5	31.4	40.8	0.2
Farms by Geography	499	4.2	9.2	42.5	43.9	0.2
Family Distribution by Income Level	103,554	24.0	15.6	19.0	41.4	0.0
Household Distribution by Income Level	154,188	26.5	15.0	15.9	42.5	0.0
Median Family Income MSA - 33660 Mobile, AL MSA		\$54,215	Median Housing Value			\$125,900
			Median Gross Rent			\$781
			Families Below Poverty Level			15.7%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 22 financial institutions operated 116 branches within the assessment area. Of these institutions, Truist ranked 11th with 1.5 percent deposit market share.

Auburn MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Auburn MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	3.7	22.2	59.3	11.1	3.7
Population by Geography	150,982	2.4	21.4	62.7	11.3	2.2
Housing Units by Geography	64,964	2.5	20.3	62.4	11.0	3.7
Owner-Occupied Units by Geography	33,753	1.8	12.5	70.9	14.3	0.5
Occupied Rental Units by Geography	23,418	3.1	30.6	52.6	7.2	6.5
Vacant Units by Geography	7,793	3.8	23.0	55.1	8.6	9.5
Businesses by Geography	7,234	1.9	33.9	51.9	11.2	1.1
Farms by Geography	224	2.2	23.2	61.6	12.9	0.0
Family Distribution by Income Level	35,939	24.8	15.2	18.6	41.4	0.0
Household Distribution by Income Level	57,171	28.5	13.4	15.3	42.8	0.0
Median Family Income MSA - 12220 Auburn-Opelika, AL MSA		\$61,141	Median Housing Value			\$156,485
			Median Gross Rent			\$788
			Families Below Poverty Level			14.3%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 18 financial institutions operated 43 branches within the assessment area. Of these institutions, Truist ranked 6th with 5.5 percent deposit market share.

Tuscaloosa MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Tuscaloosa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	58	1.7	32.8	43.1	19.0	3.4
Population by Geography	235,570	1.5	26.2	42.9	25.2	4.2
Housing Units by Geography	104,152	1.3	29.0	46.0	21.4	2.3
Owner-Occupied Units by Geography	54,112	0.9	20.9	46.2	31.5	0.4
Occupied Rental Units by Geography	28,587	2.1	38.4	46.0	10.9	2.6
Vacant Units by Geography	21,453	0.9	37.1	45.5	10.1	6.4
Businesses by Geography	11,732	1.4	31.3	41.3	23.4	2.6
Farms by Geography	448	0.4	31.9	40.2	27.0	0.4
Family Distribution by Income Level	54,760	24.2	15.9	17.9	42.0	0.0
Household Distribution by Income Level	82,699	26.5	14.7	16.1	42.8	0.0
Median Family Income MSA - 46220 Tuscaloosa, AL MSA		\$56,265	Median Housing Value			\$155,725
			Median Gross Rent			\$743
			Families Below Poverty Level			14.7%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 25 financial institutions operated 68 branches within the assessment area. Of these institutions, Truist ranked 17th with 1.2 percent deposit market share.

Gadsden MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Gadsden MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	10.0	33.3	40.0	16.7	0.0
Population by Geography	103,766	6.4	23.0	43.5	27.1	0.0
Housing Units by Geography	47,500	7.3	24.4	43.0	25.3	0.0
Owner-Occupied Units by Geography	28,472	4.0	19.7	43.5	32.9	0.0
Occupied Rental Units by Geography	11,427	13.4	30.0	43.2	13.5	0.0
Vacant Units by Geography	7,601	10.4	33.8	41.2	14.6	0.0
Businesses by Geography	4,972	4.6	21.0	48.3	26.0	0.0
Farms by Geography	154	0.6	14.3	51.3	33.8	0.0
Family Distribution by Income Level	27,595	24.6	16.1	19.2	40.1	0.0
Household Distribution by Income Level	39,899	24.9	17.0	14.8	43.4	0.0
Median Family Income MSA - 23460 Gadsden, AL MSA		\$51,104	Median Housing Value			\$98,009
			Median Gross Rent			\$616
			Families Below Poverty Level			15.4%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 12 financial institutions operated 24 branches within the assessment area. Of these institutions, Truist ranked 8th with 3.7 percent deposit market share.

Dothan MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Dothan MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	5.9	20.6	58.8	14.7	0.0
Population by Geography	147,601	3.2	17.2	57.6	21.9	0.0
Housing Units by Geography	67,715	3.5	17.2	59.1	20.2	0.0
Owner-Occupied Units by Geography	38,800	1.3	14.1	62.2	22.5	0.0
Occupied Rental Units by Geography	18,045	7.1	23.1	50.0	19.8	0.0
Vacant Units by Geography	10,870	5.3	18.7	63.4	12.6	0.0
Businesses by Geography	8,387	7.7	17.4	46.5	28.4	0.0
Farms by Geography	548	1.5	15.0	63.9	19.7	0.0
Family Distribution by Income Level	38,150	22.5	17.0	18.8	41.7	0.0
Household Distribution by Income Level	56,845	25.5	14.9	17.4	42.1	0.0
Median Family Income MSA - 20020 Dothan, AL MSA		\$51,581	Median Housing Value			\$111,522
			Median Gross Rent			\$652
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 18 financial institutions operated 52 branches within the assessment area. Of these institutions, Truist did not rank as it does not operate a branch within the assessment area.

TENNESSEE

Chattanooga MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Chattanooga MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	91	11.0	16.5	40.7	29.7	2.2
Population by Geography	391,019	7.8	15.6	39.4	37.2	0.0
Housing Units by Geography	173,133	8.3	16.7	40.7	34.3	0.0
Owner-Occupied Units by Geography	100,448	3.7	14.0	41.2	41.1	0.0
Occupied Rental Units by Geography	53,011	14.9	20.6	40.3	24.3	0.0
Vacant Units by Geography	19,674	14.1	19.7	39.5	26.6	0.0
Businesses by Geography	29,200	7.7	16.5	37.6	38.0	0.3
Farms by Geography	691	4.2	14.2	43.1	38.5	0.0
Family Distribution by Income Level	101,107	20.9	17.4	19.1	42.7	0.0
Household Distribution by Income Level	153,459	24.5	15.6	17.1	42.7	0.0
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA		\$58,694	Median Housing Value			\$155,136
			Median Gross Rent			\$758
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 22 financial institutions operated 120 branches within the assessment area. Of these institutions, Truist ranked 12th with a 1.3 percent deposit market share.

Johnson City MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Johnson City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	0.0	31.8	50.0	15.9	2.3
Population by Geography	200,327	0.0	25.9	52.2	20.9	1.0
Housing Units by Geography	95,100	0.0	27.4	52.5	20.1	0.0
Owner-Occupied Units by Geography	57,246	0.0	23.8	54.0	22.2	0.0
Occupied Rental Units by Geography	26,714	0.0	32.1	49.6	18.3	0.0
Vacant Units by Geography	11,140	0.0	35.2	51.6	13.2	0.0
Businesses by Geography	10,251	0.0	23.2	44.8	31.7	0.3
Farms by Geography	356	0.0	16.9	59.8	23.3	0.0
Family Distribution by Income Level	54,064	21.9	17.0	21.6	39.6	0.0
Household Distribution by Income Level	83,960	25.4	15.5	17.1	41.9	0.0
Median Family Income MSA - 27740 Johnson City, TN MSA		\$50,296	Median Housing Value			\$130,790
			Median Gross Rent			\$642
			Families Below Poverty Level			14.7%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 19 financial institutions operated 60 branches within the assessment area. Of these institutions, Truist ranked 10th with a 3.0 percent deposit market share.

Cleveland MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Cleveland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	12.5	16.7	50.0	20.8	0.0
Population by Geography	118,749	9.3	9.8	47.9	33.0	0.0
Housing Units by Geography	50,529	9.1	10.2	49.1	31.5	0.0
Owner-Occupied Units by Geography	30,377	3.9	8.1	49.6	38.4	0.0
Occupied Rental Units by Geography	14,834	19.2	12.1	47.6	21.1	0.0
Vacant Units by Geography	5,318	10.3	16.8	51.0	21.9	0.0
Businesses by Geography	6,218	7.7	14.3	50.1	27.8	0.0
Farms by Geography	241	1.2	6.6	49.4	42.7	0.0
Family Distribution by Income Level	31,204	22.4	17.3	18.7	41.5	0.0
Household Distribution by Income Level	45,211	24.6	16.0	16.8	42.5	0.0
Median Family Income MSA - 17420 Cleveland, TN MSA		\$52,007	Median Housing Value			\$137,954
			Median Gross Rent			\$699
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 15 financial institutions operated 30 branches within the assessment area. Of these institutions, Truist ranked 6th with a 10.5 percent deposit market share.

Morristown MSA Assessment Area

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)	21	4.8	19.0	66.7	9.5	0.0
Population by Geography	115,489	2.5	18.5	69.9	9.1	0.0
Housing Units by Geography	50,601	2.7	18.4	70.6	8.3	0.0
Owner-Occupied Units by Geography	30,574	1.0	14.6	73.8	10.6	0.0
Occupied Rental Units by Geography	13,575	6.3	26.9	61.5	5.3	0.0
Vacant Units by Geography	6,452	3.7	18.2	74.6	3.5	0.0
Businesses by Geography	5,211	7.9	23.2	63.1	5.9	0.0
Farms by Geography	195	2.6	9.7	76.4	11.3	0.0
Family Distribution by Income Level	31,061	22.1	18.1	19.8	40.0	0.0
Household Distribution by Income Level	44,149	24.6	15.4	17.6	42.3	0.0
Median Family Income MSA - 34100 Morristown, TN MSA		\$49,373	Median Housing Value			\$126,115
			Median Gross Rent			\$648
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 13 financial institutions operated 35 branches within the assessment area. Of these institutions, Truist ranked 10th with 2.9 percent deposit market share.

KENTUCKY

Lexington MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Lexington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	129	8.5	23.3	41.1	27.1	0.0
Population by Geography	489,799	7.9	24.8	40.1	27.1	0.0
Housing Units by Geography	213,431	8.3	26.0	40.0	25.7	0.0
Owner-Occupied Units by Geography	113,611	4.4	19.5	42.0	34.1	0.0
Occupied Rental Units by Geography	80,716	12.8	34.5	37.2	15.5	0.0
Vacant Units by Geography	19,104	11.8	28.4	40.2	19.6	0.0
Businesses by Geography	34,470	5.7	20.0	43.5	30.7	0.0
Farms by Geography	1,844	3.1	12.7	48.2	36.0	0.0
Family Distribution by Income Level	121,658	23.5	16.3	19.2	41.1	0.0
Household Distribution by Income Level	194,327	25.6	15.6	15.9	42.8	0.0
Median Family Income MSA - 30460 Lexington-Fayette, KY MSA		\$66,800	Median Housing Value			\$176,310
			Median Gross Rent			\$767
			Families Below Poverty Level			11.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 37 financial institutions operated 183 branches within the assessment area. Of these institutions, Truist ranked 8th with 3.9 percent deposit market share.

Owensboro MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Owensboro MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	3.4	20.7	55.2	20.7	0.0
Population by Geography	116,342	3.2	20.4	54.8	21.6	0.0
Housing Units by Geography	50,178	3.4	21.4	56.2	18.9	0.0
Owner-Occupied Units by Geography	32,154	1.5	14.9	59.4	24.1	0.0
Occupied Rental Units by Geography	13,406	6.9	34.7	49.9	8.5	0.0
Vacant Units by Geography	4,618	6.2	28.2	52.7	12.8	0.0
Businesses by Geography	6,460	2.9	27.6	47.2	22.4	0.0
Farms by Geography	479	0.0	7.7	64.3	28.0	0.0
Family Distribution by Income Level	31,213	22.2	17.8	19.8	40.2	0.0
Household Distribution by Income Level	45,560	24.2	16.6	16.8	42.5	0.0
Median Family Income MSA - 36980 Owensboro, KY MSA		\$58,106	Median Housing Value			\$111,096
			Median Gross Rent			\$632
			Families Below Poverty Level			12.3%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 15 financial institutions operated 46 branches within the assessment area. Of these institutions, Truist ranked 2nd with 22.7 percent deposit market share.

Clarksville MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Clarksville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	8.3	20.8	41.7	12.5	16.7
Population by Geography	88,409	7.4	23.5	49.5	15.0	4.5
Housing Units by Geography	37,468	7.4	20.4	56.9	15.3	0.0
Owner-Occupied Units by Geography	17,124	4.8	8.4	64.8	22.0	0.0
Occupied Rental Units by Geography	14,411	10.8	37.2	42.8	9.2	0.0
Vacant Units by Geography	5,933	6.8	14.1	68.6	10.6	0.0
Businesses by Geography	4,145	12.7	20.3	49.2	16.0	1.8
Farms by Geography	370	4.3	3.5	62.7	28.9	0.5
Family Distribution by Income Level	22,221	24.6	20.1	20.9	34.5	0.0
Household Distribution by Income Level	31,535	27.6	18.9	19.4	34.1	0.0
Median Family Income MSA - 17300 Clarksville, TN-KY MSA		\$53,918	Median Housing Value			\$102,001
			Median Gross Rent			\$759
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 16 financial institutions operated 79 branches within the assessment area. Of these institutions, Truist ranked 9th with 5.4 percent deposit market share.

NEW JERSEY

Vineland MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Vineland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	5.7	17.1	42.9	22.9	11.4
Population by Geography	157,035	7.8	13.1	47.8	26.4	4.9
Housing Units by Geography	56,216	5.4	13.9	52.4	28.2	0.0
Owner-Occupied Units by Geography	33,402	2.2	7.7	55.5	34.7	0.0
Occupied Rental Units by Geography	16,966	11.2	23.7	47.7	17.5	0.0
Vacant Units by Geography	5,848	7.5	21.7	48.0	22.8	0.0
Businesses by Geography	7,086	4.8	16.6	51.6	26.8	0.1
Farms by Geography	290	1.0	2.4	49.0	47.6	0.0
Family Distribution by Income Level	35,059	21.2	17.6	19.5	41.8	0.0
Household Distribution by Income Level	50,368	24.8	15.6	18.0	41.6	0.0
Median Family Income MSA - 47220 Vineland- Bridgeton, NJ MSA		\$57,550	Median Housing Value			\$155,671
			Median Gross Rent			\$971
			Families Below Poverty Level			14.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 10 financial institutions operated 30 branches within the assessment area. Of these institutions, Truist ranked 3rd with 14.8 percent deposit market share.

Atlantic City MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Atlantic City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	70	12.9	22.9	30.0	31.4	2.9
Population by Geography	275,376	9.9	21.5	35.0	32.8	0.8
Housing Units by Geography	127,435	11.0	20.5	33.9	33.5	1.1
Owner-Occupied Units by Geography	68,194	3.4	16.3	39.3	40.1	1.0
Occupied Rental Units by Geography	33,624	25.3	31.3	25.7	16.7	1.0
Vacant Units by Geography	25,617	12.7	17.4	30.4	38.0	1.5
Businesses by Geography	16,459	10.7	17.6	32.8	38.1	0.8
Farms by Geography	530	1.3	10.2	42.3	45.5	0.8
Family Distribution by Income Level	68,395	22.8	17.0	18.5	41.7	0.0
Household Distribution by Income Level	101,818	24.8	15.8	17.4	42.0	0.0
Median Family Income MSA - 12100 Atlantic City-Hammonton, NJ MSA		\$66,523	Median Housing Value			\$241,428
			Median Gross Rent			\$1,017
			Families Below Poverty Level			12.1%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 12 financial institutions operated 57 branches within the assessment area. Of these institutions, Truist ranked 5th with 7.5 percent deposit market share.

Trenton MSA Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: Trenton MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	23.4	19.5	24.7	31.2	1.3
Population by Geography	370,212	15.2	19.3	28.1	37.0	0.4
Housing Units by Geography	143,833	16.9	19.8	28.8	34.5	0.0
Owner-Occupied Units by Geography	84,045	7.3	16.9	32.3	43.5	0.0
Occupied Rental Units by Geography	46,501	28.5	23.4	24.9	23.2	0.0
Vacant Units by Geography	13,287	37.0	25.4	20.3	17.3	0.0
Businesses by Geography	24,847	8.7	16.6	31.5	43.2	0.0
Farms by Geography	577	6.2	15.6	32.4	45.8	0.0
Family Distribution by Income Level	88,299	23.9	16.6	18.5	41.1	0.0
Household Distribution by Income Level	130,546	26.1	14.5	16.5	42.9	0.0
Median Family Income MSA - 45940 Trenton, NJ MSA		\$94,908	Median Housing Value			\$301,759
			Median Gross Rent			\$1,154
			Families Below Poverty Level			8.0%
<i>Source: 2015 ACS Census and 2018 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>						

Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2019, 26 financial institutions operated 139 branches within the assessment area. Of these institutions, Truist ranked 19nd with 0.4 percent deposit market share.

APPENDIX F: 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.

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.