

## **PUBLIC DISCLOSURE**

**November 27, 2023** 

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

## **Primis Bank**

Glen Allen, Virginia

## Federal Reserve Bank of Richmond Richmond, Virginia

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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3325759

10900 Nuckols Road

Glen Allen, VA 23060

Federal Reserve Bank of Richmond P. O. Box 27622 Richmond, Virginia 23261

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## **INSTITUTION RATING**

## INSTITUTION'S CRA RATING: Primis Bank is rated "SATISFACTORY."

The following table indicates the performance level of <u>Primis Bank</u> with respect to the lending, investment, and service tests.

PERFORMANCE	NAME OF FINANCIAL INSTITUTION PERFORMANCE TESTS					
LEVELS						
	Lending Test*	Service Test				
Outstanding						
High Satisfactory						
Low Satisfactory	X	X	X			
Needs to Improve						
Substantial Noncompliance						

<sup>\*</sup> The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Major factors supporting the institution's rating include:

- Lending activity reflects a good responsiveness to local credit needs when taking into account the number and amount of home mortgage and small business loans in the bank's assessment areas.
- An adequate percentage of the institution's reported Home Mortgage Disclosure Act (HMDA), small business, and small farm loans were originated within the bank's assessment areas.
- While the bank's geographic distribution performance varies by assessment area and product type, the overall geographic distribution of loans reflects good penetration throughout the states and multi-state area in which the bank operates.
- The bank's borrower distribution performance also varies by assessment area and product type. The overall distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The bank exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and geographies as well as very small businesses.
- The bank extended and/or renewed an adequate level of community development loans within its assessment areas given its overall capacity to extend such loans.

- During the evaluation period, the bank made limited use of flexible lending practices in serving assessment area credit needs.
- The bank maintains an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and is rarely in a leadership position. Overall, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.
- The bank exhibits adequate responsiveness to credit and community development needs through its investment activity.
- Delivery systems and branch locations are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas.
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- Banking services do not vary in a way that inconveniences its assessment areas, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- During the evaluation period, the bank provided an adequate level of qualified community development services given its capacity and available opportunities.

#### INSTITUTION

## **DESCRIPTION OF INSTITUTION**

Primis Bank (PB) is is a wholly owned subsidiary of Primis Financial Corporation, both of which are headquartered in Glen Allen, Virginia. PB received a Satisfactory rating at its prior Community Reinvestment Act.

PB currently operates 25 full-service branch offices serving eight assessment areas within the Commonwealth of Virginia, the District of Columbia, and portions of Maryland. Since the previous evaluation the bank has closed 17 full-service branch locations. Of these locations, one was located in a moderate-income census tract. Tables reflecting the current composition of the bank's eight assessment areas and recent branching activity are included in *Appendix E*.

As of September 30, 2023, the bank had assets totaling \$3.8 billion, of which \$3.2 billion were net loans and \$228.9 million were securities. Deposits totaled \$3.3 billion as of the same time period. Various loan and deposit products are available through the institution including including loans for residential mortgage, consumer, and business purposes. The composition of the loan portfolio using gross loans, as of September 30, 2023, is represented in the following table:

# Loan Type 9/30/2023 \$(000s) % Secured by 1-4 Family dwellings 727,460 22.7 Multifamily 129,586 4.0

172,071

1,533,347

562,166

6,381

5.4

47.8

17.5

0.2

## Composition of Loan Portfolio

All Other 79,622 2.5

Total 3,210,633 100.0

As reflected in the preceding table, PB is an active commercial and residential mortgage lender. The bank offers other loans such as construction and development, consumer, and multifamily lending. Based on its financial capacity, there are no significant limitations on the bank's ability to meet the

Construction and Development

Agricultural Loans/ Farmland

NonFarm NonResidential
Consumer Loans and Credit Cards

Commercial & Industrial/

## **SCOPE OF EXAMINATION**

credit needs within the communities it serves.

The institution was evaluated using the interagency examination procedures developed by the Federal Financial Institutions Examination Council (FFIEC) for large institutions. PB is required to report certain information regarding its home mortgage lending in accordance with the Home Mortgage Disclosure Act (HMDA) as well as, collect loan data form small business and small farm loans in accordance with CRA. Consistent with these procedures, residential mortgage and small business lending activity reported by the bank from January 1, 2021 through December 31, 2022 were identified as primary product lines given the number and dollar volume of loans originated. PB reported 29 small farms loans totaling approximately \$4.7 million within its assessment areas during 2021 and 2022. Given the limited volume of small farm lending within the bank's assessment areas during the review period, analyses of the geographic and borrower distribution of small farm lending was not warranted,

The evaluation also considers any community development loans, investments, donations, and services originated, renewed, or purchased since the previous examination dated November 29, 2021. In addition, all qualified community development investments funded as of the evaluation date were considered, regardless of when made.

To help determine the availability of community development opportunities in specific assessment areas, the CRA public evaluations of other financial institutions operating in these same areas were reviewed. Further, in some markets, contact with members of the community were made to discern information about local economic conditions, area credit needs, performance of banks in the assessment area, as well as potential community development opportunities.

Due to its branch locations, an overall rating and ratings for the lending, investment, service tests are assigned to the institution, the multistate assessment area and the Commonwealth of Virginia. The state rating is based only on the performance in the assessment areas subject to full scope review, excluding the activity in the multistate assessment area, as it is rated separately. These ratings are weighted primarily according to bank activity as measured by relative lending and deposit volume and the number of branches. For assessment areas that are reviewed utilizing the limited-scope examination procedures, a determination is made as to whether performance is consistent with the overall state rating.

The bank delineates eight assessment areas. Based upon relative market size as determined by loan activity, proportion of bank deposits, area population and location, full scope evaluation procedures were applied to the following four assessment areas:

- Washington-Arlington-Alexandria, DC-VA-MD-WV MSA
- Richmond, VA MSA
- Virginia Beach-Norfolk-Newport News, VA
- Essex, VA NonMSA

The remaining four assessment areas were subject to limited scope reviews as provided for by the FFIEC examination procedures. *Appendix D* includes data about the distribution of lending, branches and deposits by assessment area.

The institution's overall rating is based on the ratings assigned to the multistate metropolitan area and the Commonwealth of Virginia. These ratings are weighted primarily according to bank activity as measured by relative lending and deposit volume and the number of branches. In reaching conclusions for each of the performance tests, PB's ratings within the Commonwealth of Virginia received the greatest weight, as it comprised 77.9%, 84%, and 88.2% of the loan volume (by dollar), number of branches, and deposit volume, respectively. According to FFIEC examination procedures, the Lending Test performance accounts for half of the overall rating, while the Investment and Service Tests are equally weighted and combined, account for the remaining half of the overall rating. In all cases, conclusions also take into consideration relevant performance context factors.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## **LENDING TEST**

The bank's overall Lending Test performance is rated "Low Satisfactory". This rating considers the bank's lending activity, assessment area concentration, geographic and borrower distribution performances, responsiveness to credit needs, community development lending, and product innovation. These components are discussed in subsequent sections.

Reported home mortgage data, as well as reported small business data from calendar years 2021 and 2022 were fully analyzed and considered in this evaluation. When evaluating a bank's residential mortgage lending performance, relevant area demographic data from American Community Survey (ACS) is used as a proxy for demand. While ACS data is collected and published by the U.S. Census Bureau on an annual basis, the demographic data relied upon in this performance evaluation is based on ACS data that is updated every five years. As such, when evaluating the bank's performance, relevant area demographic data from 2020 ACS is used as a proxy for loan demand. Dun & Bradstreet (D&B) business demographic data from 2021 and 2022 is considered when evaluating the bank's small business lending performance.

Aggregate loan data is also used as a proxy for demand when evaluating the bank's lending performance. Aggregate HMDA data includes all activity by lenders subject to reporting residential mortgage data within the bank's assessment areas. Aggregate data serves as a meaningful proxy for residential mortgage loan demand in the area. Aggregate CRA data includes all activity by lenders subject to reporting small business loan data within the bank's assessment areas.

HMDA and small business data from calendar years 2021 and 2022 are presented in the analysis tables. In instances where HMDA or small business distribution performance in 2022 varies significantly from the performance noted during 2021, such variance and the corresponding impact on the overall performance is discussed. Additionally, analysis tables for limited-scope areas are provided in *Appendix C*. While small farm loans were included in the lending activity and comparison of credit extended inside and outside of the bank's assessment areas, these loans were excluded from geographic and borrower distribution performance analyses for all assessment areas based on their limited volume.

For the analysis of small business loans by borrower revenue, during 2021, the Paycheck Protection Program (PPP) lending had a significant impact on the bank's reported data as well as the aggregate data during that year. As part of the PPP loan program, lenders were not required to consider borrower revenue as underwriting criteria; consequently, large volumes of small business loans were originated during 2021 for which revenue was unknown.

## **Lending Activity:**

Overall, the bank's lending levels reflect good responsiveness to credit needs, based on the lending activity analyzed under the Lending Test. The total number and dollar volume of loans were considered in arriving at the lending activity conclusion. In addition, loan volume by assessment area was generally comparable with the bank's share of deposits in its assessment areas.

Rated Area	Lending Activity
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	Adequate
Commonwealth of Virginia	Good
Overall Lending Test Rating	Good

Since December 31, 2021, PB's assets, net loans, and deposits have increased by 11.9%, 37.4%, and 18.4% respectively. Within the bank's assessment areas, during the evaluation period, the number of small business loans is greater than the number of HMDA-reportable loans, while the total dollar volume of HMDA-reportable loans is only slightly lower than the total dollar volume of small business loans.

## **Summary of Lending Activity**

Loan Type	#	%	\$(000)	% of \$
Home Improvement	77	2.07	8,195	1.06
Home Purchase	368	9.87	213,306	27.66
Multi-Family Housing	14	0.38	27,065	3.51
Refinancing	237	6.36	99,797	12.94
Loan Purpose Not Applicable	0	0	0	0
Other Purpose Closed-End	89	2.39	11,776	1.53
Other Purpose LOC	0	0	0	0
Total HMDA related	785	21	360,139	47
Small Business	2,913	78.14	406,205	52.67
Small Farm	30	0.00	0	0.00
TOTAL LOANS	3,728	100	771,194	100

<sup>\*</sup> This table includes affiliate loans only if originated or purchased within the bank's assessment areas.

When compared to 2022 aggregate data,, the institution ranked 156<sup>th</sup> of 1,007 reporters of mortgage lending with a .08% market share and 34<sup>th</sup> of 280 reporters of small business loans with a .15% market share. All market share rankings consider originated and purchased loans. Lending activity is discussed in more detail in the multistate MSA, state, and full-scope assessment area sections of this report.

## **Assessment Area Concentration:**

To determine the institution's volume of lending within its assessment areas, the geographic location of the bank's originations and purchases for specific loan types from January 1, 2022, through December 31, 2023 were considered. The lending distribution inside and outside of the bank's combined assessment areas is reflected in the following table.

Loan Type	Inside			Outside				
Loan Type	#	%	\$(000)	%	#	%	\$(000)	%
Home Purchase	161	43.8	62,272	29.2	207	56.3	151,034	70.8
Home Improvement	73	94.8	7,533	91.9	4	5.2	662	8.1
Refinancing	169	71.3	42,915	43.0	68	28.7	56,882	57.0
Multi-Family Housing	10	71.4	15,877	58.7	4	28.6	11,188	41.3
Loan Purpose Not Applicable	0	0.0	0	0.0	0	0.0	0	0.0
Other Purpose Closed/Exempt	85	95.5	11,195	95.1	4	4.5	581	4.9
Other Purpose LOC	0	0.0	0	0.0	0	0.0	0	0.0
Total HMDA related	498	63.4	139,792	38.8	287	36.6	220,347	61.2
Small Business	2,213	76.0	275,557	67.8	700	24.0	130,648	32.2
Small Farm	29	96.7	4,682	96.5	1	3.3	168	3.5
TOTAL LOANS	2,740	73.5	420,031	54.5	988	26.5	351,163	45.5

As indicated in the table, a majority of the total number (73.5%) and dollar amount (54.5%) of loans were extended to borrowers within the bank's assessment areas.

## Geographic and Borrower Distribution:

When evaluating the geographic and borrower distribution for a specific loan category within an assessment area, primary emphasis is placed on the number of loans originated or purchased. To arrive at an overall assessment area level conclusion regarding the distribution of lending, performance in each loan category is then weighted by the dollar volume and strength of performance for each category extended in the assessment area. The geographic and borrower distribution performance of HMDA loans focused on Home Purchase, Home Improvement, Refinancing, and Multifamily loan categories. Performance for the Not Applicable, Other Purpose Closed/Exempt, and Other Line of Credit loan categories were not evaluated because not all HMDA reporters are required to report each loan category. When the performance of multiple assessment areas is considered to reach a statewide, multistate, and/or institutional rating, the overall level of performance from each assessment area subject to full-scope review is weighted primarily according to the dollar volume of originations during the review period.

The bank's overall geographic distribution of loans in low- and moderate-income census tracts is good, and its lending patterns do not reveal any unexplained gaps in any of the assessment areas. Overall, the bank's distribution of loans to low- and moderate-income borrowers and businesses of different sizes is adequate. Further details with respect to the geographic and borrower distributions are provided within each assessment area discussion.

## **Community Development Lending:**

The bank originates or renews an adequate level of community development loans. Community development lending opportunities within the bank's full-scope assessment areas are reasonably available in the metropolitan assessment areas (Washington-Arlington-Alexandria, DC-MD-VA MSA; Richmond, VA; Virginia Beach-Norfolk-Newport News, VA MSA), while opportunities are limited in the bank's remaining full-scope nonmetropolitan assessment area (Essex, VA NonMSA). This conclusion is based, in part, upon the review of other public evaluations for institutions serving these assessment areas, as well as information from affordable housing, economic development, community

development financial institutions, and community service officials working within the full-scope assessment areas. Further, nonmetropolitan assessment areas are less densely populated and contain fewer low- and moderate-income census tracts, which can limit the availability of community development opportunities. Notwithstanding these limitations, the bank faces no constraints relative to its size and business strategy in making community development loans.

Rated Area	Community Development Lending
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	Makes few if any
Commonwealth of Virginia	Adequate
Overall Lending Test Rating	Adequate

The bank originated or renewed a total of 11 community development loans totaling approximately \$29.9 million across all its assessment areas and/or statewide areas. These loans were made to borrowers who develop affordable housing, offer community services to low- and moderate-income individuals, promote economic development, and/or create jobs within the bank's markets. Community development loans that benefit the multistate, statewide, and/or assessment area levels are discussed within the corresponding sections of this evaluation. The following table summarizes the number and dollar volume of HTB's community development lending by category.

Community Development Definition	#	\$
Affordable Housing	4	\$12.6 million
Community Service to Low/Moderate-Income People	1	\$3.2 million
Economic Development	6	\$14.1 million
Total	11	\$29.9 million

## **INVESTMENT TEST**

The institution's level of responding to community development needs through its investment activities is rated low satisfactory at the institutional level. This conclusion is driven by the low satisfactory ratings within the Commonwealth of Virginia and the multistate MSA. The institution also supports community development organizations by making charitable donations. During the evaluation period, the bank made charitable donations to community development organizations totaling approximately \$71,722 on a combined assessment area basis.

Rated Area		vestments		nations/ Frants	Investment Test Rating
	#	\$	#	\$	
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	5	\$11,486,312	2	\$5,150	Low Satisfactory
Commonwealth of Virginia	11	\$5,258,672	10	\$66,572	Low Satisfactory
Total	16	\$16,744,984	12	\$71,722	Low Satisfactory

As of November 27, 2023, PB maintained a securities portfolio of \$228.9 million; of which, the bank holds an adequate level of community development investments, comprised of 26 allocations from qualified investments, of which approximately \$36.8 million directly benefits regional or statewide areas that include one or more of the bank's assessment areas.

The bank's qualified investments that benefit areas within multiple states or multiple assessment areas include the following:

- \$2 million in three small business investment company (SBIC) funds. SBICs are licensed and regulated by the SBA and provide venture capital to small businesses facilitating community development. These funds provide capital to companies located across all of the institution's assessment areas.
- \$6 million invested in five affordable housing bonds. Proceeds of the bonds are used to finance multifamily properties that are affordable to low- and moderate-income families.

Qualified investments and donations targeting specific statewide areas and/or assessment areas are discussed within the corresponding sections of this evaluation.

## **SERVICE TEST**

PB's overall performance under the Service Test is rated Low Satisfactory. This rating considers the accessibility of delivery systems, reasonableness of hours and services, changes in branch office locations, and the level of community development services provided by the bank and its employees. The bank's products and service offerings are consistent and made available across all its assessment areas.

## **Accessibility of Delivery Systems:**

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the bank's assessment areas. In addition to branch locations, consideration was given to the distribution of stand-alone ATMS, which provide further ease of access to individuals in the bank's assessment areas. The bank's website and mobile banking application offer full functionality and extend the bank's ability to offer its products and services beyond its physical branch presence. Further, the bank offers mobile banking through its courier service, V1be banking in which the bank offers a courier service offering traditional banking services to small business customers within its assessment areas. The bank currently has 25 full-service branches with none being in low-income census tracts and four (16%) located in moderate-income tracts.

Rated Area	Accessibility of Delivery Systems
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	Reasonably Accessible
Commonwealth of Virginia	Reasonably Accessible
Overall Component Rating	Reasonably Accessible

## **Changes in Branch Locations:**

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or individuals. During the review period, PB closed 17 branch locations, of which 14 were within the full-scope assessment areas, as outlined in *Appendix E*. While the majority of the bank's branch closure activity was located within middle- and upper-income census tracts, one closure was in a moderate-income census tract. During the review period, the bank did not open or acquire any full-service branches.

Rated Area	Changes in Branch Locations
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	Adversely Affected
Commonwealth of Virginia	Generally Not Adversely Affected
Overall Component Rating	Generally Not Adversely Affected

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs:

The bank's business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly low- and moderate-income geographies or individuals. Most branch offices operate within standard weekday hours (9:00 a.m. to 5:00 p.m.) While the bank's extended hours and drive-thru availability vary by branch, the variance does not adversely impact low- and moderate-income geographies or individuals. Moreover, the bank offers the same suite of products and services throughout its entire branch network, including 24-hour ATM access, bank-by-mail and bank-by-phone services, mobile and online banking, contact-free mobile deposits, its V1be courier service, and cash management programs for small businesses. PB also offers a free checking account to all customers, including low- and moderate-income residents that features no monthly fee or minimum balance requirements.

Rated Area	Reasonableness of Business Hours and Services
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	Do Not Vary
Commonwealth of Virginia	Do Not Vary
Overall Component Rating	Do Not Vary

## **Community Development Services:**

Overall, PB and its employees provide an adequate level of community development services through the bank's assessment areas. Further discussion of community development services are discussed within the applicable assessment area sections of this evaluation. During the review period 16 employees provided community services at 16 different organizations throughout its assessment areas. The following table depicts the provision of community development services within the rated areas.

Rated Area	Community Development Services
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA	Adequate Level
Commonwealth of Virginia	Adequate Level
Overall Component Rating	Adequate Level

Overall, PB and its employees provide an adequate level of community development services through the bank's assessment areas. The following activities support community development within the State of Maryland:

- WETATi Academy: an employee serves on the board of this organization that aims to educate low- and moderate-income students, to prepare for employment, entrepreneurship, and future economic opportunities
- Neighborhood Housing Services of Baltimore: an employee serves on the board of this an
  organization that aims to achieve and maintain homeownership for low- and moderateincome individuals.

## FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. Adequate policies, procedures, and training programs have been developed to support nondiscrimination in lending activities. Retail banking services do not vary in a way that inconveniences any portion of the bank's assessment areas, including low- and moderate-income areas or people.

## MULTISTATE METROPOLITAN AREA

## CRA RATING FOR Washington-Arlington-Alexandria, DC-MD-VA<sup>1</sup> MSA: SATISFACTORY

The lending test is rated: <u>Low Satisfactory</u>
The investment test is rated: <u>Low Satisfactory</u>
The service test is rated: <u>Low Satisfactory</u>

Major factors supporting the rating include:

- Lending levels reflect adequate responsiveness to assessment area credit needs.
- The geographic distribution performance reflects adequate penetration throughout the multistate assessment area.
- The borrower distribution performance reflects poor penetration among customers of different income levels and businesses of different sizes.
- The bank exhibits an adequate record of serving the credit needs of low-income individuals and areas as well as very small businesses.
- PB makes use of flexible lending practices to meet area credit needs and the bank extended few, if any community development loans in the multistate metropolitan area during the evaluation period.
- The bank maintains and provides an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position.
- While the bank makes occasional use of innovative and/or complex investments to support
  community development initiatives, it exhibits adequate responsiveness to credit and community
  development needs through its investment activity.
- Delivery systems and branch locations are reasonably accessible within the bank's multistate metropolitan assessment area. Retail banking services do not vary in a way that inconveniences the bank's assessment areas, particularly low- and moderate-income areas and people.
- The bank and its employees provided an adequate level of community development services within the multistate metropolitan area during the evaluation period.

## **SCOPE OF EXAMINATION**

The Lending Test review considered residential mortgage (HMDA) and small business loans (CRA), originated or purchased from calendar years 2021 and 2022. Qualified community development loans that were originated or renewed from November 29, 2021, the date of the most recent CRA evaluation, through November 27, 2023 (i.e., the evaluation period), are also considered for this evaluation. All qualified community development services provided since the previous evaluation, all qualified investments made during the evaluation period, and those investments outstanding as of the date the evaluation began, regardless of when made, were also considered.

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON-ARLINGTON-ALEXANDRIA, DC-MD-VA MULTISTATE METROPOLITAN AREA

The bank's Washington-Arlington-Alexandria, DC-MD-VA multistate assessment area is comprised of portions of the Washington-Arlington-Alexandria DC-VA-MD WV and Frederick-Gaithersburg-Rockville, MD metropolitan divisions. The bank currently operates four full-service branches within the multistate metropolitan area. Specific cities and counties included in the assessment area are outlined in *Appendix E*.

According to 2020 American Consumer Survey (ACS) data, the assessment area has a population of 6.4 million and a median housing value of \$436,595. The owner-occupancy rate for the multistate assessment area equaled 60.2%, which is significantly greater than the rate for the District of Columbia (38.4%) and is consistent with the statewide rate for Virginia (60%), Maryland (60.8%), and West Virginia (60.5%) The owner-occupancy rate for the assessment area is also lower than the rate in the Frederick-Gaithersburg-Rockville, MD (64.6%) metropolitan division and approximates the rate for the Washington-Arlington-Alexandria, DC-VA-MD-WV (59.1%) metropolitan division.

Within the multistate area, 5% of families are below the poverty level, which is below the rate for the Commonwealth of Virginia (6.8%) and is significantly lower than the percentage in the District of Columbia (11.3%), State of West Virginia (12.3%), and approximates the State of Maryland (5.9%). The following table details the median family income for the two metropolitan divisions (MD) that make up the Washington-Arlington-Alexandria, DC-VA-MD-WVA MSA during 2021 and 2022.

Aggagament Auga	Median Family Income					
Assessment Area	2021	2022				
Washington-Arlington-Alexandria, DC-VA-MD-WV (MD)	\$122,100	\$139,700				
Frederick-Gaithersburg-Rockville, MD (MD)	\$129,900	\$143,900				

The following table includes relevant demographic data for the 2022 multistate MSA assessment area.

20	22 Washing	ton-Arlingto	on-Alex, DC	VA-MD-WV	MSA AA D	emographic	CS .	
In come Categories	Tract Dis	tribution	Families by	Tract Income		overty Level lies by Tract	Families l In co	y Family ome
	#	%	#	%	#	%	#	%
Low	125	8.4	101,056	6.9	18,290	18.1	320,201	21.8
Moderate	341	22.9	329,196	22.4	25,796	7.8	251,988	17.2
Middle	516	34.7	541,846	36.9	19,593	3.6	302,801	20.6
Upper	477	32.1	491,458	33.5	8,956	1.8	593,572	40.4
Unknown	28	1.9	5,006	0.3	556	11.1	0	0.0
Total AA	1,487	100.0	1,468,562	100.0	73,191	5.0	1,468,562	100.0
	Housing			Hous	ing Type by	Tract		
	Units by	C	)wn er-occupie	d	Rer	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	194,760	53,006	3.7	27.2	126,868	65.1	14,886	7.6
Moderate	557,558	280,111	19.5	50.2	239,224	42.9	38,223	6.9
Middle	858,674	559,481	39.0	65.2	253,674	29.5	45,519	5.3
Upp er	756,706	538,796	37.6	71.2	181,235	24.0	36,675	4.8
Unknown	13,533	2,992	0.2	22.1	8,924	65.9	1,617	11.9
Total AA	2,381,231	1,434,386	100.0	60.2	809,925	34.0	136,920	5.7
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	17,427	5.0	16,231	5.1	1,030	4.1	166	5.2
Moderate	71,177	20.4	65,096	20.3	5,499	21.9	582	18.2
Middle	123,880	35.5	114,141	35.6	8,768	34.9	971	30.4
Upper	133,119	38.2	122,458	38.2	9,419	37.5	1,242	38.9
Unknown	3,233	0.9	2,588	0.8	414	1.6	231	7.2
Total AA	348,836	100.0	320,514	100.0	25,130	100.0	3,192	100.0
Pero	entage of Tota	d Businesses:		91.9		7.2		0.9
				Fa	rms by Tract	& Revenue Si	ze	
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	47	1.7	47	1.7	0	0.0	0	0.0
Moderate	619	22.5	606	22.4	12	31.6	1	16.7
Middle	1,208	43.9	1,192	44.1	14	36.8	2	33.3
Upp er	870	31.6	856	31.6	11	28.9	3	50.0
Unknown	5	0.2	4	0.1	1	2.6	0	0.0
Total AA	2,749	100.0	2,705	100.0	38	100.0	6	100.0
1	Percentage of	Total Farms:		98.4		1.4		0.2
Source: 2022 FFIEC Census I	Data							

Source: 2022 FFIEC Census Data

2022 Dun & Brad street Data

2016-2020 U.S. Coisus Bureau: Amorican Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

PB's assessment area benefits from a diverse mix of industries including manufacturing, healthcare, financial, service, and tourism. The area also includes several universities, including Georgetown, George Mason, George Washington, and the Universities of Maryland and Mary Washington. The area's largest private employers include Accenture National Securities, Capital One Bank, Crosby Corp., Inova Health Care Systems, Lockheed Martin, Marriott, McDonald's, Northrop Grunman International, Micron Technology, Orbital Sciences Corporation, and Ussi Inc.

Recent and historical unemployment rates since the previous evaluation are presented in the following table.

Washington-Arlington-Alex, DC-VA-MD-WV MSA Unemployment Rates												
Area	2019	2020	2021	2022	2023							
District of Columbia, DC	5.5%	7.9%	6.8%	4.7%	4.9%							
Calvert County, MD	3.0%	5.0%	4.2%	2.7%	1.9%							
Charles County, MD	3.4%	6.4%	5.2%	3.1%	2.2%							
Frederick County, MD	3.0%	5.6%	4.4%	2.7%	2.0%							
Montgomery County, MD	2.8%	6.0%	5.0%	2.7%	1.9%							
Prince George's County, MD	3.5%	7.8%	6.7%	3.3%	2.2%							
Arlington County, VA	1.9%	4.6%	3.0%	2.0%	2.1%							
Clarke County, VA	2.4%	4.7%	3.1%	2.5%	2.5%							
Culpeper County, VA	2.6%	5.1%	3.2%	2.7%	2.8%							
Fairfax County, VA	2.3%	6.0%	3.5%	2.4%	2.5%							
Fauquier County, VA	2.4%	4.9%	3.0%	2.5%	2.5%							
Loudoun County, VA	2.3%	5.5%	3.1%	2.3%	2.5%							
Madison County, VA	2.2%	3.9%	2.5%	2.1%	2.3%							
Prince William County, VA	2.5%	6.7%	3.9%	2.6%	2.7%							
Rappahannock County, VA	2.5%	4.7%	2.9%	2.5%	2.6%							
Spotsylvania County, VA	2.9%	6.2%	3.8%	2.9%	3.0%							
Stafford County, VA	2.7%	5.8%	3.6%	2.8%	2.9%							
Warren County, VA	2.8%	6.0%	3.5%	2.8%	2.9%							
Alexandria city, VA	2.1%	6.2%	3.7%	2.3%	2.3%							
Fairfax city, VA	2.1%	6.0%	3.4%	2.4%	2.4%							
Falls Church city, VA	2.1%	3.9%	2.6%	2.1%	2.3%							
Fredericksburg city, VA	3.3%	7.4%	4.6%	3.2%	3.4%							
Manassas city, VA	2.5%	6.8%	3.9%	2.5%	2.5%							
Manassas Park city, VA	2.5%	6.9%	3.8%	2.5%	2.6%							
Jefferson County, WV	3.1%	5.9%	3.2%	2.5%	2.7%							
District of Columbia	5.5%	7.9%	6.8%	4.7%	4.9%							
Maryland	3.4%	6.4%	5.2%	3.0%	2.1%							
Virginia	2.8%	6.4%	3.9%	2.8%	2.9%							
West Virginia	5.0%	8.2%	5.1%	3.9%	3.9%							
Source: Bureau of Labor Statistics(BLS), Local Area Unemployi	ment Statisti	cs										

While unemployment rates increased from 2019 to 2020 as a result of the COVID-19 pandemic, rates have steadily decreased from 2020 to 2022 across all counties, cities, and states within the assessment area. In 2023, most all areas have maintained unemployment rates from 2022 or have experienced a slight increase in rates.

An official from a local economic development organization was recently contacted to discuss area economic conditions and community credit needs. The contact noted that there is a need for partnerships between small businesses and local financial institutions, which should include business mentoring in a manner that will foster growth and development of the small business and noted that small businesses would benefit from education about financing opportunities and credit products offered by local institutions.

As of June 30, 2023, the institution ranked 38<sup>th</sup> out of 72 financial institutions in local deposit market share according to data compiled by the Federal Deposit Insurance Corporation (FDIC) and held .10% of the deposits within the assessment area (credit unions deposits are not included). Overall, there is significant opportunity for community development loans and investments within the market area. Despite it being a competitive market, the bank faces no significant constraints in taking advantage of all available community development opportunities.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON-ARLINGTON-ALEXANDRIA, DC-MD-VA MSA)

## LENDING TEST

The bank's Lending Test performance in the Washington-Arlington-Alexandria, DC-MD-VA MSA assessment area is considered low satisfactory. The conclusion is based primarily on the bank's lending activity, and its geographic and borrower distribution performance, while considering the bank's market strategy, area demographic data, and aggregate loan data.

## **Lending Activity:**

Lending levels reflect adequate responsiveness in relation to assessment area credit needs. During 2021 and 2022 the bank reported 39 HMDA loans, and 720 small business loans within the multistate assessment area. The bank's lending activity within this assessment area during the evaluation period, as measured by number (27.1%) and dollar volume (28.1%), exceeds both the proportion of the bank branches (16%) and the percentage of local deposits (12.1%) in the assessment area. As of June 30, 2023, ranked 38<sup>th</sup> out of 72 financial institutions in deposit market share with .10% of the area's available FDIC-insured deposits (excluding credit union deposits). According to 2022 aggregate loan data, the institution ranked 251<sup>st</sup> out of 897 reporters in HMDA lending volume with a < .01% market share and 26<sup>th</sup> out of 247 reporters for small business/small farm lending with a .8% market share in the assessment area. All market share rankings consider originated and purchased loans.

## **Geographic Distribution:**

PB's geographic distribution performance for HMDA is considered poor, while its small business lending is considered adequate. As previously noted, the dollar volume of HMDA and small business lending from 2021 and 2022 was used to determine the weight of products when deriving an overall performance rating. Given the dollar volume of small business lending (\$76.1 million) as compared to HMDA (\$19.8), more weight was placed on the bank's small business lending performance. The bank's geographic distribution performance is considered adequate overall.

## **Distribution of HMDA Loans by Income Level Census Tract**

					5444		2.8.0	IICi, I	,	-MD-W	• 1,101	•	
					k And	Aggre ga	ite Loans	By Yea		22			
Geographic Income Level				21					20				Owner Occupied Units %
mcome Level	Ban		Agg	Ban		Agg	Ban		Agg	Ban		Agg	Chit's 40
	#	# %	#%	\$(000)	\$ %	\$ %	#	#96	# %	\$(000)	\$%	\$ %	<u>i</u>
	_						hase Loan			_			
Low	0	0.0	4.5	0	0.0	3.5	0	0.0	4.2	0	0.0	3.0	3.7
Moderate	0	0.0	18.9	0	0.0	13.9	0	0.0	20.3	0	0.0	14.6	19.5
M iddle	4	44.4	411	852	20.5	36.3	1	15.7	411	227	3.2	36.3	39.0
Upper	5	55.6	35.3	3,314	79.5	46.1	5	83.3	34.1	6,798	96.8	45.9	37.6
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Total	9	100.0	100.0	4,166	100.0	100.0	6	<b>D</b> 0.0	100.0	7,025	<b>D</b> 0.0	100.0	100.0
T	ء ۔						ce Loans					3.0	
Low	0	0.0 66.7	3.4 15.3	0 566	0.0	2.6 11.2	0	0.0	4.3 20.1	0	0.0	3.0	3.7
Moderate	4				36.6		0	0.0			0.0	14.4	19.5
Middle	1	16.7	38.4	100	6.5	33.5	0	0.0	412	1167	0.0	36.5	39.0
Upper	1	16.7	42.8	880	56.9	52.5	2	100.0	34.3	1,167	100.0	45.9	37.6
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	200.0
Total	6	100.0	100.0	1546	100.0	100.0	2	<b>D</b> 0.0	100.0	1,167	<b>D</b> 0.0	100.0	100.0
							rement Lo						
Low	0	0.0	2.4	0	0.0	2.2	0	0.0	2.2	0	0.0	17	1
Moderate	0	0.0	114	0	0.0	8.5	1	33.3	13.7	240	72.1	9.7	19.5
M iddle	0	0.0	32.8	0	0.0	27.2	1	33.3	36.0	43	12.9	28.9	39.0
Upper	0	0.0	53.2	0	0.0	618 0.3	1	33.3	48.0 0.1	50 0	15.0	59.5	37.6
Unknown	0						0				0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	200.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	333	100.0	100.0	Multi-family
					М	ultifam	ily Loans						Units %
Low	0	0.0	28.1	0	0.0	9.7	0	0.0	29.0	0	0.0	219	15.3
M o derate	0	0.0	214	0	0.0	20.1	0	0.0	23.8	0	0.0	23.7	27.5
M id dle	3	100.0	27.2	1700	100.0	43.6	2	66.7	18.2	650	24.5	26.8	30.8
Upper	0	0.0	20.7	0	0.0	24.2	1	33.3	28.0	2,000	75.5	26.2	24.9
Unknown	0	0.0	2.5	0	0.0	2.4	0	0.0	10	0	0.0	14	14
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1700	100.0	100.0	3	<b>D</b> 0.0	100.0	2,650	100.0	100.0	
					Total H	lome M	ortgage Lo	aus					Owner Occupied Units %
Low	0	0.0	3.7	0	0.0	3.2	0	0.0	4.0	0	0.0	4.1	
M o derate	4	20.0	15.5	566	7.3	12.5	1	5.3	19.5	240	2.0	14.9	19.5
M iddle	9	45.0	39.1	2,752	35.5	34.8	5	26.3	40.6	1120	9.3	35.4	39.0
Upper	7	35.0	40.5	4,444	57.3	49.3	13	68.4	35.6	10,722	88.7	45.3	37.6
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	7,762	100.0	100.0	19	<b>D</b> 0.0	100.0	12,082	100.0	100.0	100.0
Source 2022 FFI				2						,			

During 2021, home purchase loans were the leading HMDA product, followed by refinance loans. Home improvement and multifamily lending were given less weight due to the limited lending within the multistate area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered very poor, while refinance lending is considered excellent.

In 2021, PB did not extend any loans in low-income census tracts. Thus, the bank's performance lagged the percentage of owner-occupied housing units located in such areas (3.8%) and the aggregate level of lending (3.7%). PB's level of lending in moderate-income census tracts exceeded both the percentage of owner-occupied housing units located in such areas (18.2%) and the aggregate level of lending (16.5%). Overall, the bank's 2021performance for HMDA loans is considered good in 2021.

During 2022, home purchase loans were the leading HMDA product followed by refinance loans. As in 2021, given the relatively low level of activity, multi-family and home improvement loans were given less weight when determining overall performance. Considering both demographic and aggregate proxies for demand, the bank's performance for its home purchase and refinance lending is considered very poor.

As reflected in the preceding tables, in 2022 PB did not extend any loans in low-income census tracts. Thus, the bank's performance lagged the percentage of owner-occupied housing units located in such areas (3.7%) and the aggregate level of lending (4.0%). PB's level of lending in moderate-income census tracts (5.3%) significantly lagged the percentage of owner-occupied housing units located in such areas (19.5%) and the aggregate level of lending (19.5%). Overall, the bank's 2022 performance for HMDA loans is considered very poor.

On a combined basis, HMDA geographic distribution performance is considered poor.

## Distribution of Small Business Loans by Income Level of Census Tract

Di	Distribution of 2021 and 2022 Small Business Lending By Income Level of Geograph Assessment Area: Washington-Arlington-Alex, DC-VA-MD-WV MSA															
Geographic		Bank And Aggregate Loans By Year 2021 2022														
Income	Ban	Bank Agg Bank Agg Bank Agg														
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%			
Low	27	4.2	5.1	1,309	2.3	5.0	0	0.0	4.7	0	0.0	4.8	5.0			
Moderate	114	17.6	19.5	8,341	14.4	20.0	12	16.9	19.8	2,999	16.3	19.3	20.4			
Middle	222	34.2	36.2	21,272	36.8	36.2	11	15.5	36.9	4,000	21.8	36.7	35.5			
Upper	284	43.8	38.5	26,634	46.1	38.3	46	64.8	37.8	11,327	61.7	38.3	38.2			
Unknown	2	0.3	0.4	182	0.3	0.5	2	2.8	0.6	40	0.2	0.8	0.9			
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1				
Total	649	100.0		57,738	100.0	100.0	71	100.0	100.0	18,366	100.0	100.0	100.0			

Source: 2022 FFIEC Census Data

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

During 2021, PB's lending in low-income tracts (4.2%) was slightly less than both the aggregate lending level (5.1%) and the percentage of businesses located in such tracts (5%). The bank's small business lending performance in moderate-income census (17.6%) tracts also lagged the percentage of area businesses (20.4%) and the aggregate lending in such tracts (19.5%). Overall, the bank's small business geographic distribution for 2021 is considered adequate and its performance during 2022 is substantially similar.

## Distribution by Borrower Income and Revenue Size of the Business:

HMDA borrower distribution is considered poor and small business distribution performance is considered adequate. As previously noted, the dollar volume of HMDA and small business lending from 2021 and 2022 was used to determine the weight of products when deriving an overall performance rating. Given the dollar volume of small business lending (\$76.1 million) as compared to HMDA (\$19.8), more weight was placed on the bank's small business lending performance. The bank's borrower distribution performance is considered adequate overall.

	Distribu	tion of	f 2021	and 2022	2 Hon	ie Moi	rtgage Le	ending	g By Bo	orrower	Incon	ie Lev	el	
	A	ssessn	nent A	rea: Wa	shingt	on-Ar	lington-	Alex, I	OC-VA	-MD-W	V MSA	A		
				Вап	k And .	Aggre g	ate Loans	By Year	r					
Borrower	2021								20	22			Families by	
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Family Income %	
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %		
					Hor	ne Pur	hase Loa	11.5						
Low	0	0.0	7.9	0	0.0	4.1	0	0.0	7.7	0	0.0	3.7	218	
Moderate	0	0.0	210	0	0.0	15.2	1	15.7	214	227	3.2	15.0	17.2	
M id dle	0	0.0	214	0	0.0	20.1	0	0.0	218	0	0.0	20.0	20.6	
Upper	0	0.0	30.0	0	0.0	414	5	83.3	30.4	6,798	96.8	42.6	40.4	
Unknown	9	100.0	19.7	4,166	100.0	19.2	0	0.0	18.7	0	0.0	18.7	0.0	
Total 9 100.0 100.0 4,166 100.0 100.0 6 100.0 100.0 7,025 100.0 100.0													100.0	
Refinance Loans														
Low														
Moderate	0	0.0	15.6	0	0.0	113	0	0.0	219	0	0.0	15.7	17.2	
M id d le	0	0.0	20.6	0	0.0	18.3	0	0.0	22.8	0	0.0	215	20.6	
Upper	1	15.7	32.2	100	6.5	40.5	2	100.0	27.3	1,167	100.0	38.0	40.4	
Unknown	4	66.7	24.7	1436	92.9	26.0	0	0.0	14.7	0	0.0	15.0	0.0	
Total	6	100.0	100.0	1546	100.0	100.0	2	100.0	100.0	1,167	100.0	100.0	100.0	
					Home	Impro	vement Lo	ans						
Low	0	0.0	4.7	0	0.0	3.0	1	33.3	6.4	240	72.1	3.9	218	
Moderate	0	0.0	12.3	0	0.0	8.9	0	0.0	15.7	0	0.0	112	17.2	
M id dle	0	0.0	23.3	0	0.0	18.8	1	33.3	27.1	50	15.0	218	20.6	
Upper	0	0.0	57.0	0	0.0	65.1	1	33.3	47.2	43	12.9	59.7	40.4	
Unknown	0	0.0	2.7	0	0.0	4.1	0	0.0	2.6	0	0.0	3.4	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	333	100.0	100.0	100.0	
					Totall	Home M	lortgage I	oans						
Low	1	5.9	7.2	10	0.2	4.0	1	6.3	9.2	240	2.5	4.7	218	
Moderate	0	0.0	17.2	0	0.0	12.7	2	12.5	20.9	476	5.0	15.2	17.2	
M id dle	0	0.0	20.9	0	0.0	18.9	2	12.5	22.6	250	2.7	20.3	20.6	
Upper	3	17.6	32.2	450	7.4	412	11	68.8	313	8,466	89.8	42.1	40.4	
Unknown	13	76.5	22.6	5,602	92.4	23.2	0	0.0	15.1	0	0.0	17.7	0.0	
Total 17 100.0 100.0 6,062 100.0 100.0 15 100.0 100.0 9,432 100.0 100.0 100.0														
Source: 2022 FFIEC Census Data														
2016-2020 U.S. Census Bureau: American Community Survey  Note: Percenta ges may not total 100.0 percent due to rounding.														
_	-				-	_	analusis							
минајат	шу юанѕа	ונו זוטנ זונ	сипеа 1	n the borro	wer aust	ισπαιο	anaiyas.							

In 2021, home purchase loans were the leading HMDA product by number, followed by home refinance loans. Home improvement lending was given less weight due to the limited lending within the multistate area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered very poor, while refinance lending is considered adequate.

In 2021, the bank's level of lending to low-income borrowers (5.9%) significantly lagged the percentage of families by family income (21.8%) and was slightly lower than the aggregate lending to such borrowers (7.2%). The bank did not originate any loans to moderate-income borrowers, which lagged bothe the percentage of families by family income and the aggregate level of lending to such borrowers (16.8% and 17.2% respectively). Overall, the bank's 2021 HMDA performance is considered very poor.

During 2022, home purchase loans were the leading HMDA product followed by home improvement loans. Given the relatively low level of activity, refinance loans were given less weight when determining overall performance. Considering both demographic and aggregate proxies for demand, the bank's performance for its home purchase lending is considered poor and its home improvement lending is considered excellent.

In 2022, the bank's level of lending to low-income borrowers (6.3%) significantly lagged the percentage of families by family income (21.8%), and slightly lags the aggregate lending to such borrowers (9.2%). Similarly, the bank's level of lending to moderate-income borrowers (12.5%) lagged the percentage of families by family income (17.2%), and lagged the aggregate lending in such tracts in such tracts (20.9%). PB's 2022 HMDA performance is considered adequate.

On a combined basis HMDA borrower distribution performance for is considered poor.

## Distribution of Lending by Loan Amount and Size of Business

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Distrib							_	-				sses	
Assessment Area: Washington-Arlington-Alex, DC-VA-MD-WV MSA													
		Bank And Aggregate Loans By Year											Total
			20	21					20	22			Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	Million or Less 56 8.6 48.1 8,877 15.4 29.0 10 14.1 52.0 2,796 15.2 34.3												91.9
Over \$1 Million	39	6.0		9,448	16.4		50	70.4		11,506	62.6		7.2
Revenue Unknown	554	85.4		39,413	68.3		11	15.5		4,064	22.1		0.9
Total	649	100.0		57,738	100.0		71	100.0		18,366	100.0		100.0
By Loan Size													
\$100,000 or Less	513	79.0	92.6	15,631	27.1	37.8	34	47.9	95.8	1,497	8.2	47.1	
\$100,001 - \$250,000	76	11.7	4.1	12,507	21.7	17.9	14	19.7	2.2	2,482	13.5	13.3	
\$250,001 - \$1 Million	60	9.2	3.2	29,600	51.3	44.3	23	32.4	2.0	14,387	78.3	39.6	
Total	649	100.0	100.0	57,738	100.0	100.0	71	100.0	100.0	18,366	100.0	100.0	
		I	By Loa	n Size a	nd Re	venue	\$1 Mill	ion or	Less				
\$100,000 or Less	37	66.1		1,502	16.9		4	40.0		243	8.7		
\$100,001 - \$250,000	5	8.9		994	11.2		2	20.0		351	12.6		
\$250,001 - \$1 Million	14	25.0		6,381	71.9		4	40.0		2,202	78.8		
Total	56	100.0		8,877	100.0		10	100.0		2,796	100.0		
Source: 2022 FFIEC C	ensus Dat	а											
2022 Dwn & Bradstreet Data													
2016-2020 U.						vey							
Note: Percentages ma	ıy not total	100.0 p	ercent di	ue to round	ing.								

D&B data from 2021 indicates that 91.9% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 8.6% were to businesses with revenues of \$1 million or less, while 48.1% of the aggregate lending level were to businesses with revenues of \$1 million or less. The percentage of the bank's small business loans extended to businesses with revenues of \$1 million or less was impacted by a large volume of loans for which borrower revenue was unknown (i.e., 85.4% of all loans). The bank was an active PPP lender during 2021, and the PPP loan program did not require the collection or consideration of borrower revenue data. Consequently, large volumes of small business loans were originated during 2021 for which borrower revenue is unkown. However, when borrower revenues were known, 58.9% of the bank's loans (56 of 95 loans) were to businesses with revenues of \$1 million or less.

Aggregate small business data was also considered as an element of performance context in evaluating the bank's distribution by business revenue. During 2021, 48.1% of all reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of loans were to businesses that either had revenues exceeding \$1 million or had unknown revenues. The 2021 aggregate small business loan data also includes an unknown volume of PPP loans, which limits its usefulness as a proxy when evaluating the bank's performance.

Because smaller dollar loans can demonstrate a willingness to provide credit to small businesses, the bank's distribution by loan size was also considered. Overall, in 2021 the bank originated 79% of its small business loans in amounts of \$100,000 or less which lagged the aggregate reporter level of such lending (92.6%). Within the assessment area, the aggregate lenders reported an unusually large percentage of small business loans in amounts of \$100,000 or less.

As an element of performance context, the bank's small business loans without borrower revenue data were also evaluated by loan size within this assessment area. The following table reflects this distribution.

Distribution of 2021 S Assessment Area: V			•									
	Bank											
	#	%	\$(000s)	%								
	By Loan Size											
\$100,000 or less	461	83.2	13,217	33.5								
\$100,001 - \$250,000	59	10.6	9,518	24.1								
\$250,001 - \$1 Million	34	6.1	16,678	42.3								
Total	554	100	39,413	100								

Within the assessment area, a majority (83.2%) of the bank's small business loans for which borrower revenue was not known had loan amounts of \$100,000 or less, indicating that the bank is helping to serve the needs of small businesses within the area. The bank's 2021 performance is considered adequate.

In 2022, D&B data indicates that 91.9% of all local businesses have revenues that do not exceed \$1 million per year. Aggregate small business data was also considered as an element of performance context in evaluating the bank's distribution by business revenue. During 2022, of the total volume of small business loans considered in the evaluation, 14,1% were to businesses with revenues of \$1 million or less, while 52% of the aggregate lending level were to businesses with revenues of \$1 million or less. The bank's 2022 performance is considered to be poor.

Overall, PB's borrower distribution performance for small business lending is considered adequate and places more weight on the 2021 small business lending due to the significantly larger dollar volume of lending.

## **Community Development Loans:**

Opportunities for community development lending are readily available within the Washington-Arlington-Alexandria DC-MD-VA-WV MSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, PB originated two qualified community development loans for \$7.4 million within the assessment area. To the extent that the bank extended other such loans, they were required to be reported as small business lending activity and could not also be reported as community development. Both loans were part of a Small Business Administration (SBA) 504 program, which are specifically classified by the SBA to promote economic development. Overall, within this assessment area the bank originated few if any qualified community development loans, when considering the bank's capacity and available opportunities.

## **INVESTMENT TEST**

The bank's level of responding to community development needs through its investment activities is considered adequate within the Washing-Arlington-Alexandria, DC-MD-VA-WV MSA, and PB maintains an adequate level of qualified community development investments and grants and makes occasional use of complex investments that support community development initiatives.

During the evaluation period, PB made charitable donations totaling \$5,150 that specifically benefited this assessment area. Additionally, the bank holds five qualified investments totaling \$11.5 million that benefit the multistate assessment area. The following are examples of qualified investments that the bank made that directly benefited this assessment area.

- \$6.7 million invested in three affordable housing bonds impacting this assessment area. Proceeds of the bonds are used to finance multifamily properties that are affordable to low- and moderate-income families.
- \$2.2 million in one equity fund utilizing Low Income Housing Tax Credits (LIHTC) to facilitate area revitalization and affordable housing efforts within this assessment area.

## **SERVICE TEST**

The bank's performance under the Service Test is considered adequate overall within this assessment area. This conclusion is based on the bank's branch distribution, branching activity during the review period, availability of alternative delivery systems, range of services provided in the assessment area, and extent of innovativeness of community development services. Since the previous evaluation, nine branch offices have been closed within the assessment area. Additionally, the bank provides an adequate level of community development service.

## **Retail Services:**

Delivery systems are reasonably accessible to individuals and census tracts of varying income levels in the assessment area. The bank currently operates four branches within the assessment area, none of which are located within low- or moderate-income census tracts. Within the assessment area, 9.3% and 22% of area households are located in low-and-moderate-income census tracts, respectively. During the review period the bank closed nine full-service branches. One (7.1%) of which was located in a low- or moderate-income census tract. Consequently, the bank's record of closing branches has adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

Retail banking services do not vary in a way that inconveniences any portion of the bank's assessment areas, including low- and moderate-income areas or people. ATMS are available and provide customers with 24 hour nationwide access. Bank by-mail and internet-based banking services are also offered by the institution. The institution offers no-cost checking products as well as low-cost checking to businesses. Such accounts benefit all segments of the community, including low- and moderate-income individuals and business.

## **Community Development Services:**

The bank and its employees provide an adequate level of community development services to nine qualified organizations whose operations benefit low- and moderate-income people and/or promote small business development.

The bank supported the following organizations that specifically benefitted the Washing-Arlington-Alexandria, DC-MD-VA-WV multistate statistical area during the evaluation.

- Wetati Academy College Park
  - An employee serves on the board for this organization that aims to empower low-to-moderate income students on how to become financially independent through practical and experiential activities.
- Life Asset
  - One employee serves on the board for this organization that supports economic growth by targeting the financial needs for low-income individuals and businesses through microlending and non-traditional underwriting criteria to secure loans.
- Prince George's Financial Services Corporation FSC First
  - An employee represents the bank for this organization that supports economic growth for small businesses

## **COMMONWEALTH OF VIRGINIA**

## CRA RATING FOR VIRGINIA<sup>2</sup>: SATISFACTORY

The lending test is rated: <u>Low Satisfactory</u>
The investment test is rated: <u>Low Satisfactory</u>
The service test is rated: Low Satisfactory

Major factors supporting the rating include:

- Lending levels reflect good responsiveness to assessment areas credit needs.
- Geographic distribution performance varies by product and is considered good overall.
- Borrower distribution performance varies by product and is considered adequate overall.
- The bank exhibits an adequate record of serving the credit needs of low-income individuals and areas as well as very small businesses.
- PB makes use of flexible lending practices to meet area credit needs and the bank extended an adequate level of community development loans in Virginia during the evaluation period.
- The bank maintains and provides an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and is rarely in a leadership position.
- While the bank makes occasional use of innovative and/or complex investments to support
  community development initiatives, it exhibits adequate responsiveness to credit and community
  development needs through its investment activity.
- Delivery systems and branch locations are reasonably accessible within the bank's assessment areas located in Virginia. Retail banking services do not vary in a way that inconveniences the bank's assessment areas, particularly low- and moderate-income areas and people.
- The bank and its employees provided an adequate level of community development services within its Virginia assessment areas during the evaluation period.

## **SCOPE OF EXAMINATION**

The Lending Test review considered HMDA and small business loans originated or purchased from January 1, 2021 through December 31, 2022. Small farm loans were not evaluated in all Virginia assessment areas given the small volume of such loans within the state during the review period. Qualified community development loans that were originated or renewed during the evaluation period and qualified community development services provided during the review period, were considered. All qualified investments extended during the review period or funded as of the evaluation date, and those investments outstanding, regardless of when made, were also considered.

Performance in the Commonwealth of Virginia was evaluated by applying the full-scope interagency examination procedures to the following assessment areas:

- Richmond, VA MSA
- Virginia Beach-Norfolk-Newport News, VA
- Essex, VA NonMSA

<sup>&</sup>lt;sup>2</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

These three assessment areas, on a combined basis, account for 69.0% of lending by number of loans, 73.7% by dollar volume of loans, 77.7% of branches, and 85.8% of deposits within Virginia. Information about loan volume, branches, and deposits are included in *Appendix E* of this report. The remaining assessment areas (Charlottesville, VA MSA, Clifton Forge, VA NonMSA, Shenandoah, VA NonMSA, and Surry, VA NonMSA) were reviewed using limited -scope examination procedures.

To arrive at an overall state rating, the full-scope assessment areas were generally weighted based on the dollar volume of lending, as well as the percentage of loans originated within the market. The greatest weight was given to the Richmond, VA assessment area, as it accounted for 36.5% and 39.6% of loans in the Commonwealth of Virginia by number and dollar volume of loans evaluated, respectively. For the assessment areas subject to limited review procedures, a determination was made as to whether the performance exceeded, was consistent with, or was below the assigned state rating.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA

PB operates 23 full-service branches within the Commonwealth of Virginia assessment areas. The Richmond, VA MSA and Virginia Beach-Norfolk-Newport News, VA MSA assessment areas account for a majority of the bank's lending activity within the Commonwealth. Within Virginia, the institution ranked 10<sup>th</sup> out of 113 financial institutions in deposit market share according to data compiled by the FDIC and held 1 % of the assessment areas deposits (credit union deposits not included.)

According to 2020 ACS data, the combined assessment areas within the Commonwealth of Virginia have a total population of 3,446,407, including 1,034,378 families. A majority of the families are middle- and upper-income (21.2% and 40.6%, respectively), while low- and moderate-income families comprised 20.1% and 18.1%, respectively. Within these assessment areas, the median housing value is \$251,746 and the owner-occupancy rate is 58.5%, which approximates the average rate for the entire Commonwealth of Virginia (60.0%). The poverty rate of the assessment areas served by the bank is 7.3%, which is higher than the statewide rate (6.8%). The following table includes 2020 and 2021 median family income information for the assessment areas in the Commonwealth of Virginia.

Assessment Area	Median Family Incomes				
	2021	2022			
Richmond, VA MSA	\$86,900	\$101,100			
Virginia Beach-Norfolk-Newport News, VA	\$69,896	\$82,601			
Nonmetropolitan areas of Virginia	\$58,900	\$67,800			

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

## LENDING TEST

Overall, the statewide Lending Test is rated Low Satisfactory. This conclusion is based primarily on the institution's lending activity, geographic and borrower performance, and its level of community development lending, while also considering the bank's market strategy, area demographic data, and aggregate data.

During 2021 and 2022, the bank originated \$114.3 million in HMDA loans and \$228.4 million in small business loans. Accordingly, the bank's small business lending performance was generally given greater weight when evaluating overall performance.

## **Lending Activity:**

The institution's lending levels reflect good responsiveness to assessment area credit needs during the evaluation period. The bank's HMDA and small business lending within the Commonwealth of Virginia assessment areas, as measured by the number (72%) and dollar volume (77.9%) is lower than the percentage of local deposits (88.2%) but approximates the percentage of bank branches (77.8%). When compared to 2022 aggregate loan data, the institution ranked 89<sup>th</sup> of 772 reporters in HMDA lending with a .19% market share and ranked 20<sup>th</sup> out of 190 reporters in small business lending with a .43% market share. All market share rankings consider originated and purchased loans.

## Geographic and Borrower Distribution:

Overall, PB's geographic distribution is considered good, while the borrower distribution of lending is considered adequate. When reaching overall conclusions, the level of performance for each product is typically weighted by the dollar volume of each product by year and overall. Within the markets reviewed; small business loans were the largest product by dollar volume followed by HMDA loans. Therefore, small business lending performance received the greatest weight.

## **Community Development Loans:**

Community development lending opportunities are reasonably available within the metropolitan areas of the bank's assessment areas and limited in the bank's non-metropolitan assessment area. The bank faces no constraints relative to community development lending when considering its capacity and business strategy.

Considering the institution's capacity and reasonably available opportunities, the institution makes an adequate level of community development loans within the Commonwealth of Virginia. While the bank did not originate any community development loans with a statewide level impact, when considering loans funded or renewed inclusive of all assessment areas within Virginia, PB originated eight qualified community development loans totaling approximately \$21.2 million. Additional discussion of community development loans is included within the applicable assessment area sections of this evaluation.

## **INVESTMENT TEST**

PB's Investment Test performance in the Commonwealth of Virginia is Low Satisfactory. The bank holds an adequate level of qualified community development investments and grants. The bank also makes occasional use of innovative and/or complex investments to support community development initiatives and exhibits adequate responsiveness to credit and community development needs in the state.

Investments and donations that benefit the broader statewide level are include:

- 10 equity investments totaling \$3.5 million which support affordable housing through the Commonwealth. (Housing Equity Fund of Virginia, Virginia Housing Development Authority).
- Participation in one loan pool totaling \$1.8 million consisting of mortgage-backed securities with loans primarily in low- and-moderate income areas or to low- and-moderate income borrowers. (Freddie Mac)
- Charitable donations of \$66,572 were made to entities that provide community development services to residents within the bank's combined Virginia assessment areas.

## **SERVICE TEST**

The bank's statewide rating under the Service Test is Low Satisfactory. This conclusion is based on the bank's branch distribution, branching activity during the review period, availability of alternative delivery systems, range of services provided in the state, and extent/innovativeness of community development services.

#### **Retail Services:**

Delivery systems are reasonably accessible to individuals and geographies of varying income levels within the state. During the review period, PB closed eight branch offices throughout the Commonwealth of Virginia. Of the total branch closures, five were located in middle-income census tracts, and three were located in upper-income census tracts. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low-and moderate-income geographies and/or low-and moderate-income individuals. Retail banking services do not vary in a way that inconveniences any portion of the bank's assessment areas, including low- and moderate-income areas or people. The institution offers no-cost checking products as well as low-cost checking to businesses. Such accounts benefit all segments of the community, including low- and moderate-income individuals and small businesses.

## **Community Development Services:**

Within the Commonwealth of Virginia, community development opportunities are reasonably available within the bank's metropolitan assessment areas and limited in the nonmetropolitan areas, and the bank has sufficient capacity to participate in such activities. During the review period, the bank provided an adequate level of qualified community development services with 13 employees who volunteered their time and utilized their financial expertise across four organizations whose operations benefit low- and moderate-income geographies and/or low- and moderate-income people or support small businesses.

## **METROPOLITAN AREAS**

## **FULL-SCOPE REVIEW**

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN RICHMOND, VA MSA

PB delineates and serves the entire Richmond, Virginia MSA and operates nine branches within the assessment area. Information about loan volume, branches, and deposits are included in *Appendix E* of this report. Additionally, the complete composition of the assessment area for 2021 and 2022 is detailed in *Appendix D*.

According to 2020 ACS data, the assessment area has a population of 1.3 million and a median housing value of \$247,516. The owner-occupancy rate for the MSA is 61.8% which is slightly greater than the statewide rate for Virginia (60%). Within the assessment area 6.8% of families are considered below the poverty level, which is consistent with the percentage of such families in Virginia (6.7%). The 2021 and 2022 median family incomes for the Richmond MSA were \$86,900 and \$101,100, respectively.

The following table includes relevant demographic data for the 2022 Richmond, VA MSA assessment area.

		2022 Richn	nond, VA M	SAAA Dem	ographics			
In come Categories	Tract Dis	tribution	Families by 1	Tract Income		overty Level lies by Tract		
	#	%	#	%	#	%	#	%
Low	34	10.2	20,649	6.6	6,130	29.7	64,660	20.7
Moderate	80	24.1	56,395	18.0	5,785	10.3	57,093	18.3
Middle	121	36.4	133,840	42.8	6,701	5.0	65,235	20.9
Upper	89	26.8	100,220	32.0	2,163	2.2	125,767	40.2
Unknown	8	2.4	1,651	0.5	401	24.3	0	0.0
Total AA	332	100.0	312,755	100.0	21,180	6.8	312,755	100.0
	Housing			Hous	ing Type by	Tract		
	Units by	C	)wn er-occupie	d	Rer	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	43,914	11,653	3.6	26.5	27,385	62.4	4,876	11.1
Moderate	114,160	50,259	15.5	44.0	52,409	45.9	11,492	10.1
Middle	216,142	149,870	46.1	69.3	52,028	24.1	14,244	6.6
Upper	147,398	112,113	34.5	76.1	28,252	19.2	7,033	4.8
Unknown	4,515	1,345	0.4	29.8	2,687	59.5	483	10.7
Total AA	526,129	325,240	100.0	61.8	162,761	30.9	38,128	7.2
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busine	sses by Tract	Less Than o	r=\$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	4,116	6.4	3,739	6.3	347	8.3	30	5.4
Moderate	11,378	17.6	10,487	17.5	804	19.2	87	15.7
Middle	26,484	41.1	24,630	412	1,665	39.7	189	34.1
Upper	21,628	33.5	20,095	33.6	1,291	30.8	242	43.7
Unknown	909	1.4	812	1.4	91	2.2	6	1.1
Total AA	64,515	100.0	59,763	100.0	4,198	100.0	554	100.0
Perc	entage of Tota	al Businesses:		92.6		6.5		0.9
				Fa	rms by Tract	& Revenue Si	ze	
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	10	1.2	10	12	0	0.0	0	0.0
Moderate	101	12.2	99	12.3	2	10.0	0	0.0
Middle	451	54.4	438	54.3	11	55.0	2	100.0
Upp er	266	32.1	259	32.1	7	35.0	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
Total AA	829	100.0	807	100.0	20	100.0	2	100.0
	Percentage of	Total Farms:		97.3		2.4		0.2
Source: 2022 FFIEC Census I	Data							

Solarce: 2022 FFIEC Census Data

2022 Dun & Brad street Data

2016-2020 U.S. Cersus Bureau: American Community Stavey

Note: Percentages may not total 100.0 percent due to rounding.

As the capital region for the Commonwealth of Virginia, employment opportunities in the area primarily consist of local, state, and federal government, as well as a mixture of manufacturing, healthcare, financial, service, and tourism industries. There are several major medical facilities including Bon Secours and HCA health systems, MCV Hospital, and Southside Regional Medical Center, and the area also attracts distribution centers given its location and access to thoroughfares along the East Coast. Other major employers in the area include Anthem, Amazon, Capital One Bank, DuPont, Altria, Virginia Commonwealth University, and Walmart.

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Richmond, VA MSA Unemployment Rates												
Area	2019	2020	2021	2022	2023							
Amelia County, VA	3.1%	6.0%	3.5%	2.9%	3.0%							
Charles City County, VA	3.4%	6.9%	4.3%	3.0%	3.2%							
Chesterfield County, VA	2.7%	6.1%	3.6%	2.7%	2.9%							
Dinwiddie County, VA	3.2%	6.6%	4.4%	3.2%	3.3%							
Goochland County, VA	2.7%	5.0%	3.1%	2.6%	2.9%							
Hanover County, VA	2.4%	5.0%	3.0%	2.4%	2.5%							
Henrico County, VA	2.8%	6.7%	3.9%	2.7%	2.9%							
King and Queen County, VA	2.8%	5.3%	3.2%	2.6%	2.7%							
King William County, VA	2.7%	5.5%	3.3%	2.6%	2.7%							
New Kent County, VA	2.3%	4.7%	2.9%	2.3%	2.6%							
Powhatan County, VA	2.5%	5.0%	2.9%	2.5%	2.7%							
Prince George County, VA	3.3%	6.7%	4.5%	3.3%	3.4%							
Sussex County, VA	4.5%	8.9%	6.3%	4.1%	4.1%							
Colonial Heights city, VA	3.2%	7.4%	4.7%	3.1%	3.1%							
Hopewell city, VA	4.3%	11.2%	7.2%	4.3%	4.4%							
Petersburg city, VA	5.6%	14.7%	10.1%	5.5%	5.4%							
Richmond city, VA	3.3%	9.1%	5.3%	3.3%	3.5%							
Virginia	2.8%	6.4%	3.9%	2.8%	2.9%							
Source: Bureau of Labor Statistics(BLS), Local Area	Unemployi	ment Statisti	cs									

While unemployment rates increased from 2019 to 2020 as a result of the COVID-19 pandemic, rates have steadily decreased from 2020 to 2022 across all counties, cities, and states within the assessment area. In 2023, most all areas have maintained unemployment rates from 2022 or have experienced a increase in unemployment.

A local official of a nonprofit affordable housing organization was contacted during the evaluation to assist in evaluating the bank's CRA performance and to discuss local economic conditions and community credit needs within the Richmond, VA assessment area. The organization serves the area by developing affordable housing rentals through the issuance of Virginia Housing Development Authority bonds. The organization's goals are to address statewide affordable housing and rental needs of low-income and critical needs populations, strengthen homeownership for first-time homebuyers in Virginia, and secure long-term funding to finance its programs. The official noted that there are several opportunities for banks to better-serve the community; specifically, the most pressing need is for access to affordable housing and additional affordable housing supply in the local area. The contact noted the organization's partnership with several local and large financial institutions, and said he is unaware of any discriminatory practices by banks in the area.

As of June 30<sup>th</sup> 2023, the institution ranked 7<sup>th</sup> out of 27 financial institutions in local deposit market share according to data compiled by the FDIC and held a 1.6% of assessment area deposits (credit union deposits not included). Overall, there is significant opportunity for community development loans and investments within the market area. Despite it being a competitive market, the bank faces no significant constraints in taking advantage of all available community development opportunities.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN RICHMOND, VA MSA ASSESSMENT AREA

## **LENDING TEST**

The bank's Lending Test performance in the Richmond, VA MSA assessment area is adequate. This conclusion is based primarily on the institution's lending activity, geographic and borrower distribution performance, and its level of community development lending, while also considering the bank's market strategy, area demographic data, and aggregate data.

## **Lending Activity:**

Lending reflects good responsiveness to assessment area credit needs. During 2021 and 2022, the bank reported 184 HMDA loans and 805 small business loans, and 17 small farm loans within the assessment area. The bank's residential mortgage and small business lending within the assessment area, as measured by number (36.5%) and dollar (39.6%) is higher than the percentage of deposits (25.6%) and the percentage of branch offices (33.3%). As of June 30, 2023, PB ranked 7<sup>th</sup> out of 27 financial institutions in deposit market share with 1.6% of the area's available FDIC-insured deposits (excluding credit union deposits). According to 2022 aggregate loan data, the institution ranked 76<sup>th</sup> out of 615 reporters of HMDA lending volume with a .2% market share and 18<sup>th</sup> out of 141 reporters in small business/farm lending volume with a .5% market share in the assessment area.

## **Geographic Distribution:**

The bank's geographic distribution performance is considered good for both HMDA and for small business lending and is thus considered good overall.

Di	stributio	on of 2	021 ar	nd 2022 F Assess		_	age Len Richmon		-		el of G	eogra	phy
Geographic			20	21					20	22	Owner Occupied		
Income Level	Bank		Agg Banl		k Agg		Bank		Agg Banl		k	Agg	Units %
	#	# %	# %	\$(000)	\$ %	\$ %	#	#96	# %	\$(000)	\$%	\$%	
					Hor	me Pur	hase Loan	15					
Low	6	<b>D.4</b>	5.3	982	116	3.7	1	4.2	4.8	88	11	2.9	3.0
M o derate	11	35.5	18.1	1,528	18.0	13.7	4	15.7	18.9	685	8.2	14.1	15.5
M iddle	5	15.1	39.1	2,151	25.4	35.6	6	25.0	43.1	1986	23.9	40.4	46.
Upper	8	25.8	37.3	3,641	43.0	46.9	13	54.2	32.8	5,555	66.8	42.3	34.5
Unknown	1	3.2	0.2	165	19	0.1	0	0.0	0.4	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	8,467	100.0	100.0	24	100.0	100.0	8,314	100.0	100.0	100.0
						Refinan	ce Loans						
Low	2	6.5	2.9	2,701	32.2	2.0	0	0.0	4.3	0	0.0	2.6	3.0
M o derate	10	32.3	13.2	1,291	15.4	9.6	3	10.0	17.8	485	7.7	13.5	15.5
M iddle	12	38.7	39.2	2,235	26.6	34.7	15	53.3	45.4	2,884	45.7	42.1	46.
Upper	7	22.6	44.7	2,167	25.8	53.7	11	36.7	32.4	2,946	46.7	417	34.5
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	8,394	100.0	100.0	30	<b>D</b> 0.0	100.0	6,315	D0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.0	0	0.0	2.4	0	0.0	17	0	0.0	14	3.6
M o derate	2	33.3	118	60	18.6	9.3	2	7.1	9.3	121	4.2	6.7	15.5
M iddle	2	33.3	35.6	100	310	30.6	12	42.9	40.5	1,338	46.1	34.7	46.
Upper	2	33.3	49.5	163	50.5	57.5	14	50.0	48.3	1446	49.8	57.0	34.5
Unknown	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	323	100.0	100.0	28	<b>D</b> 0.0	100.0	2,905	<b>D</b> 0.0	100.0	100.0
					M	ultifam	ily Loans						Multi-family Units %
Low	0	0.0	25.3	0	0.0	22.2	0	0.0	20.9	0	0.0	4.5	16.3
M o derate	0	0.0	37.6	0	0.0	29.4	1	50.0	39.2	8,158	80.3	48.8	29.9
M id dle	0	0.0	22.9	0	0.0	30.0	0	0.0	20.3	0	0.0	26.9	31
Upper	0	0.0	12.9	0	0.0	17.5	1	50.0	15.5	2,000	19.7	19.4	20.
Unknown	0	0.0	12	0	0.0	0.8	0	0.0	3.2	0	0.0	0.4	2.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	10,158	100.0	100.0	100.0
					To tal H	lome M	ortgage Lo	aus					Owner Occupied Units %
Low	8	9.6	3.8	3,683	20.0	3.5	1	10	4.4	88	0.3	2.9	3.6
Moderate	25	30.1	15.1		15.1		11	10.9	17.6	9,699	32.1	15.4	15.5
M iddle	25	30.1	39.1	_	28.1	34.8	42	416	43.5	6,950	23.0	39.5	46.
Upper	24	28.9	419	6,441	34.9	49.5	47	46.5	34.3	13,438	44.5	410	34.5
Unknown	1	12	0.1		0.9	0.1	0	0.0	0.3	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	83	100.0	100.0	18,461	100.0	100.0	101	100.0	100.0	30,175	100.0	100.0	100.0
Source 2022 FFI	EC Censu	s Data											
				nerican Co ent due to r			y						

During 2021, home purchase and refinance loans were the leading HMDA products. Home improvement and multifamily lending was given less weight due to the limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for its home purchase and refinance lending are excellent.

In 2021, the bank's level of lending in low-income census tracts (9.6%) significantly exceeded the percentage of owner-occupied housing units located in such areas (4.5%) and the aggregate level of lending (3.8%). Similarly, the bank's level of lending in moderate-income census tract significantly exceeded the percentage of owner-occupied housing units located in such areas (17.9%) and the aggregate level of lending (15.1%). The bank's geographic distribution performance for residential mortgage loans is considered excellent.

During 2022, refinance and home improvement loans were the leading HMDA products, followed by home purchase loans. Multifamily lending was given less weight due to the limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for its refinance lending is poor, while the bank's performance for home improvement and home purchase lending are both adequate.

As reflected in the preceding table, PB's percentage of 2022 HMDA lending in low-income census tracts (1.0%) lagged the percentage of owner-occupied housing units located in such tracts (3.6%) and the aggregate level (4.4%). The bank's level of lending in moderate-income census tracts (10.9%) also lagged the percentage of owner-occupied housing units located in such areas (15.5%) and the aggregate level of lending (17.6%). Overall, the bank's 2022 performance is considered poor.

On a combined basis, HMDA lending performance is considered good.

Di	Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography Assessment Area: Richmond, VA MSA													
Geographic			20		And A	ggreg	ate Loai	Total						
Income Level	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	Businesses	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%	
Low	41	6.4	5.2	7,554	10.1	6.8	13	8.0	5.1	5,374	13.2	7.3	6.4	
Moderate	133	20.7	19.7	12,994	17.4	21.4	26	16.0	16.8	3,984	9.8	16.1	17.6	
Middle	244	37.9	35.2	28,240	37.7	33.0	74	45.7	40.6	17,736	43.4	38.2	41.1	
Upper	221	34.4	38.9	25,846	34.5	37.8	47	29.0	36.0	13,495	33.0	36.7	33.5	
Unknown	4	0.6	0.3	182	0.2	0.9	2	1.2	1.0	250	0.6	1.5	1.4	
Tract-Unk	0	0.0	0.6	0	0.0	0.1	0	0.0	0.4	0	0.0	0.2		
Total	643	100.0	100.0	74,816	100.0	100.0	162	100.0	100.0	40,839	100.0	100.0	100.0	

Source: 2022 FFIEC Census Data

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

During 2021, the bank's level of small business lending in low-income census tracts (6.4%) exceeded the percentage of business in such areas (6.2%), and the aggregate lending level (5.2%). The bank's level of lending in moderate-income census tracts (20.7%) also exceeded the percentage of businesses in such tracts (17.5%) and the aggregate level of lending (19.7%). Overall, the bank's small business performance during 2021 is considered good, and its performance during 2022 is substantially similar.

## Distribution by Borrower Income and Revenue Size of the Business:

The bank's borrower distribution of HMDA lending is considered poor and its small business lending is considered adequate. As previously noted, the dollar volume of HMDA and small business lending from 2021 and 2022 was used to determine the weight of products when deriving an overall performance rating. Given the dollar volume of small business lending (\$115.7 million) as compared to HMDA (\$38.5 million), more weight was placed on the bank's small business lending performance. The bank's borrower distribution performance is considered adequate overall.

	Distribu	tion o	f 2021	and 2022	2 Hom	e Mo	rtgage Le	ending	g By B	orrower	Incom	e Lev	el
				Assess	ment.	Area:	Richmor	ıd, VA	MSA				
				Вац	k And	Aggre g	nte Lo aus	By Year	r				
Borrower	2021									Families by			
Income Level	Bank		Agg Bank		Agg	Ban	Bank		gg Bank		Agg	Family Income %	
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
					Ноп	ne Pur	hase Loa	11.5					
Low	0	0.0	7.9	0	0.0	4.4	0	0.0	8.0	0	0.0	4.4	20.7
Moderate	0	0.0	22.7	0	0.0	15.9	1	4.2	216	354	4.3	15.1	18.3
M id d le	0	0.0	213	0	0.0	20.4	5	20.8	217	1,729	20.8	20.8	20.9
Upper	2	6.5	30.3	242	2.9	39.6	11	45.8	29.9	5,335	64.2	39.9	40.2
Unknown	29	93.5	17.8	8,225	97.1	18.8	7	29.2	18.8	896	10.8	18.8	0.0
Total	31	100.0	100.0	8,467	100.0	100.0	24	100.0	100.0	8,314	100.0	100.0	100.0
					I	Refinan	ce Loans						
Low	2	6.5	6.7	447	5.3	3.9	4	13.3	14.7	317	5.0	9.2	20.7
Moderate	0	0.0	18.0	0	0.0	13.4	5	16.7	25.0	835	13.2	20.9	18.3
M id dle	4	12.9	20.1	365	4.3	18.1	8	26.7	20.3	1,104	17.5	20.3	20.9
Upper	8	25.8	33.8	1,383	16.5	42.0	13	43.3	23.9	4,059	64.3	32.5	40.2
Unknown	17	54.8	214	6,199	73.9	22.5	0	0.0	16.1	0	0.0	17.0	0.0
Total	31	100.0	100.0	8,394	100.0	100.0	30	100.0	100.0	6,315	100.0	100.0	100.0
					Home	Impro	vement Lo	aus					
Low	1	16.7	6.2	50	15.5	4.0	5	17.9	6.9	565	19.4	4.8	20.7
Moderate	1	16.7	14.8	30	9.3	11.1	0	0.0	19.2	0	0.0	13.3	18.3
M id d le	1	16.7	23.9	80	24.8	19.1	7	25.0	25.8	512	17.6	212	20.9
Upper	3	50.0	50.7	163	50.5	60.5	15	57.1	45.3	1,828	62.9	57.6	40.2
Unknown	0	0.0	4.3	0	0.0	5.2	0	0.0	2.9	0	0.0	3.0	0.0
Total	6	100.0	100.0	323	100.0	100.0	28	100.0	100.0	2,905	100.0	100.0	100.0
					Totall	Home M	lortgage I	oans					
Low	6	7.2	7.2	602	3.3	4.1	11	111	10.0	947	4.7	5.7	20.7
M o de rate	1	12	19.6	30	0.2	14.8	9	9.1	22.2	1844	9.2	17.2	18.3
M id d le	10	12.0	20.6	812	4.4	19.0	27	27.3	214	4,154	20.8	20.5	20.9
Upper	20	24.1	33.0	2,593	14.0	412	45	45.5	29.5	12,176	60.8	38.6	40.2
Unknown	46	55.4	19.7	14,424	78.1	20.9	7	7.1	17.0	896	4.5	18.0	0.0
Total	83	100.0	100.0	18,461	100.0	100.0	99	100.0	100.0	20,017	100.0	100.0	100.0
Source: 2022 FF	IEC Census	s Data		-									

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2021, home purchase and refinance loans were the leading HMDA products, followed by home improvement loans. Home improvement lending was given less weight due to the limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered very poor, and the performance for refinance lending is considered poor.

In 2021, the bank's level of lending to low-income borrowers (7.2%) significantly lagged the percentage of families by family income (21.1%) but mirrored the aggregate lending to such borrowers (7.2%). The bank's level of lending to moderate-income borrowers (12%) lagged the percentage of families by family income (18%) and lagged the aggregate lending to such borrowers (19.6%). PB's 2021 HMDA borrower distribution performance is considered poor.

During 2022, refinance and home improvement loans were the leading HMDA products, followed by home purchase loans. Considering both demographic and aggregate proxies for demand, the bank's performance for its refinance and home improvement lending is considered adequate, and it performance for home purchase lending is considered very poor.

In 2022, the bank's level of lending to low-income borrowers (11.1%) significantly lagged the percentage of families by family income (20.7%), but was slightly higher than the aggregate lending to such borrowers (10%). The bank's level of lending to moderate-income borrowers (9.1%) significantly lagged both the percentage of families by family income (18.3%), and the aggregate lending to such borrowers (22.2%). PB's 2022 HMDA borrower distribution performance is considered adequate.

Overall, the bank's combined performance for HMDA lending is poor.

### Distribution of Lending by Loan Amount and Size of Business

Distrib	Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses												
			Ass	essmen	t Area	: Richi	nond, V	A MS	A				
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear				
			20	21					20	22			Total
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	~
	By Revenue												
\$1 Million or Less	87	13.5	49.4	16,391	21.9	29.9	50	30.9	51.4	9,135	22.4	33.5	92.6
Over \$1 Million	84	13.1		22,361	29.9		65	40.1		19,354	47.4		6.5
Revenue Unknown	472	73.4		36,064	48.2		47	29.0		12,350	30.2		0.9
Total	643	100.0		74,816	100.0		162	100.0		40,839	100.0		100.0
By Loan Size													
\$100,000 or Less	459	71.4	91.8	16,120	21.5	33.8	69	42.6	94.5	3,512	8.6	39.1	
\$100,001 - \$250,000	101	15.7	4.5	16,249	21.7	18.5	42	25.9	2.7	7,549	18.5	14.3	
\$250,001 - \$1 Million	83	12.9	3.7	42,447	56.7	47.7	51	31.5	2.8	29,778	72.9	46.6	
Total	643	100.0	100.0	74,816	100.0	100.0	162	100.0	100.0	40,839	100.0	100.0	
		1	By Loa	n Size a	nd Re	venue	\$1 Mill	ion or	Less				
\$100,000 or Less	51	58.6		2,171	13.2		31	62.0		1,373	15.0		
\$100,001 - \$250,000	14	16.1		2,321	14.2		7	14.0		1,084	11.9		
\$250,001 - \$1 Million	22	25.3		11,899	72.6		12	24.0		6,678	73.1		
Total	87	100.0		16,391	100.0		50	100.0		9,135	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & I	Bradstreet I	Data											
2016-2020 U.	S. Census l	Вигеаи:	America	п Сотти	nity Sur	vey							
Note: Percentages ma	v v												

D&B data from 2021 indicates that 92.6% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 13.5% were to businesses with revenues of \$1 million or less, while 49.4% of the aggregate lending level were to businesses with revenues of \$1 million or less. The percentage of the bank's small business loans extended to businesses with revenues of \$1 million or less was impacted by a large volume of loans for which borrower revenue was unknown (i.e., 73.4% of all loans). The bank was an active PPP lender during 2021, and the PPP loan program did not require the collection or consideration of borrower revenue data. Consequently, large volumes of small business loans were originated during 2021 for which borrower revenue is unkown. However, when borrower revenues were known, 50.9% of the bank's loans (87 of 171 loans) were to businesses with revenues of \$1 million or less.

Aggregate small business data was also considered as an element of performance context in evaluating the bank's distribution by business revenue. During 2021, 49.4% of all reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of loans were to businesses that either had revenues exceeding \$1 million or had unknown revenues. The 2021 aggregate small business loan data also includes an unknown volume of PPP loans, which limits its usefulness as a proxy when evaluating the bank's performance.

Because smaller dollar loans can demonstrate a willingness to provide credit to small businesses, the bank's distribution by loan size was also considered. Overall, in 2021 the bank originated 71.4% of its small business loans in amounts of \$100,000 or less which lagged the aggregate reporter level of such lending (91.8%). Within the assessment area, the aggregate lenders reported an unusually large percentage of small business loans in amounts of \$100,000 or less.

As an element of performance context, the bank's small business loans without borrower revenue data were also evaluated by loan size within this assessment area. The following table reflects this distribution.

Distribution of 2021 Small Business Loans with No Revenue By Loan Size Assessment Area: Richmond, VA MSA									
	Bank								
	#	%	\$(000s)	%					
By Loan Size									
\$100,000 or less	377	79.9	11,865	32.9					
\$100,001 - \$250,000	63	13.3	9,363	26					
<b>\$250,001 - \$1 Million</b> 32 6.8 14,836 41.1									
Total	472	100	36,064	100					

Within the assessment area, a majority (79.9%) of the bank's small business loans for which borrower revenue was not known had loan amounts of \$100,000 or less, indicating that the bank is helping to serve the needs of small businesses within the area. Overall, after considering these elements, the bank's small business borrower distribution for 2021 is considered adequate.

D&B data from 2022 indicates that 92.6% of all local businesses have revenues that do not exceed \$1 million per year. Aggregate small business data was also considered as an element of performance context in evaluating the bank's distribution by business revenue. During 2022, of the total volume of small business loans considered in the evaluation, 30.9% were to businesses with revenues of \$1 million or less, while 51.4% of the aggregate lending level were to businesses with revenues of \$1 million or less. The bank's small business borrower distribution for 2022 is considered adequate. Overall, the bank's small business borrower distribution performance is considered adequate.

## **Community Development Lending:**

Opportunities for community development lending are reasonably available within the Richmond, VA assessment area. When considering the bank's capacity, market position and business strategy, the bank faces no constraints extending community development loans. During the evaluation period, PB extended an adequate level of community development loans within the assessment area. Seven qualified community development loans for approximately \$20 million were originated that directly benefit the assessment area.

#### INVESTMENT TEST

Overall, PB has an adequate level of qualified community development investments that benefit the assessment area. The bank also makes occasional use of innovative and/or complex investments to support community development initiatives and exhibits adequate responsiveness to credit and community development needs in the assessment area.

PB holds the following qualified community development investments and donations specifically impacting this assessment area.

- \$11.3 million invested in two affordable housing bonds impacting this assessment area. Proceeds of the bonds used to finance multifamily properties that are affordable to low- and moderate-income families.
- Charitable donations of \$54,072 were made to entities that provide community development services to residents within the assessment area.

PB's Investment Test performance in this assessment area is considered adequate.

#### SERVICE TEST

Within the assessment area, PB's performance under the Service Test is considered adequate. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low-and moderate-income areas, and do not vary in a way that inconveniences low- and-moderate income individuals or areas within the MSA. Additionally, the bank has provided an adequate level of qualified services to community development organizations. While the bank has closed two branches within the assessment area since the previous evaluation, none of the closures were located in low- and moderate-income census tracts.

#### **Retail Services:**

Delivery systems are reasonably accessible to individuals and geographies of varying income levels within the assessment area. ATMs, are available and, through a network, provide customers with 24-hour access. Currently the bank operates nine full-service branch offices and one drive-thru within the assessment area. Two (22.2%) of the branches are located within moderate-income census tracts. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies.

As previously noted, PB closed two full-service branches during the review period, which were located in a middle-income and an upper-income census tract. PB's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low-and moderate-income individuals. Within the assessment area, 8.3% and 21.7% of the households are located in low- and moderate tracts, respectively. In addition, PB provides customers with 24-hour telephone access to their accounts through an automated system. The bank's services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or low-and moderate-income individuals.

## **Community Development Services:**

The bank provided an adequate level of qualified community development services. Ten bank employees volunteered their time and utilized their financial expertise across three organizations whose operations benefit low- and moderate-income geographies and/or low- and moderate-income people.

In addition to service activities that benefit multiple assessment areas, the bank supported the following organizations which specifically benefited this assessment area.

- Junior Achievement
  - Several employee volunteers their time to provide financial literacy to low- and moderate-income children.
- Chesterfield CASA
  - One employee serves on the board. The organization provides court appointed aid to abused, neglected, and/or abandoned children.
- Chesterfield Food Bank Outreach Center
  - One employee volunteers on the fundraising committee for this organization that works to reduce food starvation and deprivation.

### **METROPOLITAN AREAS**

#### **FULL-SCOPE REVIEW**

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA BEACH-NORFOLK-NEWPORT NEWS, VIRGINIA

PB delineates the entire Virginia portion of the Virgina Beach-Norfolk-Newport News, VA-NC MSA that includes six counties and ten cities and currently operates six branches within the assessment area. Information about loan volume, branches, and deposits are included in *Appendix E* of this report. The complete composition of the assessment area is detailed in *Appendix D*.

According to 2020 ACS data, the assessment area has a population of 1.8 million and a median housing value of \$254,889. The owner-occupancy rate equaled 56.5%, which is below the statewide rate of Virginia (59.2%), but is slightly above the rate for the MSA (55.5%). Within the assessment area, 10.2% of families were considered below the poverty level, which mirrors the entire Virginia Beach-Norfolk-Newport News, VA MSA rate (10.2%), and is comparable to the statewide rate of such families (9.9%). The 2021 and 2022 median family incomes for the MSA were \$80,800 and \$93,200, respectively.

The following table provides family and household demographic information for the assessment area, as well as the tract and owner-occupied housing unit distribution by tract income level. The table also provides D&B business data.

	2022 Vi	rginia Beac	h-Norfolk-N	News, VA	AA Demogr	aphics				
In come Categories	Tract Dis	tribution	Families by 1	Tract Income		overty Level lies by Tract	Families l In co	y Family ome		
	#	%	#	%	#	%	#	%		
Low	35	7.4	22,832	5.3	6,956	30.5	87,211	20.2		
Moderate	121	25.4	97,122	22.5	12,031	12.4	78,476	18.2		
Middle	162	34.0	158,487	36.7	8,388	5.3	92,443	21.4		
Upper	139	29.2	149,311	34.6	4,399	2.9	173,308	40.2		
Unknown	19	4.0	3,686	0.9	1,558	42.3	0	0.0		
Total AA	476	100.0	431,438	100.0	33,332	7.7	431,438	100.0		
	Housing			Hous	ing Type by	Tract				
	Units by	О	wn er-occupie	xd	Rei	ıtal	Vac	ant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	43,701	10,095	2.5	23.1	28,789	65.9	4,817	11.0		
Moderate	177,070	70,750	17.5	40.0	88,344	49.9	17,976	10.2		
Middle	261,536	159,142	39.5	60.8	82,848	31.7	19,546	7.5		
Upper	222,556	160,916	39.9	72.3	44,228	19.9	17,412	7.8		
Unknown	8,719	2,303	0.6	26.4	5,168	59.3	1,248	14.3		
Total AA	713,582	403,206	100.0	56.5	249,377	34.9	60,999	8.5		
		Businesses by Tract & Revenue Size								
	Total Busines	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported		
	#	%	#	%	#	%	#	%		
Low	3,253	4.1	3,017	4.1	211	4.7	25	4.5		
Moderate	17,410	22.2	16,088	21.9	1,224	27.3	98	17.5		
Middle	29,964	38.2	27,963	38.1	1,796	40.1	205	36.7		
Upper	26,497	33.8	25,186	34.3	1,090	24.3	221	39.5		
Unknown	1,343	1.7	1,170	1.6	163	3.6	10	1.8		
Total AA	78,467	100.0	73,424	100.0	4,484	100.0	559	100.0		
Pero	entage of Tota	al Businesses:		93.6		5.7		0.7		
				Fa	rms by Tract					
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported		
	#	%	#	%	#	%	#	%		
Low	11	1.6	11	1.6	0	0.0	0	0.0		
Moderate	74	10.8	74	11.0	0	0.0	0	0.0		
Middle	360	52.3	351	52.2	9	56.3	0	0.0		
Upp er	241	35.0	234	34.8	7	43.8	0	0.0		
Unknown	2	0.3	2	0.3	0	0.0	0	0.0		
Total AA	688	100.0	672	100.0	16	100.0	0	0.0		
1	Percentage of	Total Farms:		97.7		2.3		0.0		
Source: 2022 FFIEC Census I	Data									

Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data

2016-2020 U.S. Cersus Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The federal government provides a large portion of area employment opportunities for residents, primarily through the Department of Defense, in addition to opportunities provided by local government agencies. In addition, healthcare, hospitality, retail, manufacturing, and construction are primary employment drivers of the local economies. There are several large universities in the area, including William and Mary, Christopher Newport, Old Dominion, Hampton, and Norfolk State Universities.

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Virginia Beach-Norfolk-Newport News, VA 23 Unemployment Rates									
Area	2019	2020	2021	2022	2023				
Gloucester County, VA	2.5%	5.6%	3.4%	2.6%	2.6%				
Isle of Wight County, VA	2.8%	5.2%	3.4%	2.7%	2.8%				
James City County, VA	2.6%	7.1%	3.9%	2.8%	2.8%				
Mathews County, VA	2.8%	5.1%	3.2%	2.8%	2.8%				
Southampton County, VA	2.6%	5.1%	3.5%	2.7%	2.6%				
York County, VA	2.6%	5.7%	3.3%	2.7%	2.7%				
Chesapeake city, VA	2.8%	6.3%	3.8%	2.8%	2.9%				
Franklin city, VA	3.9%	8.6%	6.6%	3.9%	3.8%				
Hampton city, VA	3.7%	8.8%	5.5%	3.7%	3.7%				
Newport News city, VA	3.4%	9.0%	5.4%	3.5%	3.4%				
Norfolk city, VA	3.4%	9.0%	5.5%	3.4%	3.4%				
Poquoson city, VA	2.4%	4.3%	2.8%	2.4%	2.5%				
Portsmouth city, VA	3.9%	9.8%	6.4%	3.7%	3.7%				
Suffolk city, VA	3.0%	6.6%	4.3%	3.0%	3.1%				
Virginia Beach city, VA	2.7%	6.4%	3.7%	2.7%	2.8%				
Williamsburg city, VA	3.8%	8.4%	4.8%	3.9%	4.0%				
Virginia	2.8%	6.4%	3.9%	2.8%	2.9%				
Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics									

While unemployment rates increased from 2019 to 2020 as a result of the COVID-19 pandemic, rates have steadily decreased from 2020 to 2022 across all counties, cities, and states within the assessment area. In 2023, most all areas have maintained unemployment rates from 2022 or have experienced slight increases in unemployment.

A local official of a nonprofit affordable housing organization was contacted during the evaluation to assist in evaluating the bank's CRA performance and to discuss local economic conditions and community credit needs within the multistate area. The organization serves the community by developing affordable housing rentals and homeownership opportunities throughout Virginia Beach, as well as providing housing counseling and tenant support services to low- and moderate-income residents. The representative noted that demand for affordable housing has been exacerbated by post-pandemic economic conditions. The representative stated that the rising cost of homeownership, as well as the increase in mortgage rates, are the drivers of the demand for more affordable housing and noted that banks could help meet the affordable housing needs of its markets by offering low interest rates on residential mortgage loans. The contact noted that she believes local financial institutions were adequately invested and involved in their communities, and she was not aware of any discriminatory activities or practices.

As of June 30, 2023, the institution ranked 11<sup>th</sup> out of 22 financial institutions in local deposit market share according to data compiled by the FDIC and held .9% of assessment area deposits (credit union deposits not included). Overall, there is opportunity for community development loans and investments within the market area and the bank faces no significant constraints in taking advantage of all available community development opportunities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA BEACH-NORFOLK-NEWPORT NEWS, VIRGINIA ASSESSMENT AREA

#### **LENDING TEST**

The bank's Lending Test performance in the Virginia Beach-Norfolk-Newport News, VA assessment area is considered adequate. This conclusion is primarily on the institution's lending activity, geographic and borrower performance, and its level of community development lending, while also considering the bank's market strategy, area demographic data, and aggregate data.

### **Lending Activity:**

The institution's lending level reflects good responsiveness to assessment area credit needs during the evaluation period. During 2021 and 2022 the bank reported 138 HMDA loans and 627 small business loans within this assessment area. The bank's HMDA and small business lending within this assessment area, as measured by the number (17.5%) and dollar volume (24.1%) is greater than local percentage of deposits (8.7%) and bank branches (22.2%). As of June 30, 2023, PB ranked 11<sup>th</sup> out of 22 financial institutions in deposit market share with .9% of the area's available FDIC-insured deposits (excluding credit union deposits). According to 2022 aggregate loan data, the institution ranked 99<sup>th</sup> out of 634 reporters in HMDA lending volume with a >.1% market share and 26<sup>th</sup> out of 148 reporters in small business/farm lending volume with a .2% market share in the assessment area.

## **Geographic Distribution:**

The geographic distribution performance is considered good for HMDA lending and excellent for small business lending. Within this assessment area, small business lending performance carries slightly greater weight, as the bank originated \$51.7 million in small business compared to \$48.6 million in HMDA loans. Overall, the bank's performance is considered excellent when considering the relative performance levels and dollar volumes of each product.

							te Loans			ews, VA			i
Caagraphic	2021 2022					Owner Occupied							
Geographic Income Level	Ban	k	Agg	Ban	k	Agg	Ban	Bank Agg Bank Agg		Units %			
	#	# 9/6	# 9/6	\$(000)	\$ %	\$ %	#	#0/6	# %	\$(000)	\$%	\$ %	
				4(000)			hase Loan	15		*(***)	4.70	<b>V</b> 1.2	
Low	5	D.6	3.1	886	7.5	2.1	0	0.0	3.5	0	0.0	2.5	2
M o derate	13	27.7	214	2,467	20.9	16.2	6	20.7	22.2	986	5.8	16.8	n
M id dle	14	29.8	38.5	2,417	20.5	34.8	3	10.3	38.6	791	4.7	36.0	39
Upper	15	319	36.7	6,022	511	46.6	19	65.5	34.8	15,044	88.7	44.1	39
Unknown	0	0.0	0.3	0	0.0	0.3	1	3.4	0.9	135	0.8	0.7	(
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	11,792	100.0	100.0	29	100.0	100.0	16,956	100.0	100.0	100
					I	Refinanc	e Loans						
Low	0	0.0	17	0	0.0	11	2	10.0	2.8	441	4.5	18	2
M o derate	6	30.0	15.1	1440	25.0	11.1	2	10.0	19.2	237	2.4	14.4	17
M id dle	4	20.0	36.5	488	8.5	318	5	25.0	39.2	275	2.8	35.7	39
Upper	10	50.0	46.5	3,825	66.5	55.7	11	55.0	38.0	8,803	90.2	47.2	39
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.8	0	0.0	0.8	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	5,753	100.0	100.0	20	100.0	100.0	9,756	<b>D</b> 0.0	100.0	100
'					Home	Improv	ement Lo	ans					-
Low	0	0.0	2.0	0	0.0	18	0	0.0	13	0	0.0	0.9	2
M o derate	0	0.0	B.5	0	0.0	9.1	1	12.5	13.4	15	18	10.5	17
M id dle	1	33.3	314	143	38.9	27.7	5	62.5	34.1	550	67.4	30.0	39
Upper	2	66.7	53.0	225	611	613	2	25.0	50.7	251	30.8	58.0	39
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.5	0	0.0	0.6	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	368	100.0	100.0	8	100.0	100.0	816	<b>D</b> 0.0	100.0	100
					М	ultifami	ly Lo ans						Multi-family
Low	0	0.0	14.6	0	0.0	13.9	0	0.0	113	0	0.0	8.7	Units % 14
M o derate	0	0.0	37.3	0	0.0	23.5	0	0.0	42.3	0	0.0	29.1	32
M id dle	0	0.0	29.7	0	0.0	37.4	1	50.0	24.6	1170	85.5	32.5	30
Upper	0	0.0	17.3	0	0.0	25.0	1	50.0	211	199	14.5	29.6	20
Unknown	0	0.0	11	0	0.0	0.2	0	0.0	0.7	0	0.0	0.1	2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	1369	100.0	100.0	100
							rtgage Lo						Owner Occupie
. 1						П							Units %
Low	5	6.6	2.3	886	4.6	2.2	2	3.2	3.1	441	15	2.7	2
Moderate	19	25.0	17.9	3,907	20.3	14.1	9	14.5	20.5	1238	4.2	16.9	17
Middle	23	30.3	37.3	3,643	19.0	33.4	17	27.4	38.2	3,261	111	35.4	39
Upper	29	38.2	42.2	10,782	56.1	50.0	33	53.2	37.4	24,297	82.7	44.3	39
Unknown	0	0.0	0.2	0	0.0	0.3	1	16	0.8	135	0.5	0.7	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total Source 2022 FFI	76	100.0	100.0	19,218	100.0	100.0	62	100.0	100.0	29,372	<b>D</b> 0.0	100.0	100

Note: Percenta ges may not total 100.0 percent due to rounding.

During 2021, home purchase loans were the leading HMDA product by number followed by refinance loans. Home improvement and multifamily lending were given less weight due to the limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase and refinance lending are considered excellent.

The bank's 2021 HMDA lending in low-income census tracts (6.6%) significantly exceeds both the aggregate lending level (2.3%) and the percentage of owner-occupied housing units located in such tracts (2.5%). Similarly, the bank's level of lending in moderate-income census tracts (25%) significantly exceeded both the aggregate level of lending (17.9%) and the percentage of owner-occupied housing units located in such tracts (18.1%) and is considered excellent.

During 2022, home purchase loans were the leading HMDA product by number followed by refinance loans. Home improvement and multifamily lending were given less weight due to the limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase and home refinance lending is considered adequate. While their conclusions carry significantly less weight, home improvement and multifamily lending are both considered poor.

As reflected in the preceding table, PB's percentage of 2022 HMDA lending in low-income census tracts (3.2%) approximates both the aggregate lending level (3.1%) and the percentage of owner-occupied housing units located in such tracts (2.5%) and is considered good. The bank's level of lending in moderate-income census tracts lagged both the aggregate lending level (20.5%) and the percentage of owner-occupied housing units located in such tracts (17.5%) and is considered adequate.

On a combined basis, HMDA lending performance is considered good.

Di	Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography												
	Assessment Area: Virginia Beach-Norfolk-N News, VA												
C	Bank And Aggregate Loans By Year										Total		
Geographic		2021 2022											
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	31	11.9	3.7	8,260	25.2	4.3	6	8.0	3.7	1,991	10.5	3.7	4.1
Moderate	72	27.6	21.4	6,766	20.7	24.5	23	30.7	21.0	4,925	26.0	21.9	22.2
Middle	88	33.7	35.6	9,432	28.8	35.6	24	32.0	37.8	5,722	30.2	39.0	38.2
Upper	67	25.7	37.3	8,161	24.9	32.9	20	26.7	35.3	6,202	32.7	32.1	33.8
Unknown	3	1.1	1.4	114	0.3	2.6	2	2.7	1.9	100	0.5	3.2	1.7
Tract-Unk	0	0.0	0.5	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	261	100.0	100.0	32,733	100.0	100.0	75	100.0	100.0	18,940	100.0	100.0	100.0

Source: 2022 FFIEC Census Data

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank's percentage of small business lending 2021 in low-income census tracts (11.9%) significantly exceeds both the aggregate reporters lending levels (3.7%) and the percentage of businesses located in such tracts (4.1%). The bank's percentage of small business lending in moderate-income census tracts (27.6%) also significantly exceeds both the aggregate reporters lending levels (21.4%) and the percentage of businesses located in such tracts (22.2%). Overall, the bank's small business lending performance during 2021 is considered excellent, and its performance during 2022 is substantially similar.

## Distribution by Borrower Income and Revenue Size of the Business:

The bank's borrower distribution is considered poor for HMDA, adequate for small business lending. Given the relative performance levels and dollar volumes of lending, overall, borrower distribution is considered poor.

1	Distribu			and 2022				_			Incom	e Lev	el	
		1	Assess	ment Ar						ews, VA				
			2021	Bar	k And	Aggreg	ate Loans	By Year	r 20:					
Borrower Income Level	Ban	1.	2021	Bank		1	Ban	1.	Agg	Ban	1.	1	Families by Family Income %	
mcome Level			Agg			Agg						Agg	ramny meome 90	
	#	# %	#%	\$(000)	\$ %	\$ %	#	#%	#%	\$(000)	\$ %	\$ %		
-			4.5				hase Loa		4.5	1000				
Low	0	0.0	4.9	0	0.0	2.5	1	3.4	4.8	1,000	5.9	2.5	20.2	
Moderate	0	0.0	219	0	0.0	15.0	1	3.4	23.2	50	0.3	17.2	18.2	
Middle	0	0.0	22.6	0	0.0	215	2	6.9	219	485	2.9	212	214	
Upper	1	2.1	26.0	160	14	34.5	18	62.1	24.6	13,963	82.3	33.1	40.2	
Unknown	46	97.9	24.5	11,632	98.6	25.6	7	24.1	25.4	1,458	8.6	26.0	0.0	
Total	47	100.0	100.0	11,792	100.0	100.0	29	100.0	100.0	16,956	100.0	100.0	100.0	
_							ce Loans							
Low	0	0.0	3.9	0	0.0	2.1	1	5.0	9.1	30	0.3	5.2	20.2	
M o de rate	0	0.0	119	0	0.0	8.4	2	10.0	215	120	12	16.6	18.2	
Middle	1	5.0	15.8	60	10	13.6	4	20.0	22.8	532	5.5	22.0	214	
Upper	5	25.0	27.9	646	112	33.0	10	50.0	27.5	8,471	86.8	35.7	40.2	
Unknown	14	70.0	40.5	5,047	87.7	42.8	3	15.0	19.1	603	6.2	20.5	0.0	
Total	20	100.0	100.0	5,753	100.0	100.0	20	100.0	100.0	9,756	100.0	100.0	100.0	
							vement Lo							
Low	1	33.3	5.1	100	27.2	3.5	1	12.5	5.4	15	18	3.7	20.2	
Moderate	0	0.0	14.1	0	0.0	9.4	2	25.0	17.6	350	42.9	12.3	18.2	
Middle	0	0.0	22.0	0	0.0	17.0	1	12.5	26.7	120	14.7	218	214	
Upper	1	33.3	55.3	125	34.0	64.5	3	37.5	47.9	151	18.5	59.2	40.2	
Unknown	1	33.3	3.5	143	38.9	5.7	1	12.5	2.6	180	22.1	3.1	0.0	
Total	3	100.0	100.0	368	100.0	100.0	8	100.0	100.0	816	100.0	100.0	100.0	
						Home M	lortgage I							
Low	2	2.6	4.4	300	16	2.3	3	5.0	6.0	1045	3.7	3.2	20.2	
M o de rate	3	3.9	16.3	395	2.1	12.0	5	8.3	219	520	19	15.8	18.2	
M id d le	1	13	18.9	60	0.3	17.4	7	117	22.5	1137	4.1	213	214	
Upper	9	118	27.8	1,641	8.5	34.0	34	56.7	27.8	23,060	82.3	34.6	40.2	
Unknown	61	80.3	32.5	16,822	87.5	34.2	11	18.3	218	2,241	8.0	24.1	0.0	
Total	76	100.0	100.0	19,218	100.0	100.0	60	100.0	100.0	28,003	100.0	100.0	100.0	

Source: 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2021, home purchase loans were the leading HMDA product by number followed by refinance loans. Home improvement lending was given less weight due to the limited lending with the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase and refinance lending are both considered poor and home improvement lending is considered excellent.

In 2021, the bank's overall level of HMDA lending to low-income borrowers (2.6%) significantly lagged the the percentage of low-income families (20.2%) and slightly lagged the aggregate lending levels to such borrowers (4.4%). The bank's level of lending to moderate-income borrowers (3.9%) also lagged both the percentage to moderate-income families (18.2%) and the aggregate lending levels to such borrowers (16.3%). Overall, the bank's borrower distribution performance during 2021 is considered poor and its 2022 performance is substantially similar.

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
				t Area: V			_	-					
				Bank	And A	ggreg	ate Loai	ıs By Y	(ear				
		2021							20	22			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					By F	Reveni	ıe						
\$1 Million or Less	36	13.8	46.1	9,272	28.3	27.7	26	34.7	50.8	4,613	24.4	34.5	93.6
Over \$1 Million	38	14.6		9,116	27.8		35	46.7		10,403	54.9		5.7
Revenue Unknown	187	71.6		14,345	43.8		14	18.7		3,924	20.7		0.7
Total	261	100.0		32,733	100.0		75	100.0		18,940	100.0		100.0
By Loan Size													
\$100,000 or Less	181	69.3	92.0	5,638	17.2	33.7	25	33.3	95.3	1,452	7.7	42.1	
\$100,001 - \$250,000	41	15.7	4.5	6,647	20.3	18.3	26	34.7	2.4	5,021	26.5	14.0	
\$250,001 - \$1 Million	39	14.9	3.6	20,448	62.5	48.0	24	32.0	2.3	12,467	65.8	43.9	
Total	261	100.0	100.0	32,733	100.0	100.0	75	100.0	100.0	18,940	100.0	100.0	
		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	13	36.1		435	4.7		12	46.2		717	15.5		
\$100,001 - \$250,000	7	19.4		1,350	14.6		9	34.6		1,706	37.0		
\$250,001 - \$1 Million	16	44.4		7,487	80.7		5	19.2		2,190	47.5		
Total	36	100.0		9,272	100.0		26	100.0		4,613	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & E			A		uita. Com								
	2016-2020 U.S. Census Bureau: American Community Survey  Note: Percentages may not total 100.0 percent due to rounding.												

D&B data from 2021 indicates that 93.6% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 13.8% were to businesses with revenues of \$1 million or less, while 46.1% of the aggregate lending level were to businesses with revenues of \$1 million or less. The percentage of the bank's small business loans extended to businesses with revenues of \$1 million or less was impacted by a large volume of loans for which borrower revenue was unknown (i.e., 71.6% of all loans). The bank was an active PPP lender during 2021, and the PPP loan program did not require the collection or consideration of borrower revenue data. Consequently, large volumes of small business loans were originated during 2021 for which borrower revenue is unkown. However, when borrower revenues were known, 48.6% of the bank's loans (36 of 74 loans) were to businesses with revenues of \$1 million or less.

Aggregate small business data was also considered as an element of performance context in evaluating the bank's distribution by business revenue. During 2021, 46.1% of all reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of loans were to businesses that either had revenues exceeding \$1 million or had unknown revenues. The 2021 aggregate small business loan data also include an unknown volume of PPP loans, which limits its usefulness as a proxy when evaluating the bank's performance.

Because smaller dollar loans can demonstrate a willingness to provide credit to small businesses, the bank's distribution by loan size was also considered. Overall, in 2021 the bank originated 69.3% of its small business loans in amounts of \$100,000 or less which lagged the aggregate reporter level of such lending (92%). Within the assessment area, the aggregate lenders reported an unusually large percentage of small business loans in amounts of \$100,000 or less.

As an element of performance context, the bank's small business loans without borrower revenue data were also evaluated by loan size within this assessment area. The following table reflects this distribution.

Distribution of 2021 Small Business Loans with No Revenue By Loan Size Assessment Area: Virginia Beach-Norfolk-Newport News VA									
	Bank								
	#	%	\$(000s)	%					
By Loan Size									
\$100,000 or less	154	82.4	4,438	30.9					
\$100,001 - \$250,000	19	10.2	2,677	18.7					
\$250,001 - \$1 Million	14	7.5	7,230	50.4					
Total	187	100	14,345	100					

Within the assessment area, a majority (82.4%) of the bank's small business loans for which borrower revenue was not known had loan amounts of \$100,000 or less, indicating that the bank is helping to serve the needs of small businesses within the area. The bank's borrower distribution performance for 2021 is considered adequate.

D&B data from 2022 indicates that 93.6% of all local business have revenues that do not exceed \$1 million per year. Aggregate small business data was also considered as an element of performance context in evaluating the bank's distribution by business revenue. During 2022, of the total volume of small business loans considered in the evaluation, 34.7% were to businesses with revenues of \$1 million or less, while 50,8% of the aggregate lending level were to businesses with revenues of \$1 million or less. The bank's borrower distribution performance for 2022 is also considered adequate.

Overall, the bank's small business lending performance is considered adequate.

### **Community Development Loans:**

Opportunities for community development lending are readily available within the Virginia Beach-Norfolk-Newport News, VA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, PB extended few community development loans within the assessment area, having originated one qualified affordable housing community development loan for \$1.2 million dollars that directly benefit the assessment area.

#### INVESTMENT TEST

Overall, PB has a poor level of responding to community development needs through its investment activities within this assessment area, as the bank does not hold any qualified community development investments or donations specifically impacting this assessment area. The bank also makes rare use of innovative and/or complex investments to support community development initiatives. PB's Investment Test performance in this assessment area is considered poor.

#### SERVICE TEST

Within the assessment area, HTB's performance under the Service Test is considered adequate. This conclusion is based on the bank's branch distribution, branching activity during the review period, availability of alternative delivery systems, range of services provided in the assessment area, and extent/innovativeness of community development services.

#### **Retail Services:**

Delivery systems are reasonably accessible to individuals and geographies of varying income levels within the assessment area. The bank currently operates six branches within the assessment area, of which one (17%) is located in a moderate-income geography. Within the assessment area, 6.1% and 24.5 percent of area households are located in low-and moderate-income census tracts, respectively.

Since the previous evaluation the bank has closed one branch in this assessment area, located in a middle-income census tract. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies Retail banking services do not vary in a way that inconveniences any portion of the bank's assessment areas, including low- and moderate-income areas or people. The institution offers no-cost checking products as well as low-cost checking to businesses. Such accounts benefit all segments of the community, including low- and moderate-income individuals and businesses.

## **Community Development Services:**

The bank provides an adequate level of community development services in this assessment area. Community development opportunities are reasonably available, and the bank has sufficient capacity to participate in such activities. Three bank employees volunteered their time and utilized their financial expertise across four organizations whose operations benefit low- and moderate-income geographies and/or low- and moderate-income people or support small businesses. During the review period, the bank provided five qualified community development services. These activities include the following:

- Virginia Peninsula Foodbank
  - A bank employee serves on the board of this organization that fights against food hardship in the assessment area.
- Transition Family Violence Service
  - o An employee serves on the board of this organization that works to build safe, healthy, and violence free families.
- The Maximum Business Bootcamp
  - A bank employee was a speaker at a two-day conference designed to help scale and grow small businesses.

#### **METROPOLITAN AREAS**

#### LIMITED-SCOPE REVIEW

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLOTTESVILLE, VA MSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Charlottesville, VA, MSA assessment area was conducted. Overall, the bank's investment test performance was consistent with the statewide performance level, but its lending and service test performances were below the statewide level.

This assessment area is located in central Virginia and includes the City of Charlottesville, and the counties of Albemarle, Fluvanna, Greene, and Nelson. The bank operates one full-service branch location in a middle-income tract within this assessment area, which includes two low- and 14 moderate-income tracts.

The following table provides information regarding the demographic characteristics of the assessment area, and the subsequent table reflects PB's lending activity in the area during the evaluation period.

Assessment	Area	Demographi	ics - Charlottesville, V	A MSA Assessment Area
	Di	Tract istribution	Percentage of	Percentage of Families by
Income Category	#	%	Families by Tract	Income Level
Low Income	2	3.6%	1.6%	19.6%
Moderate Income	14	25.5%	22.0%	17.8%
Middle Income	24	43.6%	47.0%	21.8%
Upper Income	15	27.3%	29.5%	40.8%
Total	55	100%	100%	100%

Lending Activity in the Charlottesville, VA MSA Assessment Area										
Loan Type 2021 2022 Total										
HMDA	9	3	12							
Small Business	20	8	28							
Total	29	11	40							

The bank did not originate any qualified community development loans within this assessment area during the evaluation period. Investments benefitting this assessment area are limited to those previously discussed benefitting statewide or multistate areas. Banking services provided in this assessment area are identical to services offered at other branch locations throughout the bank's assessment areas. The bank did not participate in any community development service activities specifically benefiting this assessment area.

#### **METROPOLITAN AREA**

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the assessment areas, including selected demographic data, is included in *Appendix C* of this report.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in *Appendix C* of this evaluation. Conclusions regarding performance, which did not impact the institution's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	<b>Lending Test</b>	Investment Test	Service Test
Charlottesville, VA MSA	Below	Consistent	Below

### NON-METROPOLITAN STATEWIDE AREA

#### **FULL-SCOPE REVIEW**

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN ESSEX, VIRGINIA NONMSA

The Essex, Virginia NonMSA assessment area is comprised of six counties within the northeastern portions of Virginia and the bank currently operates six branches. Assessment area demographics shifted during the bank's evaluation period. In 2021, similar to the previous evaluation, the assessment area did not contain any low- or moderate-income census tracts. However, of the 25 tracts within the assessment area, two were designated underserved as remote rural areas. However, in 2022, the assessment area contained 29 tracts and of those tracts, one was designated as moderate-income and two were designated underserved, as remote rural areas (Richmond and Northumberland Counties). According to data published by the FFIEC, census tracts are designated underserved when they are located in predominately rural areas that are distant from population centers, and they may lack access to certain services.

On a combined basis, this assessment area accounts for 10.3% (dollar volume) of the bank's combined 2021 and 2022, 22.2% of branches, and 51.5% of deposit volume. Information about loan volume, branches, and deposits are included in *Appendix D* of this report and a complete composition of the assessment area is detailed in *Appendix E*.

According to 2020 ACS data, the assessment area has a population of 83,792 and a median housing value of \$228,462. The owner-occupancy rate for the Essex, VA NonMSA (57.3%) declined slightly since the previous evaluation but still approximates the rate for nonmetropolitan areas of Virginia (56.7%), both of which are below the statewide rate for the Commonwealth (60%). Within the assessment area 8% of families were considered below the poverty level, which is higher than the percentage of such families in Virginia (6.8%), but lower than the rate for nonmetropolitan areas of the commonwealth (11.5%). The 2021 and 2022 median family incomes for nonmetropolitan areas of the Virginia were \$58,900 and \$67,800.

The following table includes relevant demographic data for the 2022 Essex, VA NonMSA assessment area.

		2022 Essex	, VA NonM	SA AA Dem	ographics			
In come Categories	Tract Dis	tribution	Families by 1	Tract Income		overty Level lies by Tract	Families l	y Family ome
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,318	14.6
Moderate	1	3.4	1,130	5.0	168	14.9	3,436	15.1
Middle	10	34.5	9,022	39.7	954	10.6	4,779	21.0
Upper	15	51.7	12,587	55.4	701	5.6	11,206	49.3
Unknown	3	10.3	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	22,739	100.0	1,823	8.0	22,739	100.0
	Housing			Hous	ing Type by	Tract		
	Units by	C	)wn er-occupie	d	Rei	ntal	Vac	ant
	Tract	ŧ	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,526	1,440	5.4	57.0	97	3.8	989	39.2
Middle	18,008	10,287	38.6	57.1	3,513	19.5	4,208	23.4
Upper	25,936	14,919	56.0	57.5	3,949	15.2	7,068	27.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	46,470	26,646	100.0	57.3	7,559	16.3	12,265	26.4
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busine	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	ŧ	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	148	4.3	146	4.6	1	0.5	1	2.5
Middle	1,339	38.9	1,231	38.6	95	44.8	13	32.5
Upper	1,952	56.8	1,810	56.8	116	54.7	26	65.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,439	100.0	3,187	100.0	212	100.0	40	100.0
Pero	entage of Tota	al Businesses:		92.7		6.2		1.2
				Fa	rms by Tract			
	Total Farn	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	13	7.1	13	7.5	0	0.0	0	0.0
Middle	87	47.8	81	46.6	6	75.0	0	0.0
Upp er	82	45.1	80	46.0	2	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	182	182 100.0		100.0	8	100.0	0	0.0
	Percentage of	Total Farms:		95.6		4.4		0.0
Source: 2022 FFIEC Census I	Data							-

Source: 2022 FFIEC Census Data

2022 Dun & Brad street Data

2016-2020 U.S. Cotsus Bureau: Amoican Community Stavey

Note: Percentages may not total 100.0 percent due to rounding.

This assessment area is relatively rural compared to the bank's metropolitan assessment areas, and the local economy is largely driven by fishing, farming, healthcare, manufacturing, and tourism. Major employers include local governments, school boards, and medical centers. Recent and historical unemployment rates since the previous evaluation are included in the following table.

Essex, VA NonMSA Annual Average Unemployment Rates										
Area	2021	2022								
Caroline County, VA	4.3%	3.4%								
Essex County, VA	4.8%	3.6%								
Lancaster County, VA	5.3%	3.9%								
Middlesex County, VA	3.4%	2.7%								
Northumberland County, VA	4.9%	3.9%								
Richmond County, VA	3.5%	2.8%								
NonMSA Virginia 4.4% 3.4%										
Commonwealth of Virginia 3.9% 3.0%										
Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics										

Unemployment rates within the assessment area have decreased significantly since 2020, as the local employment market normalizes in the years following the initial COVID-19 pandemic restrictions. The unemployment rate for the Commonwealth of Virginia is generally lower than the unemployment rate for the NonMSA counties in Virginia. Unemployment rates in counties throughout the assessment area

varied in relation to those of their respective states.

A local official of an economic development organization was contacted during the evaluation to assist in evaluating the bank's CRA performance and to discuss local economic conditions and community credit needs within the Essex, VA NonMSA assessment area. The organization serves the community by providing a wide range of comprehensive planning, technical assistance, grant seeking, and regional coordination activities. While the organization's purpose focuses primarily on economic development, the official noted that one of the primary economic challenges facing the area is a lack of affordable housing, which has a downstream impact on the local workforce. As a result, area businesses struggle to retain and attract a qualified workforce. According to the official, while many low- and moderateincome individuals in the local workforce are able to find affordable housing, they are unable to find quality housing that meets a certain level of quality standards they find appealing. In addition to affordable housing, the official noted that medium-size businesses struggle to find quality operational facilities that are connected to utilities and roads. Areas for partnership with local financial institutions include programs that address affordable housing and site improvements for commercial facilities. The official noted that while there are some funding opportunities and tax credits available in the area, funding for economic development projects is competitive and limited. The contact state that there are currently no partnerships between the economic development organization and any financial institutions; however, he continued that he is unaware of any discrimination by financial institutions in the region.

As of June 30, 2023, the institution ranked 1<sup>st</sup> out of 10 financial institutions in local deposit market share according to data compiled by the FDIC and held 45.6% of assessment area deposits (credit union deposits not included). While the bank faces no significant constraints in taking advantage of available community development opportunities, opportunities for community development loans and investments are somewhat limited within the assessment area.

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

#### LENDING TEST

The bank's Lending Test performance the Essex, VA NonMSA assessment area is good. This conclusion is based primarily on the institution's lending activity, geographic and borrower performance, and its level of community development lending, while also considering the bank's market strategy, area demographic data, and aggregate data. Additionally, the bank makes limited use of flexible lending practices in serving the credit needs of the assessment area.

## **Lending Activity:**

Lending activity reflect good responsiveness to assessment area credit needs and is considered good overall. During 2021 and 2022, the bank originated 119 HMDA, 288 small business loans, and 11 small farm loans within the assessment area. The bank's lending activity within this assessment area during the evaluation period as measured by the number (15%) and dollar volume (10%) lags the percentage of bank branches (22.2%) and substantially lags the percentage of local deposits (51.5%). As of June 30, 2023, PB ranked 1<sup>st</sup> out of 10 financial institutions in deposit market share with 45.6% of the area's available FDIC-insured deposits (excluding credit union deposits). According to 2022 aggregate loan data, the institution ranked 8<sup>th</sup> out of 310 reporters in HMDA lending with a 2.2% market share and ranked 2<sup>nd</sup> out of 66 reporters in small business/farm lending volume with a 14% market share in the assessment area.

## **Geographic Distribution:**

The geographic loan distribution within this assessment area is considered excellent overall, and for residential mortgage and small business lending.

							te Loans		MSA				ĭ
Cangraphic			20				201123	2, 10	20	22			Owner Occurrie
Geographic Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Owner Occupie Units %
ŀ	#	# 9/6	# 0/6	\$(000)	\$ %	\$ %	#	#06	# 9/6	\$(000)	\$%	\$ %	1
	-			4(000)		+	hase Loan	ns		4(000)	477	<b>4</b> / <b>2</b>	•
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	(
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	4.5	0	0.0	4.7	
M id dle	1	33.3	32.4	90	5.7	28.8	2	50.0	34.7	380	27.9	30.5	31
Upper	2	66.7	67.3	1500	94.3	70.9	2	50.0	60.8	982	72.1	64.8	56
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	(
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1590	100.0	100.0	4	100.0	100.0	1362	<b>D</b> 0.0	100.0	100
'					I	Refinanc	e Loans						•
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	(
M o derate	0	0.0	0.0	0	0.0	0.0	5	12.5	4.0	573	110	3.8	5
M iddle	6	40.0	30.8	904	43.5	29.0	8	20.0	32.7	349	6.7	28.8	38
Upper	9	60.0	69.2	1173	56.5	710	27	67.5	63.3	4,300	82.3	67.4	56
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	(
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	2,077	100.0	100.0	40	100.0	100.0	5,222	100.0	100.0	100
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0
M o derate	0	0.0	0.0	0	0.0	0.0	1	6.7	7.3	100	8.6	6.3	5
M iddle	4	57.1	39.7	465	317	46.5	7	45.7	30.9	293	25.2	313	38
Upper	3	42.9	60.3	1,000	68.3	53.5	7	45.7	618	769	66.2	62.4	56
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	(
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1465	100.0	100.0	15	100.0	100.0	1,162	<b>D</b> 0.0	100.0	100
					М	ultifami	ly Lo ans						Multi-family
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	Units %
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
M id dle	0	0.0	28.6	0	0.0	20.1	0	0.0	33.3	0	0.0	62.1	60
Upper	0	0.0	714	0	0.0	79.9	0	0.0	66.7	0	0.0	37.9	39
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100
							ortgage Lo						Owner Occupie
	_					П							Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0
Moderate	0	0.0	0.0	0	0.0	0.0	8	9.5	4.6	978	9.1	4.7	
Middle	16	45.7	317	1833	28.9	28.8	29	34.5	33.9	2,292	214	30.0	38
Upper	19	54.3	68.1	4,518	711	710	47	56.0	615	7,465	69.5	65.3	50
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total Source 2022 FFI	35	100.0	100.0	6,351	100.0	100.0	84	100.0	100.0	10,735	100.0	100.0	100

Note: Percenta ges may not total 100.0 percent due to rounding.

Since the area did not contain any low- or moderate-income tracts in 2021, performance in 2022 drove the overall conclusion. In 2022, refinance loans were the leading HMDA product by number, followed by home improvement loans and home purchase loans. The bank did not extend any multifamily loans therefore this product was not considered in the analysis. Considering both demographic and aggregate proxies for demand, the bank's performance for its refinance lending is considered excellent and home improvement lending is considered good.

In 2022, while there were no low-income tracts in the assessment area, there were moderate-income tracts. PB's level of lending in moderate-income census tracts (9.5%) exceeded both the percentage of owner-occupied housing units (5.4%) and the aggregate level of lending (4.6%) and is considered excellent.

Di	Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography													
	Assessment Area: Essex, VA NonMSA													
C	Bank And Aggregate Loans By Year													
	Geographic 2021 2022													
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses	
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	6	10.3	2.7	1,497	16.4	3.2	4.3	
Middle	114	49.6	42.9	7,259	47.4	45.6	30	51.7	36.5	4,612	50.5	40.5	38.9	
Upper	116	50.4	55.5	8,048	52.6	53.8	22	37.9	58.7	3,026	33.1	55.7	56.8	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	1.7	0	0.0	0.5	0	0.0	2.2	0	0.0	0.5		
Total	230	100.0	100.0	15,307	100.0	100.0	58	100.0	100.0	9,135	100.0	100.0	100.0	

Source: 2022 FFIEC Census Data

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Consistent with its HMDA lending performance, since there were no low- or moderate-income tracts in the assessment area in 2021, the bank's performance in 2022 drove the small business lending conclusion.

During 2022, the bank's small business lending in the moderate-income census tract (10.3%) exceeds the percentage of area businesses (4.3%) and the aggregate level of lending in the tract (2.7%). This level of performance is considered excellent.

## Distribution by Borrower Income and Revenue Size of the Business:

The bank's HMDA Borrower distribution performance is considered excellent overall. Conversely, the bank's small business borrower distribution performance is considered adequate. Overall, the distribution is considered good when considering the relative performance levels and dollar volume of each lending product during 2021 and 2022.

1	Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Essex, VA NonMSA												
													ı
				Вац	k And	Aggre g	ate Loans	By Year					
Borrower			2021	_					20				Families by
Income Level	Ban		Agg	Ban		Agg	Ban		Agg	Ban		Agg	Family Income %
	#	#96	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	16	0	0.0	0.6	0	0.0	16	0	0.0	0.6	
Moderate	0	0.0	111	0	0.0	6.4	1	25.0	10.8	62	4.6	6.3	15.1
Middle	0	0.0	19.9	0	0.0	15.6	0	0.0	20.9	0	0.0	15.3	210
Upper	2	66.7	47.5	390	24.5	57.5	3	75.0	45.7	1,300	95.4	55.6	49.3
Unknown	1	33.3	19.8	1,200	75.5	19.9	0	0.0	210	0	0.0	212	0.0
Total	3	100.0	100.0	1,590	100.0	100.0	4	100.0	100.0	1,362	100.0	100.0	100.0
					I	Refinan	ce Loans						
Low	0	0.0	2.6	0	0.0	14	1	2.5	5.3	147	2.8	2.5	14.6
M o de rate	4	26.7	8.4	345	16.6	5.5	13	32.5	17.9	855	16.4	12.3	15.1
M id dle	1	6.7	17.6	250	12.0	13.7	10	25.0	20.7	702	13.4	16.7	210
Upper	9	60.0	48.4	1210	58.3	55.4	15	40.0	43.8	3,518	67.4	53.8	49.3
Unknown	1	6.7	23.0	272	13.1	24.0	0	0.0	12.3	0	0.0	14.8	0.0
Total	15	100.0	100.0	2,077	100.0	100.0	40	100.0	100.0	5,222	100.0	100.0	100.0
					Home	Impro	vement Lo	ans					
Low	0	0.0	4.1	0	0.0	2.7	2	13.3	5.2	28	2.4	17	14.6
Moderate	1	14.3	10.7	50	3.4	7.2	2	13.3	115	150	12.9	8.1	15.1
Middle	1	14.3	19.0	200	13.7	16.9	1	6.7	20.9	30	2.6	13.4	210
Upper	5	714	62.0	1,215	82.9	68.6	8	53.3	60.2	664	57.1	74.6	49.3
Unknown	0	0.0	4.1	0	0.0	4.5	2	13.3	2.1	290	25.0	2.2	0.0
Total	7	100.0	100.0	1465	100.0	100.0	15	100.0	100.0	1,162	100.0	100.0	100.0
					Totall	Home M	fortgage I	oans					
Low	0	0.0	2.2	0	0.0	10	5	6.0	3.1	485	4.5	12	14.6
M o de rate	6	17.1	9.7	415	6.5	6.0	21	25.0	13.1	1565	14.6	8.0	15.1
M id dle	6	17.1	18.6	984	15.5	14.6	17	20.2	210	1217	113	16.3	210
Upper	21	60.0	48.4	3,480	54.8	56.7	39	46.4	46.0	7,178	66.9	55.9	49.3
Unknown	2	5.7	212	1472	23.2	217	2	2.4	16.8	290	2.7	18.6	0.0
Total	35	100.0	100.0	6.351	100.0	100.0	84	100.0	100.0	10.735	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
-				n the borro	•	_	analusis						

Multifamily loans are not included in the borrower distribution analysis.

During 2021, refinance loans were the leading HMDA product by number, followed by home

improvement loans and home purchase loans. Considering both demographic and aggregate proxies for demand, the bank's performance for home refinance and home improvement lending is considered excellent, and its home purchase performance is considered poor.

In 2021, the bank's overall level of HMDA lending to low-income borrowers (0%) is substantially lower than the percentage of low-income families (14.6%) and the aggregate lending levels to such borrowers (2.2%). Conversely, the bank's lending to moderate-income borrowers (17.1%) exceeded the percentage of moderate-income families (15.1%) and significantly exceeded the aggregate lending level to such borrowers (9.7%). Overall, and driven by its lending to moderate-income borrowers, the bank's performance during 2021 is considered excellent and its performance during 2022 is substantially similar.

Distrib	ution of	f 2021	and 20	)22 Smal	ll Busi	ness L	ending l	By Rev	enue	Size of B	usine	sses	
	Assessment Area: Essex, VA NonMSA												
		Bank And Aggregate Loans By Year											
			20	21					20	22			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, ,
By Revenue													
\$1 Million or Less	34	14.8	50.1	3,447	22.5	40.7	25	43.1	54.9	2,066	22.6	33.7	92.7
Over \$1 Million	22	9.6		3,552	23.2		18	31.0		2,469	27.0		6.2
Revenue Unknown	174	75.7		8,308	54.3		15	25.9		4,600	50.4		1.2
Total	230	100.0		15,307	100.0		58	100.0		9,135	100.0		100.0
By Loan Size													
\$100,000 or Less	191	83.0	92.2	5,176	33.8	38.7	34	58.6	92.7	1,954	21.4	37.5	
\$100,001 - \$250,000	29	12.6	5.0	4,310	28.2	21.0	14	24.1	4.1	2,723	29.8	20.9	
\$250,001 - \$1 Million	10	4.3	2.9	5,821	38.0	40.3	10	17.2	3.2	4,458	48.8	41.6	
Total	230	100.0	100.0	15,307	100.0	100.0	58	100.0	100.0	9,135	100.0	100.0	
		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				•
\$100,000 or Less	24	70.6		979	28.4		19	76.0		781	37.8		
\$100,001 - \$250,000	8	23.5		1,208	35.0		5	20.0		985	47.7		
\$250,001 - \$1 Million	2	5.9		1,260	36.6		1	4.0		300	14.5		
Total	34	100.0		3,447	100.0		25	100.0		2,066	100.0		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.					-	vey							
Note: Percentages ma	ıy not total	100.0 p	ercent di	ue to round	mg.								

D&B data from 2021 indicates that 92.7% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 14.8% were to businesses with revenues of \$1 million or less, while 50.1% of the aggregate lending level were to businesses with revenues of \$1 million or less. The percentage of the bank's small business loans extended to businesses with revenues of \$1 million or less was impacted by a large volume of loans for which borrower revenue was unknown (i.e., 75.7% of all loans). The bank was an active PPP lender during 2021, and the PPP loan program did not require the collection or consideration of borrower revenue data. Consequently, large volumes of small business loans were originated during 2021 for which borrower revenue is unkown. However, when borrower revenues were known, 60.7% of the bank's loans (34 of 56 loans) were to businesses with revenues of \$1 million or less.

Aggregate small business data was also considered as an element of performance context in evaluating the bank's distribution by business revenue. During 2021, 50.1% of all reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of loans were to businesses that either had revenues exceeding \$1 million or had unknown revenues. The 2021 aggregate small business loan data also include an unknown volume of PPP loans, which limits its usefulness as a proxy when evaluating the bank's performance.

Because smaller dollar loans can demonstrate a willingness to provide credit to small businesses, the bank's distribution by loan size was also considered. Overall, in 2021 the bank originated 83% of its small business loans in amounts of \$100,000 or less which lagged the aggregate reporter level of such lending (92.2%). Within the assessment area, the aggregate lenders reported an unusually large percentage of small business loans in amounts of \$100,000 or less.

As an element of performance context, the bank's small business loans without borrower revenue data were also evaluated by loan size within this assessment area. The following table reflects this distribution.

Distribution of 2021 Small Business Loans with No Revenue By Loan Size Assessment Area: Essex, VA NonMSA										
Bank										
	#	%	\$(000s)	%						
By I	By Loan Size									
\$100,000 or less	157	90.2	3,497	42.1						
\$100,001 - \$250,000	12	6.9	1,711	20.6						
\$250,001 - \$1 Million	5	2.9	3,100	37.3						
Total	174	100	8,308	100						

Within the assessment area, a majority (90.2%) of the bank's small business loans for which borrower revenue was not known had loan amounts of \$100,000 or less, indicating that the bank is helping to serve the needs of small businesses within the area. The bank's borrower distribution performance for 2021 is considered adequate.

D&B data from 2022 indicates that 92.7% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 43.1% were to businesses with revenues of \$1 million or less, while 54.9% of the aggregate lending level were to businesses with revenues of \$1 million or less. The bank's borrower distribution performance for 2022 is also considered adequate.

Overall, the bank's small business lending performance is considered adequate.

## **Community Development Lending:**

Opportunities for community development lending are limited within the Essex, VA NonMSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans. During the evaluation period, the bank did not make any qualified community development loans specifically impacting this assessment area.

### **INVESTMENT TEST**

The bank's performance under the Investment Test is considered poor. During the evaluation period, the bank does not maintain any qualified community development investments or donations directly benefitting this assessment area. The bank also makes rare use of innovative and/or complex investments to support community development initiatives. Other qualified investments in this assessment area may include those activities previously described at the institutional or statewide level.

#### SERVICE TEST

The bank's performance under the Service Test is considered adequate. This conclusion is based on the bank's branch distribution, branching activity during the review period, availability of alternative delivery systems, range of services provided in the assessment area, and extent/innovativeness of community development services.

#### **Retail Services:**

Delivery systems are reasonably accessible to individuals and geographies of varying income levels within the assessment area. The bank currently operates six branches within the assessment area, all of which are located in middle-income geographies. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and

moderate-income geographies and/or low- and moderate-income individuals, as the bank has not opened or closed any branches in this assessment area during the evaluation period. Retail banking services do not vary in a way that inconveniences any portion of the bank's assessment areas, including low- and moderate-income areas or people. The institution offers no-cost checking products as well as low-cost checking to businesses. Such accounts benefit all segments of the community, including low- and moderate-income individuals and small businesses.

## **Community Development Services:**

The institution provides few, if any community development services within the assessment area during the review period. However, conversations with a community development official indicate opportunities do exist for PB to provide financial expertise to community development organizations within the assessment area.

#### NON-METROPOLITAN STATEWIDE AREA

(Reviewed using limited-scope review)

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CLIFTON FORGE, VANONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the assessment area was conducted. Overall, the bank's investment test performance was consistent with the statewide performance level, but its lending and service test performances were below the statewide level.

This assessment area is located in central Virginia and includes the City of Covington, and the counties of Alleghany and Bath. The bank closed its singular branch location in this assessment area since the previous evaluation.

The following table provides information regarding the demographic characteristics of the assessment area, and the subsequent table reflects PB's lending activity in the area during the evaluation period.

Assessment Area Demographics - Clifton Forge, VA Non-MSA Assessment Area											
	Di	Tract istribution	Percentage of	Percentage of Families by							
Income Category	#	%	Families by Tract	Income Level							
Low Income	0	0.0%	0.0%	20.5%							
Moderate Income	0	0.0%	0.0%	16.0%							
Middle Income	8	80.0%	83.7%	20.8%							
Upper Income	2	20.0%	16.3%	42.7%							
Total	10	100%	100%	100%							

Lending Activity in the Clifton Forge, VA Non-MSA Assessment Area										
Loan Type 2021 2022 Tot										
HMDA	1	1	2							
Small Business	3	0	3							
Total	4	1	5							

The bank did not originate any community development loans within this assessment area during the evaluation period, and investments benefitting this assessment area are limited to those previously discussed benefitting statewide or multistate areas. Banking services provided in this assessment area are identical to services offered at other branch locations throughout the bank's assessment areas. The bank did not participate in any community development service activities specifically benefiting this assessment area.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SHENANDOAH, VA NONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the assessment area was conducted. Overall, the bank's investment test performance was consistent with the statewide performance level, but its lending and service test performances were below the statewide level.

This assessment area is located in the central-northern portion of Virginia and includes the county of Shenandoah. The bank closed its single branch location in this assessment area since the previous evaluation. There are no low-or moderate-income tracts located within this assessment area.

The following table provides information regarding the demographic characteristics of the assessment area, and the subsequent table reflects PB's lending activity in the area during the evaluation period.

Assessment Area Demographics - Shenandoah, VA Non-MSA Assessment Area											
	Di	Tract istribution	Percentage of	Percentage of Families by							
Income Category	#	%	Families by Tract	Income Level							
Low Income	0	0.0%	0.0%	16.7%							
Moderate Income	0	0.0%	0.0%	18.1%							
Middle Income	7	63.6%	70.0%	20.2%							
Upper Income	4	36.4%	30.0%	45.0%							
Total	11	100%	100%	100%							

Lending Activity in the Shenandoah, VA Non-MSA Assessment Area										
Loan Type	2021	2022	Total							
HMDA	0	1	1							
Small Business	15	0	15							
Total	15	1	16							

The bank did not originate any community development loans within this assessment area during the evaluation period, and investments benefitting this assessment area are limited to those previously discussed benefitting statewide or multistate areas. Banking services provided in this assessment area are identical to services offered at other branch locations throughout the bank's assessment areas. The bank did not participate in any community development service activities specifically benefiting this assessment area.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SURRY, VA NONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the assessment area was conducted. Overall, the bank's investment test performance was consistent with the statewide performance level, but its lending and service test performances were below the statewide level.

This assessment area is located in eastern Virginia and includes the county of Surry. The bank operates one full-service branch location in this assessment area. There are no low- or moderate-income tracts located within this assessment area.

The following table provides information regarding the demographic characteristics of the assessment area, and the subsequent table reflects PB's lending activity in the area during the evaluation period.

Assessment Area Demographics - Surry, VA Non-MSA Assessment Area											
		Tract Distribution	Percentage of	Percentage of Families by							
Income Category	#	%	Families by Tract	Income Level							
Low Income	0	0.0%	0.0%	19.4%							
Moderate Income	0	0.0%	0.0%	14.5%							
Middle Income	1	50.0%	51.3%	18.7%							
Upper Income	1	50.0%	48.7%	47.4%							
Total	2	100%	100%	100%							

Lending Activity in the Surry, VA Non-MSA Assessment Area												
Loan Type	2021	2022	Total									
HMDA	0	3	3									
Small Business	16	2	18									
Total	16	5	21									

The bank did not originate any community development loans within this assessment area during the evaluation period, and any investments benefitting this assessment area are limited to those previously discussed benefitting statewide or multistate areas. Banking services provided in this assessment area are identical to services offered at other branch locations throughout the bank's assessment areas. The bank did not participate in any community development service activities specifically benefiting this assessment area.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMETROPOLITAN STATEWIDE ASSESSMENT AREA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the assessment areas, including selected demographic data, is included in *Appendix C* of this report.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in *Appendix C* of this evaluation. Conclusions regarding performance, which did not impact the institution's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	Lending Test	Investment Test	Service Test
Clifton Forge, VA NonMSA	Below	Consistent	Below
Shenandoah, VA NonMSA	Below	Consistent	Below
Surry, VA NonMSA	Below	Consisent	Below

## **CRA APPENDIX A**

## **SCOPE OF EXAMINATION**

ASSESSMENT AREA	STATE	REVIEW TYPE
Washington-Arlington-Alexandria,		
DC-VA-MD-WV MSA	Multistate CSA	Full Scope
Richmond, VA MSA	Virginia	Full Scope
Virginia Beach-Norfolk-Newport		
News, VA	Virginia	Full Scope
Essex, VA NonMSA	Virginia	Full Scope
Charlottesville, VA MSA	Virginia	Limited Scope
Clifton Forge, VA NonMSA	Virginia	Limited Scope
SHENANDOAH, VA NONMSA	Virginia	Limited Scope
SURRY, VA NONMSA	Virginia	Limited Scope

## **CRA APPENDIX B**

## **Summary of State and Multistate MSA Ratings**

State or Multistate Metropolit an Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Washington -Arlington- Alexandria, DC-VA- MD-WV MSA	Low	Low	Low	Low
	Satisfactory	Satisfactory	Satisfactory	Satisfactory
State of Virginia	Low	Low	Low	Low
	Satisfactory	Satisfactory	Satisfactory	Satisfactory

## **CRA APPENDIX C**

## LIMITED-SCOPE LENDING AND DEMOGRAPHIC TABLES

	2	022 Charlot	tesville, VA	MSA AA De	mographics	ı			
In come Categories	Tract Dis	tribution	Families by 1	Tract Income		overty Level lies by Tract	Families l		
	#	%	ŧ	%	#	%	#	%	
Low	2	3.6	816	1.6	239	29.3	10,259	19.6	
Moderate	14	25.5	11,496	22.0	1,209	10.5	9,317	17.8	
Middle	24 43.6		24,594	47.0	1,005	4.1	11,412	21.8	
Upp er	15	27.3	15,441	29.5	348	2.3	21,359	40.8	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	55	100.0	52,347	100.0	2,801	5.4	52,347	100.0	
	Housing			Hous	ing Type by	Tract			
	Units by	C	wn er-occupie	sd	Rei	ntal	Vac	ant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	3,288	286	0.5	8.7	2,533	77.0	469	14.3	
Moderate	23,340	11,073	20.4	47.4	8,735	37.4	3,532	15.1	
Middle	43,555	25,983	47.9	59.7	11,990	27.5	5,582	12.8	
Upper	26,439	16,914	31.2	64.0	7,537	28.5	1,988	7.5	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	96,622	54,256	100.0	56.2	30,795	31.9	11,571	120	
				Busi	nesses by Tra	ct & Revenue	Size		
	Total Busine	sses by Tract	Less Than o	r=\$1 Million	Over \$1	Million	Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	242	2.1	214	2.0	26	3.4	2	1.8	
Moderate	2,223	19.0	2,044	18.9	158	20.4	21	18.6	
Middle	5,108	43.7	4,730	43.8	327	42.1	51	45.1	
Upp er	4,117	35.2	3,813	35.3	265	34.1	39	34.5	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	11,690	100.0	10,801	100.0	776	100.0	113	100.0	
Perc	entage of Tota	al Businesses:		92.4		6.6		1.0	
				Fa	rms by Tract	& Revenue Si	ze		
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	ŧ	%	#	%	#	%	
Low	2	0.6	2	0.6	0	0.0	0	0.0	
Moderate	93	27.0	89	26.4	4	66.7	0	0.0	
Middle	132	38.4	129	38.3	2	33.3	1	100.0	
Upper	117	34.0	117	34.7	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	344	100.0	337	100.0	6	100.0	1	100.0	
1	Percentage of	Total Farms:		98.0		1.7		0.3	
Source: 2022 FFIEC Census I	Data								

Solorce: 2022 FFIEC Census Data

2022 Dun & Brad street Data

2016-2020 U.S. Coisus Bureau: Amoican Community Stavey

Note: Percentages may not total 100.0 percent due to rounding.

	2	021 Charlot	tesville, VA	MSA AA De	mographics							
In come Categories	Tract Dis	stribution	Families by 7	Tract Income		overty Level lies by Tract	Families l In co	y Family ome				
	ŧ	%	#	%	#	%	#	%				
Low	2	4.5	1,164	2.4	239	20.5	10,022	20.4				
Moderate	12	27.3	9,096	18.5	1,254	13.8	8,510	17.4				
Middle	19	43.2	26,012	53.0	1,474	5.7	10,418	21.2				
Upp er	10	22.7	12,736	26.0	596	4.7	20,092	41.0				
Unknown	1	2.3	34	0.1	34	100.0	0	0.0				
Total AA	44	100.0	49,042	100.0	3,597	7.3	49,042	100.0				
	Housing			Hous	ing Type by	Tract						
	Units by	С	)wn er-occupie	d	Rei	ntal	Vac	ant				
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit				
Low	3,975	1,365	2.7	34.3	2,217	55.8	393	9.9				
Moderate	21,473	8,651	16.9	40.3	9,146	42.6	3,676	17.1				
Middle	44,993	27,897	54.5	62.0	11,056	24.6	6,040	13.4				
Upper	21,490	13,293	26.0	61.9	6,269	29.2	1,928	9.0				
Unknown	52	14	0.0	26.9	38	73.1	0	0.0				
Total AA	91,983	51,220	100.0	55.7	28,726	31.2	12,037	13.1				
			Businesses by Tract & Revenue Size									
	Total Busine	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue Not Reported					
	#	%	ŧ	%	#	%	#	%				
Low	400	3.4	359	3.3	39	5.0	2	1.9				
Moderate	1,925	16.4	1,755	162	146	18.6	24	22.9				
Middle	5,279	45.0	4,939	45.6	301	38.4	39	37.1				
Upper	4,092	34.9	3,762	34.7	291	37.1	39	37.1				
Unknown	35	0.3	27	02	7	0.9	1	1.0				
Total AA	11,731	100.0	10,842	100.0	784	100.0	105	100.0				
Pero	entage of Tota	al Businesses:		92.4		6.7		0.9				
				Fa	rms by Tract							
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported				
	#	%	#	%	#	%	#	%				
Low	2	0.6	2	0.6	0	0.0	0	0.0				
Moderate	81	24.0	77	23.3	4	80.0	0	0.0				
Middle	184	54.6	183	55.3	1	20.0	0	0.0				
Upp er	70	20.8	69	20.8	0	0.0	1	100.0				
Unknown	0	0.0	0	0.0	0	0.0	0	0.0				
Total AA	337	100.0	331	100.0	5	100.0	1	100.0				
I	Percentage of	Total Farms:		98.2		1.5		0.3				
Source: 2021 FFIEC Census D	1010											

Source: 2021 FFIEC Census Data 2021 Dun & Brad street Data

2011-2015 U.S. Cetsus Bureau: American Community Stavey

Note: Percentages may not total 100.0 percent due to rounding.

	Distribu	tion o	f 2021	and 202	2 Hon	ie Mo	rtgage L	ending	g By Bo	orrower	Incom	e Lev	el
			1	Assessm	ent A	rea: Cl	narlottes	ville, V	A MS	A			
				Bai	ık And	Aggreg	ate Loans	By Yea					
Borrower			2021	_					20				Families by
Income Level	Ban		Agg	Ban	_	Agg	Ban	_	Agg	Ban		Agg	Family Income %
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
	Home Purchase Loaus												
Low	0	0.0	5.6	0	0.0	2.9	0	0.0	7.9	0	0.0	3.4	19.6
Moderate	0	0.0	17.8	0	0.0	12.6	0	0.0	17.0	0	0.0	10.2	17.8
M id dle	0	0.0	19.3	0	0.0	17.1	1	33.3	19.6	437	46.9	14.5	218
Upper	1	20.0	40.3	70	4.2	50.4	2	66.7	37.0	495	53.1	418	40.8
Unknown	4	80.0	17.0	1,598	95.8	17.0	0	0.0	18.5	0	0.0	30.2	0.0
Total	5	100.0	100.0	1,668	100.0	100.0	3	100.0	100.0	932	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.7	0	0.0	3.5	0	0.0	15.0	0	0.0	8.5	19.6
M o de rate	0	0.0	16.5	0	0.0	11.5	0	0.0	20.5	0	0.0	15.5	17.8
M id d le	0	0.0	19.6	0	0.0	15.6	0	0.0	212	0	0.0	18.4	218
Upper	0	0.0	37.9	0	0.0	47.3	0	0.0	28.8	0	0.0	40.0	40.8
Unknown	2	100.0	19.3	2,270	100.0	210	0	0.0	14.5	0	0.0	17.6	0.0
Total	2	100.0	100.0	2,270	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Home	Impro	vement Lo	ans					
Low	0	0.0	7.9	0	0.0	5.1	0	0.0	7.3	0	0.0	4.3	19.6
M o de rate	0	0.0	15.2	0	0.0	10.8	0	0.0	16.7	0	0.0	12.1	17.8
M id d le	0	0.0	219	0	0.0	20.7	0	0.0	24.5	0	0.0	20.0	218
Upper	1	100.0	52.5	56	100.0	60.4	0	0.0	48.6	0	0.0	57.7	40.8
Unknown	0	0.0	2.5	0	0.0	3.0	0	0.0	2.9	0	0.0	5.8	0.0
Total	1	100.0	100.0	56	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Total	Home M	iortgage I	Loans					
Low	0	0.0	6.3	0	0.0	3.3	0	0.0	10.1	0	0.0	4.5	19.6
M o de rate	0	0.0	16.9	0	0.0	119	0	0.0	17.7	0	0.0	113	17.8
M id dle	0	0.0	19.6	0	0.0	16.7	1	33.3	20.5	437	46.9	15.4	218
Upper	3	33.3	39.7	276	6.7	49.3	2	66.7	35.9	495	53.1	42.4	40.8
Unknown	6	66.7	17.6	3,868	93.3	18.9	0	0.0	15.8	0	0.0	26.3	0.0
Total	9	100.0	100.0	4,144	100.0	100.0	3	100.0	100.0	932	100.0	100.0	100.0
						-							

Source: 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses														
Assessment Area: Charlottesville, VA MSA														
	Bank And Aggregate Loans By Year													
			20	21					20	22			Total Businesses	
	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	%	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
By Revenue														
\$1 Million or Less	6	30.0	53.7	1,826	50.9	36.2	3	37.5	57.7	143	27.1	44.2	92.4	
Over \$1 Million	0	0.0		0	0.0		4	50.0		340	64.4		6.6	
Revenue Unknown	14	70.0		1,760	49.1		1	12.5		45	8.5		1.0	
Total	20	100.0		3,586	100.0		8	100.0		528	100.0		100.0	
					By L	oan Si	ze							
\$100,000 or Less	13	65.0	93.0	510	14.2	39.2	7	87.5	95.6	328	62.1	47.4		
\$100,001 - \$250,000	2	10.0	4.3	330	9.2	20.6	1	12.5	2.5	200	37.9	15.5		
\$250,001 - \$1 Million	5	25.0	2.7	2,746	76.6	40.1	0	0.0	1.9	0	0.0	37.1		
Total	20	100.0	100.0	3,586	100.0	100.0	8	100.0	100.0	528	100.0	100.0		
'		1	By Loa	n Size a	nd Re	venue	\$1 Mill	ion or	Less					
\$100,000 or Less	3	50.0		165	9.0		3	100.0		143	100.0			
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0			
\$250,001 - \$1 Million	3	50.0		1,661	91.0		0	0.0		0	0.0			
Total	6	100.0		1,826	100.0		3	100.0		143	100.0			

Source: 2022 FFIEC Census Data

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Di	stributio	on of 2		id 2022 F Assessm		_	_	_	-		el of G	eogra	phy
										n.			ı
Geographic			20		Bank And Aggrega			D, 161	20	22			Owner Occupied
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Units %
	#	# %	# 9/6	\$(000)	\$ %	\$ %	#	#%	# 9/6	\$(000)	\$%	\$ %	1
				*(***)	-	ne Puro	hase Loa	115		*(/			
Low	0	0.0	3.8	0	0.0	3.6	0	0.0	0.9	0	0.0	0.6	0.5
M o derate	0	0.0	13.2	0	0.0	9.8	0	0.0	15.7	0	0.0	10.0	20.4
M iddle	4	80.0	54.3	1314	78.8	511	2	66.7	49.7	495	53.1	53.2	47.9
Upper	1	20.0	28.7	354	212	35.5	1	33.3	33.7	437	46.9	36.2	312
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,668	100.0	100.0	3	D0.0	100.0	932	100.0	100.0	100.0
					1	Refinan	ce Loans						
Low	0	0.0	2.6	0	0.0	2.3	0	0.0	0.6	0	0.0	0.6	0.5
M o derate	1	50.0	12.2	870	38.3	9.2	0	0.0	20.0	0	0.0	14.6	20.4
M id d le	0	0.0	54.8	0	0.0	50.9	0	0.0	49.2	0	0.0	42.3	47.9
Upper	1	50.0	30.5	1400	617	37.6	0	0.0	30.2	0	0.0	42.6	312
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	2,270	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Home	Impro	ement Lo	aus					
Low	0	0.0	2.7	0	0.0	3.0	0	0.0	0.5	0	0.0	11	0.5
M o derate	0	0.0	12.4	0	0.0	10.3	0	0.0	15.1	0	0.0	119	20.4
M id dle	1	100.0	54.5	56	100.0	53.7	0	0.0	46.3	0	0.0	46.4	47.9
Upper	0	0.0	30.3	0	0.0	33.0	0	0.0	38.1	0	0.0	40.6	312
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	56	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					М	ultifam	ily Loans						Multi-family Units %
Low	0	0.0	12.0	0	0.0	3.0	0	0.0	13.0	0	0.0	3.9	12.
M o derate	0	0.0	32.0	0	0.0	38.2	0	0.0	26.1	0	0.0	53.8	32.0
M id d le	0	0.0	40.0	0	0.0	46.4	0	0.0	39.1	0	0.0	29.6	34.5
Upper	0	0.0	15.0	0	0.0	12.4	0	0.0	17.4	0	0.0	118	214
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.3	0	0.0	10	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
				,	Total H	ome M	ortgage Lo	o a us					Owner Occupied Units %
Low	0	0.0	3.0	0	0.0	2.9	0	0.0	0.8	0	0.0	0.7	0.5
M o derate	1	111	12.6	870	210	10.4	0	0.0	17.1	0	0.0	12.5	20.4
M id dle	6	66.7	54.6	1520	36.7	50.9	2	66.7	49.0	495	53.1	49.7	47.9
Upper	2	22.2	29.7	1754	42.3	35.8	1	33.3	33.1	437	46.9	37.0	312
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	4,144	100.0	100.0	3	100.0	100.0	932	100.0	100.0	100.0

Source 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Di	istributi	on of 2	2021 aı	nd 2022 S	Small	Busin	ess Lend	ing By	Incor	ne Level	of Ge	ograp	hy
			A	Assessm	ent Ar	ea: Ch	arlottesv	ille, V	A MS	A			
C				Bank	And A	ggreg	ate Loai	ıs By Y	(ear				Total
Geographic			20	21					20	22			
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	4.5	0	0.0	6.4	0	0.0	2.0	0	0.0	2.3	2.1
Moderate	5	25.0	17.2	1,754	48.9	17.4	5	62.5	18.2	199	37.7	16.4	19.0
Middle	12	60.0	43.3	1,659	46.3	35.5	1	12.5	45.2	50	9.5	48.4	43.7
Upper	3	15.0	34.2	173	4.8	40.5	2	25.0	34.3	279	52.8	32.8	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1	
Total	20	100.0	100.0	3,586	100.0	100.0	8	100.0	100.0	528	100.0	100.0	100.0

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

	202	1 Clifton Fo	orge, VA No	n-MSA AA	Demographi	ics		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	,
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,501	21.5
Moderate	1	11.1	769	11.0	198	25.7	1,070	15.3
Middle	5	55.6	4,489	64.4	600	13.4	1,253	18.0
Upper	3	33.3	1,716	24.6	166	9.7	3,150	45.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	6,974	100.0	964	13.8	6,974	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,646	945	10.9	57.4	422	25.6	279	17.0
Middle	9,663	5,434	62.7	56.2	1,895	19.6	2,334	24.2
Upper	3,183	2,287	26.4	71.9	420	13.2	476	15.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	14,492	8,666	100.0	59.8	2,737	18.9	3,089	21.3
	Businesses by Tract & Revenue Size Total Businesses by Tract							
	Total Busines	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	84	10.2	77	10.3	6	10.2	1	5.6
Middle	598	72.7	541	72.6	42	71.2	15	83.3
Upper	140	17.0	127	17.0	11	18.6	2	11.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	822	100.0	745	100.0	59	100.0	18	100.0
Perc	entage of Tota	l Businesses:		90.6		7.2		2.2
				Fa	rms by Tract	& Revenue Si	ze	
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	23	59.0	23	59.0	0	0.0	0	0.0
Upper	16	41.0	16	41.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39	100.0	39	100.0	0	0.0	0	0.0
		Total Farms:		100.0				

Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

	202	2 Clifton Fo	orge, VA No	n-MSA AA l	Demographi	ics		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract		oy Family ome
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,370	20.5
Moderate	0	0.0	0	0.0	0	0.0	1,065	16.0
Middle	8	80.0	5,588	83.7	652	11.7	1,391	20.8
Upper	2	20.0	1,088	16.3	130	11.9	2,850	42.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	6,676	100.0	782	11.7	6,676	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	11,583	7,008	82.8	60.5	1,894	16.4	2,681	23.1
Upper	2,776	1,457	17.2	52.5	383	13.8	936	33.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	14,359	8,465	100.0	59.0	2,277	15.9	3,617	25.2
	Businesses by Tract & Revenue							
	Total Busine	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	644	80.0	580	79.8	52	85.2	12	70.6
Upper	161	20.0	147	20.2	9	14.8	5	29.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	805	100.0	727	100.0	61	100.0	17	100.0
Perce	entage of Tota	al Businesses:		90.3		7.6		2.1
				Fa	rms by Tract	& Revenue S	ize	
	Total Farn	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	28	80.0	28	80.0	0	0.0	0	0.0
Upper	7	20.0	7	20.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	35	100.0	35	100.0	0	0.0	0	0.0
1	Percentage of	Total Farms:		100.0		0.0		0.0
Source: 2022 FFIEC Census I								

Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Distribu	tion o									Incom	ie Lev	el	
		As	sessmer	ıt Area	a: Clift	on Forg	e, VA	Non-N	1SA				
			Вац	k And	Aggreg	ate Loans	By Year						
		2021						20:				Families by	
Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Family Income %	
#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %		
				Hor	ne Puro	hase Loa	11.5						
0	0.0	7.1	0	0.0	4.0	0	0.0	10.4	0	0.0	5.1	20.5	
0	0.0	18.1	0	0.0	14.2	0	0.0	18.6	0	0.0	13.9	15.0	
0	0.0	20.4	0	0.0	20.6	0	0.0	18.9	0	0.0	20.5	20.8	
0	0.0	22.7	0	0.0	313	0	0.0	219	0	0.0	33.5	42.7	
0	0.0	317	0	0.0	29.8	0	0.0	30.3	0	0.0	27.0	0.0	
0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	
Refinance Loans													
0	0.0	5.5	0	0.0	2.8	0	0.0	9.4	0	0.0	7.0	20.5	
0	0.0	15.4	0	0.0	9.6	0	0.0	18.9	0	0.0	16.7	15.0	
0	0.0	22.8	0	0.0	19.3	1	100.0	26.4	125	100.0	27.1	20.8	
1	100.0	36.9	215	100.0	47.6	0	0.0	23.9	0	0.0	317	42.7	
0	0.0	19.4	0	0.0	20.7	0	0.0	214	0	0.0	17.6	0.0	
1	100.0	100.0	215	100.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0	
				Home	Impro	vement Lo	ans						
0	0.0	14.3	0	0.0	7.6	0	0.0	14.3	0	0.0	9.8	20.5	
0	0.0	9.5	0	0.0	5.1	0	0.0	19.0	0	0.0	7.5	15.0	
0	0.0	19.0	0	0.0	117	0	0.0	19.0	0	0.0	14.2	20.8	
0	0.0	57.1	0	0.0	75.6	0	0.0	42.9	0	0.0	54.2	42.7	
0	0.0	0.0	0	0.0	0.0	0	0.0	4.8	0	0.0	14.3	0.0	
0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	
			·	Totali	Home M	lortgage I	Loans						
0	0.0	6.6	0	0.0	3.5	0	0.0	10.1	0	0.0	5.6	20.5	
0	0.0	16.4	0	0.0	117	0	0.0	19.2	0	0.0	14.9	16.0	
0	0.0	213	0	0.0	19.7	1	100.0	214	125	100.0	22.1	20.8	
1	100.0	30.6	215	100.0	40.4	0	0.0	23.3	0	0.0	33.2	42.7	
0	0.0	25.1	0	0.0	24.8	0	0.0	25.9	0	0.0	24.2	0.0	
1	100.0	100.0	215	100.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0	
	# # O O O O O O O O O O O O O O O O O O	# #%  # 0 0.0  0 0.0  0 0.0  0 0.0  0 0.0  0 0.0  0 0.0  1 100.0  0 0.0  0 0.0  0 0.0  0 0.0  1 100.0  0 0.0  0 0.0  0 0.0  1 100.0  0 0.0  0 0.0  1 100.0  1 100.0  1 100.0	Bank   Agg   # %%   # %%   # %%   # %%     # %%	Bank   Agg   Bank   # %   \$(000)	Bank And	Bank   Agg   Bank   Agg   Agg   Bank   Agg	Bank And Aggregate Loans   2021     Bank And Aggregate Loans   2021     Bank	Bank   And Aggregate Loans By Year   2021	Seasy	Bank   Agg	Bank And Aggregate Loans By Year   2021   2021   2022	Bank   Age	

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Clifton Forge, VA Non-MSA													
				Bank	And A	Aggreg	gate Loai	ns By Y	(ear				
			20	21					20	22			Total Businesses
	Ban	ık	Agg	Ban	ık	Agg	Ban	ık	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	,
					By I	Reven	ue						,
\$1 Million or Less	1	33.3	55.0	20	3.9	41.1	0	0.0	53.3	0	0.0	28.7	90.3
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		7.6
Revenue Unknown	2	66.7		487	96.1	1	0	0.0		0	0.0		2.1
Total	3	100.0		507	100.0	]	0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	2	66.7	90.3	41	8.1	30.6	0	0.0	91.4	0	0.0	38.8	
\$100,001 - \$250,000	0	0.0	5.8	0	0.0	24.2	0	0.0	6.2	0	0.0	31.1	
\$250,001 - \$1 Million	1	33.3	3.9	466	91.9	45.2	0	0.0	2.3	0	0.0	30.1	
Total	3	100.0	100.0	507	100.0	100.0	0	0.0	100.0	0	0.0	100.0	
		1	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	1	100.0		20	100.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		20	100.0		0	0.0		0	0.0		

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

I				D.	le And	A ggrace	te Loans	By Vac-	r				
			20		ik And .	Aggrega	te Loans	Dy 1ear	20	22			
Geographic Income Level	Banl	ŀ	Agg	Ban	ŀ	Agg	Banl		Agg	Ban		Agg	Owner Occupied Units %
	#	# %	#%	\$(000)	\$ %	\$ %	# hase Loan	#%	# %	\$(000)	\$%	\$ %	
	٥												
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	12.8	0	0.0	9.7	0	0.0	0.0	0	0.0	0.0	0.0
M id d le	0	0.0	62.7	0	0.0	57.5	0	0.0	87.2	0	0.0	814	82.8
Upper	0	0.0	24.4	0	0.0	32.8	0	0.0	12.8	0	0.0	18.6	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
							ce Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	1	100.0	7.1	215	100.0	5.0	0	0.0	0.0	0	0.0	0.0	0.0
M id d le	0	0.0	60.7	0	0.0	60.5	1	100.0	87.4	125	<b>D</b> 0.0	85.9	82.8
Upper	0	0.0	32.2	0	0.0	34.4	0	0.0	12.6	0	0.0	14.1	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	215	100.0	100.0	1	100.0	100.0	125	10.0	100.0	100.0
					Home	Improv	ement Lo	ans					
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	4.8	0	0.0	18	0	0.0	0.0	0	0.0	0.0	0.0
M id d le	0	0.0	66.7	0	0.0	75.1	0	0.0	714	0	0.0	72.2	82.8
Upper	0	0.0	28.6	0	0.0	23.1	0	0.0	28.6	0	0.0	27.8	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					М	ultifami	ily Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M id dle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	84.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	15.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
		0.0	200.0				ortgage Lo		250.0	, vi	0.0	20.0	Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	1	100.0	9.8	215	100.0	7.2	0	0.0	0.0	0	0.0	0.0	0.0
M id dle	0	0.0	62.6	0	0.0	59.9	1	100.0	86.7	125	100.0	83.1	82.8
Upper	0	0.0	27.6	0	0.0	33.0	0	0.0	13.3	0	0.0	16.9	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	215	100.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0
Source 2022 FFI	FC Census	Data											

Di	istributio	on of 2	2021 aı	nd 2022 S	Small	Busine	ess Lend	ing By	/ Incor	ne Level	l of Ge	ograp	hy
			As	sessmen	t Area	: Clifto	on Forge	, VA 1	Non-M	ISA			
C 1:				Bank	And A	ggreg	ate Loar	ıs By Y	Year				Total
Geographic			20	21					20	22			
Income	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.0	0	0.0	18.5	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	72.9	507	100.0	65.1	0	0.0	77.8	0	0.0	84.8	80.0
Upper	0	0.0	19.0	0	0.0	16.2	0	0.0	21.4	0	0.0	15.1	20.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.2	0	0.0	0.2	0	0.0	0.8	0	0.0	0.1	
Total	3	100.0	100.0	507	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

	2022 S	hen and oah	County, VA	NonMSA A	A Demogra	phics			
In come Categories	Tract Dis	tribution	Families by 1	Tract Income		overty Level lies by Tract	Families l In co	y Family ome	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	1,910	16.7	
Moderate	0	0.0	0	0.0	0	0.0	2,068	18.1	
Middle	7	63.6	8,011	70.0	765	9.5	2,307	20.2	
Upper	4	36.4	3,426	30.0	165	4.8	5,152	45.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	11	100.0	11,437	100.0	930	8.1	11,437	100.0	
	Housing			Hous	ing Type by	Tract			
	Units by	C	wn er-occupie	sd.	Rei	ntal	Vac	ant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0.0	0	0.0	0	0.0	
Middle	13,663	7,919	64.8	58.0	4,484	32.8	1,260	9.2	
Upper	7,600	4,300	35.2	56.6	838	11.0	2,462	32.4	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	21,263	12,219	100.0	57.5	5,322	25.0	# Inco # 1,910 0 1,910 0 2,068 5 2,307 8 5,152 0 0 0 1 11,437	17.5	
				Busi	nesses by Tra	act & Revenue Size			
	Total Busine	sses by Tract	Less Than o	r=\$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	1,585	72.7	1,500	72.9	63	69.2	22	68.8	
Upp er	595	27.3	557	27.1	28	30.8	10	31.3	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	2,180	100.0	2,057	100.0	91	100.0	32	100.0	
Perce	entage of Tota	al Businesses:		94.4		4.2		1.5	
				Fa	rms by Tract	& Revenue Si	ze		
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	118	64.8	117	64.6	1	100.0	0	0.0	
Upper	64	35.2	64	35.4	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	182	100.0	181	100.0	1	100.0	0	0.0	
I	Percentage of	Total Farms:		99.5		0.5		0.0	
Source: 2022 FFIEC Census D	Data								

2022 Dun & Brad street Data

2016-2020 U.S. Свіянь Вичели: Атвісан Соттаніту Stavey

	2021 S	henandoah	County, VA	NonMSA A	A Demogra	phics		
In come Categories		stribution		Tract Income	Families < Po	overty Level lies by Tract	Families l	y Family ome
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,719	14.6
Moderate	0	0.0	0	0.0	0	0.0	2,060	17.5
Middle	5	55.6	6,347	54.0	587	9.2	2,362	20.1
Upper	4	44.4	5,411	46.0	307	5.7	5,617	47.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	11,758	100.0	894	7.6	11,758	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	)wn er-occupie	d	Rei	ntal	Vac	ant
	Tract	ŧ	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	11,484	6,670	53.7	58.1	2,272	19.8	2,542	22.1
Upper	9,542	5,747	46.3	60.2	2,407	25.2	1,388	14.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	21,026	12,417	100.0	59.1	4,679	22.3	3,930	18.7
		ct & Revenue	Size					
	Total Busine	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,171	53.9	1,108	54.0	46	50.0	17	60.7
Upper	1,002	46.1	945	46.0	46	50.0	11	39.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,173	100.0	2,053	100.0	92	100.0	28	100.0
Perc	entage of Tota	al Businesses:		94.5		4.2		1.3
				Fa	rms by Tract			
	Total Farn	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	118	64.8	118	65.2	0	0.0	0	0.0
Upp er	64	35.2	63	34.8	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	182	100.0	181	100.0	1	100.0	0	0.0
	Percentage of	Total Farms:		99.5		0.5		0.0
Source: 2021 FFIEC Census I	Doto.							

Source: 2021 FFIEC Census Data 2021 Dun & Brad street Data

2011-2015 U.S. Cetsus Bureau: American Community Stavey Note: Pewestages may not total 100.0 pewest due to rosading.

Total acrossing arriving new artist array persons in the array restricting.

	Distribu	tion of	f 2021	and 2022	2 Hom	ie Moi	rtgage L	ending	g By Bo	orrower	Incom	e Lev	el	
			Asses	sment A	rea: S	henan	doah Co	unty,	VA No	nMSA				
				Baı	k And .	Aggre g	ate Loans	By Year	r					
Borrower			2021						20				Families by	
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Family Income %	
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$%	\$ %		
					Hor	me Pur	hase Loa	<b>11</b> S						
Low	0	0.0	17	0	0.0	0.8	0	0.0	18	0	0.0	0.9	15.7	
Moderate	0	0.0	14.5	0	0.0	10.9	0	0.0	16.5	0	0.0	12.4	18.1	
M id dle	0	0.0	19.4	0	0.0	17.8	0	0.0	19.3	0	0.0	17.7	20.2	
Upper	0	0.0	38.8	0	0.0	45.5	0	0.0	39.1	0	0.0	44.9	45.0	
Unknown	0	0.0	25.5	0	0.0	25.0	0	0.0	23.4	0	0.0	24.1	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	
	Refinance Loans													
Low	0	0.0	2.7	0	0.0	15	0	0.0	4.9	0	0.0	2.6	16.7	
Moderate	0	0.0	115	0	0.0	8.0	0	0.0	18.8	0	0.0	14.9	18.1	
M id d le	0	0.0	18.2	0	0.0	15.7	0	0.0	25.6	0	0.0	22.5	20.2	
Upper	0	0.0	44.4	0	0.0	50.4	0	0.0	39.2	0	0.0	46.7	45.0	
Unkno wn	0	0.0	23.2	0	0.0	24.4	0	0.0	115	0	0.0	13.2	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	
					Home	Impro	vement Lo	ans						
Low	0	0.0	12	0	0.0	11	0	0.0	3.7	0	0.0	4.3	16.7	
Moderate	0	0.0	10.7	0	0.0	9.7	0	0.0	9.6	0	0.0	8.2	18.1	
M id dle	0	0.0	16.7	0	0.0	8.7	0	0.0	22.8	0	0.0	20.9	20.2	
Upper	0	0.0	70.2	0	0.0	80.3	0	0.0	618	0	0.0	64.1	45.0	
Unkno wn	0	0.0	12	0	0.0	0.2	0	0.0	2.2	0	0.0	2.4	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	
					Totall	Home M	iortgage I	oans						
Low	0	0.0	2.2	0	0.0	11	0	0.0	2.9	0	0.0	15	16.7	
Moderate	0	0.0	12.7	0	0.0	9.5	0	0.0	15.7	0	0.0	13.0	18.1	
M id dle	0	0.0	18.9	0	0.0	15.6	0	0.0	214	0	0.0	19.0	20.2	
Upper	0	0.0	42.7	0	0.0	48.3	0	0.0	410	0	0.0	46.0	45.0	
Unknown	0	0.0	23.6	0	0.0	24.5	1	100.0	17.9	40	100.0	20.6	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	40	100.0	100.0	100.0	

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Shenandoah County, VA NonMSA													
				Bank	And A	ggreg	gate Loai	ns By Y	(ear				
			20	21					20	22			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					By I	Reveni	ue						
\$1 Million or Less	0	0.0	60.3	0	0.0	57.0	0	0.0	54.0	0	0.0	47.0	94.4
Over \$1 Million	1	6.7		300	14.8		0	0.0		0	0.0		4.2
Revenue Unknown	14	93.3		1,729	85.2		0	0.0		0	0.0		1.5
Total	15	100.0		2,029	100.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	6	40.0	94.9	346	17.1	44.2	0	0.0	96.6	0	0.0	54.0	
\$100,001 - \$250,000	6	40.0	3.0	827	40.8	18.2	0	0.0	2.1	0	0.0	16.3	
\$250,001 - \$1 Million	3	20.0	2.1	856	42.2	37.6	0	0.0	1.3	0	0.0	29.6	
Total	15	100.0	100.0	2,029	100.0	100.0	0	0.0	100.0	0	0.0	100.0	
		1	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Di	stributio			nd 2022 I sment A		_			-		el of G	eogra	phy
							te Loans						
Geographic			20	21					20	22			Owner Occupied
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Units %
	#	# %	# %	\$(000)	\$ %	\$ %	#	#96	# %	\$(000)	\$%	\$ %	
					Hon	ne Purc	hase Loa	11.5					
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M iddle	0	0.0	46.7	0	0.0	45.5	0	0.0	68.8	0	0.0	67.2	64.8
Upper	0	0.0	53.3	0	0.0	54.5	0	0.0	312	0	0.0	32.8	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M id d le	0	0.0	49.2	0	0.0	48.2	0	0.0	65.4	0	0.0	64.3	64.8
Upper	0	0.0	50.8	0	0.0	518	0	0.0	34.6	0	0.0	35.7	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M id d le	0	0.0	52.4	0	0.0	53.2	0	0.0	62.5	0	0.0	63.2	64.8
Upper	0	0.0	47.6	0	0.0	46.8	0	0.0	37.5	0	0.0	36.8	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					М	ultifami	ly Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M id dle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	90.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	9.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
-					To tal H	ome M	ortgage Lo	o a us					Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M id dle	0	0.0	48.3	0	0.0	47.6	1	100.0	67.6	40	100.0	66.9	64.8
Upper	0	0.0	517	0	0.0	52.4	0	0.0	32.4	0	0.0	33.1	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	40	100.0	100.0	100.0
Source 2022 FFI			0.00	U	0.0	100.0	1	10.0	100.0	40	10.0	100.0	EU.

2016-2020 U.S. Census Bureau: American Community Survey

Di	Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography															
	Assessment Area: Shenandoah County, VA NonMSA															
		Bank And Aggregate Loans By Year														
Geographic			20	21					Total							
Income Level	Ban	ık	Agg	Ban	k	Agg	Ban	Bank Agg Bank Agg		Bank		Agg	Businesses			
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%			
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0			
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0			
Middle	1	6.7	49.6	6	0.3	58.8	0	0.0	66.6	0	0.0	71.0	72.7			
Upper	14	93.3	49.6	2,023	99.7	40.9	0	0.0	32.7	0	0.0	28.6	27.3			
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0			
Tract-Unk	0	0.0	0.8	0	0.0	0.3	0	0.0	0.7	0	0.0	0.4				
Total	15	100.0	100.0	2,029	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0			

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

		2022 Surry	, VA NonM	SA AA Dem	ographics			
In come Categories	Tract Dis	stribution		Tract Income	Families < Po	overty Level lies by Tract		y Family ome
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	361	19.4
Moderate	0	0.0	0	0.0	0	0.0	270	14.5
Middle	1	50.0	953	51.3	223	23.4	347	18.7
Upper	1	50.0	906	48.7	31	3.4	881	47.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2	100.0	1,859	100.0	254	13.7	1,859	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	О	)wn er-occupie	d	Rei	ntal	Vac	ant
	Tract	ŧ	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	1,935	998	49.6	51.6	385	19.9	552	28.5
Upp er	1,665	1,016	50.4	61.0	395	23.7	254	15.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	3,600	2,014	100.0	55.9	780	21.7	806	22.4
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busine	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	121	49.2	113	48.9	4	44.4	4	66.7
Upper	125	50.8	118	51.1	5	55.6	2	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	246	100.0	231	100.0	9	100.0	6	100.0
Pero	entage of Tota	al Businesses:		93.9		3.7		24
				Fa	rms by Tract	& Revenue Si	ze	
	Total Farn	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	¥	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	9	23.1	9	23.1	0	0.0	0	0.0
Upper	30	76.9	30	76.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39	100.0	39	100.0	0	0.0	0	0.0
	Percentage of	Total Farms:		100.0		0.0		0.0
Source: 2022 FFIEC Census								

2022 Dun & Brad street Data

2016-2020 U.S. Coisus Bureau: Amoican Community Stavey

		2021 Surry	, VA NonM	SA AA Dem	ographics			
In come Categories	Tract Dis	tribution	Families by 7	Γract Income		overty Level lies by Tract	Families l	y Family ome
	#	%	¥	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	303	15.4
Moderate	0	0.0	0	0.0	0	0.0	192	9.8
Middle	0	0.0	0	0.0	0	0.0	466	23.8
Upper	2	100.0	1,962	100.0	195	9.9	1,001	51.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2	100.0	1,962	100.0	195	9.9	1,962	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	)wn er-occupie	sd	Rei	ntal	Vac	ant
	Tract	ŧ	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	0	0	0.0	0.0	0	0.0	0	0.0
Upp er	3,497	2,134	100.0	61.0	534	15.3	829	23.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	3,497	2,134	100.0	61.0	534	15.3	829	23.7
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busine	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upp er	235	100.0	220	100.0	9	100.0	6	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	235	100.0	220	100.0	9	100.0	6	100.0
Pero	entage of Tota	al Businesses:		93.6		3.8		26
				Fa	rms by Tract			
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	38	100.0	38	100.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	38	100.0		100.0		0.0	0	0.0
	Percentage of			100.0		0.0		0.0
Sotarce: 2021 FFIEC Census I								

Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data

2011-2015 U.S. Сенясь Вигели: Атейсан Соттайу Stavey

	Distribu	tion o	f 2021	and 202	2 Hon	ie Mo	rtgage Lo	ending	By Bo	orrower	Incom	e Lev	el
				Assess	ment	Area:	Surry, V	A Nor	ıMSA				
				Bar	k And	Aggreg	ate Loans	By Yea					
Borrower			2021						20				Families by
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Family Income %
	#	# %	# %	\$(000)	\$ %	\$%	#	# %	# %	\$(000)	\$%	\$ %	
					Hor	me Pur	hase Loa	11.5					
Low	0	0.0	16	0	0.0	0.7	0	0.0	0.8	0	0.0	0.4	19.4
Moderate	0	0.0	12.3	0	0.0	6.6	0	0.0	118	0	0.0	7.7	14.5
M id dle	0	0.0	24.6	0	0.0	19.7	0	0.0	24.4	0	0.0	22.5	18.7
Upper	0	0.0	34.4	0	0.0	45.0	0	0.0	42.9	0	0.0	48.6	47.4
Unknown	0	0.0	27.0	0	0.0	28.1	0	0.0	20.2	0	0.0	20.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	5.6	0	0.0	0.8	19.4
M o de rate	0	0.0	6.9	0	0.0	5.2	0	0.0	25.0	0	0.0	9.5	14.5
M id dle	0	0.0	16.9	0	0.0	13.1	1	100.0	22.2	75	100.0	10.1	18.7
Upper	0	0.0	46.9	0	0.0	50.9	0	0.0	40.3	0	0.0	25.3	47.4
Unknown	0	0.0	29.4	0	0.0	30.8	0	0.0	6.9	0	0.0	54.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	75	100.0	100.0	100.0
					Home	Impro	vement Lo	ans					
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	7.1	0	0.0	2.5	19.4
M o de rate	0	0.0	0.0	0	0.0	0.0	1	50.0	14.3	80	76.2	8.5	14.5
M id d le	0	0.0	16.7	0	0.0	5.2	0	0.0	214	0	0.0	22.8	18.7
Upper	0	0.0	83.3	0	0.0	94.8	1	50.0	50.0	25	23.8	52.0	47.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	7.1	0	0.0	14.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	105	100.0	100.0	100.0
					Totall	Home M	fortgage I	Loans					
Low	0	0.0	0.7	0	0.0	0.3	0	0.0	2.8	0	0.0	0.7	19.4
Moderate	0	0.0	9.0	0	0.0	5.8	1	33.3	16.2	80	44.4	8.5	14.5
M id d le	0	0.0	20.1	0	0.0	16.2	1	33.3	23.6	75	417	15.7	18.7
Upper	0	0.0	42.1	0	0.0	48.1	1	33.3	43.1	25	13.9	37.7	47.4
Unknown	0	0.0	28.1	0	0.0	29.6	0	0.0	14.4	0	0.0	36.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	180	100.0	100.0	100.0
c 2000 FF													

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
			As	sessmen	t Area	: Surr	y, VA No	onMSA	A				
				Bank	And A	ggreg	gate Loai	ns By Y	(ear				T. 1
			20	2021			2022						Total Businesses
	Ban	ık	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					By I	Revent	ue						
\$1 Million or Less	3	18.8	53.9	195	21.1	46.7	2	100.0	64.9	110	100.0	44.3	93.9
Over \$1 Million	3	18.8		267	28.9		0	0.0		0	0.0		3.7
Revenue Unknown	10	62.5		461	49.9		0	0.0		0	0.0		2.4
Total	16	100.0		923	100.0		2	100.0		110	100.0		100.0
					By L	oan Si	ize						
\$100,000 or Less	14	87.5	94.1	537	58.2	53.6	2	100.0	97.3	110	100.0	70.2	
\$100,001 - \$250,000	1	6.3	3.9	125	13.5	24.5	0	0.0	2.7	0	0.0	29.8	
\$250,001 - \$1 Million	1	6.3	2.0	261	28.3	21.9	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	923	100.0	100.0	2	100.0	100.0	110	100.0	100.0	
		1	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	3	100.0		195	100.0		2	100.0		110	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	3	100.0		195	100.0		2	100.0		110	100.0		

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Di	stributio	on of 2	021 ar	d 2022 I						me Leve	el of G	eogra	phy
							Surry, V						<u> </u>
			20		ik And .	Aggre g:	te Loans	By Year	r 20	22			
Geographic Income Level	Ban	ŀ	Agg	Ban	ŀ	Agg	Ban	l-	Agg	Ban	ŀ	Agg	Owner Occupied Units %
	#	# %	# %	\$(000)	\$ %	\$ %	#	#06	# %	\$(000)	\$96	\$ %	1
	#	# 90	# 90	\$(000)		7	hase Loa		# 90	\$(000)	\$ 90	\$ 90	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
M iddle	0	0.0	0.0	0	0.0	0.0	0	0.0	412	0	0.0	411	
Upper	0	0.0	100.0	0	0.0	100.0	0	0.0	58.8	0	0.0	58.9	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					1	Refinan	ce Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
M iddle	0	0.0	0.0	0	0.0	0.0	1	100.0	44.4	75	100.0	74.6	49.6
Upper	0	0.0	100.0	0	0.0	100.0	0	0.0	55.6	0	0.0	25.4	50.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	75	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M iddle	0	0.0	0.0	0	0.0	0.0	1	50.0	50.0	25	23.8	59.3	49.6
Upper	0	0.0	100.0	0	0.0	100.0	1	50.0	50.0	80	76.2	40.7	50.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	D0.0	100.0	105	100.0	100.0	
					M	ultifam	ily Lo ans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M iddle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
				,	To tal H	ome M	ortgage Lo	o aus					Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
M o derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M id d le	0	0.0	0.0	0	0.0	0.0	2	66.7	42.1	100	55.6	57.4	49.6
Upper	0	0.0	100.0	0	0.0	100.0	1	33.3	57.9	80	44.4	42.6	50.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	180	100.0	100.0	100.0

2016-2020 U.S. Census Bureau: American Community Survey

Di	istributio	on of 2	2021 aı	nd 2022 s	Small	Busin	ess Lend	ing By	Incor	ne Level	of Ge	ograp	hy		
				Assess	ment .	Area: !	Surry, V	A Non	MSA						
Caarmanhia		Bank And Aggregate Loans By Year 2021 2022													
Geographic			20	21				Total							
Income Level	Ban	ık	Agg	Ban	ık	Agg	Ban	Bank Agg Bank Agg		Bank		Agg	Businesses		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Middle	0	0.0	0.0	0	0.0	0.0	1	50.0	51.4	100	90.9	63.2	49.2		
Upper	16	100.0	98.0	923	100.0	99.7	1	50.0	48.6	10	9.1	36.8	50.8		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	2.0	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0			
Total	16	100.0	100.0	923	100.0	100.0	2	100.0	100.0	110	100.0	100.0	100.0		

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

## **CRA APPENDIX D**

# LOAN, BRANCH, AND DEPOSIT VOLUME BY ASSESSMENT AREA

The following table includes the distribution of Primis Bank branch offices, along with deposit and loan volume. The deposit volume includes all bank deposits and is current as of June 30, 2023, while the loan volume includes all reported HMDA, small business loans considered in the evaluation.

		HMDA/C	RA Loan Volume		Bra	nches	Deposit Volume		
Assessment Area	#	%	\$ (000s)	%	#	%	\$ (000s)	%	
			Multista	ite Areas					
Washington-Arlington- Alexandria, DC-VA-MD- WV MSA	759	28%	\$95,948	23.1%	4	16%	\$393,088	11.8%	
Multistate Subtotal	759	28%	\$95,948	23.1%	4	16%	\$393,088	11.8%	
		Con	monwealth of Vir	ginia Assessn	nent Areas				
Richmond, VA MSA	989	36.5%	\$164,291	39.6%	9	33.3%	\$851,770	25.6%	
Virginia Beach-Norfolk- Newport News, VA MSA	474	17.5%	\$100,263	24.1%	6	22.2%	\$291,080	8.7%	
Essex, VA NonMSA	407	15%	\$41,528	10%	6	22.2%	\$1,715,304	51.5%	
Charlottesville, VA MSA	40	1.5%	\$9,190	2.2%	1	3.7%	\$43,009	1.3%	
Clifton Forge, VA NonMSA	5	0.2%	\$847	0.2%		0.0%	0	0.0%	
Shenandoah, VA NonMSA	16	0.6%	\$2,069	0.5		0.0%	0	0.0%	
Surry, VA NonMSA	21	0.8%	\$1,213	0.3	1	3.7%	\$36,482	1.1%	
Virginia Subtotal	1,952	72%	\$319,401	77.9%	23	84%	\$2,937,645	88.2%	
Total	2,711	100%	\$415,349	100%	27	100%	\$3,330,733	100%	

## **CRA APPENDIX E**

## ASSESSMENT AREA AND BRANCHING ACTIVITY

The bank's assessment areas are located in the multistate MSA assessment area as well as multiple MSA and NonMSA assessment areas throughout Virginia. The composition of the bank's assessment areas is detailed in the following tables.

	Multis	tate MSA Assessment Area Delineation	
Assessment Area Name	State	County/City	Tracts
	DC	Washington	All
	VA	Alexandria	All
	VA	Arlington County	All
	VA	Clarke County	All
	VA	Culpeper County	All
	VA	Fairfax County	All
	VA	Fairfax	All
	VA	Falls Church	All
	VA	Fauquier County	All
	VA	Fredericksburg	All
	VA	Loudoun County	All
Washington-Arlington-	VA	Madison County	All
Alexandria, DC-VA-MD-	VA	Manassas	All
WV MSA	VA	Manassas Park	All
	VA	Prince William County	All
	VA	Rappahannock County	All
	VA	Spotsylvania County	All
	VA	Stafford County	All
	VA	Warren County	All
	MD	Calvert	All
	MD	Charles	All
	MD	Frederick	All
	MD	Montgomery	All
	MD	Prince George's	All
	WV	Jefferson County	All

Virginia Assessment Area Delineations					
Assessment Area Name	State	County/City	Tracts		
	VA	Amelia County	All		
	VA	Charles City County	All		
	VA	Chesterfield County	All		
	VA	Colonial Heights	All		
	VA	Dinwiddie County	All		
	VA	Goochland County	All		
	VA	Hanover County	All		
	VA	Henrico County	All		
Richmond, VA MSA	VA		All		
	VA	New Kent County	All		
	VA	Petersburg	All		
	VA	Powhatan County	All		
	VA	Prince George County	All		
	VA	Richmond	All		
	VA	Sussex County	All		
	VA	Chesapeake	All		
	VA	Franklin	All		
	VA	Gloucester County	All		
	VA	Isle of Wight County	All		
	VA	Hampton	All		
	VA	James City County	All		
	VA	Mathews County	All		
Virginia Beach-Norfolk-	VA	Newport News	All		
	-				
	VA	Suffolk	All		
	VA	Virginia Beach	All		
	VA	Williamsburg	All		
	VA	York County	All		

	Virg	ginia Assessment Area Delineations	
Assessment Area Name	State	County/City	Tracts
	VA	Albemarle County	All
	VA	Charlottesville	All
Charlottesville, VA MSA	VA	Fluvanna County	All
	VA	Greene County	All
	VA	Nelson County	All
	VA	Essex County	All
	VA	Lancaster County	All
E VA NIMCA	VA	Middlesex County	All
Essex VA NonMSA	VA	Northumberland County	All
	VA	Richmond County	All
	VA	Caroline County	All
	VA	Alleghany County	All
Clifton Forge, VA NonMSA	VA	Bath County	All
	VA	Covington	All
Shenandoah, VA NonMSA	VA	Shenandoah County	All
Surry, VA NonMSA	VA	Surry County	All

The bank closed fifteen branch offices since the previous evaluation. The branch closings are detailed in the following table.

Assessment Area	Address	City	State	Zip	Tract income Level	Open/ Closed
Charlottesville VA MSA	1770 Timberwood Boulevard Suite 100	Charlottesville	VA	22911	Upper	Closed
Clifton Forge VA NonMSA	511 Main Street	Clifton Forge	VA	24422	Middle	Closed
Essex VA NonMSA	307 Church Lane	Tappahannock	VA	22560	Middle	Closed
Essex VA NonMSA	437 North Main Street	Kilmarnock	VA	22482	Upper	Closed
Richmond VA MSA	2599 New Kent Hwy	Quinton	VA	23141	Middle	Closed
Richmond VA MSA	13804 Hull Street Rd	Midlothian	VA	23112	Upper	Closed
Shenandoah County VA NonMSA	9484 Congress Street	New Market	VA	22844	Middle	Closed
Virginia Beach-Norfolk-Newport News VA	1953 George Washington Memorial HWY	Gloucester Point	VA	23072	Middle	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	1 East Market Street	Leesburg	VA	20176	Moderate	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	10855 Fairfax Boulevard	Fairfax	VA	22030	Middle	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	1 S Royal Ave	Front Royal	VA	22630	Middle	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	45 North Hill Drive	Warrenton	VA	20186	Middle	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	11A Main Street	Warrenton	VA	20186	Middle	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	137 E. Chesapeake Beach Road	Owings	MD	20736	Middle	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	7700 Wisconsin Ave	Bethesda	MD	20814	Upper	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	14118 Brandywine Rd	Brandywine	MD	20613	Upper	Closed
Washington-Arlington-Alexandria DC-VA-MD CSA	11527 Sunrise Valley Dr.	Reston	VA	20191	Upper	Closed

#### **CRA APPENDIX F**

#### **GLOSSARY**

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - (A) Rates of poverty, unemployment, and population loss; or
  - (B) Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

**Full-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

**Home mortgage loans**: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of 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.

**Limited-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

**Rated area:** A rated area is a state or 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.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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