# **2024 CRA PUBLIC FILE**





## AmeriFirst Bank CRA PUBLIC FILE



**AmeriFirst Bank** is committed to being an independently owned financial institution, striving to provide quality products and services to our customers and a return to its shareholders that is balanced with safe and sound banking practices, while addressing the needs of our community and continuing the education, training and enhancement of our staff.

As your financial institution, we are obligated to share the contents of our Community Reinvestment Act (CRA) Public File with you via our website: https://www.amerifirstbank.com. You may also request a copy in paper or digital form. We are allowed to charge a reasonable fee for copying and mailing. During our last performance evaluation examination in May 2022, we were assigned a *"Satisfactory"* CRA rating.

If you have any questions or comments about our CRA Public File, please send to: mmoffett@amerifirstbank.com

## **Regulatory Public File Requirements**



The bank is required to maintain the following information in its Public File and be current as of April 1<sup>st</sup> of each year, and updated quarterly thereafter:

- 1. Any written public comments and the bank's response for the current year and each of the two prior calendar years impacting the bank's performance to help meet the community credit needs.
- 2. A copy of the public section of the bank's most recent CRA Performance Evaluation.
- 3. Branch Listing With Addresses and Geographies.
- 4. Branches opened and/or closed during the current year and each of the prior two calendar years, with addresses and census tracts.
- 5. Hours of operation, List of services available deposit and loan products and transaction fees.
- 6. A map of each assessment area showing the boundaries and identifying census tracts on the map or in a separate list.
- 7. The Loan-to-Deposit ratios for each quarter of the prior calendar year.
- HMDA Disclosure Statement may be obtained from the Consumer Financial Protection Bureau's (CFPB) website (<u>http://www.consumerfinance.gov/hmda</u>).

## 1. Written CRA-Related Comments



1. All written comments that are received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet the credit needs of its community, and any response by the bank. If neither the comments or responses contain statements that reflect unfavorably on the good name or reputation of any person other than the bank or publication of which would violate specific provisions of law.

AmeriFirst Bank hasn't received any comments from the public regarding its performance in meeting the credit needs of its communities for the current year and the preceding two calendar years.

## 2. Public Section of CRA Performance Evaluation



2. A copy of the public section of the bank's most recent CRA Performance Evaluation prepared by the FDIC will be placed in the public file within 30 business days after its receipt.

The public section of the bank's most recent CRA Performance Evaluation, as of **May 31, 2022** is found at the end of the file.

## 3. Branch Listing With Addresses and Geographies



Branch Service Type	Popular Name	Street Address	City	State	Zip	County Name	Tract Code	County Code	MSA/MD Code	MSA/MD Name	Tract Income Level
Full Service (Main)	PEPPERTREE	8165 VAUGHN ROAD	MONTGOMERY	AL	36116	MONTGOMERY	0054.12	101	33860	Montgomery, AL	Upper
Full Service	ESCAMBIA	2151 RINGOLD STREET	FLOMATON	AL	36441	ESCAMBIA	9703.00	053	NA	NA (outside of MSA)	Moderate
Full Service	UNION SPRINGS	104 E HARDAWAY AVENUE	UNION SPRINGS	AL	36089	BULLOCK	9522.01	011	NA	NA (outside of MSA)	Middle
Full Service	AUBURN	2594 HILTON GARDEN DRIVE	AUBURN	AL	36830	LEE	0402.02	081	12220	Auburn/Opelika, AL	Upper
Full Service	PRATTVILLE	1799 HIGHWAY 14 EAST	PRATTVILLE	AL	36066	AUTAUGA	0208.04	001	33860	Montgomery, AL	Upper

## 4. Branches/ATMs Opened and/or Closed



A list of branches and ATMs opened and/or closed by the bank during the current year and each of the prior two calendar years, street addresses and geographies.

AmeriFirst Bank operates with 5 full-service facilities, all within its assessment areas. AmeriFirst has ATM's at 5 of its facilities and 1 located in the Old Conecuh Square Shopping Center in the Piggly Wiggly Supermarket. No openings or closings in current year or previous two years as of this posting (4/1/2024).

Location/ATM Address	Branch	АТМ	Date Opened	Census Tracts & Income
Peppertree – Main Office 8165 Vaughn Road Montgomery, AL 36116 Montgomery County, AL	Yes	Yes	Opened – 1998 Main Office – 9/18/2019	0054.12 Upper
Prattville 1799 Fairview Avenue Prattville, AL 36066 Autauga County, AL	Yes	Yes	August 4, 2008	0208.04 Upper
Union Springs 104 E. Hardaway Avenue Union Springs, AL 36089 Bullock County, AL	Yes	Yes	March 2010	9522.01 Middle
Auburn 2594 Hilton Garden Drive Auburn, AL 36830 Lee County, AL	Yes	Yes	January 11, 2021	0402.02 Upper
Escambia 2151 Ringold Street Flomaton, AL 36441 Escambia County, AL	Yes	Yes	Acquired November 30, 2020	9703.00 Moderate
ATM Old Conecuh Square Shopping Center inside Piggly Wiggly Grocery Store 205 W. Conecuh Avenue Union Springs, AL 36089 Bullock County, AL	No	Yes Does not take deposits	1998	9522.02 Low

5. Hours of Operation, List of Services and available deposit and loan products and transaction fees.



#### Hours of Operation (All Locations) LOBBY and DRIVE-IN:

Monday - Friday: 8:30 am - 5:00 pm Piggly Wiggly Grocery Store (Conecuh Square Shopping Center) Hours of Operation to use ATM STORE HOURS: Monday-Sunday: 7:00 am – 9:00 pm

Branch #	Branch Name	Address	City	State	Zip	Drive Thru	АТМ	Night Drop	Safe Deposit Boxes
003	PEPPERTREE	8165 VAUGHN ROAD	MONTGOMERY	AL	36116	Yes	Yes	Yes	Yes
007	ESCAMBIA	2151 RINGOLD STREET	FLOMATON	AL	36441	Yes	Yes	Yes	Yes
001	UNION SPRINGS	104 E HARDAWAY AVENUE	UNION SPRINGS	AL	36089	Yes	Yes	Yes	Yes
006	AUBURN	2594 HILTON GARDEN DRIVE	AUBURN	AL	36830	Yes	Yes	Yes	Yes
007	PRATTVILLE	1799 HIGHWAY 14 EAST	PRATTVILLE	AL	36066	Yes	Yes	Yes	Yes
ATM	PIGGLY WIGGLY	1799 HIGHWAY 14 EAST	PRATTVILLE	AL	36066	Yes	Yes	Yes	Yes

Material differences in the Availability or Costs of Services at Particular Branches No material differences in the availability or costs of services exist.

## Available Deposit and Loan Products and Transaction Fees





For many it's business, but for AmeriFirst, it's community. Over the last 100 years, we have grown with our tightly knit staff and community to offer more than just banking to Central Alabama. We hold ourselves to a higher standard of excellence for our customers, catering traditional services to the public that include checking, savings, loans, and deposits. No matter what your personal consumer banking needs may be, AmeriFirst Bank has an option that's right for you.



AmeriFirst Bank offers a higher touch in business banking that clients simply can't find with our competition. By hiring and retaining local officers and employees who are passionate about their work, it allows us to better assist our customers with their ongoing business banking needs. With local decision making, routine office visits, timely responses, and our trained regional loan officers, AmeriFirst Bank has the skills and expertise to make business banking personal and simple.

## 5. Available Deposit and Loan Products and Transaction Fees

## $\checkmark$

#### PERSONAL CHECKING and SERVICES

- Personal Checking Accounts
- Personal Savings Accounts
- Certificates of Deposit
- Individual Retirement Accounts
- Internet Banking with Billpay
- Mobile Banking
- ATM's
- Telephone Banking (iTalk)
- Personal Credit Cards (3<sup>rd</sup> Party)
- Gift Cards & Travel Cards
- Wire Transfer Services
- Personal Loans
- Real Estate Loans
- Home Equity Loans

## COUNT ON CONVENIENCE.

Convenience is the key for SURCHARGE-FREE access to your bank accounts at your neighborhood Publix.

More than 1,100 ATMs 24/7—SURCHARGE-FREE.

The following transactions are **SURCHARGE-FREE** at any Publix Presto! ATM.

- Cash withdrawals
- Balance inquiries
- Transfers between accounts

Presto!

#### **BUSINESS CHECKING and SERVICES**

- Business Checking Accounts
- Business Savings Accounts
- Commercial Analysis Accounts
- Certificates of Deposit
- Internet Banking with Billpay
- Mobile Banking
- ATM's
- Telephone Banking
- Merchant Services
- Remote Deposit Capture
- Business Credit Cards (3<sup>rd</sup> Party)
- Commercial Purchasing Card (3<sup>rd</sup> Party)
- Business Loans
- Commercial Real Estate Loans
- SBA Loans
- Wire Transfer Services
- ACH Origination
- Positive Pay

## 5. Common Features and Transaction Fees

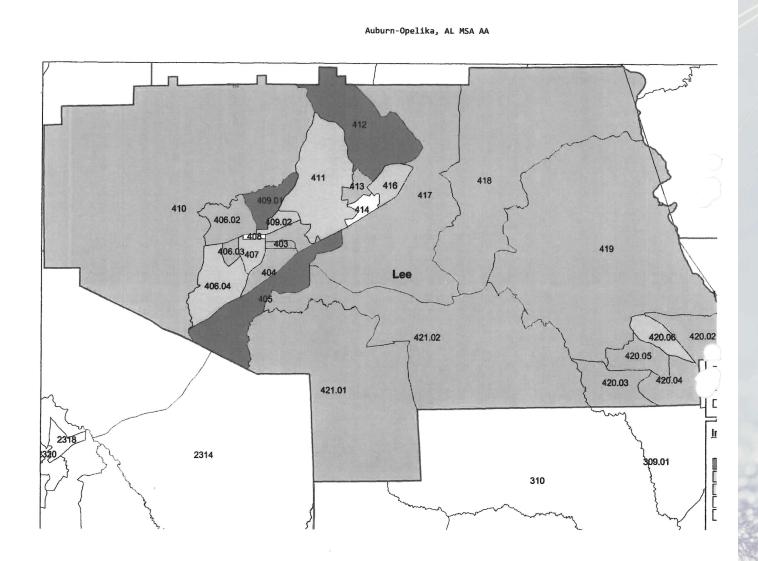


Limits and fees - The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Account Printout	\$2.00
Account Research (per hour)	\$25.00
ATM Usage Fee/Non-Customers (AmeriFirst Card no charge & also at Publix)	\$4.00
Bill Pay Service	\$0.00
Cashier's Check Fee	\$10.00
Check Printing and Deposit Slips - Fees vary by the style ordered	
Closed Account Fee (if within 90 days of opening)	\$15.00
Collection Item - Foreign (does not include return item & other fees)	\$75.00
Collection Item - Domestic (plus remitting bank's fees & postage)	\$25.00
Commercial Zero Balance Sweep Account (per month)	\$50.00
Copy of Bank Statement	\$5.00
Debit Card Replacement	\$15.00
Dormant Account (per month)	\$10.00
Employee-Assisted Telephone Transfer	\$3.00
Fax Service (Customer only)	\$5.00
Gift Cards (Bank customer only)	\$5.00
Levy/Garnishment	\$50.00
Lock Deposit Bags (Night Drop)	\$35.00
Non-Customer Check Cashing (checks over \$500.00)	\$5.00
Notary Fee (Customer only)	\$0.00

Overdraft Fee, NSF, Return Item Fee, Paid Item Fee (Checking/Savings)	\$36.00
Overdraft Sweep - Consumer & Commercial (per sweep)	\$2.00
Photocopies (non customer)	\$0.50
Printed Sheet of Personalized Checks (per sheet)	\$5.00
Safe Deposit Box Annual Fee - 3 x 10	\$70.00
Safe Deposit Box Annual Fee - 7 x 10	\$100.00
Safe Deposit Box Annual Fee - 5 x 10	\$90.00
Safe Deposit Box Annual Fee - 10 x 10	\$150.00
Safe Deposit Box Annual Fee - 2 x 5	\$25.00
Safe Deposit Box Annual Fee - 3 x 5	\$25.00
Safe Deposit Box Annual Fee - 3 x 11	\$70.00
Safe Deposit Box Annual Fee - 5 x 5	\$60.00
Safe Deposit Box Drill Fee (minimum charge)	\$175.00
Safe Deposit Box Key Replacement	\$40.00
Safe Deposit Box Late Fee (30 days or more past due)	\$10.00
Savings Bond Redemption (Customer only)	\$0.00
Stop Payment (per request)	\$35.00
Travel Cards - reload (Customer only)	\$2.00
Travel Cards w/chip (Customer Only)	\$9.50
Wire Transfer - Incoming (Bank customer only)	\$10.00
Wire Transfer - Outgoing Domestic (Bank customer only)	\$35.00
Wire Transfer - International (Bank customer only)	\$100.00
Wire Transfer - Incoming (Federal Reserve)	\$75.00
Vinyl Zipper Bag (Customer only)	\$7.00
Vinyl Zipper Bag (Non-customer)	\$10.00

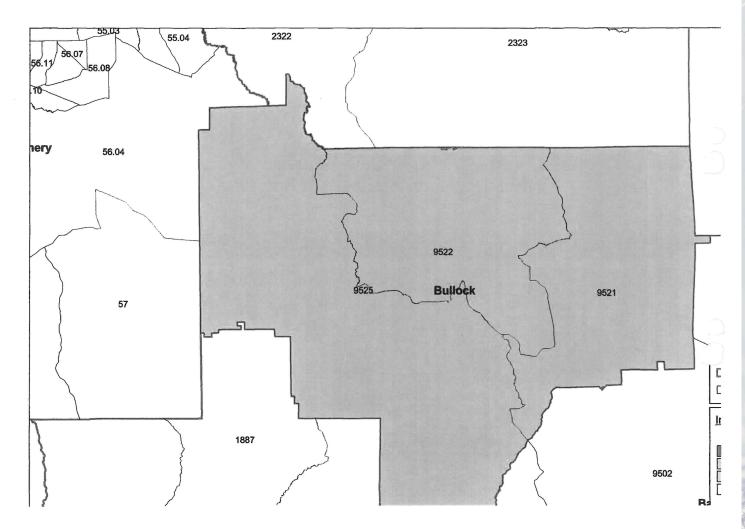




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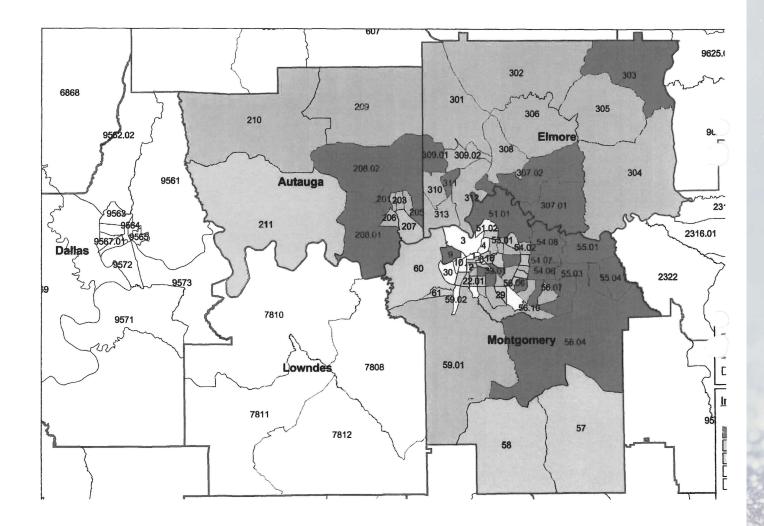


Bullock County, AL (Non-MSA) AA



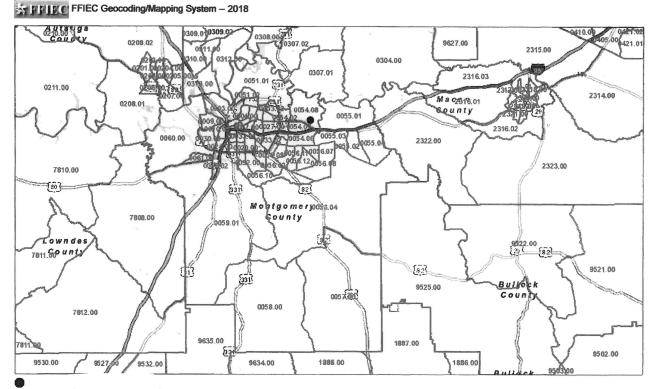
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Montgomery-Autauga-Elmore, AL AA





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MSA: 33860 - MONTGOMERY, AL || State: 01 - ALABAMA || County: 101 - MONTGOMERY COUNTY || Tract Code: 0054.08

#### Selected Tract

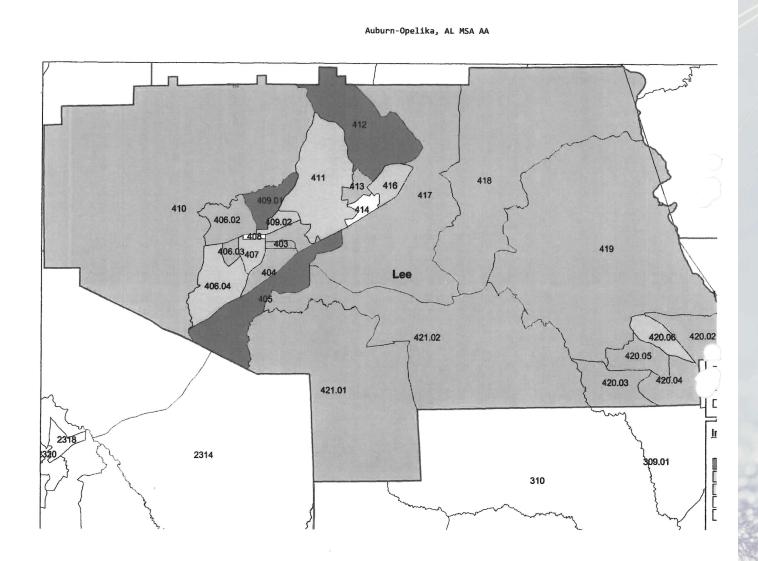
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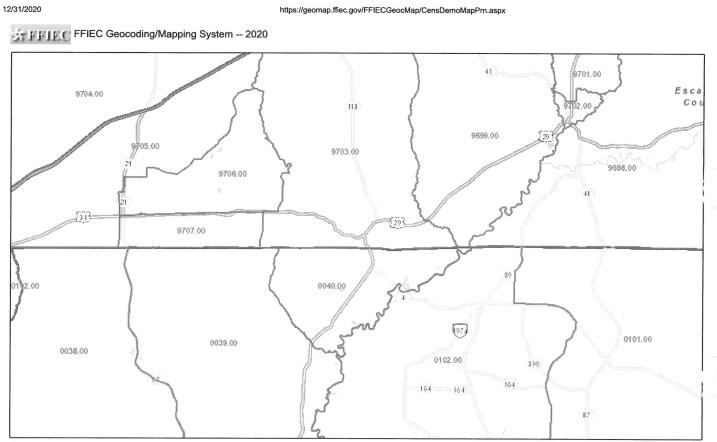
https://geomap.ffiec.gov/FFIECGeocMap/CensDemoMapPrn.aspx

4/5/2019





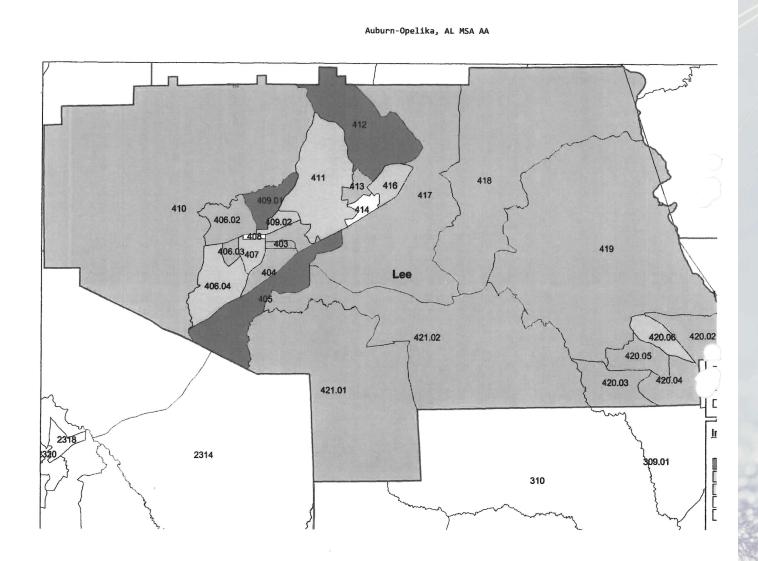


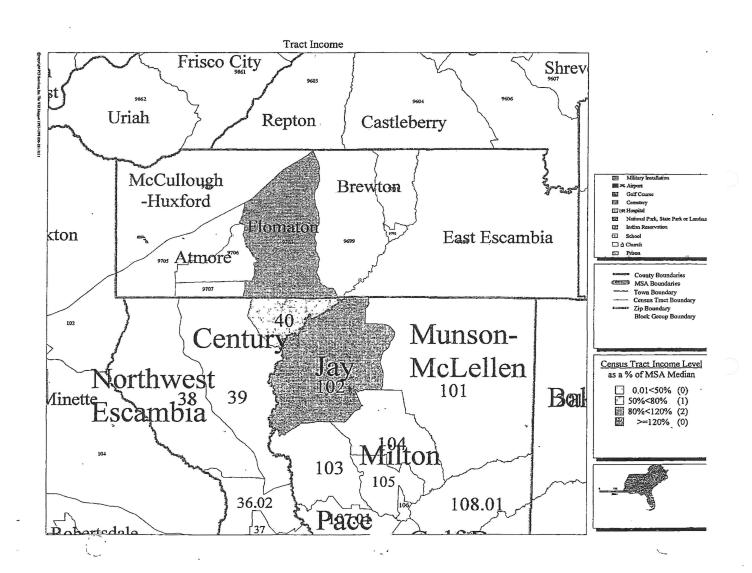


Matched Address: MSA: || State: || County: || Tract Code:

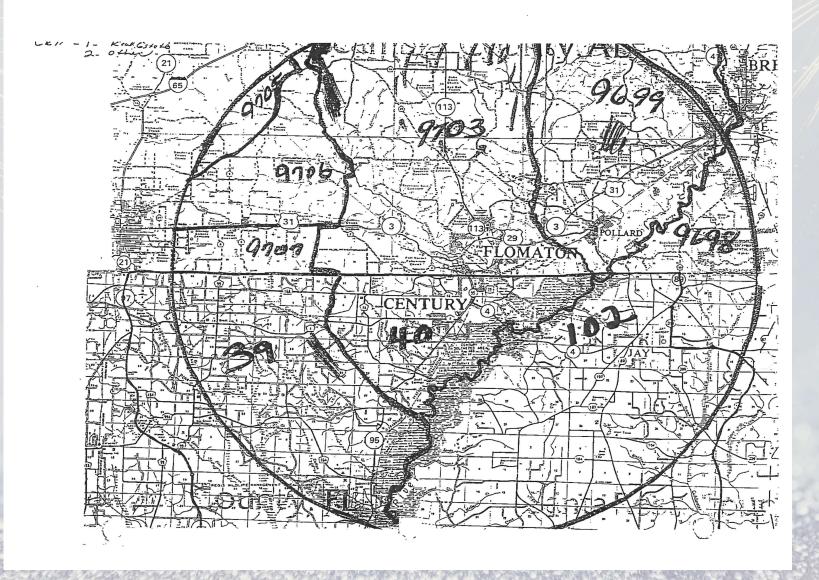
Selected Tract MSA: || State: || County: || Tract Code:

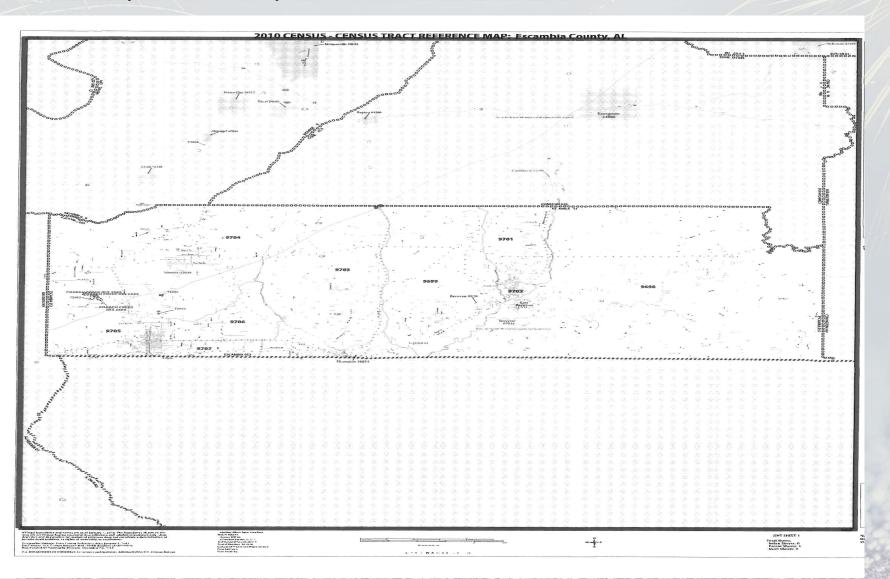


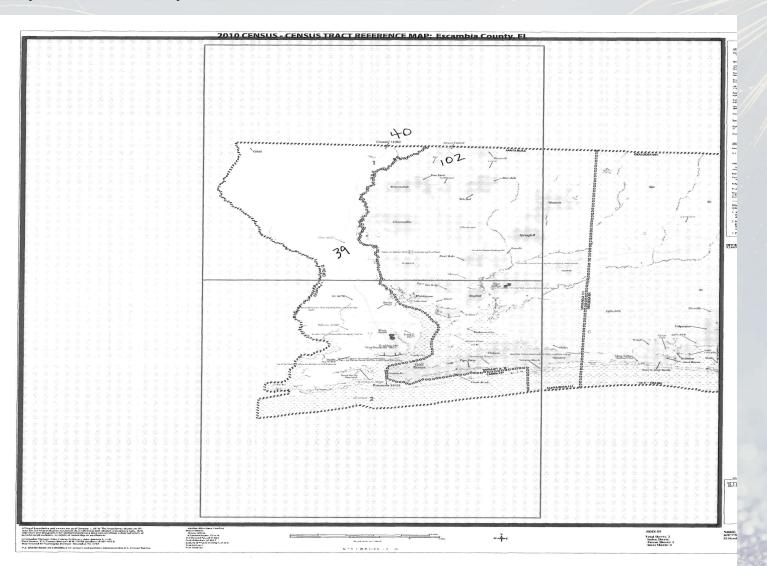














2023 FFIEC Census Report - Summary Census Demographic Information State: 01 - ALABAMA (AL)

County: 001 - AUTAUGA COUNTY

6.



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	001	0201.00	Middle	No	103.79	\$74,400	\$77,220	\$70,699	1775	22.48	399	507	710
01	001	0202.00	Moderate	No	73.60	\$74,400	\$54,758	\$50,133	2055	59.42	1221	392	717
01	001	0203.00	Middle	No	102.93	\$74,400	\$76,580	\$70,111	3216	30.97	996	967	1401
01	001	0204.00	Middle	No	110.95	\$74,400	\$82,547	\$75,580	4246	17.05	724	1290	1598
01	001	0205.01	Upper	No	133.41	\$74,400	\$99,257	\$90,879	4322	25.71	1111	1024	1659
01	001	0205.02	Middle	No	115.06	\$74,400	\$85,605	\$78,375	3284	43.64	1433	688	979
01	001	0205.03	Upper	No	154.17	\$74,400	\$114,702	\$105,016	3616	31.22	1129	587	773
01	001	0206.00	Middle	No	101.29	\$74,400	\$75,360	\$69,000	3729	33.92	1265	1111	1464
01	001	0207.00	Moderate	No	66.98	\$74,400	\$49,833	\$45,625	3409	32.56	1110	844	1267
01	001	0208.01	Upper	No	130.37	\$74,400	\$96,995	\$88,804	3143	15.91	500	914	1217
01	001	0208.03	Middle	No	97.26	\$74,400	\$72,361	\$66,250	4635	24.88	1153	1080	1750
01	001	0208.04	Upper	No	120.28	\$74,400	\$89,488	\$81,934	6064	34.14	2070	1562	1823
01	001	0208.05	Upper	No	150.82	\$74,400	\$112,210	\$102,734	3122	15.86	495	853	1026
01	001	0209.01	Middle	No	84.66	\$74,400	\$62,987	\$57,667	3268	12.88	421	1013	1420
01	001	0209.02	Middle	No	117.19	\$74,400	\$87,189	\$79,825	3091	24.43	755	998	1191
01	001	0210.00	Middle	No	84.58	\$74,400	\$62,928	\$57,614	2645	25.03	662	985	1499
01	001	0211.00	Moderate	No	63.18	\$74,400	\$47,006	\$43,036	3185	55.86	1779	1273	1770

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

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2023 FFIEC Census Report - Summary Census Demographic Information State: 01 - ALABAMA (AL) County: 011 - BULLOCK COUNTY

6.



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	011	9521.00	Middle	Yes*	81.58	\$65,700	\$53,598	\$45,655	1272	93.32	1187	402	748
01	011	9522.01	Middle	Yes*	103.04	\$65,700	\$67,697	\$57,665	2423	87.49	2120	591	944
01	011	9522.02	Low	No	47.68	\$65,700	\$31,326	\$26,685	4341	80.00	3473	741	1462
01	011	9525.00	Middle	Yes*	119.36	\$65,700	\$78,420	\$66,797	2321	55.84	1296	797	1189
01	011	9999.99	Middle	No	96.45	\$65,700	\$63,368	\$53,976	10357	77.98	8076	2531	4343

\* Will automatically be included in the 2024 Distressed or Underserved Tract List



2023 FFIEC Census Report - Summary Census Demographic Information State: 01 - ALABAMA (AL) County: 051 - ELMORE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	051	0301.01	Middle	No	119.28	\$74,400	\$88,744	\$81,250	3711	8.41	312	1027	1382
01	051	0301.02	Middle	No	90.26	\$74,400	\$67,153	\$61,484	2353	18.78	442	458	824
01	051	0301.03	Middle	No	80.11	\$74,400	\$59,602	\$54,569	5534	42.65	2360	346	578
01	051	0302.00	Middle	No	116.88	\$74,400	\$86,959	\$79,615	4970	14.83	737	1355	1932
01	051	0303.00	Upper	No	171.74	\$74,400	\$127,775	\$116,985	2766	6.98	193	890	2451
01	051	0304.01	Middle	No	99.34	\$74,400	\$73,909	\$67,667	3332	36.67	1222	1100	1476
01	051	0304.02	Middle	No	102.18	\$74,400	\$76,022	\$69,600	4757	24.53	1167	1192	1962
01	051	0305.00	Middle	No	103.82	\$74,400	\$77,242	\$70,719	5272	16.67	879	1377	2077
01	051	0306.00	Middle	No	117.98	\$74,400	\$87,777	\$80,368	7432	32.08	2384	1871	2498
01	051	0307.01	Upper	No	170.81	\$74,400	\$127,083	\$116,353	8391	24.53	2058	2396	2554
01	051	0307.02	Upper	No	162.61	\$74,400	\$120,982	\$110,768	4073	16.89	688	1356	1580
01	051	0308.01	Middle	No	84.11	\$74,400	\$62,578	\$57,295	2255	37.34	842	839	1527
01	051	0308.02	Moderate	No	69.39	\$74,400	\$51,626	\$47,265	4317	43.36	1872	1048	1709
01	051	0309.01	Middle	No	116.07	\$74,400	\$86,356	\$79,063	6862	31.64	2171	1735	2129
01	051	0309.02	Middle	No	88.84	\$74,400	\$66,097	\$60,515	4120	31.38	1293	996	1635
01	051	0310.01	Moderate	No	51.26	\$74,400	\$38,137	\$34,918	4017	45.33	1821	990	1399
01	051	0310.02	Middle	No	97.83	\$74,400	\$72,786	\$66,643	3610	32.27	1165	948	1193
01	051	0311.00	Upper	No	129.43	\$74,400	\$96,296	\$88,162	4267	25.83	1102	1184	1543
01	051	0312.00	Moderate	No	64.84	\$74,400	\$48,241	\$44,167	1781	51.49	917	436	612
01	051	0313.00	Middle	No	89.83	\$74,400	\$66,834	\$61,188	4157	43.59	1812	856	1483

\* Will automatically be included in the 2024 Distressed or Underserved Tract List



Film Film C' Federal Financial Institution

2023 FFIEC Census Report - Summary Census Demographic Information State: 01 - ALABAMA (AL) County: 053 - ESCAMBIA COUNTY

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	053	9698.01	Middle	Yes*	112.18	\$65,700	\$73,702	\$62,778	1453	7.23	105	387	622
01	053	9698.02	Middle	Yes*	82.34	\$65,700	\$54,097	\$46,083	4099	35.89	1471	939	1845
01	053	9699.00	Middle	Yes*	83.22	\$65,700	\$54,676	\$46,571	4399	22.21	977	936	1728
01	053	9701.00	Middle	Yes*	102.59	\$65,700	\$67,402	\$57,411	4600	27.59	1269	1270	2110
01	053	9702.00	Middle	Yes*	93.81	\$65,700	\$61,633	\$52,500	1578	73.45	1159	332	706
01	053	9703.00	Moderate	No	68.26	\$65,700	\$44,847	\$38,203	3748	19.16	718	985	1717
01	053	9704.00	Middle	Yes*	105.27	\$65,700	\$69,162	\$58,911	4511	51.47	2322	722	1528
01	053	9705.00	Middle	Yes*	91.17	\$65,700	\$59,899	\$51,023	4976	45.86	2282	1239	2112
01	053	9706.00	Low	No	48.22	\$65,700	\$31,681	\$26,985	3707	78.55	2912	756	1687
01	053	9707.00	Moderate	No	72.45	\$65,700	\$47,600	\$40,547	3686	41.73	1538	1027	1571

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

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2023 FFIEC Census Report - Summary Census Demographic Information State: 12 - FLORIDA (FL) County: 033 - ESCAMBIA COUNTY

6.



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
12	033	0001.00	Upper	No	139.48	\$83,900	\$117,024	\$99,167	2306	34.91	805	316	631
12	033	0003.00	Moderate	No	76.64	\$83,900	\$64,301	\$54,487	2594	40.86	1060	676	1423
12	033	0004.00	Low	No	39.53	\$83,900	\$33,166	\$28,106	3479	83.85	2917	447	1095
12	033	0005.00	Upper	No	192.96	\$83,900	\$161,893	\$137,188	1480	36.89	546	497	757
12	033	0006.00	Moderate	No	73.05	\$83,900	\$61,289	\$51,941	1954	66.53	1300	272	970
12	033	0008.01	Upper	No	151.71	\$83,900	\$127,285	\$107,857	2025	19.11	387	516	952
12	033	0008.02	Upper	No	141.79	\$83,900	\$118,962	\$100,811	2990	31.34	937	1036	1573
12	033	0009.00	Upper	No	159.86	\$83,900	\$134,123	\$113,654	2616	16.40	429	935	1195
12	033	0010.01	Upper	No	166.72	\$83,900	\$139,878	\$118,529	6063	16.11	977	1992	2423
12	033	0010.02	Moderate	No	74.23	\$83,900	\$62,279	\$52,778	2941	16.70	491	690	806
12	033	0011.01	Upper	No	151.82	\$83,900	\$127,377	\$107,938	5908	17.64	1042	2043	2412
12	033	0011.03	Upper	No	124.83	\$83,900	\$104,732	\$88,750	2789	19.51	544	690	958
12	033	0011.04	Middle	No	94.37	\$83,900	\$79,176	\$67,098	6352	28.92	1837	1686	2480
12	033	0012.01	Middle	No	103.62	\$83,900	\$86,937	\$73,670	4741	40.20	1906	682	1752
12	033	0012.02	Moderate	No	58.38	\$83,900	\$48,981	\$41,510	4016	43.50	1747	793	1494
12	033	0013.00	Moderate	No	67.85	\$83,900	\$56,926	\$48,240	4165	67.83	2825	892	1513
12	033	0014.01	Middle	No	94.72	\$83,900	\$79,470	\$67,344	5453	28.90	1576	349	562
12	033	0014.02	Moderate	No	66.17	\$83,900	\$55,517	\$47,045	6743	52.04	3509	1590	2706
12	033	0015.00	Low	No	49.63	\$83,900	\$41,640	\$35,284	1232	90.18	1111	454	681
12	033	0016.00	Low	No	41.25	\$83,900	\$34,609	\$29,327	2191	69.28	1518	237	555
12	033	0017.00	Low	No	48.62	\$83,900	\$40,792	\$34,566	3125	72.35	2261	357	800
12	033	0018.00	Moderate	No	54.20	\$83,900	\$45,474	\$38,534	1872	64.21	1202	590	1012
12	033	0019.00	Low	No	41.54	\$83,900	\$34,852	\$29,537	2204	63.43	1398	389	874
12	033	0020.00	Moderate	No	58.84	\$83,900	\$49,367	\$41,838	1927	73.17	1410	324	1011
12	033	0021.00	Moderate	No	53.42	\$83,900	\$44,819	\$37,981	4967	56.88	2825	860	2268
12	033	0022.00	Middle	No	80.47	\$83,900	\$67,514	\$57,212	3660	38.36	1404	783	1832

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
12	033	0023.00	Middle	No	112.91	\$83,900	\$94,731	\$80,274	4861	21.79	1059	1632	2708
12	033	0024.00	Middle	No	95.44	\$83,900	\$80,074	\$67,857	5532	39.43	2181	0	450
12	033	0025.00	Upper	No	214.72	\$83,900	\$180,150	\$152,656	2939	8.74	257	1321	1482
12	033	0026.01	Middle	No	113.76	\$83,900	\$95,445	\$80,882	3278	29.26	959	1165	1384
12	033	0026.02	Upper	No	213.09	\$83,900	\$178,783	\$151,500	1845	10.73	198	625	634
12	033	0026.04	Middle	No	117.46	\$83,900	\$98,549	\$83,508	4452	18.13	807	1072	2028
12	033	0026.05	Middle	No	89.15	\$83,900	\$74,797	\$63,385	5061	40.82	2066	916	1961
12	033	0026.06	Upper	No	120.10	\$83,900	\$100,764	\$85,386	3223	19.11	616	879	1195
12	033	0026.07	Middle	No	88.83	\$83,900	\$74,528	\$63,159	5100	24.92	1271	1424	2045
12	033	0027.01	Middle	No	93.18	\$83,900	\$78,178	\$66,250	3284	39.98	1313	827	1241
12	033	0027.03	Low	No	42.04	\$83,900	\$35,272	\$29,893	3012	57.64	1736	787	1183
12	033	0027.04	Moderate	No	62.38	\$83,900	\$52,337	\$44,350	6277	37.52	2355	1505	2590
12	033	0028.01	Middle	No	86.31	\$83,900	\$72,414	\$61,364	2820	40.74	1149	600	1097
12	033	0028.02	Middle	No	109.56	\$83,900	\$91,921	\$77,891	5243	40.43	2120	1314	2257
12	033	0028.03	Moderate	No	75.14	\$83,900	\$63,042	\$53,424	2593	49.36	1280	583	1122
12	033	0028.04	Middle	No	87.61	\$83,900	\$73,505	\$62,292	3568	45.71	1631	211	641
12	033	0029.00	Low	No	47.68	\$83,900	\$40,004	\$33,899	4199	39.96	1678	954	2068
12	033	0030.01	Moderate	No	69.13	\$83,900	\$58,000	\$49,154	3716	63.11	2345	697	1436
12	033	0030.02	Moderate	No	77.31	\$83,900	\$64,863	\$54,965	3756	56.26	2113	795	1172
12	033	0031.00	Moderate	No	61.09	\$83,900	\$51,255	\$43,435	5104	80.53	4110	647	1829
12	033	0032.01	Moderate	No	78.53	\$83,900	\$65,887	\$55,833	5044	56.36	2843	1111	1923
12	033	0032.03	Moderate	No	78.94	\$83,900	\$66,231	\$56,125	4687	58.25	2730	1527	2008
12	033	0032.04	Middle	No	105.21	\$83,900	\$88,271	\$74,800	2843	36.19	1029	1056	1292
12	033	0033.01	Middle	No	107.49	\$83,900	\$90,184	\$76,422	4486	34.31	1539	1161	1475
12	033	0033.05	Middle	No	109.41	\$83,900	\$91,795	\$77,788	2593	35.40	918	609	804
12	033	0033.07	Middle	No	103.00	\$83,900	\$86,417	\$73,229	2180	47.16	1028	554	902
12	033	0033.08	Middle	No	80.25	\$83,900	\$67,330	\$57,054	4336	37.80	1639	1322	1966
12	033	0033.10	Middle	No	97.21	\$83,900	\$81,559	\$69,111	4960	44.70	2217	1304	1788
12	033	0033.11	Moderate	No	63.11	\$83,900	\$52,949	\$44,872	3491	49.90	1742	509	915

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
12	033	0033.12	Moderate	No	69.14	\$83,900	\$58,008	\$49,157	3239	44.30	1435	943	1358
12	033	0033.13	Moderate	No	74.31	\$83,900	\$62,346	\$52,837	4113	36.42	1498	1083	1444
12	033	0034.00	Moderate	No	74.62	\$83,900	\$62,606	\$53,056	6376	40.75	2598	1487	2300
12	033	0035.05	Moderate	No	79.54	\$83,900	\$66,734	\$56,553	3817	35.34	1349	793	1509
12	033	0035.06	Middle	No	95.99	\$83,900	\$80,536	\$68,250	4707	34.61	1629	1421	1872
12	033	0035.07	Middle	No	100.41	\$83,900	\$84,244	\$71,392	6419	36.72	2357	879	1711
12	033	0035.09	Middle	No	86.31	\$83,900	\$72,414	\$61,364	5294	50.23	2659	825	1545
12	033	0035.10	Moderate	No	52.38	\$83,900	\$43,947	\$37,241	2878	45.83	1319	568	1309
12	033	0035.11	Upper	No	130.65	\$83,900	\$109,615	\$92,885	2562	24.28	622	801	997
12	033	0035.12	Moderate	No	72.34	\$83,900	\$60,693	\$51,435	3879	32.28	1252	925	1811
12	033	0036.03	Upper	No	127.20	\$83,900	\$106,721	\$90,435	10870	25.60	2783	3156	3612
12	033	0036.07	Middle	No	99.30	\$83,900	\$83,313	\$70,600	2593	29.62	768	240	388
12	033	0036.08	Middle	No	94.09	\$83,900	\$78,942	\$66,896	7770	23.95	1861	1914	3266
12	033	0036.09	Middle	No	86.33	\$83,900	\$72,431	\$61,376	3821	30.80	1177	967	1507
12	033	0036.10	Upper	No	128.76	\$83,900	\$108,030	\$91,543	6762	26.15	1768	1894	2397
12	033	0036.11	Upper	No	131.86	\$83,900	\$110,631	\$93,750	5951	21.46	1277	1836	2325
12	033	0036.12	Middle	No	113.95	\$83,900	\$95,604	\$81,014	6070	21.96	1333	1756	2176
12	033	0036.13	Upper	No	133.84	\$83,900	\$112,292	\$95,153	4168	15.09	629	1269	1594
12	033	0036.14	Middle	No	113.41	\$83,900	\$95,151	\$80,633	6132	28.10	1723	1674	2126
12	033	0037.00	Middle	No	91.90	\$83,900	\$77,104	\$65,338	5644	35.03	1977	1310	1833
12	033	0038.00	Middle	No	114.64	\$83,900	\$96,183	\$81,509	4961	15.80	784	1434	1915
12	033	0039.00	Middle	No	105.27	\$83,900	\$88,322	\$74,846	4962	18.52	919	1584	1875
12	033	0040.00	Moderate	No	66.61	\$83,900	\$55,886	\$47,357	4641	50.27	2333	810	1433
12	033	9900.00	Unknown	No	0.00	\$83,900	\$0	\$0	0	0.00	0	0	0

\* Will automatically be included in the 2024 Distressed or Underserved Tract List



2023 FFIEC Census Report - Summary Census Demographic Information State: 12 - FLORIDA (FL) County: 113 - SANTA ROSA COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD Non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
12	113	0101.00	Middle	No	87.52	\$83,900	\$73,429	\$62,227	3852	9.61	370	1141	1669
12	113	0102.00	Middle	No	99.47	\$83,900	\$83,455	\$70,722	4756	8.75	416	1290	1859
12	113	0103.01	Middle	No	91.94	\$83,900	\$77,138	\$65,365	6291	18.60	1170	1525	1936
12	113	0103.02	Upper	No	182.90	\$83,900	\$153,453	\$130,036	4953	17.50	867	1362	1492
12	113	0103.03	Upper	No	138.90	\$83,900	\$116,537	\$98,750	5219	15.29	798	1436	1790
12	113	0104.00	Middle	No	90.84	\$83,900	\$76,215	\$64,583	2823	15.59	440	953	1329
12	113	0105.03	Middle	No	91.49	\$83,900	\$76,760	\$65,046	6361	21.00	1336	1159	2670
12	113	0105.04	Middle	No	118.25	\$83,900	\$99,212	\$84,071	6381	19.31	1232	2148	2401
12	113	0105.05	Middle	No	80.75	\$83,900	\$67,749	\$57,415	4394	25.44	1118	968	1721
12	113	0105.06	Upper	No	122.89	\$83,900	\$103,105	\$87,372	4183	15.71	657	1388	1629
12	113	0106.01	Moderate	No	53.80	\$83,900	\$45,138	\$38,250	4636	34.06	1579	843	1827
12	113	0106.02	Moderate	No	71.94	\$83,900	\$60,358	\$51,149	1781	26.95	480	388	878
12	113	0107.04	Middle	No	108.86	\$83,900	\$91,334	\$77,396	6973	22.66	1580	1627	2330
12	113	0107.05	Moderate	No	61.00	\$83,900	\$51,179	\$43,372	3484	17.14	597	841	1388
12	113	0107.07	Upper	No	126.78	\$83,900	\$106,368	\$90,139	4424	14.20	628	1405	1662
12	113	0107.08	Middle	No	90.50	\$83,900	\$75,930	\$64,347	6492	18.73	1216	1945	2655
12	113	0107.09	Middle	No	94.15	\$83,900	\$78,992	\$66,941	5861	19.76	1158	1531	2100
12	113	0107.10	Middle	No	113.77	\$83,900	\$95,453	\$80,888	2480	14.35	356	724	921
12	113	0107.11	Middle	No	107.31	\$83,900	\$90,033	\$76,296	4764	17.93	854	1513	1780
12	113	0107.12	Upper	No	122.03	\$83,900	\$102,383	\$86,758	3852	21.68	835	1396	2001
12	113	0108.02	Upper	No	126.26	\$83,900	\$105,932	\$89,766	5734	23.07	1323	1560	1979
12	113	0108.08	Middle	No	81.17	\$83,900	\$68,102	\$57,708	10646	40.84	4348	1333	1838
12	113	0108.09	Upper	No	121.94	\$83,900	\$102,308	\$86,696	5324	18.52	986	1596	2373
12	113	0108.12	Upper	No	182.85	\$83,900	\$153,411	\$130,000	5076	15.52	788	1726	2176
12	113	0108.13	Middle	No	111.86	\$83,900	\$93,851	\$79,528	5107	14.84	758	1564	2366
12	113	0108.14	Upper	No	140.41	\$83,900	\$117,804	\$99,830	6542	16.48	1078	1719	2483

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD Non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
12	113	0108.20	Upper	No	159.50	\$83,900	\$133,821	\$113,401	6896	25.22	1739	1702	2164
12	113	0108.21	Upper	No	140.07	\$83,900	\$117,519	\$99,583	5793	29.19	1691	1207	1510
12	113	0108.22	Upper	No	126.75	\$83,900	\$106,343	\$90,114	5446	23.30	1269	1630	1761
12	113	0108.23	Moderate	No	79.85	\$83,900	\$66,994	\$56,771	4924	18.85	928	1482	2174
12	113	0108.24	Upper	No	131.22	\$83,900	\$110,094	\$93,292	5278	20.97	1107	1852	2226
12	113	0108.25	Upper	No	147.81	\$83,900	\$124,013	\$105,090	3292	20.17	664	1012	1318
12	113	0108.26	Moderate	No	75.60	\$83,900	\$63,428	\$53,750	3091	29.89	924	760	1006
12	113	0108.27	Upper	No	122.96	\$83,900	\$103,163	\$87,420	9096	30.51	2775	2163	2964
12	113	0108.28	Upper	No	140.21	\$83,900	\$117,636	\$99,681	5493	30.73	1688	1516	2072
12	113	0109.00	Upper	No	179.23	\$83,900	\$150,374	\$127,426	6302	11.57	729	2265	2817
12	113	9900.00	Unknown	No	0.00	\$83,900	\$0	\$0	0	0.00	0	0	0

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

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2023 FFIEC Census Report - Summary Census Demographic Information State: 01 - ALABAMA (AL) County: 081 - LEE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	081	0402.01	Middle	No	86.64	\$83,900	\$72,691	\$65,060	3760	36.38	1368	175	68
01	081	0402.02	Upper	No	131.19	\$83,900	\$110,068	\$98,516	3084	31.55	973	548	104
01	081	0403.00	Upper	No	135.25	\$83,900	\$113,475	\$101,563	2576	28.14	725	378	81
01	081	0404.01	Moderate	No	69.22	\$83,900	\$58,076	\$51,985	3532	43.46	1535	97	59
01	081	0404.02	Upper	No	156.86	\$83,900	\$131,606	\$117,793	2055	16.45	338	845	117
01	081	0404.03	Upper	No	160.13	\$83,900	\$134,349	\$120,250	1965	23.51	462	558	76
01	081	0405.01	Upper	No	177.98	\$83,900	\$149,325	\$133,654	6514	18.27	1190	1924	228
01	081	0405.02	Middle	No	87.04	\$83,900	\$73,027	\$65,365	4536	46.76	2121	832	145
01	081	0406.02	Middle	No	104.08	\$83,900	\$87,323	\$78,155	8254	49.77	4108	1591	237
01	081	0406.03	Unknown	No	0.00	\$83,900	\$0	\$0	1379	52.21	720	251	56
01	081	0406.05	Moderate	No	65.70	\$83,900	\$55,122	\$49,338	1754	14.08	247	459	77
01	081	0406.06	Low	No	35.85	\$83,900	\$30,078	\$26,926	2855	44.06	1258	205	53
01	081	0406.07	Unknown	No	0.00	\$83,900	\$0	\$0	1307	46.67	610	282	61
01	081	0407.00	Unknown	No	0.00	\$83,900	\$0	\$0	5173	61.24	3168	22	2
01	081	0408.01	Unknown	No	0.00	\$83,900	\$0	\$0	2743	28.95	794	45	18
01	081	0408.02	Unknown	No	0.00	\$83,900	\$0	\$0	2132	27.58	588	27	22
01	081	0409.01	Upper	No	121.14	\$83,900	\$101,636	\$90,972	4226	31.19	1318	865	14:
01	081	0409.03	Moderate	No	79.37	\$83,900	\$66,591	\$59,605	1961	49.72	975	158	34
01	081	0409.04	Middle	No	81.00	\$83,900	\$67,959	\$60,828	5637	36.12	2036	833	17
01	081	0410.01	Upper	No	170.86	\$83,900	\$143,352	\$128,304	7376	29.31	2162	1628	18
01	081	0410.02	Moderate	No	57.92	\$83,900	\$48,595	\$43,500	4218	52.70	2223	1084	17
01	081	0411.01	Unknown	No	0.00	\$83,900	\$0	\$0	2070	57.34	1187	464	7:
01	081	0411.02	Middle	No	96.93	\$83,900	\$81,324	\$72,786	4000	50.15	2006	360	68
01	081	0411.03	Upper	No	122.23	\$83,900	\$102,551	\$91,784	2280	72.63	1656	403	69
01	081	0411.04	Middle	No	90.70	\$83,900	\$76,097	\$68,110	3084	31.71	978	1132	13
01	081	0412.00	Upper	No	123.73	\$83,900	\$103,809	\$92,917	4986	23.08	1151	1753	19

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	081	0413.00	Middle	No	82.29	\$83,900	\$69,041	\$61,797	3353	45.33	1520	707	1170
01	081	0414.00	Low	No	36.08	\$83,900	\$30,271	\$27,096	3388	91.26	3092	680	1530
01	081	0416.00	Moderate	No	77.70	\$83,900	\$65,190	\$58,348	3573	76.77	2743	485	1255
01	081	0417.01	Middle	No	101.22	\$83,900	\$84,924	\$76,008	3293	52.02	1713	1113	1322
01	081	0417.02	Moderate	No	54.34	\$83,900	\$45,591	\$40,809	2869	38.93	1117	782	1033
01	081	0417.03	Moderate	No	76.87	\$83,900	\$64,494	\$57,727	5114	42.67	2182	1672	2091
01	081	0418.01	Middle	No	87.50	\$83,900	\$73,413	\$65,711	2618	24.37	638	910	1117
01	081	0418.02	Moderate	No	56.91	\$83,900	\$47,747	\$42,738	2764	36.36	1005	506	1089
01	081	0418.03	Middle	No	115.01	\$83,900	\$96,493	\$86,364	2649	10.23	271	789	1289
01	081	0419.01	Upper	No	134.69	\$83,900	\$113,005	\$101,141	2299	14.57	335	785	1188
01	081	0419.02	Middle	No	97.10	\$83,900	\$81,467	\$72,917	3513	23.09	811	1018	1189
01	081	0419.03	Moderate	No	76.70	\$83,900	\$64,351	\$57,596	3585	19.58	702	1183	1299
01	081	0420.02	Middle	No	114.84	\$83,900	\$96,351	\$86,238	8883	31.76	2821	1610	2541
01	081	0420.03	Middle	No	110.38	\$83,900	\$92,609	\$82,888	3507	20.13	706	1211	1548
01	081	0420.05	Middle	No	89.37	\$83,900	\$74,981	\$67,115	4218	28.83	1216	1207	1850
01	081	0420.06	Moderate	No	75.88	\$83,900	\$63,663	\$56,982	1827	22.88	418	476	806
01	081	0420.07	Middle	No	119.96	\$83,900	\$100,646	\$90,085	3123	32.47	1014	1058	1339
01	081	0420.08	Middle	No	97.87	\$83,900	\$82,113	\$73,499	5961	42.31	2522	1509	2023
01	081	0420.09	Moderate	No	55.70	\$83,900	\$46,732	\$41,830	1642	22.59	371	692	924
01	081	0421.01	Middle	No	93.36	\$83,900	\$78,329	\$70,112	3993	30.38	1213	1111	1537
01	081	0421.03	Moderate	No	77.02	\$83,900	\$64,620	\$57,841	2366	27.18	643	601	997
01	081	0421.04	Middle	No	105.95	\$83,900	\$88,892	\$79,563	6246	23.95	1496	1459	2062

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Mederal Financial Institutions

2023 FFIEC Census Report - Summary Census Demographic Information State: 01 - ALABAMA (AL) County: 101 - MONTGOMERY COUNTY

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	101	0001.00	Unknown	No	0.00	\$74,400	\$0	\$0	982	62.53	614	20	105
01	101	0002.00	Moderate	No	70.19	\$74,400	\$52,221	\$47,813	1440	78.75	1134	79	221
01	101	0003.00	Low	No	30.58	\$74,400	\$22,752	\$20,833	1261	87.79	1107	216	653
01	101	0004.00	Low	No	37.33	\$74,400	\$27,774	\$25,429	4267	73.26	3126	657	1970
01	101	0005.00	Moderate	No	60.55	\$74,400	\$45,049	\$41,250	2902	62.47	1813	449	1522
01	101	0006.00	Low	No	27.40	\$74,400	\$20,386	\$18,667	1763	91.55	1614	128	678
01	101	0007.00	Moderate	No	78.26	\$74,400	\$58,225	\$53,309	997	79.84	796	281	766
01	101	0009.00	Upper	No	154.39	\$74,400	\$114,866	\$105,165	2133	46.32	988	0	337
01	101	0010.00	Low	No	27.60	\$74,400	\$20,534	\$18,801	1200	91.75	1101	136	527
01	101	0011.00	Low	No	36.12	\$74,400	\$26,873	\$24,605	2684	98.55	2645	460	1581
01	101	0012.00	Unknown	No	0.00	\$74,400	\$0	\$0	1455	99.11	1442	158	746
01	101	0013.00	Middle	No	104.98	\$74,400	\$78,105	\$71,513	2094	68.48	1434	609	1168
01	101	0014.00	Upper	No	154.88	\$74,400	\$115,231	\$105,500	3555	26.86	955	919	1661
01	101	0015.00	Moderate	No	59.94	\$74,400	\$44,595	\$40,833	4112	59.46	2445	211	740
01	101	0016.00	Moderate	No	56.98	\$74,400	\$42,393	\$38,813	3830	73.66	2821	449	1720
01	101	0017.00	Moderate	No	77.79	\$74,400	\$57,876	\$52,988	5469	48.27	2640	1322	2195
01	101	0018.00	Middle	No	101.16	\$74,400	\$75,263	\$68,911	3375	47.91	1617	846	1596
01	101	0019.00	Middle	No	114.18	\$74,400	\$84,950	\$77,778	3110	34.08	1060	927	1417
01	101	0020.00	Upper	No	165.37	\$74,400	\$123,035	\$112,647	4750	41.71	1981	1313	1938
01	101	0021.00	Middle	No	82.58	\$74,400	\$61,440	\$56,250	3886	84.05	3266	835	1557
01	101	0022.01	Low	No	46.49	\$74,400	\$34,589	\$31,667	3754	98.00	3679	752	1773
01	101	0022.02	Low	No	45.15	\$74,400	\$33,592	\$30,759	884	99.32	878	146	391
01	101	0023.00	Low	No	41.98	\$74,400	\$31,233	\$28,598	2501	99.72	2494	548	1339
01	101	0024.00	Low	No	39.35	\$74,400	\$29,276	\$26,810	1758	98.18	1726	415	882
01	101	0025.00	Moderate	No	60.70	\$74,400	\$45,161	\$41,346	2315	83.80	1940	436	992
01	101	0026.00	Middle	No	107.87	\$74,400	\$80,255	\$73,480	5458	33.13	1808	1974	2465

\* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
01	101	0027.00	Upper	No	130.93	\$74,400	\$97,412	\$89,183	4349	37.66	1638	1375	1841
01	101	0028.00	Moderate	No	76.94	\$74,400	\$57,243	\$52,413	4948	85.43	4227	881	1558
01	101	0029.01	Moderate	No	51.73	\$74,400	\$38,487	\$35,237	3313	95.93	3178	331	794
01	101	0029.02	Moderate	No	64.93	\$74,400	\$48,308	\$44,233	3875	98.30	3809	703	1178
01	101	0030.00	Low	No	32.79	\$74,400	\$24,396	\$22,337	1904	84.87	1616	382	1070
01	101	0031.00	Moderate	No	67.39	\$74,400	\$50,138	\$45,903	3436	95.49	3281	821	1629
01	101	0032.00	Moderate	No	62.09	\$74,400	\$46,195	\$42,299	5741	93.92	5392	1168	1731
01	101	0033.01	Upper	No	139.69	\$74,400	\$103,929	\$95,150	3470	47.84	1660	802	1356
01	101	0033.03	Middle	No	117.90	\$74,400	\$87,718	\$80,313	2652	76.96	2041	888	1034
01	101	0033.04	Middle	No	84.56	\$74,400	\$62,913	\$57,600	3723	77.97	2903	577	770
01	101	0051.01	Middle	No	95.26	\$74,400	\$70,873	\$64,890	3604	77.72	2801	985	1481
01	101	0051.02	Moderate	No	75.48	\$74,400	\$56,157	\$51,419	4239	91.41	3875	1108	1957
01	101	0053.01	Middle	No	107.81	\$74,400	\$80,211	\$73,438	1154	44.71	516	0	266
01	101	0053.02	Middle	No	80.13	\$74,400	\$59,617	\$54,583	2198	74.11	1629	581	826
01	101	0054.02	Moderate	No	69.92	\$74,400	\$52,020	\$47,630	5486	81.63	4478	1316	1987
01	101	0054.03	Moderate	No	67.26	\$74,400	\$50,041	\$45,818	3905	82.87	3236	382	776
01	101	0054.07	Middle	No	96.50	\$74,400	\$71,796	\$65,735	4335	57.72	2502	1113	1608
01	101	0054.09	Middle	No	93.81	\$74,400	\$69,795	\$63,902	2325	68.77	1599	618	761
01	101	0054.10	Moderate	No	68.81	\$74,400	\$51,195	\$46,875	5070	79.11	4011	502	1083
01	101	0054.11	Upper	No	241.79	\$74,400	\$179,892	\$164,702	3092	25.58	791	1097	1129
01	101	0054.12	Upper	No	164.91	\$74,400	\$122,693	\$112,335	6381	47.58	3036	1477	1874
01	101	0054.13	Upper	No	158.63	\$74,400	\$118,021	\$108,051	3973	42.74	1698	1281	1761
01	101	0054.14	Middle	No	111.00	\$74,400	\$82,584	\$75,613	3945	77.79	3069	1412	1709
01	101	0055.01	Middle	No	105.70	\$74,400	\$78,641	\$72,000	3426	60.95	2088	502	758
01	101	0055.02	Upper	No	148.57	\$74,400	\$110,536	\$101,200	3195	66.42	2122	632	740
01	101	0055.03	Upper	No	136.16	\$74,400	\$101,303	\$92,750	6176	39.85	2461	1943	2314
01	101	0055.04	Upper	No	182.57	\$74,400	\$135,832	\$124,363	1829	15.36	281	527	691
01	101	0056.04	Upper	No	148.91	\$74,400	\$110,789	\$101,434	3541	41.60	1473	1324	1522
01	101	0056.05	Middle	No	111.89	\$74,400	\$83,246	\$76,215	3712	79.31	2944	939	1358

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01	101	0056.06	Middle	No	108.94	\$74,400	\$81,051	\$74,205	4770	91.17	4349	591	1359
01	101	0056.07	Upper	No	163.14	\$74,400	\$121,376	\$111,124	5640	59.52	3357	1149	1997
01	101	0056.08	Upper	No	200.02	\$74,400	\$148,815	\$136,250	1633	34.42	562	558	562
01	101	0056.09	Upper	No	143.41	\$74,400	\$106,697	\$97,689	5034	81.62	4109	871	1155
01	101	0056.10	Middle	No	109.91	\$74,400	\$81,773	\$74,872	1400	79.79	1117	374	595
01	101	0056.11	Upper	No	142.82	\$74,400	\$106,258	\$97,284	3644	46.87	1708	650	798
01	101	0056.12	Upper	No	133.33	\$74,400	\$99,198	\$90,819	2131	64.38	1372	579	724
01	101	0056.13	Moderate	No	72.56	\$74,400	\$53,985	\$49,428	4832	95.26	4603	1557	2478
01	101	0056.14	Low	No	21.99	\$74,400	\$16,361	\$14,979	2808	97.93	2750	74	586
01	101	0057.00	Middle	No	82.46	\$74,400	\$61,350	\$56,172	1417	37.61	533	506	712
01	101	0058.00	Middle	No	86.76	\$74,400	\$64,549	\$59,097	1918	33.21	637	825	1228
01	101	0059.02	Moderate	No	71.65	\$74,400	\$53,308	\$48,807	3212	98.91	3177	716	1220
01	101	0059.03	Upper	No	123.87	\$74,400	\$92,159	\$84,375	1943	38.14	741	859	1013
01	101	0059.04	Middle	No	86.81	\$74,400	\$64,587	\$59,135	2369	57.32	1358	763	1350
01	101	0060.00	Middle	No	87.01	\$74,400	\$64,735	\$59,273	3209	53.60	1720	883	1318
01	101	0061.00	Moderate	No	54.77	\$74,400	\$40,749	\$37,313	2062	98.35	2028	680	918

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

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6.

# 7. Loan-to-Deposit ratios for each quarter of the prior calendar year.



The institution's loan-to-deposit ratio for each quarter of the prior calendar year.

2023 Loan-to-Deposit Ratio by Quarter					
1 <sup>st</sup> Quarter	86.4%				
2 <sup>nd</sup> Quarter	85.1%				
3 <sup>rd</sup> Quarter	84.34%				
4 <sup>th</sup> Quarter	84.90%				

### 8. HMDA Disclosure Statement



An institution required to report home mortgage loan data pursuant to Part 1003 of this title shall include in its public file a written notice that the institution's Home Mortgage Disclosure Act (HMDA) Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's Website.

> The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda).





## HOW TO CONTACT US

If you have any comments or questions about the CRA Public File or AmeriFirst Bank, please email:

Marsha Moffett – mmoffett@amerifirstbank.com

Or

Fannie Davis – <u>fdavis@amerifirstbank.com</u>

Thank You

#### PUBLIC DISCLOSURE

May 31, 2022

#### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

AmeriFirst Bank Certificate Number: 2838

8165 Vaughn Road Montgomery, Alabama 36116

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

> 10 10th Street NE, Suite 800 Atlanta, Georgia 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 Satisfactory.

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

AmeriFirst Bank's satisfactory Community Reinvestment Act (CRA) performance under the Lending Test supports the overall rating. Examiners did not identify any evidence of discriminatory or other illegal credit practices. The following points summarize the bank's Lending Test performance.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment areas' credit needs.
- The bank originated a majority of the loans reviewed within the assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of loans to borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels.
- The institution has not received any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

#### **DESCRIPTION OF INSTITUTION**

AmeriFirst Bank is a small community bank headquartered in Montgomery, Alabama. AmeriFirst Bank is wholly-owned by USAL Bancorp, Inc., a one-bank holding company headquartered in Union Springs, AL. USAL Bancorp, Inc. is AmeriFirst Bank's only affiliate and does not offer credit products or services. AmeriFirst Bank received a Satisfactory rating at its previous FDIC Performance Evaluation, dated April 3, 2019, based on Interagency Small Institution Examination Procedures.

AmeriFirst Bank operates five full-service offices in its assessment areas. The bank operates a main office in Montgomery, AL and branch offices in Auburn, Flomaton, Prattville, and Union Springs, AL. On September 18, 2019, the main office was relocated from Union Springs to an existing branch office (Peppertree) in Montgomery. Consequently, the Union Springs location became a full-service branch, office and the Peppertree location became the new main office. In November 2020, AmeriFirst Bank merged with Escambia County Bank, Flomaton, AL and acquired its only location in Flomaton. This office, located on the Alabama-Florida state line, is now known as the Escambia County branch. On January 8, 2021, AmeriFirst Bank closed the Opelika branch office, located in Lee County, AL, due to the close proximity of a new branch office in Auburn, Lee County, AL that was opened on January 11, 2021.

The bank offers a variety of loan products, including commercial, home mortgage, consumer, and agricultural loans. However, commercial lending is AmeriFirst Bank's primary focus. The bank also provides a variety of deposit services, including checking, savings, and individual retirement accounts, and certificates of deposit. Additionally, AmeriFirst Bank offers mobile banking, internet banking, and operates six automated teller machines (ATMs) throughout the assessment areas.

Additionally, to support customers experiencing financial hardship related to the COVID-19 pandemic, AmeriFirst Bank offered loans through the Small Business Administration Paycheck Protection Program (PPP). Under the PPP, loans were originated to help small businesses retain employees throughout the pandemic. The bank originated 137 PPP loans in 2020 totaling \$12.8 million and 134 PPP loans totaling \$6.8 million in 2021.

As of the March 31, 2022 Reports of Condition and Income, AmeriFirst Bank had assets totaling \$321.1 million, including total deposits of \$291.7 million and total loans of \$203.4 million. As reflected in the following table, commercial loans comprised the largest portion of the loan portfolio at 53.8 percent of total loans followed by home mortgage loans at 25.1 percent.

Loan Portfolio Distribution as of March 31, 2022					
Loan Category	\$(000s)	%			
Construction and Land Development	24,937	12.3			
Secured by Farmland	2,150	1.1			
Secured by 1-4 Family Residential Properties	50,970	25.1			
Secured by Multifamily (5 or more) Residential Properties	4,502	2.2			
Secured by Nonfarm Nonresidential Properties	68,857	33.9			
Total Real Estate Loans	151,416	74.6			
Commercial and Industrial Loans	40,454	19.9			
Agricultural Loans	6,109	3.0			
Consumer Loans	5,084	2.5			
Other Loans	313	0.2			
Less: Unearned Income	0	0			
Total Loans	203,376	100.0			
Source: Reports of Condition and Income (03/31/2022)	· •				

Examiners did not identify any financial, legal, or other impediments that affected the bank's ability to meet each assessment area's credit needs.

#### **DESCRIPTION OF ASSESSMENT AREAS**

The CRA regulation requires financial institutions to define assessment areas within which its CRA performance will be evaluated. AmeriFirst Bank has designated four assessment areas:

- Montgomery, AL Metropolitan Statistical Area (MSA) assessment area,
- Auburn-Opelika, AL MSA assessment area,
- Non-MSA (NMSA) assessment area, and
- Pensacola-Ferry Pass, FL-AL Combined Statistical Area (CSA) assessment area.

The Montgomery, AL MSA assessment area includes three of the four counties, Montgomery, Elmore, and Autauga, which comprise the Montgomery, AL MSA. The Auburn-Opelika, AL MSA assessment area includes Lee County, which comprises the Auburn-Opelika, AL MSA in its entirety. The NMSA assessment area is comprised of Bullock County, AL. Due to the acquisition of Escambia County Bank, the Pensacola-Ferry Pass, FL-AL CSA assessment area is a new assessment area that includes select census tracts in the following counties: Escambia (AL), Escambia (FL), and Santa Rosa (FL). Detailed demographic information regarding each assessment area is provided in the subsequent sections of this evaluation. Refer to each individual assessment area section for additional information.

#### **SCOPE OF EVALUATION**

#### **General Information**

This evaluation covers the period from the prior evaluation dated April 3, 2019, to the current evaluation dated May 31, 2022. Examiners used the Interagency Small Institution Examination Procedures to evaluate AmeriFirst Bank's CRA performance. These procedures include the CRA Small Bank Lending Test.

All assessment areas were reviewed using full-scope procedures; however, the Montgomery, AL MSA assessment area will be more heavily weighted since it holds 72.6 percent of loans and 41.3 percent of bank-wide deposits, followed by the Auburn-Opelika, AL MSA assessment area, and then the NMSA and Pensacola-Ferry Pass, FL-AL, CSA assessment areas. Additionally, 40.0 percent of the bank's offices are located within this assessment area. See the table below concerning the assessment area breakdown of loans, deposits, and branching.

4	Loans		Depo	sits	Branches	
Assessment Area	\$(000s)	%	\$(000s)	%	#	%
Montgomery, AL MSA	29,955	72.6	109,094	41.3	2	40.0
Auburn-Opelika, AL MSA	7,905	19.1	4,474	1.7	1	20.0
NMSA	1,627	3.9	76,299	28.9	1	20.0
Pensacola-Ferry Pass, FL- AL, CSA	1,802	4.4	74,223	28.1	1	20.0
Total	41,289	100.0	264,090	100.0	5	100.0

#### **Activities Reviewed**

Examiners determined that AmeriFirst Bank's major product lines are small business and home mortgage loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. Consumer and small farm loans were not reviewed as part of this evaluation, as they do not represent a major product line and do not provide material support for the conclusions and ratings.

Bank records indicate the lending focus and product mix remained consistent throughout the evaluation period. Therefore, the CRA evaluation includes an analysis of small business and home mortgage loans for the period of calendar year 2021. The bank originated 263 small business loans totaling \$29.6 million during 2021. All small business loans were included in the *Assessment Area Concentration* and *Geographic Distribution* performance. Since income was not readily available, examiners sampled 143 small business loans totaling approximately \$16.0 million for *Borrower Profile* performance. Small business loans contributed more weight to the overall conclusions due to the larger loan volume when compared to home mortgage loans during the review period. D&B data for 2021 provided a standard of comparison for the small business loans.

During the evaluation period, the bank was not required to collect and report Home Mortgage Disclosure Act (HMDA) data. Therefore, examiners utilized the bank's loan trial to identify the bank's 82 residential real estate loans totaling \$18.9 million originated in 2021. All home mortgage loans were included in the *Assessment Area Concentration* and *Geographic Distribution* performance. Since income was not readily available, examiners sampled 59 residential loans totaling approximately \$14.0 million for *Borrower Profile* performance. The percentage of families by income level and owner-occupied housing units by geography were used for comparison purposes, which are based on the 2015 American Community Survey (ACS) demographic data.

For the Lending Test, examiners reviewed the number and dollar volume of small business and home mortgage loans. While number and dollar volume of loans are presented, examiners emphasized performance by number of loans, because the number of loans is a better indicator of the number of businesses and individuals served.

#### **CONCLUSIONS ON PERFORMANCE CRITERIA**

#### LENDING TEST

AmeriFirst Bank demonstrated satisfactory performance under the Lending Test. This rating is supported by a reasonable loan-to-deposit ratio, a majority of loans were originated within the assessment areas; and reasonable geographic distribution of small business and home mortgage loans.

#### Loan-to-Deposit Ratio

AmeriFirst Bank's net loan-to-deposit ratio is reasonable give the institution's size, financial capacity, and assessment areas' credit needs. The average net loan-to-deposit ratio, as calculated from Call Report data, averaged 79.3 percent over the past 12 calendar quarters from June 30, 2019 to March 31, 2022. The net loan-to-deposit ratio ranged from a high of 90.3 percent on June 30, 2020 to a low of 67.9 percent on March 31, 2021. While the net loan-to-deposit ratio has fluctuated, due to increased total deposits, the ratio has decreased to 68.9 percent as of March 31, 2022.

#### Assessment Area Concentration

	Number of Loans			Dollar Amount of Loans \$(000s)						
Loan Category	Insi	de	Out	side	Total	Inside		Outsi	de	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	74	90.2	8	9.8	82	16,028	84.5	2,944	15.5	18,972
Small Business	218	82.9	45	17.1	263	25,261	85.2	4,376	14.8	29,637
Total	292	84.6	53	15.4	345	41,289	84.9	7,320	15.1	48,609

The bank made a majority of small business and home mortgage loans, by number and dollar volume, within its assessment areas. See the following table for more details.

#### **Geographic Distribution**

Overall, the geographic distribution of small business and home mortgage loans reflects reasonable dispersion throughout the assessment areas. Conclusions regarding lending performance are generally consistent among the assessment areas. Refer to the *Geographic Distribution* sections of each assessment area for additional details.

#### **Borrower Profile**

Overall, the distribution of loans to borrowers reflects, given the demographics of the assessment areas, reasonable penetration among businesses of different sizes and individuals of different income levels, including low- and moderate-income individuals. Conclusions regarding lending performance are generally consistent among the assessment areas. Refer to the *Borrower Profile* sections of each assessment area for additional details.

#### **Response to Complaints**

The bank has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

#### DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiner did not identify any discriminatory or other illegal credit practices.

#### MONTGOMERY, AL MSA ASSESSMENT AREA- Full-Scope Review

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MONTGOMERY, AL MSA ASSESSMENT AREA

The Montgomery, AL MSA assessment area consists of all 92 census tracts within three (Montgomery, Autauga, Elmore) of the four counties in the Montgomery, AL MSA. Lowndes County is also part of the Montgomery, AL MSA, but is not part of this assessment area. Currently, the bank operates two or 40.0 percent of its branches in this assessment area. Additionally, by dollar volume, the bank originated 72.4 percent of loans and holds 41.3 percent of bank-wide deposits within this assessment area.

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

The Montgomery, AL MSA assessment area consists of 92 census tracts with the following 2015 ACS designations:

- 11 low-income census tracts;
- 21 moderate-income census tracts;
- 32 middle-income census tracts;

- 27 upper-income census tracts; and
- 1 census tract with no income designation.

The following table illustrates select demographic characteristics of the assessment area.

Demogra	Demographic Information of the Assessment Area							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	92	12.0	22.8	34.8	29.3	1.1		
Population by Geography	364,122	9.4	19.8	37.2	33.5	0.1		
Housing Units by Geography	158,792	9.5	21.3	37.0	32.0	0.2		
Owner-Occupied Units by Geography	89,536	6.1	16.9	38.5	38.5	0.0		
Occupied Rental Units by Geography	49,043	13.4	27.2	35.3	23.7	0.4		
Vacant Units by Geography	20,213	15.2	26.7	34.5	23.3	0.4		
Businesses by Geography	25,314	7.1	16.9	36.8	35.2	4.0		
Farms by Geography	693	3.9	15.4	43.4	36.7	0.6		
Family Distribution by Income Level	91,711	24.0	16.0	18.2	41.7	0.0		
Household Distribution by Income Level	138,579	24.7	15.2	17.0	43.1	0.0		
Median Family Income MSA - 33860 Montgomery, AL MSA		\$59,161	Median Hous	ing Value		\$136,030		
· · · · · · · · · · · · · · · · · · ·			Median Gross	Rent		\$811		
			Families Belo	w Poverty Le	evel	15.0%		

Source: 2015 ACS and 2021 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.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owneroccupied housing units and small business loans to the percentage of businesses located in low-, moderate-, middle-, and upper-income census tracts. The majority of owner-occupied housing units and businesses are in the middle- and upper-income tracts. The remaining owner-occupied housing is mainly disbursed among the moderate-income tracts, with a low volume in the low-income tracts.

The 2021 Federal Financial Institutions Examination Council (FFIEC) median family income levels for the Montgomery, AL MSA are used to analyze home mortgage lending under the Borrower Profile criterion. The following table presents the income category using the 2021 median family income of \$67,600.

	Medi	an Family Income Range	S	
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Γ	Montgomery, AL	MSA Median Family Inc	come (33860)	
2021 (\$67,600)	<\$33,800	\$33,800 to <\$54,080	\$54,080 to <\$81,120	≥\$81,120
Source: FFIEC				

A low-income individual, who earned less than \$33,800 in 2021, may have difficulty qualifying for a conventional home mortgage loan given the median housing value of \$136,030. Furthermore, 15.0 percent of families are below the poverty level, which further limits the potential for a conventional mortgage loan.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of small business lending by gross annual revenues. The gross annual revenues for these businesses, according to 2021 D&B data, are as follows:

- 81.2 percent had \$1.0 million or less;
- 4.9 percent has more than \$1.0 million; and
- 13.9 percent had unknown revenues.

According to D&B data, service industries represent the largest portion of businesses at 38.8 percent, followed by retail trade at 13.4 percent. Moodysanalytics.com indicates that the top employers in the Montgomery, AL MSA are Maxwell-Gunter Air Force Base, Baptist Health, Hyundai Motor Manufacturing Alabama, Alfa Insurance Cos., and MOBIS North America LLC.

As illustrated in the following table, in 2020, the unemployment rate increased throughout the assessment area due to the COVID-19 pandemic. In 2021, the assessment area's unemployment rate decreased and was below the national rate. Similarly, the unemployment rate for Autauga and Elmore counties remained below the state unemployment rate; however, Montgomery County's unemployment rate remained above the state unemployment rate in 2021. Refer to the following table for details.

	Unemploymen	it Rates*	
A	2019	2020	2021
Area	%	%	%
Autauga	2.9	5.4	2.8
Elmore	2.7	5.3	2.7
Montgomery	3.2	8.6	4.9
Alabama	3.2	6.5	3.4
National Average	3.7	8.1	6.1
Source: Bureau of Labor Statistics; *N	ot Seasonally Adjusted		

#### Competition

The assessment area is highly competitive in the market for financial services. According to FDIC Deposit Market Share data, as of June 30, 2020, 23 FDIC-insured financial institutions operated 97 offices within the Montgomery, AL MSA assessment area. Of these institutions, AmeriFirst Bank ranked 14<sup>th</sup> with a 1.07 percent deposit market share.

The bank is not required to collect or report HMDA data. Therefore, the analysis of home mortgage loans under the Lending Test does not include comparisons against aggregate data. However, the aggregate data reflects a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders. In 2020, 351 lenders reported a total 15,225 residential mortgage loans originated or purchased in the assessment area. The top five lenders accounted for 29.1 percent of the total market share of home mortgage loans.

The bank is also not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, the aggregate data for small business lending reflects the level of demand for small business loans and is therefore included. In 2020, the aggregate data showed 109 institutions reporting 6,829 small business loans within the assessment area. The top five institutions accounted for 42.8 percent of the market share, indicating a high degree of competition in this area.

#### **Community Contact**

As part of the evaluation process, examiners contact third parties that are active in the assessment area to assist in identifying credit and community development needs. This information helps examiners determine whether local financial institutions are responsive to those needs and to identify the credit and community development opportunities that are available. Examiners contacted a representative of an area organization involved in small business development within the bank's assessment area. The contact identified micro-business loan programs with flexible underwriting standards and financial literacy training as needs for small business. The contact indicated that potential small business borrowers need assistance in repairing credit and obtaining small business loans.

#### Credit Needs

Considering information obtained from bank management, the community contact, demographic data, and economic data, examiners determined that there is a need for affordable housing and small business lending programs. Specifically, the community contact noted the need for micro-business loan programs. Additionally, demographic data suggests a need for affordable housing loans, since 15.0 percent of families live below the poverty level, and 40.0 percent of families are low- or moderate-income families.

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MONTGOMERY, AL MSA ASSESSMENT AREA

#### LENDING TEST

AmeriFirst Bank demonstrated reasonable performance under the Lending Test. This conclusion is supported by an overall reasonable geographic distribution and borrower profile.

#### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout this assessment area. The reasonable dispersion of small business and home mortgage loans supports this conclusion.

#### Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion in the assessment area. While lending in low- and moderate-income census tracts was slightly below demographic data, performance is still considered reasonable. The following table reflects the distribution of small business loans by income level.

Geographic Distribution of Small Business Loans							
Tract Income Level	% of Businesses	#	%	\$(000s)	%		
Low	7.1	8	5.7	1,129	6.3		
Moderate	16.9	20	14.2	1,576	8.8		
Middle	36.8	40	28.4	3,395	19.0		
Upper	35.2	70	49.6	10,976	61.3		
Not Available	4.0	3	2.1	824	4.6		
Totals	100.0	141	100.0	17,900	100.0		

#### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The bank extended one loan or 2.0 percent in a low-income census tract; this lending was below, but considered reasonable given the low volume of owner-occupied housing units within these geographies. The bank's performance in moderate-income census tracts exceeded the demographic data. The following table reflects the distribution of home mortgage loans.

Tract Income Level	% of Owner- Occupied Housing Units	#	%	\$(000s)	%
Low	6.1	1	2.0	178	1.5
Moderate	16.9	9	17.6	1,609	13.3
Middle	38.5	12	23.5	2,897	24.0
Upper	38.5	29	56.9	7,371	61.2
Not Available	0.0	0	0.0	0	0.0
Totals	100.0	51	100.0	12,055	100.0

#### **Borrower Profile**

The distribution of loans reflects reasonable penetration among businesses of different sizes and borrowers of different income levels. Reasonable penetration for small business loans supports this conclusion.

#### Small Business Loans

The distribution of loans reflects reasonable penetration among business of different sizes. Lending to businesses with revenues of \$1.0 million or less is significantly below demographic data. However, 18 loans in the sample were PPP loans for which revenue data was not collected. Accounting for these loans results in 54.1 percent of businesses with revenue data available originated to small businesses, which continues to be significantly below demographic data. While the bank is not required to report small business loan data and is not compared to aggregate data, the aggregate data provides information on the level of demand for small business loans. The most recent aggregate data available is for calendar year 2020, which reflects all institutions reporting small business loans in this assessment area originated 37.3 percent of the loans to small businesses, which supports a low level of demand for these loans.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%	
<=\$1,000,000	81.2	40	43.5	5,731	52.3	
>\$1,000,000	4.9	34	36.9	3,880	35.4	
Revenue Not Available	13.9	18	19.6	1,355	12.3	
Totals	100.0	92	100.0	10,966	100.0	

#### Home Mortgage Loans

The distribution of home mortgage loans reflects poor penetration among borrowers of different income levels. Lending to low-income families was below the demographic data, even when considering the families within the assessment area below the poverty level at 15.0 percent. The bank did not originate any home loans to moderate-income borrowers. A large percentage of the home loans were originated to businesses as evidenced by the 38.0 percent of the loans with income not available, which indicates investment and rental property.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	#	%	\$(000s)	%	
Low	24.0	1	2.4	120	1.1	
Moderate	16.0	0	0.0	0	0.0	
Middle	18.2	2	4.8	221	2.0	
Upper	41.7	23	54.8	7,630	69.6	
Not Available	0.0	16	38.0	2,998	27.3	
Totals	100.0	42	100.0	10,969	100.0	

#### AUBURN-OPELIKA, AL MSA ASSESSMENT AREA- Full-Scope Review

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE AUBURN-OPELIKA, AL MSA ASSESSMENT AREA

The Auburn-Opelika, AL MSA assessment area consists of all 27 census tracts within Lee County, which comprises the Auburn-Opelika, AL MSA in its entirety. The bank operates one full-service branch in a middle-income census tract within the assessment area. This branch was previously located in a moderate-income census tract and was closed on January 18, 2021 and reopened at its new location in Auburn on January 11, 2021. The bank originated 19.2 percent of loans and holds 1.7 percent of bank-wide deposits within the Auburn-Opelika, AL MSA assessment area.

#### Economic and Demographic Data

The Auburn-Opelika, AL MSA assessment area consists of 27 census tracts with the following 2015 ACS designations.

- 1 low-income census tract;
- 6 moderate-income census tracts;
- 16 middle-income census tracts;
- 3 upper-income census tracts; and
- 1 census tract with no income designation.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	3.7	22.2	59.3	11.1	3.1
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.
Owner-Occupied Units by Geography	33,753	1.8	12.5	70.9	14.3	0.:
Occupied Rental Units by Geography	23,418	3.1	30.6	52.6	7.2	6.
Vacant Units by Geography	7,793	3.8	23.0	55.1	8.6	9.
Businesses by Geography	9,351	1.5	32.3	53.4	11.6	1.
Farms by Geography	280	1.1	18.6	66.4	13.9	0.0
Family Distribution by Income Level	35,939	24.8	15.2	18.6	41.4	0.
Household Distribution by Income Level	57,171	28.5	13.4	15.3	42.8	0.
Median Family Income MSA - 12220 Auburn-Opelika, AL MSA		\$61,141	Median Housi	ing Value		\$156,48
			Median Gross	Rent		\$78
			Families Belo	w Poverty Le	evel	14.3%

The following table illustrates select demographic characteristics of the assessment area.

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

The Geographic Distribution criterion compares home mortgage loans to the distribution of owneroccupied housing units and small business loans to the percentage of businesses located in low-, moderate-, middle-, and upper-income census tracts. The majority of owner-occupied housing units and businesses are in the middle-income geographies followed by moderate-income geographies. The remaining owner-occupied housing units and businesses are disbursed among the upper-income tracts, with a limited volume in the low-income tracts.

The 2021 FFIEC median family income levels for the Auburn-Opelika, AL MSA are used to analyze home mortgage lending under the Borrower Profile criterion. The following table presents the income category using the 2021 median family of \$78,000.

	Medi	an Family Income Range	S	
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Au	uburn-Opelika, A	L MSA Median Family I	ncome (12220)	
2021 (\$78,000)	<\$39,000	\$39,000 to <\$62,400	\$62,400 to <\$93,600	≥\$93,600
Source: FFIEC	-	•		

A low-income individual, who earned less than \$39,000 in 2021, may have difficulty qualifying for a conventional home mortgage loan given the median housing value of \$156,485. Furthermore,

14.3 percent of families are below the poverty level, which further limits the potential for a conventional home mortgage loan.

According to 2021 D&B data, there were 9,351 businesses in this assessment area. The analysis of small business loans under the Borrower Profile criterion compares the distribution of small business lending by gross annual revenues. The gross annual revenues for these businesses according to 2021 D&B data are as follows:

- 84.0 percent had \$1.0 million or less;
- 4.1 percent has more than \$1.0 million; and
- 11.9 percent had unknown revenues.

Service industries represent the largest portion of businesses at 38.0 percent, followed by retail trade at 14.1 percent. In addition, 60.7 percent of area businesses have four or fewer employees, and 88.2 percent operate from a single location. MoodysAnalytics.com indicates that the top employers in the Auburn-Opelika, AL MSA are Auburn University, East Alabama Medical Center, Afni Inc., and Mando American Corporation.

As illustrated in the following table, in 2020, the unemployment rate increased throughout the assessment area due to the COVID-19 pandemic. In 2021, the assessment area's unemployment rate decreased and was below the national rate and the state average.

Unemployment Rates*							
Area	2019	2020	2021				
	%	%	%				
Lee County	2.9	5.8	2.8				
Alabama	3.2	6.5	3.4				
National Average	3.7	8.1	6.1				

#### Competition

The assessment area is moderately competitive in the market for financial services. According to FDIC Deposit Market Share data, as of June 30, 2020, 19 FDIC-insured financial institutions operated 42 offices within the Auburn-Opelika, AL MSA assessment area. Of these institutions, AmeriFirst Bank ranked 19th with a 0.1 percent deposit market share.

The bank is not required to collect or report HMDA data. Therefore, the analysis of home mortgage loans under the Lending Test does not include comparisons against aggregate data. However, the aggregate data reflects a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders. In 2020, 310 lenders reported a total 8,920 residential mortgage loans originated or purchased in the assessment area. The top five lenders accounted for 27.6 percent of the total market share of home mortgage loans.

The bank is also not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, the aggregate data for small business lending reflects the level of demand for small business loans and is therefore included. In 2020, the aggregate data showed 89 institutions reporting 3,011 small business loans within the assessment area. The top five institutions accounted for 36.7 percent of the market share, indicating a moderate degree of competition in this area.

#### Credit Needs

Considering information obtained from bank management, demographic data, and economic data, examiners determined that there is a need for affordable housing loans and small business loans. Demographic data indicates that 14.3 percent of families have incomes below the poverty level, and the median housing value is \$156,485. Additionally, 88.2 percent of businesses operate from a single location indicating a need for small business lending for expansion.

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN AUBURN-OPELIKA, AL MSA ASSESSMENT AREA

#### LENDING TEST

AmeriFirst Bank demonstrated reasonable performance under the Lending Test. This conclusion is supported by an overall reasonable geographic distribution and borrower profile.

#### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout this assessment area. The reasonable dispersion of small business and excellent dispersion of home mortgage loans support this conclusion.

#### Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion in the assessment area. Although no loans were originated in the low-income census tract, only 1.5 percent of businesses are located in the census tract. Loans to businesses in the moderate-income census tracts exceed demographics, slightly. The following table reflects the distribution of small business loans.

Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	1.5	0	0.0	0	0.0
Moderate	32.3	8	33.4	1,134	21.2
Middle	53.4	14	58.3	4,082	76.4
Upper	11.6	2	8.3	129	2.4
Not Available	1.1	0	0.0	0	0.0
Totals	100.0	24	100.0	5,345	100.0

#### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. Although no loans were originated in the low-income census tract, only 1.8 percent of owner-occupied housing units is located in the census tract. Home mortgage lending performance in moderate-income census tracts doubled demographics, significantly exceeding the demographic data and reflecting excellent dispersion. The following table reflects the distribution of home mortgage loans.

Tract Income Level	% of Owner- Occupied Housing Units	#	%	\$(000s)	%
Low	1.8	0	0.0	0	0.0
Moderate	12.5	3	25.0	640	25.0
Middle	70.9	5	41.7	977	38.2
Upper	14.3	4	33.3	943	36.8
Not Available	0.5	0	0.0	0	0.0
Totals	100.0	12	100.0	2,560	100.0

#### **Borrower Profile**

The distribution of loans reflects reasonable penetration among businesses of different sizes. Due to the limited number of home mortgage loans sampled with revenues available within this assessment area, meaningful conclusions could not be reached.

#### Small Business Loans

The distribution of loans reflects reasonable penetration among business of different sizes. Lending to businesses with revenues of \$1.0 million or less fell significantly below demographic data.

While the bank is not required to report small business loan data and is not compared to aggregate data, the aggregate data provides information on the level of demand for small business loans. The most recent aggregate data available is for calendar year 2020, which reflects all institutions reporting small business loans in this assessment area originated 37.3 percent of the loans to small businesses, which supports a low level of demand for these loans. Therefore, lending performance is considered reasonable. The following table reflects the distribution of small business loans among businesses of different sizes.

Distribution of Small Business Loans by Gross Annual Revenue Category								
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%			
<=\$1,000,000	84.0	7	43.8	479	12.0			
>\$1,000,000	4.1	9	56.2	3,517	88.0			
Revenue Not Available	11.9	0	0.0	0	0.0			
Totals	100.0	16	100.0	3,996	100.0			
Source: 2021 D&B Data								

#### Home Mortgage Loans

The bank originated nine of the sampled loans totaling approximately \$1.6 million within these assessment area. Zero loans were extended to low-income borrowers, and one loan was extended to moderate-income borrowers. Of note, seven loans totaling approximately \$1.2 million were extended with income levels not available, indicating investment properties.

#### NMSA ASSESSMENT AREA- Full-Scope Review

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NMSA ASSESSMENT AREA

The NMSA assessment area consists of all three census tracts in Bullock County. The bank operates one full-service branch in a middle-income census tract within the assessment area. The bank originated 3.9 percent of loans and holds 28.9 percent of bank-wide deposits within this assessment area.

#### Economic and Demographic Data

Based on the 2015 ACS designation, the three census tracts in the assessment area are middleincome geographies. The following table illustrates select demographic characteristics of the assessment area.

Demogra	Demographic Information of the Assessment Area								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0			
Population by Geography	10,678	0.0	0.0	100.0	0.0	0.0			
Housing Units by Geography	4,465	0.0	0.0	100.0	0.0	0.0			
Owner-Occupied Units by Geography	2,609	0.0	0.0	100.0	0.0	0.0			
Occupied Rental Units by Geography	1,074	0.0	0.0	100.0	0.0	0.0			
Vacant Units by Geography	782	0.0	0.0	100.0	0.0	0.0			
Businesses by Geography	424	0.0	0.0	100.0	0.0	0.0			
Farms by Geography	49	0.0	0.0	100.0	0.0	0.0			
Family Distribution by Income Level	2,333	27.7	14.6	22.6	35.1	0.0			
Household Distribution by Income Level	3,683	29.2	15.6	14.7	40.5	0.0			
Median Family Income Non-MSAs - AL		\$45,454	Median Hous	ing Value		\$78,038			
			Median Gross	Rent		\$566			
			Families Belo	w Poverty Le	evel	22.7%			

The 2021 FFIEC median family income levels for the AL NMSA are used to analyze home mortgage lending under the Borrower Profile criterion. The following table presents the income categories using the 2021 median family income of \$53,400.

	Medi	an Family Income Range	s	
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
	AL NA N	1edian Family Income (99	9999)	
2021 (\$53,400)	<\$26,700	\$26,700 to <\$42,720	\$42,720 to <\$64,080	≥\$64,080
Source: FFIEC		•		)

Since 22.7 percent of families are below the poverty level, the potential for a low-income individual to qualify for a conventional mortgage loan is limited.

According to 2021 D&B data, there were 424 businesses in this assessment area. The analysis of small business loans under the Borrower Profile criterion compares the distribution of small business lending by gross annual revenues. The gross annual revenues for these businesses according to the 2021 D&B data are as follows:

- 76.2 percent had \$1.0 million or less;
- 6.6 percent has more than \$1.0 million; and,
- 17.2 percent had unknown revenues.

According to D&B data, service industries represent the largest portion of businesses at 34.3 percent, followed by retail trade at 11.4 percent. According to the Bullock County Development Authority, major employers in the assessment area are Wayne Farms, Bonnie Plants, Bullock County Correctional Facility, and Bullock County Hospital.

As illustrated in the following table, in 2020, the unemployment rate increased in the assessment area due to the COVID-19 pandemic. In 2021, Bullock County's unemployment rate decreased and was below the national rate; however, it remained above the state unemployment rate

Unemployment Rates*							
Area	2019	2020	2021				
	%	%	%				
Bullock County	3.9	6.0	4.0				
Alabama	3.2	6.5	3.4				
National Average	3.7	8.1	6.1				
Source: Bureau of Labor Statistics; *N	ot Seasonally Adjusted						

#### **Competition**

There are only two banks located in Bullock County, including AmeriFirst Bank. As of the June 30, 2021 FDIC Deposit Market Share data, AmeriFirst Bank ranks first with a deposit market share of 61.4 percent.

The bank is not required to collect or report its home mortgage loans data. Therefore, the analysis of home mortgage loans under the Lending Test does not include comparisons against aggregate data. However, aggregate data reflects there is a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders. In 2020, 27 lenders reported a total 58 residential mortgage loans originated or purchased in the assessment area. The top five lenders accounted for 41.4 percent of the total market share of home mortgage loans.

The bank is also not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, aggregate data for small business lending reflects the level of demand for small business loans and is therefore included. In 2020, the aggregate data reflected 35 institutions reporting 102 small business loans within the assessment area. The top five institutions accounted for 44.1 percent of the market share, indicating a moderate degree of competition in this area.

#### Credit Needs

Considering information obtained from bank management, demographic data, and economic data, examiners determined that there is a need for affordable housing and small business lending programs. These conclusions are supported by the high level (22.7 percent) of families that live below the poverty level coupled with the fact that 42.3 percent of families are low- or moderate-

income families. In addition, 76.2 percent of small businesses that operate in the assessment area reported gross annual revenues of \$1 million or under.

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NMSA ASSESSMENT AREA

#### LENDING TEST

AmeriFirst Bank demonstrated reasonable performance under the Lending Test. This conclusion is supported by reasonable borrower profile performance with regards to small business lending.

#### **Geographic Distribution**

The assessment area includes only middle-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.

#### **Borrower Profile**

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. Due to the limited number of home mortgage loans originated within this assessment area, meaningful conclusions could not be reached.

#### Small Business Loans

The distribution of loans reflects reasonable penetration among business of different sizes. Lending to businesses with revenues of \$1.0 million is below demographic data; however, two loans in the sample were PPP loans for which revenue data was not collected. Accounting for these PPP loans, lending performances increases to 65.5 percent, which remains below demographics, but considered reasonable performance. The following table reflects the distribution of small business loans among businesses of different sizes.

Distribution of Small Business Loans by Gross Annual Revenue Category								
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%			
<=\$1,000,000	76.2	19	61.3	397	40.0			
>\$1,000,000	6.6	10	32.3	567	56.9			
Revenue Not Available	17.2	2	6.4	32	3.1			
Totals	100.0	31	100.0	996	100.0			

#### Home Mortgage Loans

Two sampled home mortgage loans totaling \$71,000 were originated in this assessment area. One loan totaling \$25,000 was extended to low-income borrowers, and one loan totaling \$46,000 was extended to middle-income borrowers.

#### PENSACOLA-FERRY PASS AL-FL, CSA ASSESSMENT AREA Full-Scope Review

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PENSACOLA-FERRY PASS, AL-FL CSA ASSESSMENT AREA

AmeriFirst Bank acquired Escambia County Bank in November of 2020, which resulted in the addition of this assessment area. The assessment area includes five contiguous census tracts; two located in Escambia County, AL, two in Escambia County, FL, and one in Santa Rosa County, FL. These three aforementioned counties comprise the Pensacola-Ferry Pass, AL-FL CSA in its entirety, which encompasses the Pensacola-Ferry Pass-Brent, FL MSA and Escambia County, AL. The branch office is located in census tract 9703, a distressed middle-income census tract. The bank originated 4.4 percent of loans and holds 28.1 percent of bank-wide deposits within this assessment area.

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

The assessment area consists of five census tracts with the following 2015 ACS designations:

- 1 moderate-income census tract; and
- 4 middle-income census tracts.

The following table illustrates select demographic characteristics of the assessment area.

Demogra	phic Inforn	nation of th	e Assessment	Area		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0.0	20.0	80.0	0.0	0.0
Population by Geography	20,391	0.0	21.3	78.7	0.0	0.0
Housing Units by Geography	8,844	0.0	16.2	83.8	0.0	0.0
Owner-Occupied Units by Geography	5,877	0.0	12.5	87.5	0.0	0.0
Occupied Rental Units by Geography	1,476	0.0	30.1	69.9	0.0	0.0
Vacant Units by Geography	1,491	0.0	16.9	83.1	0.0	0.0
Businesses by Geography	1,533	0.0	16.2	83.8	0.0	0.0
Farms by Geography	152	0.0	7.2	92.8	0.0	0.0
Family Distribution by Income Level	4,982	23.8	20.2	22.0	34.0	0.0
Household Distribution by Income Level	7,353	26.1	22.2	14.5	37.3	0.0
Median Family Income MSA - 37860 Pensacola-Ferry Pass-Brent, FL MSA		\$60,705	Median Housi	ing Value		\$88,769
Median Family Income Non-MSAs - AL		\$45,454	Median Gross	Rent		\$609
			Families Belo	w Poverty Le	evel	11.5%

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

The Geographic Distribution criterion compares home mortgage loans to the distribution of owneroccupied housing units and small business loans to the percentage of businesses located in moderate- and middle-income census tracts. The majority of owner-occupied housing units and businesses, at 83.8 percent, are in the middle-income tracts.

The 2021 FFIEC median family income levels are used to analyze home mortgage lending under the Borrower Profile criterion. The following table presents the income categories using the 2021 median family income of \$73,900 for the census tracts located in the Pensacola-Ferry Pass-Brent, FL MSA and \$53,400 for AL NMSA counties.

	Medi	an Family Income Range	'S	
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Pensaco	la-Ferry Pass-Br	ent, FL MSA Median Fa	mily Income (37860)	
2021 (\$73,900)	<\$36,950	\$36,950 to <\$59,120	\$59,120 to <\$88,680	≥\$88,680
	AL NA N	Iedian Family Income (99	9999)	
2021 (\$53,400)	<\$26,700	\$26,700 to <\$42,720	\$42,720 to <\$64,080	≥\$64,080
Source: FFIEC		•		•

The demographic table above provides the distribution of families by income level, which is used to analyze the Borrower Profile criterion for home mortgage lending. Since 11.5 percent of families are below the poverty level, the potential for a low-income individual to qualify for a conventional mortgage loan may be limited.

According to 2021 D&B data, there were 1,533 businesses in this assessment area. The analysis of small business lending compares the percentage of businesses located within low-moderate-, middle-, and upper-income census tracts for the Geographic Distribution criterion. The analysis of small business loans under the Borrower Profile criterion compares the distribution of small business lending by gross annual revenues. The gross annual revenues for these businesses according to 2021 D&B data are as follows:

- 87.6 percent had \$1.0 million or less;
- 3.4 percent has more than \$1.0 million; and,
- 9.0 percent had unknown revenues.

According to D&B data, service industries represent the largest portion of businesses at 29.9 percent, followed by construction at13.4 percent. According to Escambia County, AL Industrial Development Authority, major employers in the area include Poarch Band of Creek Indians, Escambia County Board of Education, Alabama Department of Corrections, and Georgia-Pacific, Brewton, LLC.

As illustrated in the following table, in 2020, the unemployment rate increased throughout the Pensacola-Ferry Pass, AL-FL CSA due to the COVID-19 pandemic. In 2021, the unemployment rate decreased mostly below the state and national rate; however, the average unemployment rate for Escambia County, AL remained about the state average.

Unemployment Rates*		
2019	2020	2021
Area %		
3.7	6.8	4.1
3.3	7.3	4.5
3.0	5.6	3.5
3.2	6.5	3.4
3.2	8.2	4.6
3.7	8.1	6.1
	2019 % 3.7 3.3 3.0 3.2 3.2 3.2	2019 2020   % %   3.7 6.8   3.3 7.3   3.0 5.6   3.2 6.5   3.2 8.2

#### Competition

There is a moderate level of competition in the assessment area. According to the FDIC Deposit Market Share data, as of June 30, 2021, 10 financial institutions operated 20 offices within these counties. Of these institutions, AmeriFirst Bank ranked fifth with a 7.5 percent market share.

The bank is not required to collect or report its home mortgage loans data. Therefore, the analysis of home mortgage loans under the Lending Test does not include comparisons against aggregate data. However, the aggregate data reflects a moderate level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders. In 2020, 98 lenders reported a total 482 residential mortgage loans originated or purchased in the assessment area. The top five lenders accounted for 29.1 percent of the total market share of home mortgage loans.

The bank is also not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, the aggregate data for small business lending reflects the level of demand for small business loans and is therefore included. In 2020, the aggregate data showed 142 institutions reporting 12,704 small business loans within the assessment area. The top five institutions accounted for 39.6 percent of the market share.

#### Credit Needs

Considering information obtained from bank management, demographic data, and economic data, examiners determined that there is a need for affordable housing and small business lending programs. Demographic data suggests a need for affordable housing loans, since 11.5 percent of families live below the poverty level and 44.0 percent of families are low- or moderate-income families. Additionally, the high number of businesses with gross annual revenues of \$1 million or less supports the small business lending program need.

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE PENSACOLA-FERRY PASS, AL-FL CSA ASSESSMENT AREA

#### LENDING TEST

Given the limited the limited number of loans within this assessment area, meaningful conclusions could not be obtained.

#### **Geographic Distribution**

Due to the limited amount of small business and home mortgage lending activity within this assessment area, meaningful conclusions could not be reached. The assessment area does not contain low-income geographies.

#### Small Business Loans

The bank originated nine small business loans totaling \$549,000 in this assessment area. Of these loans, one was originated in a moderate-income geography.

#### Home Mortgage Loans

The bank originated seven home mortgage loans totaling approximately \$1.3 million. Of these loans, one was originated within a moderate-income geography.

#### **Borrower Profile**

Due to the limited amount of small business and home mortgage lending activity within this assessment area, meaningful conclusions could not be reached.

#### Small Business Loans

Four loans totaling \$352,000 were sampled within this assessment area. Of these loans, two were extended to businesses with gross annual revenues of \$1.0 million or less.

#### Home Mortgage Loans

Six home mortgage loans totaling approximately \$1.2 million were sampled within this assessment area. Of these loans, one loan totaling \$135,000 was extended to a low-income borrower, and zero loans were extended to moderate-income borrowers.

#### APPENDICES

#### SMALL BANK PERFORMANCE CRITERIA

#### Lending Test

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The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The institution's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### GLOSSARY

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

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the institution 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.

**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.

**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 (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that 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 (e.g, 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.

**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.

**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.

**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 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.

**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.