

# **PUBLIC DISCLOSURE**

**July 28, 2015**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Citizens Bank of Lafayette  
Certificate Number: 1711**

**400 Highway 52 By-Pass West  
Lafayette, Tennessee 37083**

**Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Region – Memphis Area Office**

**6060 Primacy Parkway, Suite 300  
Memphis, Tennessee 38119**

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'S CRA RATING

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

The following table indicates the performance level of Citizens Bank of Lafayette with respect to the Lending, Investment, and Service Tests.

PERFORMANCE LEVELS	CITIZENS BANK OF LAFAYETTE		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*\*Note – The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.*

The following points summarize the major factors supporting the institution's rating:

### **Lending Test**

- Lending levels reflect good responsiveness to assessment area credit needs.
- A high percentage of loans are made in the institutions' assessments areas.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas.
- Overall, the distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among retail customers of different income levels and businesses (including farms) of different sizes.
- The institution has made an adequate level of community development loans.
- The institution uses innovative and/or flexible lending practices in order to serve assessment area credit needs. The bank's willingness to extend a large number of small dollar loans received favorable CRA credit.

### **Investment Test**

- The institution has an excellent level of qualified community development investment and grants.
- The institution exhibits good responsiveness to credit and community economic development needs.
- The institution occasionally uses innovative and/or complex investments to support community development initiatives.

- The institution used an adequate degree of investments not routinely provided by private investors.

**Service Test**

- The institution exhibited an excellent record regarding its retail banking services.
- The institution provides an adequate level of community development services.

**SCOPE OF EVALUATION**

***General Information***

This evaluation covers the period from the prior evaluation dated December 10, 2012, to the current evaluation dated July 28, 2015. While the bank met the asset threshold to be evaluated as an Intermediate Small Bank, management collected and reported CRA data since the last evaluation and has elected to be evaluated as a Large Bank. To assess performance, examiners applied the CRA Large Bank tests: Lending Test, Investment Test, and Service Test.

***Multiple Assessment Areas***

As seen in the table below, the bank generated the greatest dollar volume of loan activity in the Nashville MSA Assessment Area (Nashville MSA AA). The bank only operates in the State of Tennessee. Generally, when arriving at applicable conclusions for the institution as a whole, examiners weighted each assessment area’s performance according to its relative loan percentage noted in the below table. Consequently, examiners performed full-scope procedures for the Nashville MSA AA and weighted performance in this area more heavily, according to the relative loan percentage, when arriving at overall conclusions and ratings. The Non-MSA was reviewed using limited-scope procedures.

<b>Assessment Area Breakdown of Loans, Deposits, and Branches</b>						
<b>Assessment Area</b>	<b>Loans</b>		<b>Deposits</b>		<b>Offices *</b>	
	<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Nashville MSA AA	46,270	75.9	297,268	55.9	9	60.0
TN Non-MSA AA	14,729	24.1	235,036	44.1	6	40.0
<b>Total</b>	<b>\$60,999</b>	<b>100.0</b>	<b>\$532,304</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>

*Source: Bank Records; HMDA & CRA Data (2013-2014); FDIC Summary of Deposits (6/30/2014) \*Offices exclude 5 recently acquired Traders Bank branches.*

**Lending Test**

***Loan Product Choice***

CRA Large Bank procedures require examiners to consider a bank’s reported home mortgage, small business, and small farm loans for the previous 24 to 36 months, as well as all reported community development loans granted since the prior evaluation. Consequently, this evaluation considered the following loans reported either to Home Mortgage Disclosure Act or CRA data collection reporting requirements:

### Home Mortgage Loans

- 2013: 281 loans totaling \$18,882,000
- 2014: 274 loans totaling \$23,613,000

### Small Business Loans

- 2013: 201 loans totaling \$7,588,000
- 2014: 254 loans totaling \$14,248,000

### Small Farm Loans

- 2013: 248 loans totaling \$9,477,000
- 2014: 261 loans totaling \$11,501,000

### Community Development Loans

- 2013: 8 loans totaling \$2,573,436
- 2014: 9 loans totaling \$3,810,533
- January-June 2015: 5 loans totaling \$3,314,150

### ***Loan Product Weighting***

When weighing the loan products' effect on applicable conclusions other than the Community Development Lending factor, examiners evaluated home mortgage, small business, and small farm loans relative to volume of lending over the review period.

As seen in the following table, the lending emphasis of reportable loans reflects an emphasis on home mortgage lending. This emphasis reflects a relatively similar pattern with the other years considered. Because of the bank's lending concentrations, examiners gave the most weight to the bank's home mortgage lending, with less weight on small farm lending and small business lending when arriving at conclusions.

<b>Loans Reported</b>				
<b>Loan Type</b>	<b>Dollar Amount \$(000)</b>	<b>Percent %</b>	<b>Number</b>	<b>Percent %</b>
Home Mortgage	42,495	49.8	555	36.5
Small Business	21,836	25.6	455	30.0
Small Farm	20,978	24.6	509	33.5
<b>Total Loans</b>	<b>85,309</b>	<b>100.0</b>	<b>1,519</b>	<b>100.0</b>

*Source: Bank records (1/1/2013 – 12/31/14).*

Since no trends exist that materially affect conclusions and ratings, the remainder of this evaluation only presents and discusses information for 2013, the most recent year for which aggregate data exists as of the evaluation date.

The following table shows gross loan activity for 2014. As seen, based on all loans originated, the bank's lending emphasis shows a similar concentration to that noted for reported loans since residential loans at 32.8 percent by dollar volume constitutes the primary loan type, while commercial loans at 23.7 percent by dollar volume and agricultural loans at 14.7 percent by dollar volume represent a secondary lending emphasis.

<b>Loans Originated or Purchased</b>				
<b>Loan Type</b>	<b>Dollar Amount \$(000)</b>	<b>Percent %</b>	<b>Number</b>	<b>Percent %</b>
Construction and Land Development	5,802	6.3	82	1.5
Secured by Farmland	9,330	10.1	69	1.2
1-4 Family Residential	26,609	28.9	398	7.1
Multi-Family Residential	3,600	3.9	4	0.1
Commercial Real Estate	14,677	15.9	64	1.2
<b>Total Real Estate</b>	<b>60,018</b>	<b>65.1</b>	<b>617</b>	<b>11.1</b>
Agricultural Production	4,245	4.6	109	1.9
Commercial and Industrial	7,206	7.8	153	2.7
Consumer Purpose	19,678	21.3	4,692	84.2
Other Loans	1,125	1.2	3	0.1
<b>Gross Loans</b>	<b>92,272</b>	<b>100.0</b>	<b>5,574</b>	<b>100.0</b>

Source: Bank records (1/1/2014-12/31/2014).

Examiners also considered the institution’s small dollar loan program when evaluating performance. For institutions evaluated pursuant to Large Bank performance criteria these loans are considered under the *Innovative and Flexible Lending Practices* component.

### **Investment and Service Tests**

The scope of this evaluation also encompassed all qualified investments either purchased prior to but still outstanding as of this evaluation date or purchased since the prior evaluation. It also includes all community development services performed since the previous evaluation.

## **DESCRIPTION OF INSTITUTION**

### ***Background***

Citizens Bank is headquartered in Lafayette, Tennessee, and operates in Middle Tennessee in Bedford, Clay, Coffee, DeKalb, Franklin, Jackson, Macon, Smith, Sumner, and Wilson Counties. Citizens Bank is wholly-owned by Citizens Bancorp Investment, Inc., a one-bank holding company headquartered in Lafayette, Tennessee. The holding company also wholly owns Town and Country Finance Company, Citizens Insurance Services, and Liberty Insurance Company. The institution received a “Satisfactory” rating at its previous FDIC Performance Evaluation dated December 10, 2012 based on Large Bank Evaluation Procedures.

### ***Operations***

Citizens Bank operates 20 offices and 16 automated teller machines (ATMs) which are located in 10 counties in Middle Tennessee. On December 13, 2013, former affiliate Liberty State Bank (Liberty, Tennessee) was merged and consolidated into Citizens Bank of Lafayette, adding 5 branches in DeKalb and Wilson Counties. The bank began collecting CRA data from the former Liberty State Bank branches as of January 1, 2014. Therefore, starting in 2014, the bank’s

activity includes data from the former Liberty State Bank branches.<sup>1</sup> On April 20, 2015, Traders Bank (Tullahoma, Tennessee) was also merged and consolidated into Citizens Bank, adding 5 branches in Bedford, Coffee, and Franklin Counties. The activity from the former Traders Bank branches will not be included in this evaluation. There have otherwise been no office openings or closings since the last evaluation.

The main office and three branches are located in Macon County, one office is in Bedford County, two offices are in Clay County, three offices are in Coffee County, three offices are in DeKalb County, one office is in Franklin County, one office is in Jackson County, two offices are in Smith County, one office is in Sumner County, and two offices are in Wilson County.

The main office in Lafayette, which is the county seat of Macon County, is located 70 miles northeast of Nashville, Tennessee. Nine of the bank's offices are located in the Nashville-Davidson-Murfreesboro TN MSA, and the remaining 11 offices are located in the non-metropolitan portion of the state (which includes 5 branches in the non-metropolitan area which are the result of the recent acquisition of Traders Bank). Fifteen of the bank's ATMs are located at bank offices, while one is located offsite in Gordonsville, Tennessee.

Citizens Bank offers a full line of loan products, deposit accounts, and other financial services, including a Web site ([www.citizens-bank.org](http://www.citizens-bank.org)). It also offers hours and days of service consistent with area and industry norms.

### ***Ability & Capacity***

Assets totaled approximately \$673 million as of March 31, 2015, and included net loans of \$314 million and securities totaling \$283 million. The mix of loans outstanding is illustrated in the table on the following page.

Since the last evaluation, total assets increased 43.6 percent, total deposits increased 43.5 percent, and net loans increased 37.2 percent. On an annualized basis, the institution's growth rates on average per year are: assets grew 17.6 percent, deposits grew 17.2 percent per year, and net loans grew 14.1 percent. Most of the growth is attributed to the acquisition of Liberty State Bank in December of 2013. As of March 31, 2015, the bank reported a Return on Average Assets of 1.1 percent and a Tier 1 Leverage Capital Ratio of 8.9 percent.

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<sup>1</sup> The former Liberty Bank was a HMDA reporter prior to the merger with Citizens Bank, so 2013 HMDA data in this evaluation includes the HMDA lending for the former Liberty Bank as well.

<b>Loan Distribution as of March 31, 2015</b>		
<b>Loan Type</b>	<b>Dollar Amount (000)</b>	<b>Percent of Total Loans (%)</b>
Construction and Land Development	6,638	2.1
Secured by Farmland	36,412	11.4
1-4 Family Residential	128,043	40.0
Multifamily (5 or more) Residential	12,653	4.0
Commercial Real Estate	66,871	20.9
<b><i>Total Real Estate Loans</i></b>	<b>250,617</b>	<b>78.4</b>
Agricultural Production	5,576	1.7
Commercial and Industrial	19,620	6.1
Loans to Individuals (Consumer)	36,037	11.3
State and Political Subdivision Obligations	5,176	1.6
Other	3,307	1.0
Less: Unearned Income	(190)	(0.1)
<b>Total Loans</b>	<b>\$320,143</b>	<b>100.0%</b>

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

## **DESCRIPTION OF ASSESSMENT AREAS**

The CRA requires each financial institution to define one or more assessment area within which its CRA performance will be evaluated. Citizens Bank designated two assessment areas: (1) portions of the Nashville MSA; and (2) Non-MSA assessment area. The bank's combined assessment areas totals 27 census tracts: 12 moderate-income and 15 middle-income tracts. There are no low- or upper- income tracts. Both areas conform to the CRA regulatory requirements and do not arbitrarily exclude low- or moderate- income areas. The following discussions provide information on the individual assessment areas

### **Nashville MSA Assessment Area**

The Nashville MSA AA consists of all of Macon and Smith Counties and those census tracts in Sumner and Wilson Counties that are near the bank's offices. This AA includes only a portion of the Nashville MSA counties. These 17 tracts reflect the following income designations according to the 2010 U.S. Census: 11 moderate-income and 6 middle-income census tracts.

As seen in the following table, Citizens Bank operates 9 offices in this assessment area, with 7 of them located in moderate-income census tracts. As mentioned previously, a majority of the bank's loans, deposits, and branches are in this assessment area.

<b>Branch Distribution – Portion of Nashville, Tennessee MSA AA</b>				
<b>State #: 47 MSA #: 34980</b>				
<b>Office Name</b>	<b>Office Type</b>	<b>Census Tract</b>	<b>CT Income Level</b>	<b>Opened or Closed Since Last Examination</b>
<b><i>Macon County (111):</i></b>				
Lafayette Main Office	Main Office	9702.00	Moderate	No
Lafayette Public Square	Full Service	9703.00	Moderate	No
Lafayette Scottsville Road	Full Service	9703.00	Moderate	No
Red Boiling Springs	Full Service	9701.00	Moderate	No
<b><i>Smith County (159):</i></b>				
Carthage Main Branch	Full Service	9751.00	Moderate	No
Carthage Highway 25	Full Service	9751.00	Moderate	No
<b><i>Sumner County (165):</i></b>				
Westmoreland	Full Service	0201.01	Middle	No
<b><i>Wilson County (189):</i></b>				
Lebanon N. Cumberland	Full Service	0307.00	Moderate	(1)
Lebanon West Main	Full Service	0306.00	Middle	(1)

Source: Internal Bank Data and 2010 U.S. Census.

(1) These offices were acquired as part of the purchase of Liberty State Bank, Liberty, TN, that was effective on December 13, 2013.

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

As of the 2010 U.S. Census, the Nashville MSA AA contained a population of 76,232 and 19,529 families, of which 30.4 percent reported low incomes, 23.2 percent reported moderate incomes, 21.4 percent reported middle incomes, and 25.0 percent reported upper incomes. Based on the 2014 FFIEC adjusted median family income of \$65,600, 14.4 percent of the area's families reported incomes below the poverty level. There are 32,557 housing units. Of these, 62.0 percent are owner-occupied, 24.3 percent are occupied rental units, and 13.7 percent are vacant.

According to 2014 D&B data, there were 5,267 businesses. Gross annual revenues (GARs) for these businesses are below.

- 73.1 percent have \$1 million or less.
- 3.6 percent have more than \$1 million.
- 23.3 percent have unknown revenues.

Service industries represent the largest portion of all businesses and farms at 42.7 percent, followed by retail trade (13.7 percent), construction (8.0 percent), agriculture (6.8 percent), and finance, insurance, and real estate (5.8 percent). In addition, 67.6 percent of area businesses and farms have 4 or fewer employees, and 90.1 percent operate from a single location.

The 2013 and 2014 FFIEC-updated MFIs for the Nashville MSA were used for the borrower profile analysis in the Lending Test. The 2010 U.S. Census MFI for the Nashville MSA of \$62,315 was used to determine the income levels of the census tracts within the assessment area which is used for the geographic distribution analysis. The following table provides information on how each income level is derived.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Nashville MSA Median Family Income</b>				
2013 (\$62,300)	<\$31,150	\$31,150 to <\$49,840	\$49,840 to <\$74,760	≥\$74,760
2014 (\$65,600)	<\$32,800	\$32,800 to <\$52,480	\$52,480 to <\$78,720	≥\$78,720

Source: FFIEC

The unemployment rate for the area during May 2015 averaged 5.0 percent, which is below both the State and National averages of 5.8 and 5.5 percent, respectively. Major employers in the area include Fleetwood Homes of Tennessee, Inc.; William L. Bonnell Co., Inc.; Nyr Star LLC; Dura Automotive Systems; UMC Radiology Center; University Medical Center; TRW Automotive; Walmart Supercenter; and Cedars Healthcare Center.<sup>2</sup>

Please see Appendix D for additional details on the demographic characteristics of the assessment area.

### ***Competition***

Citizens Bank operates in a highly competitive market in the Nashville MSA AA. Competition comes from other local, regional, and national banks, as well as mortgage companies and credit unions. As of June 30, 2014, 29 banks operated 124 offices in the entire counties that make up the Nashville MSA AA<sup>3</sup>. In addition, a large number of finance companies, credit unions, and mortgage companies also operate in this area. In comparison, 6 banks operated 12 offices in the Non-MSA AA as of June 30, 2014.

### ***Community Contact***

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

As part of this evaluation, examiners utilized a recent contact conducted in the community, with a government planning agency, who was knowledgeable of the area's current economic conditions, community credit needs, and potential opportunities for local bank involvement. The contact indicated that the primary credit needs include home mortgage and small business loans and stated that the local banks were doing a good job of meeting the credit and other banking needs of the community.

<sup>2</sup> Source: [www.jobs4tn.gov](http://www.jobs4tn.gov)

<sup>3</sup> In 2013, peer deposit data showed that there were 17 financial institutions operating 44 offices in the Nashville MSA AA.

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

Consistent with other metropolitan areas, the Nashville MSA created varied demand for commercial (small business), residential real estate, and consumer loans. Despite the competition levels, lending opportunities still exist. Considering information obtained from a community contact, bank management, as well as demographic and economic information, examiners concluded that the primary credit needs of the assessment areas include small business, small farm, home mortgage loans, and small dollar loans.

Community development needs in the area primarily involve revitalizing or stabilizing low- or moderate- income areas, affordable housing, or economic development projects.

**Non-MSA AA**

The Non-MSA AA is comprised of all of Clay, DeKalb, and Jackson Counties in Tennessee. These 10 tracts reflect the following income designations according to the 2010 U.S. Census: 1 moderate-income and 9 middle-income census tracts.

As seen in the following table, Citizens Bank operates six offices in this assessment area; all are located in middle-income CTs. As mentioned previously, less than a majority of the bank’s loans, deposits, and branches are in this assessment area.

<b>Branch Distribution – Non-MSA AA</b>				
<b>State #: 47 MSA #: 99999</b>				
<b>Office Name</b>	<b>Office Type</b>	<b>Census Tract</b>	<b>CT Income Level</b>	<b>Opened or Closed Since Last Examination</b>
<b><i>Clay County (027):</i></b>				
Hermitage Springs	Full Service	9551.00	Middle*	No
Celina Main Office	Full Service	9550.00	Middle*	No
<b><i>DeKalb County (041):</i></b>				
Liberty Branch	Full Service	9203.00	Middle*	(1)
Alexandria	Full Service	9203.00	Middle*	(1)
Smithville	Full Service	9202.00	Middle*	(1)
<b><i>Jackson County (087):</i></b>				
Gainesboro	Full Service	9603.00	Middle*	No

*Source: Internal Bank Data and 2010 U.S. Census. \*Distressed or Underserved Middle Income CT. Excludes Traders Bank 5 branches recently purchased. (1) Offices acquired as part of Citizens Bank’s purchase of Liberty State Bank, Liberty, TN, that was effective on 12-12-2013.*

***Demographic and Economic Data***

As of the 2010 U.S. Census, the Non-MSA AA contained a population of 38,222 and 10,557 families, of which 24.8 percent reported low incomes, 16.1 percent moderate incomes, 23.8 percent middle incomes, and 35.3 percent upper incomes. Based on the 2014 FFIEC adjusted median family income of \$47,100, 15.7 percent of the area’s families reported incomes below the poverty level. There are 19,634 housing units. Of these, 58.8 percent are owner-occupied, 19.8 percent are rental units, and 21.4 percent are vacant. Refer to Appendix D for additional demographic characteristics of the assessment area.

According to 2014 D&B data, there were 2,105 businesses. Gross annual revenues (GARs) for these businesses are below.

- 73.3 percent have \$1 million or less.
- 2.7 percent have more than \$1 million.
- 24.0 percent have unknown revenues.

Service industries represent the largest portion of all businesses and farms at 39.7 percent, followed by retail trade (13.0 percent), agriculture (8.7 percent), construction (8.0 percent), transportation (4.7 percent), and finance, insurance, and real estate (4.3 percent). In addition, 69.4 percent of area businesses and farms have 4 or fewer employees, and 91.8 percent operate from a single location.

The 2013 and 2014 FFIEC-updated MFIs for the non-metropolitan portion of Tennessee were used for the borrower profile analysis in the Lending Test. The 2010 U.S. Census MFI for the non-metropolitan portion of Tennessee of \$44,386 was used to determine the income levels of the census tracts within the assessment area which is used for the geographic distribution analysis. The following table provides information on how each income level is derived.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Tennessee Non-MSA Median Family Income</b>				
2013 (\$46,700)	<\$23,350	\$23,350 to <\$37,360	\$37,360 to <\$56,040	≥\$56,040
2014 (\$47,100)	<\$23,550	\$23,550 to <\$37,680	\$37,680 to <\$56,520	≥\$56,520

Source: FFIEC

The unemployment rate for the area during May 2015 averaged 8.0 percent, which is above both the State and National averages of 5.8 and 5.5 percent, respectively. Of the counties in this assessment area, Clay County had the highest unemployment rate at 9.3 percent in May 2015; Jackson County followed with 7.9 percent, and DeKalb County was at 6.8 percent. Major employers in the area include Federal-Mogul Corporation; Shiroki North America, Inc.; Tenneco, Inc.; Kingston; and Crotty Tennessee.<sup>4</sup>

All of the middle-income census tracts in this area were considered distressed or underserved middle-income tracts at some point since the prior evaluation as displayed in the table below.

<b>Distressed or Underserved Middle-Income Tracts in the Non-MSA AA</b>				
<b>County</b>	<b># of Tracts</b>	<b>Designation</b>	<b>Time Period</b>	<b>Reason</b>
Clay	2*	Distressed	2013, 2014, 2015	Poverty
Clay	2*	Underserved	2014, 2015	Remote/Rural Area
DeKalb	4*	Distressed	2014, 2015	Poverty
Jackson	3*	Distressed	2013, 2014, 2015	Poverty

Source: Federal Financial Institutions Examination Council. \*All of the middle-income tracts in the county.

<sup>4</sup> Source: [www.jobs4tn.gov](http://www.jobs4tn.gov)

### ***Competition***

Citizens Bank operates in a moderately competitive market in the Non-MSA AA. Competition comes from other local, regional, and national banks, as well as credit unions. As of June 30, 2014, 6 banks operated 12 offices in the counties that make up the Non-MSA AA. Citizens Bank ranked first with 39.3 percent of the deposit market share in the assessment area.

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

The bank's area has varied loan demand for commercial, agricultural, residential real estate, and consumer loans. Considering information obtained from bank management, the community contact, review of other performance evaluations, and demographic and economic data, examiners determined that home mortgage, small business, and small farm loans reflect the primary credit needs of the assessment area. Community development needs were generally consistent with the Nashville MSA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### ***Format***

For the Lending Test, the lending activity, assessment area concentration, community development lending, and innovative and flexible lending practices performance factors discuss the bank's performance as a whole. The loan distribution performance factors, geographic and borrower profile, reflects data in the Nashville MSA AA. As previously noted, examiners used full-scope examination procedures in the Nashville MSA AA. For the Investment and Service Tests, the discussion reflects the bank's performance as a whole.

### ***Conclusions for the Nashville MSA AA***

The conclusions and ratings for the Nashville MSA AA are generally consistent with the performance record for the bank as a whole. The bank's performance in this assessment area largely dictates the overall rating for each factor. These conclusions and their effect on any specific factor are presented under the summary discussion of the Lending, Investment, and Service Tests. The Interstate Branching and Banking Efficiency Act (IBBEA) requires separate conclusions, presented below, for each MSA where a bank operates branches. As previously stated, this evaluation only considers the activity of Citizens Bank and the former Liberty Bank, since the merger with Traders Bank occurred in close proximity to the date of this evaluation. Performance as well as conclusions in the Non-MSA proved generally consistent with those presented herein. Appendix D contains the applicable loan distribution tables for both assessment areas.

## **LENDING TEST**

Citizens Bank demonstrated a good record for the bank as a whole regarding the Lending Test. Lending levels reflect good responsiveness to assessment area credit needs. A high percentage of loans are made in the bank's assessments areas, and the geographic distribution of these loans reflects excellent penetration throughout the assessment areas. The borrower profile reflects excellent penetration among retail customers of different income levels and business customers of different sizes. Additionally, the bank made an adequate level of community development loans and uses innovative and flexible lending practices in order to serve assessment area credit needs. Appendix B

lists the criteria used to evaluate the Lending Test.

### **Lending Activity**

Lending levels reflect good responsiveness to assessment areas' credit needs. As a whole, the bank exhibited a good record regarding its lending activity. Good performances regarding home mortgage and small business loans primarily support this conclusion. As previously noted, examiners weighted home mortgage loans more heavily than small business and small farm loans, according to the corresponding lending levels. Examiners considered the bank's size, business strategy, and capacity relative to the assessment areas' credit needs when arriving at this conclusion.

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

The level of home mortgage lending activity reflects good performance. Good overall market ranking and share supports this conclusion. For 2013, the bank originated 283 total reportable home mortgage loans totaling \$16,262,000 in its assessment areas. Considering the level of lending activity in each of its assessment areas, the bank ranked 9<sup>th</sup> with 2.1 percent of the market share by dollar volume out of a total of 242 reporting institutions granting home mortgage loans in the bank's assessment areas. By count, the bank ranked 3<sup>rd</sup> with 5.8 percent of the market share. Given the considerations previously noted, these levels reflect good performance.

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

The level of small business lending activity reflects good performance. Good overall market ranking and share supports this conclusion. For 2013 in their assessment areas, the bank originated 163 reportable small business loans totaling \$5,023,000. Considering the level of lending activity in each of its assessment areas, the bank ranked 11<sup>th</sup> with 4.4 percent of the market share by count and 9<sup>th</sup> with 2.7 percent of the market share by dollar volume out of a total of 50 reporting institutions granting small business loans in the entire counties in the bank's assessment areas. Given the considerations previously noted, these levels reflect good performance.

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

The level of small farm lending activity reflects excellent performance. Excellent overall market ranking and share supports this conclusion. For 2013 in their assessment areas, the bank originated 210 total reportable small farm loans totaling \$7,894,000. Considering the level of lending activity in the entire counties in its assessment areas, the bank ranked 1<sup>st</sup> with 62.5 percent of the market share by count and 65.8 percent of market share by dollar volume out of a total of 13 reporting institutions granting small farms loans in the entire counties in the bank's assessment areas. Given the considerations previously noted, these levels reflect excellent performance.

### **Assessment Area Concentration**

The institution granted a high percentage of its loans for the bank as a whole inside its assessment areas. Good performances regarding home mortgage, small business, and small farm loans support this conclusion. Examiners considered the bank's asset size and office structure as well as the loan

products reviewed relative to the assessment areas' combined size and economy when arriving at this conclusion.

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

The lending concentration of home mortgage loans reflects good performance. The following table shows that for home mortgage loans by both the percentage of the number and the percentage of the dollar volume, the bank granted clear majorities inside its assessment areas, thereby reflecting good performance by each measure. Weighing both measures equally, combined they reflect good overall performance for home mortgage loans given the considerations previously noted.

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

The lending concentration of small business loans reflects good performance. The following table shows that for small business loans by both the percentage of the number and the percentage of the dollar volume, focusing on the subtotal figures, the bank granted clear majorities inside its assessment areas, thereby reflecting good performance by each measure. Weighing both measures equally, combined they reflect good overall performance for small business loans given the considerations previously noted.

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

The lending concentration of small farm loans reflects good performance. The following table shows that for small farm loans by both the percentage of the number and the percentage of the dollar volume, focusing on the subtotal figures, the bank granted clear majorities inside its assessment areas, thereby reflecting good performance by each measure. Weighing both measures equally, combined they reflect good overall performance for small farm loans given the considerations previously noted.

<b>Lending Inside and Outside of the Assessment Areas</b>										
<b>Loan Category</b>	<b>Number of Loans</b>					<b>Dollar Amount of Loans</b>				
	<b>Inside</b>		<b>Outside</b>		<b>Total #</b>	<b>Inside</b>		<b>Outside</b>		<b>Total \$(000)</b>
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$(000)</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
Home Mortgage										
2013	226	80.4	55	19.6	281	12,172	64.5	6,710	35.5	18,882
2014	215	78.5	59	21.5	274	17,057	73.2	6,259	26.8	23,316
<b>Subtotal</b>	<b>441</b>	<b>79.5</b>	<b>114</b>	<b>20.5</b>	<b>555</b>	<b>29,229</b>	<b>69.3</b>	<b>12,969</b>	<b>30.7</b>	<b>42,198</b>
Small Business										
2013	163	81.1	38	18.9	201	5,023	66.2	2,565	33.8	7,588
2014	195	76.8	59	23.2	254	10,052	70.6	4,196	29.4	14,248
<b>Subtotal</b>	<b>358</b>	<b>78.7</b>	<b>97</b>	<b>21.3</b>	<b>455</b>	<b>15,075</b>	<b>69.0</b>	<b>6,761</b>	<b>31.0</b>	<b>21,836</b>
Small Farm										
2013	210	84.7	38	15.3	248	7,894	83.3	1,583	16.7	9,477
2014	214	82.0	47	18.0	261	8,801	76.5	2,700	23.5	11,501
<b>Subtotal</b>	<b>424</b>	<b>83.3</b>	<b>85</b>	<b>16.7</b>	<b>509</b>	<b>16,695</b>	<b>79.6</b>	<b>4,283</b>	<b>20.4</b>	<b>20,978</b>

Source: HMDA and CRA Data (2013-2014)

Appendix D provides tabulated data regarding the bank's record of lending to borrowers of different incomes and businesses/farms of different sizes, as well as the geographic distribution of home mortgage and small business/farm loans required to be reported for CRA and HMDA purposes for 2013.

### **Geographic Distribution of Loans**

The institution exhibited an excellent record regarding its geographic loan distribution. Excellent performance records regarding home mortgage, small business and small farm support this conclusion. As previously stated, home mortgage loans accounted for 49.8 percent of reported loans, while small business loans accounted for 25.6 percent and small farm loans 24.6 percent.

Examiners considered the loan product types reviewed relative to available comparative data and any performance context issues. They focused on the percentages by number of loans when in moderate-income geographies when arriving at conclusions. As noted under the Description of Assessment Areas, neither of the bank's areas contains any low-income census tracts. This factor considers only loans granted inside the assessment areas. The Nashville MSA AA has 75.9 percent of the HMDA and CRA reportable loans (by amount) for 2013 and 2014. As such, this factor only presents data for the Nashville MSA.

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

The bank's geographic distribution of its home loans reflects excellent performance. Excellent performance was noted regarding home purchase, home improvement, and home refinance loans to support this conclusion in both the Nashville MSA AA and the Non-MSA AA. However, no weighting was afforded to performance regarding home improvement loans in the Non-MSA; as there were only five loans, which is an insufficient number of loans to form conclusions. Home purchase loans accounted for 44 percent of the number of loans originated in 2013, while home refinance loans accounted for 41 percent, and home improvement loans accounted for 14 percent.

In the Nashville MSA, 59.2 percent of the owner-occupied homes are located in moderate-income areas and the remaining 40.8 percent are located in middle-income areas. During 2013, Citizens Bank originated 87.1 percent of its home purchase loans, 92.3 percent of its home improvement loans, and 85.0 of its home refinance loans in the moderate-income census tracts. In addition, to the bank percentages being above demographic data, when compared to the aggregate lending data, home mortgage lending in 2013 is substantially above aggregate data percentages. The bank's performance is considered excellent for all three home mortgage loan products. Similar results were noted in 2014. An analysis of the geographic distribution of the bank's 2013 home mortgage lending is presented in Tables 2a to 5a of Appendix D.

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

The geographic distribution of the bank's small business loans reflects excellent performance. Excellent performances in both the Nashville MSA AA and Non-MSA AA support this conclusion. As stated previously, analysis was focused on the percentages by number in moderate- income geographies and examiners focused on the comparison to the distribution of businesses in those areas.

Approximately 66.9 percent of businesses in the Nashville MSA AA are located in moderate-income areas, and the remaining 33.1 percent are located in middle-income tracts. Citizens Bank originated 90.8 percent of its small business loans in moderate-income census tracts during 2013. In addition, the bank's small business lending is substantially above the 2013 aggregate percentage of 22.8 percent in moderate-income areas. The bank's geographic dispersion of small business loans exhibits excellent performance in lending in moderate-income geographies in comparison to both the percentages of businesses in those tracts and aggregate lenders' performance. Similar performance was noted in 2014. An analysis of the geographic distribution of the bank's 2013 small business lending is presented in Table 6a of Appendix D.

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

The geographic distribution of the bank's small farm loans reflects excellent performance. Excellent performances in both the Nashville MSA AA and Non-MSA AA support this conclusion. The review focused on the percentages by number in moderate- income geographies and examiners focused on the comparison to the distribution of farms in those areas.

The Nashville MSA AA has 58.8 percent of its farms located in moderate-income areas, and the remaining 41.2 percent are located in middle-income tracts. Citizens Bank originated 86.2 percent of its small farm loans in moderate-income census tracts during 2013. Additionally, the bank's small farm lending is above the 2013 aggregate of 63.7 percent in moderate-income areas. Similar performance was noted in 2014. An analysis of the geographic distribution of the bank's small farm lending is presented in Table 7a of Appendix D.

### **Borrower Profile**

Citizens Bank demonstrated an excellent record regarding its borrower profile loan distribution. A good performance regarding home mortgage was lifted by excellent records regarding small business and small farm loans to support conclusion. The distribution of home mortgage loans by borrower income level demonstrates good penetration among low- and moderate-income borrowers. The bank's lending to small businesses and to small farms reflects excellent penetration among businesses and farms of different sizes. Conclusions were generally consistent for both assessment areas, with only exception being in home purchase product. As previously stated, home mortgage loans accounted for 49.8 percent of reported loans, while small business loans accounted for 25.6 percent and small farm loans 24.6 percent. The Nashville MSA AA has 75.9 percent of the HMDA and CRA reportable loans (by amount) for 2013 and 2014.

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

The distribution of the bank's home mortgage loans based on the borrower's income levels reflects good performance. Home purchase loans accounted for 44 percent of the number of loans originated in 2013, while home refinance loans accounted for 41 percent, and home improvement loans accounted for 14 percent. Overall good performance in both the Nashville MSA and Non-MSA support this conclusion. Adequate performances regarding home purchase, excellent performance regarding home refinances, and good performance regarding home improvement support the overall conclusion.

Examiners focused on the percentages of the number of loans to low- and moderate- income borrowers compared to the aggregate data when arriving at conclusions. The borrowers' income designations define the borrowers' profile for this analysis. The analysis below focuses on Nashville MSA only.

In the Nashville MSA, low-income families represent 30.5 percent of all families in the assessment area with 14.4 percent of the families below the poverty level. Citizens Bank originated 22.4 percent of its home purchase loans to low-income applicants in 2013, which is slightly higher than aggregate lending level of 20.4 percent to low-income borrowers reflecting good performance. However, Citizens Bank only originated 14.9 percent of its home purchase loans to moderate-income borrowers; this is significantly lower than aggregate lending data of 31.2 percent reflecting poor performance. In 2014, the bank originated 13.9 percent of its home purchase loans to low-income borrowers, while it originated 21.5 percent of its home purchase loans to moderate-income borrowers.

Regarding home improvement loans, the bank's level of lending to low- and moderate-income borrowers in 2013 were both just higher than that of aggregate lending in these categories, revealing good performance in the Nashville MSA.

Regarding home refinance loans, the bank's level of lending to low- income borrowers in 2013 was significantly higher (8.6 percentage points) than aggregate lending data reflecting excellent performance, and 5.7 percentage points higher than aggregate to moderate- income borrowers, also demonstrating excellent performance.

Overall, the level of home mortgage lending to low- and moderate-income borrowers in the Nashville MSA AA is considered good. The best performance was noted in the home refinance and home improvement loan products. See Tables 8a to 10a in Appendix D for details.

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

The distribution of the bank's small business loans based on borrowers' profiles reflects excellent performance. Excellent performance in both the Nashville MSA and Non-MSA assessment areas support this conclusion. Examiners focused on the bank's record to businesses with gross annual revenues of \$1 million or less compared to the aggregate data when arriving at this conclusion. The companies' gross annual revenues define the borrowers' profile for this analysis.

Appendix D, Table 11a shows the excellent performance in both the Nashville MSA and the Non-MSA assessment areas. In both areas, the bank's level was substantially above the aggregate levels and significantly above the percentage of small businesses. The bank originated virtually every small business loan to a company with gross annual revenues of under \$1 million in the Nashville MSA and all loans in the non-MSA to this revenue category.

According to 2013 D&B business data, 73.1 percent of the businesses in the assessment area have gross annual revenues of \$1 million or less. Citizens Bank originated 99.2 percent of its small loans to businesses (by number) to businesses with gross revenues of \$1 million or less during 2013. The 2013 aggregate data showed that 47.4 percent of loans made in the Nashville MSA AA were to businesses with revenues of \$1 million or less.

Citizens Bank also originated 95.0 percent of its small business loans in amounts of \$100,000 or less in this area during 2013, which is a proxy for business size indicating the bank's excellent record of providing loans to very small businesses.

### ***Small Loans to Farms***

The distribution of the bank's small farm loans based on borrowers' profiles reflects excellent performance. Excellent performance in both the Nashville MSA and Non-MSA assessment areas support this conclusion. Examiners focused on the bank's record to farms with gross annual revenues of \$1 million or less compared to the aggregate data when arriving at this conclusion. The entities' gross annual revenues define the borrowers' profile for this analysis.

In the Nashville MSA AA, Citizens Bank originated 98.7 percent of its loans to farms with revenues of \$1 million or less in 2013. The 2013 aggregate data showed that 79.6 percent of loans made in the assessment area were made to farms with revenues of \$1 million or less. According to 2013 D&B business data, all farms (100.0 percent) in the assessment area have gross annual revenues of \$1 million or less; however, the D&B data is not very meaningful in this instance due to its inability to survey all farms. The bank's record of lending to small farms reflects excellent performance.

Citizens Bank also originated 92.5 percent of its small farm loans in amounts of \$100,000 or less in this area during 2013, which is a proxy for farm size indicating the bank's excellent record of providing loans to very small farms. See Table 12a in Appendix D for details.

### **Community Development Lending**

Citizens Bank made an adequate level of community development loans on a bank-wide level. Since the previous evaluation, the bank originated a total of 22 community development loans totaling \$9,698,119. This level of community development loans totals 1.7 percent of average total assets and 3.4 percent of average net loans and depicts adequate responsiveness to community development needs. The level has increased over the prior period community development loans where they represented 0.97 percent of average assets. The bank originated 15 community development loans, totaling \$5,950,119 in the Nashville MSA assessment area. Appendix A defines community development, and Appendix B lists the criteria considered under this performance factor.

The community development loans were responsive to the assessment areas' credit and community development needs. The bank's community development loans included 8 loans totaling \$ 5,876,436 for revitalization and stabilization of low- and moderate-income census tracts and distressed middle-income census tracts in its assessment areas. Furthermore, the bank originated 11 loans totaling \$ 3,473,683 to provide affordable housing in the assessment area, and 3 loans totaling \$348,000 to provide affordable housing in geographies bordering the assessment areas. The following table is a summary of the bank's community development loans.

<b>Community Development Loans Whole Bank</b>				
<b>Qualifying Category</b>				<b>Totals Per Category</b>
	<b>2013</b>	<b>2014</b>	<b>YTD 2015</b>	
<b>Affordable Housing:</b>				
Number	4	7	3	<b>14</b>
Dollar Amount (000s)	414	3,111	297	<b>3,822</b>
<b>CD Organizations:</b>				
Number	0	0	0	<b>0</b>
Dollar Amount (000s)	0	0	0	<b>0</b>
<b>Economic Development:</b>				
Number	0	0	0	<b>0</b>
Dollar Amount (000s)	0	0	0	<b>0</b>
<b>Revitalize or Stabilize:</b>				
Number	4	2	2	<b>8</b>
Dollar Amount (000s)	2,159	700	3,017	<b>5,876</b>
<b>Abandoned/Foreclosed Homes:</b>				
Number	0	0	0	<b>0</b>
Dollar Amount (000s)	0	0	0	<b>0</b>
<b>Totals Per Year:</b>				
<b>Number</b>	<b>8</b>	<b>9</b>	<b>5</b>	<b>22</b>
<b>Dollar Amount (000s)</b>	<b>2,573</b>	<b>3,811</b>	<b>3,314</b>	<b>9,698</b>

Source: Bank Records.

The following are examples of community development loans originated during the review period:

- **Affordable Housing** – bank originated a \$2,500,000 loan to finance a multi-unit apartment building that provided affordable housing to 41 low- totaling and moderate-income families. (Nashville MSA AA)
- **Revitalize and Stabilize** – bank provided 3 loans totaling \$400,000, which funded various infrastructure projects in Jackson County in order to revitalize and stabilize moderate-income and distressed middle-income areas. (Non-MSA AA)
- **Revitalize and Stabilize** – bank originated a \$3,000,000 loan, which funded multiple business ventures in Jackson County, thereby, helping to attract new, or retain existing,

businesses or residents in moderate- income or distressed middle-income geographies. The loan affected 124 employees, many of which are moderate-income individuals.

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

Citizens Bank uses innovative and flexible lending practices in order to serve the assessment areas' credit needs. Its overall lending philosophy, which is to serve the community by making any loan (within the confines of safety and soundness guidelines) with an overall lending policy that stresses flexibility, has resulted in Citizens Bank making more HMDA loans in its assessment areas than any other lender. Furthermore, the bank has employed the following innovative and flexible lending practices to meet the primary credit needs of its area, as identified by the contact made within the community.

- The bank finances manufactured housing (with and without real estate) at similar rates that a conventional home is priced. In 2013, 191 financial institutions originated HMDA loans within Citizens Bank's assessment areas. Although it only originated 10.1 percent of all loans within its assessment areas, Citizens Bank originated 29.6 percent of all manufactured home loans reported in the assessment areas. The bank's average loan size on an owner-occupied manufactured home in the Nashville MSA was \$28,303, demonstrating the bank's flexible lending through the provision of affordable housing loans to low and moderate-income borrowers. In 2014, the bank's manufactured home originations increased, representing 32.8 percent of its total HMDA originations. In 2013 and 2014 combined, the bank originated 166 HMDA-reportable manufactured home loans totaling \$6,958,000.
- Citizens Bank also offers match-funded, fixed-rate loans through a program with the Federal Home Loan Bank (FHLB). This program allows the bank to control its interest rate risk while providing long term fixed rate financing that would not otherwise be available to small businesses, small farms and homeowners within the bank's assessment areas. For the consumer, this product offers borrowers that do not meet standard underwriting criteria, due to type of collateral or other factors, the opportunity to obtain long term, fixed rate financing at rates that are only slightly higher than what is offered on secondary market mortgage loans. During the review period, the bank provided 252 match-funded loans totaling \$59.6 million, including: 168 home mortgages totaling \$26.6 million, 52 commercial loans totaling \$27.3 million, and 32 farm loans totaling \$5.7 million.
- The bank receives favorable CRA credit for its willingness to offer a large number and dollar volume of affordable small dollar loans, which are in strong demand. These loans show responsiveness to credit needs of the community and offer an alternative to reliance on high cost credit by non-banks. The bank exhibited a strong willingness to extend small dollar loans within their assessment areas which demonstrate excellent responsive to community credit needs. These small dollar loans represent 1.2 percent of average assets since the prior evaluation.

<b>Affordable Small Dollar Loans</b>				
	<b>Amounts &lt; \$1,000</b>		<b>Amounts &lt; \$2,500</b>	
<b>Year</b>	<b>Number</b>	<b>Amount</b>	<b>Number</b>	<b>Amount</b>
<b>2013</b>	771	\$535,552	966	\$1,669,833
<b>2014</b>	838	\$592,998	1,332	\$2,376,766
<b>2015 * (Through 7/15)</b>	495	\$346,536	791	\$1,433,941
<b>Total</b>	<b>2,104</b>	<b>\$1,475,086</b>	<b>3,089</b>	<b>\$5,480,540</b>
<b>Total 5,193 loans totaling \$6,955,626</b>				

## **INVESTMENT TEST**

Overall, Citizens Bank demonstrates an excellent record for the bank as a whole regarding the Investment Test. Excellent performance regarding the dollar amount of qualified investments primary supports this conclusion. Appendix A defines community development, and Appendix B lists the criteria considered under this performance factor.

### **Overall Level Qualified Investments and Grants/Donations**

The bank's overall dollar volume level of qualified investments reflects excellent performance. The bank's 43 qualified investments totaled over \$21.6 million. This level of investment equates to 3.7 percent of the bank's average total assets, since the previous evaluation and 8.4 percent of average securities. The percentage of investments to average assets has significantly increased from the prior evaluation when it was 0.4 percent, and the percentage of investments to average total securities has significantly increased from the prior evaluation when it was 1.0 percent. These investments include a prior period investment with a current book value of \$401,369 for public improvements in DeKalb County, which is comprised of four distressed middle-income census tracts. The investment aids in the revitalization and stabilization of educational infrastructure of the area.

The following table displays a listing of qualified investments by year and type.

<b>Qualified Investments Whole Bank</b>					
<b>Qualifying Category</b>	<b>Activity Year</b>				<b>Totals Per Category</b>
	<i>Prior Period</i>	<i>2013</i>	<i>2014</i>	<i>YTD 2015</i>	
Affordable Housing:					
Number	5	12	3	1	21
Dollar Amount (000s)	1,075	2,526	1,230	1,942	6,773
CD Organizations:					
Number	0	0	0	0	0
Dollar Amount (000s)	0	0	0	0	0
Economic Development:					
Number	0	0	2	6	8
Dollar Amount (000s)	0	0	2,276	8,640	10,916
Revitalize or Stabilize:					
Number	3	10	1	0	14
Dollar Amount (000s)	1,063	2,721	145	0	3,929
Abandoned/Foreclosed Homes:					
Number	0	0	0	0	0
Dollar Amount (000s)	0	0	0	0	0
<b>Totals Per Year:</b>					
<b>Number</b>	<b>8</b>	<b>22</b>	<b>6</b>	<b>7</b>	<b>43</b>
<b>Dollar Amount (000s)</b>	<b>2,138</b>	<b>5,247</b>	<b>3,651</b>	<b>10,581</b>	<b>21,618</b>

Source: Bank Records.

### ***Other Performance Criteria***

The institution further demonstrated good responsiveness to the assessment areas' credit and community development needs, occasional use of innovative and complex investments, and used an adequate level of investments not routinely provided by the private sector. Although the majority of the bank's investments are not specifically within its AAs, these investments primarily serve a broader area that includes the bank's AAs and therefore qualify for credit. The bulk of the bank's qualified investments were in the form of Tennessee Housing Development Agency (THDA) bonds and Small Business Administration (SBA) SBIC/SBAP securities. The following are examples of the bank's qualified investments.

- ***Affordable Housing*** - bank has 5 THDA bonds that remain outstanding from a July 2012 investment; these bonds have a current book value of \$1,075,442. THDA is a state agency that provides financing for affordable housing to low- and moderate-income families state-wide.
- ***Economic Development*** – bank invests in bonds funding SBA's Small Business Investment Company Program (SBIC securities) and CDC/504 Loan Program (SBAP securities), both of which qualify as a CRA investment and support economic development through the provision of financial expertise, technical assistance, long-term loans and/or venture capital to small businesses. The bank made 8 such investments totaling \$10,916,009 during the review period.

- **Affordable Housing** - bank purchased a \$1,941,863 FNMA mortgage pass through security that financed a 72-unit low-income apartment unit in Sumner County, which is just outside of the bank's designated assessment area.
- **Revitalize and Stabilize** - bank made qualified investments outside its AAs, but within its local regional area, through the purchase of 10 municipal bonds totaling \$2,661,131 (in 2013 and 2014). The bank has 2 such similar bonds with a current book value of \$661,446 that remain outstanding from the prior period. These bonds provided funding for construction, improvement, and equipment for schools and municipal infrastructure projects that revitalize and stabilize low-, moderate-, or distressed/underserved middle-income areas; and funded industrial development projects that created or retained jobs.

## **SERVICES TEST**

The bank demonstrated a good record of performance for the bank as a whole regarding the Service Test. An excellent record of providing retail banking services and an adequate record of community development services support this rating. The bank's *Delivery Systems* are conveniently located and readily accessible to all portions of the assessment area, and *Business Hours and Services* are tailored to the convenience and needs of the assessment areas, particularly moderate-income geographies. Citizens Bank provides an adequate level of *Community Development Services* in the assessment areas. On December 13, 2013, former affiliate Liberty State Bank (Liberty, Tennessee) was merged and consolidated into Citizens Bank of Lafayette, adding 5 branches in DeKalb and Wilson Counties. No other branches have opened, and no branches have closed. Due to the recent merger, this evaluation does not include the former Traders Bank branches. For a description of the scope of the test, refer to Appendix C. The following is a detailed discussion of the bank's performance with respect to this test.

### **Retail Banking Services**

#### **Accessibility of Delivery Systems**

The delivery systems of Citizens Bank are readily accessible to geographies and individuals of different income levels in its assessment areas.

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

Prior to the merger with Traders Bank on April 20, 2015, Citizens Bank had a total of 15 offices and 12 ATMs throughout the combined assessment areas. None of the ATMs accept deposits. Seven of the bank's offices are located in moderate-income census tracts, and eight offices are located in middle-income census tracts, and six of those tracts are classified as distressed middle-income geographies. The percentage of offices in moderate income geographies reflects an excellent branch network distribution illustrating the bank being very responsive to low- or moderate- income individuals and geographies. In addition, five of the bank's ATMs are located in moderate-income tracts, while four are located in distressed middle-income tracts. The bank's offices are conveniently located and readily accessible to all portions of the bank's assessment

areas. All of the bank's offices offer expanded lobby and drive-through hours on Friday, and 13 of the 15 offices are open on Saturday. Refer to the table below.

Distribution of All Offices and ATMs								
Type of Geography	Number of Census Tracts		Number of Households		Number of Offices		Number of ATMs	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	12	44.4	18,785	43.2	7	46.7	5	41.7
Middle	15	55.6	24,734	56.8	8	53.3	7	58.3
Upper	0	0.0	0	0	0	0.0	0	0.0
<b>Totals</b>	<b>27</b>	<b>100.0</b>	<b>43,519</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>

Source: Bank Data, 2010 U.S. Census

### *Alternative Delivery Systems*

The bank's alternative delivery systems in moderate- income geographies or to low- and moderate- income individuals reflects good performance. In addition to the 12 ATMs noted above, customers of Citizens Bank may access their accounts free of charge through any MoneyPass ATM nationwide. The MoneyPass network offers thousands of surcharge-free ATMs coast-to-coast.

With respect to the Nashville MSA assessment area, there are 9 offices and 8 ATMs. Seven of the offices and 5 of the ATMs are located in moderate-income census tracts. The locations of the bank's branches and ATMs in the Nashville MSA assessment area are centrally located and readily accessible to all portions of the area, particularly the moderate-income geographies and low- and moderate- income individuals. Refer to the following table.

Distribution of Branches and ATMs in the Nashville MSA AA								
Type of Geography	Number of Census Tracts		Number of Households		Number of Offices		Number of ATMs	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	64.7	17,872	63.6	7	77.8	5	62.5
Middle	6	35.3	10,213	36.4	2	22.2	3	37.5
Upper	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>17</b>	<b>100.0</b>	<b>28,085</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>

Source: Bank Data, 2010 U.S. Census

### *Changes in Branch Locations*

The bank did not open or close any offices since the prior evaluation. However, the bank acquired five branches through its acquisition of Liberty State Bank. The bank had 10 offices at the prior evaluation. One census tract was re-classified from a moderate-income tract to a middle- income tract. There have been no adverse changes in the bank's delivery systems.

### ***Range of Services in Low-, Moderate-, Middle- and Upper Income Areas***

The institution has a good record of providing its range of services in all income geographies in its assessment area. Good accessibility of a variety of services, particularly in moderate- income areas supports this conclusion. Bank services, including business hours, do not vary in a way that inconveniences its assessment areas, particularly moderate-income geographies, and low- and moderate- income individuals.

The bank has excellent distribution of its offices with 47 percent located in moderate income geographies. The bank's hours do not vary in a way that inconveniences and portion of the assessment area. The range of services include Citizens Bank offers a wide variety of deposit accounts, including free consumer checking. The bank offers a free telephone banking that allows customers 24-hour access to their loan and deposit accounts. The service allows for making loan payments, loan and deposit account balance inquiries, and stop payments on deposit accounts. Additionally, the bank operates a website where it offers online banking services. Through online banking, customers can view balances, view transaction history, transfer funds between accounts, pay bills, and view previous statements. Its mobile banking product provides additional access and flexibility, including a mobile deposit option. For commercial and business customers, Citizens offers a full range of banking services, including online cash management, merchant card services, sweep services, and merchant remote deposit capture. The bank also offers a small dollar loan program to assist consumers from avoiding reliance on high cost debt alternatives in the community.

### **Community Development Services**

Citizens Bank provides an adequate level of community development services in its assessment areas. The bank has a number of directors and officers that provide their management and financial expertise to provide financial education to low-and moderate-income families and individuals, promote economic development and job creation; revitalize and stabilize economically disadvantaged areas; and provide food, shelter, and other assistance to low-income families and individuals. In addition, a bank officer is involved in various adult education programs and financial education programs in the local elementary and high schools.

The following table shows that the bank provided a total of 71 community development services since the prior evaluation. Considering the length of time since the prior evaluation and the average number of offices operated during this period, this figure equates to an average of 2.27 services provided by office, per year.

<b>Community Development Services</b>				
<b>Qualifying Category</b>	<b>Activity Year (Number of Services)</b>			<b>Totals Per Category</b>
	<b>2013</b>	<b>2014</b>	<b>YTD 2015</b>	
Affordable Housing	1	1	1	<b>3</b>
CD Organizations	8	34	14	<b>56</b>
Economic Development	3	3	3	<b>9</b>
Revitalize or Stabilize	1	1	1	<b>3</b>
Abandoned/Foreclosed Homes	0	0	0	<b>0</b>
<b>Totals Per Year</b>	<b>13</b>	<b>39</b>	<b>19</b>	<b>71</b>

Source: Bank Records.

The following are examples of the bank's community development services:

- An executive officer serves on the Board of Directors for the Macon County Joint Economic and Community Development Board. This organization encourages economic development through job creation, thereby providing employment opportunities for residents in the community.
- An executive officer serves on the Board of Directors of the Macon County Education Foundation, whose mission is to enhance the growth and development of the citizens of Macon County by expanding educational opportunities.

Most notably is Citizens Bank of Lafayette provision of financial education to schools in the highest need communities at no cost to the students, schools, or taxpayers. On June 2, 2006, a Tennessee bill was signed into law requiring a program of instruction on financial literacy within courses currently offered in public high schools to include, among other things, instructions on balancing a checkbook, completing a loan application, managing debt, savings, and investing. This bill requires the department to incorporate the elements of the financial literacy program into high school learning standards. This state graduation requirement became effective for the 9th grade class of 2009-2010 and thereafter.

To assist area schools in meeting this requirement, Citizens Bank sponsored area high schools with the Literacy in Financial Education (LiFE) Program, a media learning platform that uses the latest technology, video, animations, 3-D gaming, avatars, and social networking to bring complex financial concepts to life for today's digital generation. The course aligns with state, national, and Jump\$tart Coalition financial literacy standards and covers credit score, insurance, credit cards, taxes, investing, savings, 401Ks, and mortgages.

The bank's program started with 7 schools in spring 2013 and expanded to 9 schools the following academic year. In the most recent academic year (2014-2015) 10 schools participated with 734 students impacted; 601 of these students were from economically disadvantaged high schools in the bank's AAs.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES**

Examiners did not identify any discriminatory or other illegal credit practices inconsistent with the bank's helping to meet community credit needs; therefore, this issue did not affect the overall rating.

## APPENDIX A - GLOSSARY

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

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

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county. Census tract boundaries normally follow visible features, but they may follow governmental unit boundaries and other non-visible features in some instances. They always nest within counties. Census tracts average about 4,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogenous for population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms;
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or
- (5) Enable or facilitate projects or activities that address needs regarding foreclosed or abandoned residential properties in designated target areas.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

**Family Income:** Includes the income of all members of a family that are age 15 and older.

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Disclosure Loan Application Register (HMDA LAR):** The HMDA LARs record all applications received for residential purchase, refinance, home improvement, and temporary-to-permanent construction loans.

***Home Mortgage Loans:*** *Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans to purchase manufactured homes, and refinancings of home improvement and home purchase loans.*

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

**Household Income:** Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households are only one person, median household income is usually less than median family income.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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

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

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area:** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

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

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

## **APPENDIX B - LARGE BANK PERFORMANCE CRITERIA**

### **Lending Test**

The Lending Test evaluates the institution's record of helping to meet the credit needs of its AA(s) by considering an institution's home mortgage, small business, small farm, and community development lending. Performance under the Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating. The institution's lending performance is evaluated pursuant to the following criteria:

- 1) The volume of lending activity;
- 2) The proportion of lending within the AA(s);
- 3) The dispersion of loans and the number and amount of loans in low-, moderate-, middle- and upper-income geographies in the AA(s);
- 4) The distribution of loans among borrowers of low-, moderate-, middle- and upper-income levels and businesses (including farms) of different sizes;
- 5) The volume of community development lending; and
- 6) The use of innovative or flexible lending practices.

### **Community Development Lending**

The institution's community development lending activities are evaluated pursuant to the following criteria:

- 1) The extent to which community development lending opportunities have been made available to the institution;
- 2) The responsiveness of the institution's community development lending; and
- 3) The extent of leadership the institution has demonstrated in community development lending.

### **Innovative and Flexible Lending Practices**

The institution's innovative and flexible lending practices are evaluated pursuant to the following criteria:

- 1) The degree to which the loans serve low- and moderate-income creditworthy borrowers in new ways or serve groups of creditworthy borrowers not previously served by the institution; and
- 2) The success of each product serving low- and moderate-income borrowers, including the number and dollar volume of loans originated during the review period.

## **Investment Test**

The Investment Test evaluates the institution's record of helping to meet the credit needs of its AA(s) through its use of qualified investments that benefit the AA(s) or a broader statewide or regional area that includes the institution's AA(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The institution's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of investments to credit and community development needs; and
- 4) The degree to which the qualified investments are not routinely provided by private investors.

## **Service Test**

The Service Test evaluates the institution's record of helping to meet the credit needs of its AA(s) by analyzing both the availability and effectiveness of the institution's systems for delivering retail banking services and the extent and innovativeness of its community development services. The institution's retail banking services are evaluated pursuant to the following criteria:

- 1) The distribution of the institution's branches among geographies of different income levels;
- 2) The record of opening and closing branches, particularly branches located in low- and moderate-income geographies or that primarily serve low- or moderate-income individuals;
- 3) The availability and effectiveness of alternate systems for delivering retail banking services; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

In addition, the institution's community development services are evaluated pursuant to the following criteria:

- 1) The extent of community development services offered and used;
- 2) The innovativeness of community development services, including whether they serve low- and moderate-income customers in new ways or serve groups not previously served;
- 3) The degree to which they serve low- and moderate-income areas or individuals; and
- 4) Their responsiveness to available opportunities for community development services.

## APPENDIX C - SCOPE OF EXAMINATION

<b>Citizens Bank of Lafayette</b>
<b>SCOPE OF EXAMINATION:</b> Reviewed bank performance under the Lending, Investment, and Service Tests.
<b>TIME PERIOD REVIEWED:</b> December 10, 2012, to July 28, 2015
<b>PRODUCTS REVIEWED:</b> HMDA Loans (Home Mortgage Loans): 2013 & 2014 CRA Data (Small Business & Small Farm): 2013 & 2014 Qualified Community Development Loans: 12/10/2012 to 7/28/2015. Qualified Community Development Investments: From Inception to 7/28/2015. Qualified Community Development Donations/Grants: 12/10/2012 to 7/28/2015. Qualified Community Development Services: 12/10/2012 to 7/28/2015.

<b>LIST OF AFFILIATES AND PRODUCTS REVIEWED</b>		
<b>AFFILIATE(S):</b>	<b>AFFILIATE RELATIONSHIP:</b>	<b>PRODUCTS REVIEWED:</b>
Citizens Bancorp Investment, Inc.	Holding Company	N/A
Citizens Insurance Services, Inc.	Bank Subsidiary	N/A
Town and Country Finance Company, Inc.	Holding Company Subsidiary	N/A

<b>LIST OF AAs AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA:</b>	<b>TYPE OF EXAMINATION:</b>	<b>BRANCHES VISITED:</b>	<b>OTHER INFORMATION:</b>
Nashville MSA AA	Full Scope	Main Office	N/A
Non-MSA AA	Limited Scope	None	N/A

## APPENDIX D

### DATA TABLES

**Institution ID:** Citizens Bank

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: CITIZENS BANK												
Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013												
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Citizens - Lafayette - NASHVILLE MSA AA	72.79	157	8,275	120	3,949	159	6,053	15	5,950	436	18,277	55.85
<b>Limited Review:</b>												
Citizens - Lafayette - NONMSA AA	27.21	69	3,897	43	1,074	51	1,841	7	3,748	163	6,812	44.15

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from December 10, 2012 – July 28, 2015.

\*\*\* Deposit Data as of August 06, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: Citizens Bank

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: CITIZENS BANK					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Citizens - Lafayette - NASHVILLE MSA AA	70	70.00	0.00	0.00	59.17	87.14	40.83	12.86	0.00	0.00	0.00	56.46	43.54	0.00
<b>Limited Review:</b>														
Citizens - Lafayette - NONMSA AA	30	30.00	0.00	0.00	6.33	13.33	93.67	86.67	0.00	0.00	0.00	9.55	90.45	0.00

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Citizens Bank

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: CITIZENS BANK					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Citizens - Lafayette - NASHVILLE MSA AA	26	83.87	0.00	0.00	59.17	92.31	40.83	7.69	0.00	0.00	0.00	57.24	42.76	0.00
<b>Limited Review:</b>														
Citizens - Lafayette - NONMSA AA	5	16.13	0.00	0.00	6.33	0.00	93.67	100.00	0.00	0.00	0.00	9.62	90.38	0.00

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Citizens Bank

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CITIZENS BANK				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013					Aggregate HMDA Lending (%) by Tract Income <sup>1</sup>			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp	
	#	% of Total <sup>2</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans <sup>4</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans					
<b>Full Review:</b>															
Citizens - Lafayette - NASHVILLE MSA AA	60	64.52	0.00	0.00	59.17	85.00	40.83	15.00	0.00	0.00	0.00	59.54	40.46	0.00	
<b>Limited Review:</b>															
Citizens - Lafayette - NONMSA AA	33	35.48	0.00	0.00	6.33	15.15	93.67	84.85	0.00	0.00	0.00	7.29	92.71	0.00	

<sup>1</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>2</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>3</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

<sup>4</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Citizens Bank

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: CITIZENS BANK					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013				Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans				
<b>Full Review:</b>														
Citizens - Lafayette - NASHVILLE MSA AA	1	50.00	0.00	0.00	80.82	100.00	19.18	0.00	0.00	0.00	0.00	75.00	25.00	0.00
<b>Limited Review:</b>														
Citizens - Lafayette - NONMSA AA	1	50.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	100.00	0.00

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multi-family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: Citizens Bank

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: CITIZENS BANK					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013				Aggregate Lending (%) by Tract Income*			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans				
<b>Full Review:</b>														
Citizens - Lafayette - NASHVILLE MSA AA	120	73.62	0.00	0.00	66.91	90.83	33.09	9.17	0.00	0.00	0.00	22.83	46.74	30.43
<b>Limited Review:</b>														
Citizens - Lafayette - NONMSA AA	43	26.38	0.00	0.00	6.26	20.93	93.74	79.07	0.00	0.00	0.00	7.14	92.86	0.00

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2013).

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**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS														Geography: CITIZENS BANK		Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013								
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp										
<b>Full Review:</b>																								
Citizens - Lafayette - NASHVILLE MSA AA	159	75.71	0.00	0.00	58.75	86.16	41.25	13.84	0.00	0.00	0.00	63.67	32.21	4.12										
<b>Limited Review:</b>																								
Citizens - Lafayette - NONMSA AA	51	24.29	0.00	0.00	10.14	9.80	89.86	90.20	0.00	0.00	0.00	6.49	93.51	0.00										

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2013).

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**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: CITIZENS BANK					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>†</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Citizens - Lafayette - NASHVILLE MSA AA	70	70.00	30.45	22.39	23.20	14.93	21.39	11.94	24.97	50.75	20.38	31.20	24.16	24.26
<b>Limited Review:</b>														
Citizens - Lafayette - NONMSA AA	30	30.00	24.77	13.79	16.08	24.14	23.84	20.69	35.30	41.38	11.89	24.48	25.17	38.46

<sup>†</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by BANK.

<sup>†</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: CITIZENS BANK					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>†</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Citizens - Lafayette - NASHVILLE MSA AA	26	83.87	30.45	24.00	23.20	32.00	21.39	28.00	24.97	16.00	21.92	29.45	23.29	25.34
<b>Limited Review:</b>														
Citizens - Lafayette - NONMSA AA	5	16.13	24.77	20.00	16.08	0.00	23.84	40.00	35.30	40.00	22.45	28.57	18.37	30.61

<sup>†</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by BANK.

<sup>†</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Citizens Bank

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: CITIZENS BANK					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>1</sup>			
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>5</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Citizens - Lafayette - NASHVILLE MSA AA	60	64.52	30.45	27.12	23.20	30.51	21.39	25.42	24.97	16.95	18.55	24.81	24.60	32.04
<b>Limited Review:</b>														
Citizens - Lafayette - NONMSA AA	33	35.48	24.77	12.12	16.08	33.33	23.84	9.09	35.30	45.45	8.56	21.27	20.78	49.39

<sup>1</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>2</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>3</sup> Percentage of Families is based on the 2010 Census information.

<sup>4</sup> As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by BANK.

<sup>5</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Citizens Bank

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CITIZENS BANK			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Citizens - Lafayette - NASHVILLE MSA AA	120	73.62	73.06	99.17	95.00	3.33	1.67	3,797	1,800
<b>Limited Review:</b>									
Citizens - Lafayette - NONMSA AA	43	26.38	76.58	100.00	97.67	0.00	2.33	275	166

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Institution ID: Citizens Bank

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: CITIZENS BANK			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Citizens - Lafayette - NASHVILLE MSA AA	159	75.71	100.00	98.74	92.45	5.03	2.52	270	215
<b>Limited Review:</b>									
Citizens - Lafayette - NONMSA AA	51	24.29	97.70	100.00	90.20	7.84	1.96	77	62

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Institution ID: Citizens Bank

**Table 14. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: CITIZENS BANK				Evaluation Period: DECEMBER 10, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																	
Citizens - Lafayette - NASHVILLE MSA AA	55.85	9	60.00	0	7	2	0.00	0	0	0	0	0	0	0.00	63.14	36.86	0.00
<b>Limited Review:</b>																	
Citizens - Lafayette - NONMSA AA	44.15	6	40.00	0	0	6	0.00	0	0	0	0	0	0	0.00	6.00	94.00	0.00

\*Excludes Traders Bank branches recently purchased.

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**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM		Geography: CITIZENS BANK						Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2013									
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Citizens - Lafayette - NASHVILLE MSA AA	55.85	9	60.00	0	7	2	0	0	0	0	5	3	0	0.00	63.14	36.86	0.00
<b>Limited Review:</b>																	
Citizens - Lafayette - NONMSA AA	44.15	6	40.00	0	0	6	0	0	0	0	0	4	0	0.00	6.00	94.00	0.00

**Institution ID:** Citizens Bank

**Citizens - Lafayette - NASHVILLE MSA AA**

Demographic Information for Full Scope Area: Citizens - Lafayette - NASHVILLE MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.00	64.71	35.29	0.00	0.00
Population by Geography	76,232	0.00	63.14	36.86	0.00	0.00
Owner-Occupied Housing by Geography	20,172	0.00	59.17	40.83	0.00	0.00
Business by Geography	5,267	0.00	66.91	33.09	0.00	0.00
Farms by Geography	383	0.00	58.75	41.25	0.00	0.00
Family Distribution by Income Level	19,529	30.45	23.20	21.39	24.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,476	0.00	71.45	28.55	0.00	0.00
Median Family Income		\$63,006	Median Housing Value		\$118,006	
FFIEC Adjusted Median Family Income for 2013		\$62,300				
Households Below Poverty Level		19%				

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

Source: 2010 US Census and 2013 FFIEC updated MFI

**Institution ID:** Citizens Bank

**Citizens - Lafayette - NONMSA AA**

Demographic Information for Limited Scope Area: Citizens - Lafayette - NONMSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.00	10.00	90.00	0.00	0.00
Population by Geography	38,222	0.00	6.00	94.00	0.00	0.00
Owner-Occupied Housing by Geography	11,549	0.00	6.33	93.67	0.00	0.00
Business by Geography	2,524	0.00	6.26	93.74	0.00	0.00
Farms by Geography	217	0.00	10.14	89.86	0.00	0.00
Family Distribution by Income Level	10,557	24.77	16.08	23.84	35.30	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,313	0.00	9.14	90.86	0.00	0.00
Median Family Income		45,046	Median Housing Value		\$95,761	
FFIEC Adjusted Median Family Income for 2013		46,700				
Households Below Poverty Level		21%				

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

Source: 2010 US Census and 2013 FFIEC updated MFI