



Board of Governors of the Federal Reserve System

Re: **Docket No. R-1769 – RIN 7100-AG29**

August 4, 2022

Community Reinvestment Act

GeoDataVision Comments #5

We submit our fifth set of comments regarding the CRA NPR. As we have said in previous comments there are many good ideas in the proposed Rule that we support. However, we believe there are certain aspects of the proposed Rule that are seriously flawed and that will undermine the effectiveness, if not the integrity, of the ratings derived therefrom. These comments will focus on the major flaws in the proposed Rule. In several of our previously submitted comments we addressed some of the very good ideas in the NPR. If we had more time, we would have liked to have elaborated more completely about some of those very good improvements. But we feel the priority should be to address and correct the major flaws in the proposed Rule.

Our concerns are focused on the proliferation of the new “Retail Lending Assessment Areas” and the “Outside Retail Lending Areas” as well as enormous number of steps and computations required under the Retail Lending Test and the consolidation of the data over an undefined “evaluation period”.

The OCC just distributed a Retail Lending Test Info Graphic that presents an oversimplified version of all the steps and calculations that must be done. It creates the impression that only a few steps need to be taken to compute a bank's performance. But it omits some very important steps and calculations.

For example, the first thing a bank must determine is what qualifies as a major product line which can vary from market to market and year to year. The graphic assumes that already has been done. The graphic also glosses over the fact that it depicts computations for only a single Assessment Area. The computations must be repeated for each and every facility-based and retail-lending assessment area and then for potentially thousands of loans in hundreds of "outside retail lending areas" to be computed at the "institution level". It also omits that results must be accumulated at the state level and multi-state MSA level before getting to the

"Institution Level" at which point the conclusions-to-scores-to-AA-Major-Retail-Lending Products-scores and then AA Major Retail Lending conclusions converted back to scores again which are finally accumulated at the Institution Level to arrive at a Retail Lending Test performance rating. Does that sound confusing? Well, it's a recitation of the various steps needed to compute Retail Lending Test performance as explained in more detail below.

Even the steps depicted in the graphic appear to be misleadingly simple. In the example, it is assumed that there are 6 major retail lending product lines. So, step 1 involves (a) gathering the benchmarks, (b) computing the calibrated conclusion ranges, and then (c) comparing a bank's penetration rates to the "calibrated" standards. This means 4 comparisons (low- and moderate-income borrower metrics and low- and moderate-income geographic metrics for consumer loans as well as borrower and geographic metrics for small business and small farm loans) for each of the 5 major product lines and 2 comparisons (only LMI geographics) for the multifamily mortgage line. That adds up to 22 determinations of "conclusions" each of which must then be converted to a "score" (22 more comparisons). Having computed a score for each major product line for each metric, each score must then be weighted by a demographic variable (22 more computations). Then the weighted scores for the borrower and geographic metric must be converted to a simple average product line score for each of the 5 major product lines by taking the weighted geographic and a weighted borrower score and applying a simple average (the multifamily mortgage score is done only at the geographic level so there is no need to compute a simple average. The next step would be to take all the simple average product line scores (6 in the example) and weigh them by applying the relative volumes (based on dollars) in a given assessment area. This means 6 more computations to arrive at the score (another computation) that will be the basis for converting (another computation by comparing to the table "Conclusions derived from scores" in the example) to the "Recommended Retail Lending Test Conclusion" for all the bank's major product lines in a given assessment area.

Can someone add up all the steps and calculations just for one assessment area?

And the foregoing must be repeated for potentially hundreds of facility-based and retail lending assessment areas and then for any MSA or statewide non-MSA in the entire country that is outside the retail lending areas where a bank extends any major product line loans (no minimum threshold). This last step could involve hundreds of computations accumulated to the "institution level". Not only that, but the concept of Outside Retail Lending Areas means a single major product line loan extended in a given MSA (or statewide non-MSA) would be compared to the "tailored benchmarks" derived from an entire MSA! So, a single loan in a middle-income tract in Los Angeles, County could result in a substantial non-compliance conclusion in that MSA. That is not only lacking common sense, but it could also create seriously misleading "conclusions". Why mandate all the extra work for a relatively small volume of loans (the NPR cites that only 10% of mortgages and 16% of small business loans are generated in what would be considered as "outside retail lending areas")?

This all means that even modestly large banks may have thousands and thousands of computations. The ABA in testimony sent to the House Financial Services Committee cited a community bank with 3 facility-based assessment areas that will have 60 retail lending assessment areas: 20-fold increase in the assessment areas to be individually evaluated!

Now add to the foregoing that the computations are to be done on a consolidated basis over an undefined and open-ended "evaluation period" which could be any number of years. Then consider what happens when demographics change in the middle of an evaluation period!

How can any large bank manage its CRA risk under such a system? And if bankers will have trouble implementing and understanding the system how much more confusing will it be to the general public?

How can all these concerns be addressed?

First, eliminate the concept of retail lending areas and outside retail lending areas. This will save an enormous number of calculations. Furthermore, the focus of the Community Reinvestment Act always has been on the local communities where banks are chartered to do business, and which for 45 years has been



interpreted by all the Agencies to mean where banks maintain deposit-taking facilities. If the Agencies are concerned that banks may be taking deposits from communities far removed from their local branches, then perhaps deposit-based assessment areas could be justified (as had been proposed by all 3 Agencies in previous proposed rules in recent years). But the Agencies have never published information or cited any anecdotal evidence suggesting that such phenomena exist (except for Internet banks and Credit Card banks). The dozens of banks whose deposit geographic distribution we studied in 2021 averaged more than 85% of their depositors located within 10 miles of their branch systems.

Aside from the inconsistency of the new AA's with historic practice the adoption of these new AA's ought to cause much concern in local communities where banks do have their branches. The mandated new AA's will distract a bank's focus on its local community and will dilute the importance of serving local communities by coercing banks into putting time and resources into communities remote to their branch footprint.

Second, eliminate the distinction between lending in low-income and moderate-income communities and low- and moderate-income borrowers. Again, this will substantially reduce the number of calculations to determine a performance conclusion and performance ratings. It is not necessary to be so granular.

Third, make CRA scores based on the Retail Lending Test reportable annually and publish those scores while eliminating the concept of multi-year evaluation periods. This will avoid the complications of ever-changing demographics that are incompatible with consolidating performance over multiple years. We recognize that the OCC has been using the multiyear Evaluation Period model for some time, but when a demographic changes the practice in the field has been to break the Evaluation Period into separate periods. The problem is that when there are multiple Assessment Areas some areas may have changes in demographics when others don't (for example, when OPM changes MSA delineations, only the counties in those MSA's and statewide non-MSA's where those MSA's are located change). This means that there can be different Evaluation Periods for different Assessment Areas for a bank. Performance evaluations should be done on annual



results to assure appropriate demographics and market data are matched on a timely basis against a bank's performance.

Fourth, eliminate the Major Product Line concept. In previous comments we pointed out that the implementation of this concept may eliminate CRA evaluation of the leading small business lenders in some areas. We substantiated this observation with examples based on the 2020 HMDA and CRA A&D data revealing that very major small business lenders in various counties would not have their small business lending activity in those counties qualified as a "major product line" using the proposed 15% rule.

Our company, GeoDataVision, reviewed the 2020 HMDA and the 2020 CRA Disclosure data and identified the Top 10 Small Business lenders in each and every county in the USA and Puerto Rico. We then captured the HMDA-reported lending activity of those banks in the same counties and combined the HMDA mortgage dollars and Small Business loan dollars extended by those same institutions to establish the value of each bank's retail lending activity in each county. Following that we computed the 15% threshold for each Top Ten Small Business lender in each county. Finally, we compared each Top Ten Bank's small business loan volume (\$) to the 15% threshold, and **we determined that in 1,332 counties there were 2,189 Top Ten Small Business lenders (i.e., the leading sources of small business credit in each county) whose small business loan volume in those counties was not sufficient to meet the 15% criteria in the Proposed Rule. This means in thousands of cases the leading small business lenders would not have their small business lending activity subject to CRA examination!**

In some markets the small business loan volume of even the Top Ten lenders is quite small. But in other markets, the disqualified (from the Retail Lending Test due to failing to meet the "Major Product Line" standard) small business lending activity is shockingly large. For example, in Los Angeles California, JPMorgan Chase extended \$1.9 billion of small business loans during 2020 and was ranked #2 for Small Business loan volume in LA County that year, but that activity falls short of the 15% standard to qualify as a Major Product Line for the Bank (JPMorgan originated \$13.4 billion of HMDA-reported mortgages in Los Angeles



County that same year). This means in that market JPMorgan's small business lending activity is potentially not subject to CRA examination under the proposed Rule.

This would be a total contradiction of what CRA has stood for during the last 45 years. Community leaders and bankers should express their objections to the concept of major product line. If a bank is subject to CRA examination all its retail product line loans should be evaluated and weighted based on the relative dollar volume of activity. When a bank has minimal activity of a certain retail credit product its impact on the bank's composite performance rating would be minimal (as per the weighting of performance conclusions to derive the "Major Product Line Average Score").

The concept of major product line as proposed also creates the potential for some products qualifying in some years and not in other years. This makes it very difficult for a bank to manage its CRA responsibilities because, until the "evaluation period" is defined, it won't be possible to determine with certainty which loans in which communities may qualify for recognition as major product line loans.

Fifth, the Retail Lending Screen is too complicated and compromised by the nature of the deposit data that includes some geocoded deposits combined with SOD data. The old fashion 50% rule should continue to be applied. If a bank fails that standard, then the fallback benchmark should be a bank's retail loans relative to retail deposits (SOD) compared to all institutions that maintain deposit-taking branches within the Assessment Area.

Respectfully,

Len Suzio

Leonard F. Suzio Jr., President



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GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
ALABAMA	Autauga	1	TRUSTMARK NATIONAL BANK	\$5,972
		9	REGIONS BANK	\$1,098
	Baldwin	6	REGIONS BANK	\$31,422
		10	SOUTH STATE BANK, N.A.	\$16,242
	Barbour	4	BBVA USA	\$1,567
	Blount	6	RENASANT BANK	\$1,398
		7	REGIONS BANK	\$1,171
	Cleburne	8	REGIONS BANK	\$171
	Colbert	3	REGIONS BANK	\$3,482
		8	RENASANT BANK	\$1,195
	Coosa	5	TRUIST FINANCIAL	\$357
		6	RENASANT BANK	\$332
	Cullman	5	FIRSTBANK	\$1,531
	Elmore	2	TRUSTMARK NATIONAL BANK	\$4,407
		4	RENASANT BANK	\$3,276
		6	REGIONS BANK	\$2,515
		9	WELLS FARGO BANK, N.A.	\$1,485
	Jackson	6	RENASANT BANK	\$954
	Lamar	9	BANCORPSOUTH	\$86
	Lauderdale	5	RENASANT BANK	\$2,812
	Lawrence	5	REGIONS BANK	\$1,110
		8	SYNOVUS BANK	\$256
	Lee	2	RENASANT BANK	\$18,528
		8	TRUIST FINANCIAL	\$8,430
	Limestone	8	SOUTH STATE BANK, N.A.	\$3,398
		10	BANCORPSOUTH	\$1,980
	Lowndes	10	REGIONS BANK	\$201
	Marengo	8	REGIONS BANK	\$196
	Pickens	8	REGIONS BANK	\$202
	Pike	8	RENASANT BANK	\$772
Randolph	8	BANK OF AMERICA, N.A.	\$211	
	10	RENASANT BANK	\$154	
St. Clair	2	REGIONS BANK	\$5,886	
Tallapoosa	4	TRUIST FINANCIAL	\$1,891	
	6	REGIONS BANK	\$1,792	
	7	SOUTH STATE BANK, N.A.	\$1,292	
Washington	6	BANCORPSOUTH	\$401	
Winston	4	REGIONS BANK	\$1,685	
ALABAMA Total				\$129,858
ALASKA	Haines Borough	9	JPMORGAN CHASE BANK, NA	\$18
ALASKA Total				\$18
ARIZONA	Greenlee	7	BANK OF AMERICA, N.A.	\$13
	La Paz	10	BANK OF AMERICA, N.A.	\$160
	Mohave	8	US BANK NA	\$2,943
	Navajo	8	BANK OF AMERICA, N.A.	\$1,081
	Pinal	4	BANK OF AMERICA, N.A.	\$7,189
ARIZONA Total				\$11,386
ARKANSAS	Benton	4	IBERIABANK	\$13,783
		6	FIRST SECURITY BANK	\$8,131
		8	REGIONS BANK	\$7,203
	Clark	10	US BANK NA	\$299

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Cleburne	4	US BANK NA	\$1,381
		7	FIRST COMMUNITY BANK	\$825
		8	SIMMONS BANK	\$561
		9	IBERIABANK	\$444
	Cleveland	7	US BANK NA	\$25
	Conway	9	US BANK NA	\$309
	Crawford	3	ARVEST BANK	\$6,752
	Cross	10	BANCORPSOUTH	\$110
	Faulkner	5	FIRST SECURITY BANK	\$13,246
		9	REGIONS BANK	\$3,383
	Fulton	7	ARVEST BANK	\$32
	Grant	10	REGIONS BANK	\$137
	Izard	10	ARVEST BANK	\$90
	Johnson	9	FIRST SECURITY BANK	\$290
	Lawrence	10	ARVEST BANK	\$210
	Logan	2	ARVEST BANK	\$885
		8	FIRST SECURITY BANK	\$209
	Madison	8	US BANK NA	\$141
		9	WELLS FARGO BANK, N.A.	\$140
	Montgomery	8	SIMMONS BANK	\$50
	Perry	3	US BANK NA	\$351
	Pope	7	FIRST SECURITY BANK	\$2,648
	Saline	8	IBERIABANK	\$3,351
	Searcy	6	CENTENNIAL BANK	\$47
		10	BANCORPSOUTH	\$12
	Sharp	7	ARVEST BANK	\$195
	Stone	8	FIRST SECURITY BANK	\$178
	Van Buren	6	REGIONS BANK	\$892
	Washington	6	IBERIABANK	\$10,341
		9	REGIONS BANK	\$7,434
	White	6	REGIONS BANK	\$2,874
	Yell	3	FIRST SECURITY BANK	\$457
		9	BANCORPSOUTH	\$71
		10	WELLS FARGO BANK, N.A.	\$63
ARKANSAS Total				\$87,550
CALIFORNIA	Alameda	1	WELLS FARGO BANK, N.A.	\$417,781
		2	BANK OF AMERICA, N.A.	\$370,293
		3	JPMORGAN CHASE BANK, NA	\$265,124
		4	FREMONT BANK	\$168,633
		6	US BANK NA	\$105,591
		7	FIRST REPUBLIC BANK	\$103,082
	Alpine	6	US BANK NA	\$34
		8	UMPQUA BANK	\$10
		10	CITIBANK, N.A.	\$7
	Amador	6	UMPQUA BANK	\$1,704
	Calaveras	2	WELLS FARGO BANK, N.A.	\$5,755
	Contra Costa	1	WELLS FARGO BANK, N.A.	\$239,443
		2	BANK OF AMERICA, N.A.	\$196,497
		3	JPMORGAN CHASE BANK, NA	\$145,291
		6	FIRST REPUBLIC BANK	\$69,440
		7	US BANK NA	\$66,683

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		8	FREMONT BANK	\$58,559
	El Dorado	4	JPMORGAN CHASE BANK, NA	\$17,765
	Inyo	2	JPMORGAN CHASE BANK, NA	\$2,258
		4	WELLS FARGO BANK, N.A.	\$808
	Los Angeles	2	JPMORGAN CHASE BANK, NA	\$1,910,772
		6	US BANK NA	\$578,755
	Marin	1	WELLS FARGO BANK, N.A.	\$122,168
		3	BANK OF AMERICA, N.A.	\$76,474
		4	JPMORGAN CHASE BANK, NA	\$52,120
		5	FIRST REPUBLIC BANK	\$45,755
	Mariposa	3	WELLS FARGO BANK, N.A.	\$889
	Modoc	9	JPMORGAN CHASE BANK, NA	\$33
	Mono	2	BANK OF AMERICA, N.A.	\$3,389
		3	JPMORGAN CHASE BANK, NA	\$2,135
		4	WELLS FARGO BANK, N.A.	\$1,373
	Monterey	1	WELLS FARGO BANK, N.A.	\$63,824
		4	JPMORGAN CHASE BANK, NA	\$40,128
	Napa	2	FIRST REPUBLIC BANK	\$39,404
		5	WELLS FARGO BANK, N.A.	\$30,804
		10	JPMORGAN CHASE BANK, NA	\$15,457
	Nevada	2	WELLS FARGO BANK, N.A.	\$20,381
		5	JPMORGAN CHASE BANK, NA	\$10,013
		6	US BANK NA	\$9,398
	Orange	6	US BANK NA	\$279,455
	Plumas	1	WELLS FARGO BANK, N.A.	\$1,870
		4	BANK OF AMERICA, N.A.	\$563
	San Benito	3	WELLS FARGO BANK, N.A.	\$8,053
	San Diego	7	US BANK NA	\$261,466
	San Francisco	1	FIRST REPUBLIC BANK	\$315,906
		2	WELLS FARGO BANK, N.A.	\$308,607
		5	JPMORGAN CHASE BANK, NA	\$199,020
		10	US BANK NA	\$54,885
	San Joaquin	8	US BANK NA	\$20,411
	San Luis Obispo	3	WELLS FARGO BANK, N.A.	\$42,337
	San Mateo	1	WELLS FARGO BANK, N.A.	\$228,888
		2	BANK OF AMERICA, N.A.	\$196,588
		4	JPMORGAN CHASE BANK, NA	\$122,432
		5	FIRST REPUBLIC BANK	\$93,026
		7	US BANK NA	\$60,169
	Santa Barbara	5	WELLS FARGO BANK, N.A.	\$58,539
		6	JPMORGAN CHASE BANK, NA	\$47,598
		7	BANK OF AMERICA, N.A.	\$40,206
	Santa Clara	1	BANK OF AMERICA, N.A.	\$475,875
		2	WELLS FARGO BANK, N.A.	\$452,289
		3	JPMORGAN CHASE BANK, NA	\$296,820
		9	FIRST REPUBLIC BANK	\$110,980
		10	US BANK NA	\$108,892
	Santa Cruz	1	WELLS FARGO BANK, N.A.	\$53,715
		4	JPMORGAN CHASE BANK, NA	\$24,181
		9	US BANK NA	\$6,662
	Sierra	5	JPMORGAN CHASE BANK, NA	\$62

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		7	BANK OF AMERICA, N.A.	\$44
	Sonoma	1	WELLS FARGO BANK, N.A.	\$96,383
		8	JPMORGAN CHASE BANK, NA	\$38,929
	Trinity	9	US BANK NA	\$91
	Yolo	2	JPMORGAN CHASE BANK, NA	\$20,759
CALIFORNIA Total				\$9,283,731
COLORADO	Archuleta	4	BANK OF COLORADO	\$2,975
		8	JPMORGAN CHASE BANK, NA	\$283
		10	BANK OF AMERICA, N.A.	\$161
	Boulder	9	US BANK NA	\$25,528
	Broomfield	7	US BANK NA	\$7,179
	Chaffee	5	US BANK NA	\$1,182
	Clear Creek	3	WELLS FARGO BANK, N.A.	\$1,117
		7	COMMERCE BANK	\$450
	Costilla	5	NBH BANK	\$12
	Custer	9	JPMORGAN CHASE BANK, NA	\$110
	Dolores	3	ALPINE BANK	\$95
		5	WELLS FARGO BANK, N.A.	\$45
		7	NBH BANK	\$23
	Douglas	4	US BANK NA	\$30,282
	Eagle	3	WELLS FARGO BANK, N.A.	\$14,209
		4	US BANK NA	\$13,536
		9	JPMORGAN CHASE BANK, NA	\$5,305
	Elbert	5	US BANK NA	\$1,497
		7	JPMORGAN CHASE BANK, NA	\$1,267
	Fremont	7	US BANK NA	\$583
	Gilpin	1	WELLS FARGO BANK, N.A.	\$669
		5	FIRSTBANK	\$341
		6	JPMORGAN CHASE BANK, NA	\$196
		7	US BANK NA	\$168
	Grand	2	US BANK NA	\$5,791
		3	WELLS FARGO BANK, N.A.	\$5,202
		6	BOKF NA	\$1,076
	Gunnison	3	WELLS FARGO BANK, N.A.	\$4,442
		4	ALPINE BANK	\$1,700
		7	JPMORGAN CHASE BANK, NA	\$873
		9	US BANK NA	\$470
	Hinsdale	4	JPMORGAN CHASE BANK, NA	\$56
		6	US BANK NA	\$42
	Huerfano	10	US BANK NA	\$46
	Jackson	9	FIRSTBANK	\$11
		10	BANK OF AMERICA, N.A.	\$10
	La Plata	8	JPMORGAN CHASE BANK, NA	\$2,155
	Lake	10	US BANK NA	\$167
	Larimer	8	US BANK NA	\$18,731
	Lincoln	10	JPMORGAN CHASE BANK, NA	\$27
	Mineral	6	JPMORGAN CHASE BANK, NA	\$32
	Ouray	6	JPMORGAN CHASE BANK, NA	\$249
	Park	2	WELLS FARGO BANK, N.A.	\$1,924
		5	US BANK NA	\$954
		10	JPMORGAN CHASE BANK, NA	\$458

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Pitkin	3	WELLS FARGO BANK, N.A.	\$8,355
		5	US BANK NA	\$6,332
		7	JPMORGAN CHASE BANK, NA	\$3,966
		9	FIRSTBANK	\$2,954
		10	BANK OF COLORADO	\$2,813
	Routt	7	JPMORGAN CHASE BANK, NA	\$1,964
	San Juan	6	WELLS FARGO BANK, N.A.	\$40
	San Miguel	2	WELLS FARGO BANK, N.A.	\$3,808
		3	NBH BANK	\$3,081
		5	US BANK NA	\$1,517
		8	JPMORGAN CHASE BANK, NA	\$924
		9	FIRST REPUBLIC BANK	\$774
	Summit	3	WELLS FARGO BANK, N.A.	\$11,527
		4	US BANK NA	\$8,252
		8	JPMORGAN CHASE BANK, NA	\$2,429
	Teller	9	US BANK NA	\$477
COLORADO Total				\$210,842
CONNECTICUT	Fairfield	3	JPMORGAN CHASE BANK, NA	\$192,639
		7	WELLS FARGO BANK, N.A.	\$94,892
	Litchfield	8	WELLS FARGO BANK, N.A.	\$11,514
	New London	4	CHELSEA GROTON BANK	\$21,338
		10	WELLS FARGO BANK, N.A.	\$5,366
	Tolland	6	LIBERTY BANK	\$4,769
		10	CITIZENS BANK, NA	\$1,836
CONNECTICUT Total				\$332,354
DELAWARE	Sussex	7	WELLS FARGO BANK, N.A.	\$10,801
		8	CITIZENS BANK, NA	\$9,340
DELAWARE Total				\$20,141
DISTRICT OF COLUMBIA	District of Columbia	6	WELLS FARGO BANK, N.A.	\$71,525
		10	JPMORGAN CHASE BANK, NA	\$35,661
DISTRICT OF COLUMBIA Total				\$107,186
FLORIDA	Collier	4	WELLS FARGO BANK, N.A.	\$48,111
		5	JPMORGAN CHASE BANK, NA	\$39,745
	Flagler	3	WELLS FARGO BANK, N.A.	\$6,387
		4	AMERIS BANK	\$5,875
	Franklin	6	WELLS FARGO BANK, N.A.	\$219
		7	AMERIS BANK	\$191
	Gulf	5	AMERIS BANK	\$288
		6	WELLS FARGO BANK, N.A.	\$273
		7	REGIONS BANK	\$267
		9	TRUIST FINANCIAL	\$250
	Holmes	10	TRUSTMARK NATIONAL BANK	\$214
	Indian River	8	JPMORGAN CHASE BANK, NA	\$8,800
	Jefferson	7	TRUIST FINANCIAL	\$196
		8	AMERIS BANK	\$171
	Leon	10	WELLS FARGO BANK, N.A.	\$10,542
	Liberty	7	FIRST FEDERAL BANK OF FLORIDA	\$171
		9	AMERIS BANK	\$92
	Martin	8	JPMORGAN CHASE BANK, NA	\$15,560
	Monroe	6	IBERIABANK	\$11,431
		7	WELLS FARGO BANK, N.A.	\$8,705

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Nassau	9	REGIONS BANK	\$2,623
	St. Johns	5	TRUIST FINANCIAL	\$25,247
		10	REGIONS BANK	\$11,257
	Sumter	1	CITIZENS FIRST BANK	\$29,283
		6	WELLS FARGO BANK, N.A.	\$3,908
		8	JPMORGAN CHASE BANK, NA	\$1,795
	Union	9	FIRST FEDERAL BANK OF FLORIDA	\$132
	Wakulla	3	AMERIS BANK	\$1,991
		6	WELLS FARGO BANK, N.A.	\$383
	Walton	2	HANCOCK WHITNEY BANK	\$21,417
		3	REGIONS BANK	\$19,444
		6	TRUIST FINANCIAL	\$7,346
		9	WELLS FARGO BANK, N.A.	\$6,623
	Washington	7	TRUSTMARK NATIONAL BANK	\$364
FLORIDA Total				\$289,301
GEORGIA	Baldwin	8	WELLS FARGO BANK, N.A.	\$545
	Barrow	7	AMERIS BANK	\$3,345
	Brantley	10	TRUIST FINANCIAL	\$99
	Brooks	5	THE FIRST, A NATIONAL BANKING	\$287
		8	WELLS FARGO BANK, N.A.	\$133
	Bryan	1	AMERIS BANK	\$5,473
		5	SOUTH STATE BANK, N.A.	\$2,760
		10	WELLS FARGO BANK, N.A.	\$1,488
	Burke	6	REGIONS BANK	\$337
	Camden	7	WELLS FARGO BANK, N.A.	\$639
	Candler	8	RENASANT BANK	\$91
	Catoosa	5	REGIONS BANK	\$2,697
	Cherokee	3	AMERIS BANK	\$30,680
	Clarke	9	AMERIS BANK	\$2,868
	Cobb	7	AMERIS BANK	\$67,893
	Colquitt	7	WELLS FARGO BANK, N.A.	\$541
	Columbia	5	SOUTH STATE BANK, N.A.	\$10,795
	Coweta	6	AMERIS BANK	\$8,186
		10	PNC BANK N.A.	\$4,088
	Dawson	8	REGIONS BANK	\$903
		10	JPMORGAN CHASE BANK, NA	\$870
	DeKalb	5	AMERIS BANK	\$52,294
		10	SOUTH STATE BANK, N.A.	\$28,256
	Fannin	3	WELLS FARGO BANK, N.A.	\$1,572
		5	TRUIST FINANCIAL	\$933
		6	SOUTH STATE BANK, N.A.	\$847
		9	JPMORGAN CHASE BANK, NA	\$358
		10	SOUTH STATE BANK	\$320
	Floyd	7	SOUTH STATE BANK, N.A.	\$3,043
	Forsyth	10	AMERIS BANK	\$12,801
	Fulton	6	AMERIS BANK	\$127,226
	Gilmer	5	WELLS FARGO BANK, N.A.	\$942
		7	SOUTH STATE BANK, N.A.	\$639
		8	REGIONS BANK	\$528
	Glynn	9	WELLS FARGO BANK, N.A.	\$3,018
	Greene	1	TRUIST FINANCIAL	\$3,517

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		2	WELLS FARGO BANK, N.A.	\$2,271
		5	SYNOVUS BANK	\$1,223
		6	BANK OF AMERICA, N.A.	\$847
		7	JPMORGAN CHASE BANK, NA	\$530
		9	RENASANT BANK	\$346
	Habersham	5	REGIONS BANK	\$1,270
		6	SOUTH STATE BANK, N.A.	\$1,266
	Hancock	6	WELLS FARGO BANK, N.A.	\$122
		8	JPMORGAN CHASE BANK, NA	\$39
	Harris	1	SYNOVUS BANK	\$7,540
	Hart	7	TRUIST FINANCIAL	\$353
		10	BANK OF AMERICA, N.A.	\$218
	Heard	4	SOUTH STATE BANK, N.A.	\$437
	Henry	4	AMERIS BANK	\$14,696
	Houston	4	AMERIS BANK	\$5,799
		7	RENASANT BANK	\$3,305
		9	WELLS FARGO BANK, N.A.	\$2,408
	Jackson	4	AMERIS BANK	\$4,016
		8	REGIONS BANK	\$2,295
	Jasper	3	UNITED BANK	\$341
		7	TRUIST FINANCIAL	\$179
	Lamar	10	UNITED COMMUNITY BANK	\$81
	Lanier	6	SYNOVUS BANK	\$203
	Lee	10	WELLS FARGO BANK, N.A.	\$297
	Lincoln	5	QUEENSBOROUGH NATIONAL BANK &	\$273
		9	SOUTH STATE BANK, N.A.	\$146
	Long	9	RENASANT BANK	\$31
	Lowndes	9	WELLS FARGO BANK, N.A.	\$2,517
	Lumpkin	6	AMERIS BANK	\$843
		10	REGIONS BANK	\$488
	Madison	9	AMERIS BANK	\$460
	Monroe	3	RENASANT BANK	\$1,737
		7	SYNOVUS BANK	\$916
	Murray	10	FIRSTBANK	\$373
	Oconee	7	TRUIST FINANCIAL	\$2,526
	Oglethorpe	4	FIRST CITIZENS BANK AND TRUST	\$351
		5	SYNOVUS BANK	\$323
		10	REGIONS BANK	\$72
	Paulding	8	AMERIS BANK	\$4,314
		10	SYNOVUS BANK	\$3,480
	Pickens	2	UNITED COMMUNITY BANK	\$4,783
		7	AMERIS BANK	\$1,220
		8	REGIONS BANK	\$1,078
	Pulaski	7	WELLS FARGO BANK, N.A.	\$80
		10	JPMORGAN CHASE BANK, NA	\$48
	Putnam	2	TRUIST FINANCIAL	\$1,404
		3	WELLS FARGO BANK, N.A.	\$1,339
		7	AMERIS BANK	\$377
		9	BANK OF AMERICA, N.A.	\$237
		10	SYNOVUS BANK	\$233
	Rabun	6	REGIONS BANK	\$656

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		9	WELLS FARGO BANK, N.A.	\$460
	Rockdale	10	AMERIS BANK	\$2,561
	Talbot	4	SYNOVUS BANK	\$107
	Towns	5	WELLS FARGO BANK, N.A.	\$463
		9	TRUIST FINANCIAL	\$160
		10	BANK OF AMERICA, N.A.	\$147
	Union	9	TRUIST FINANCIAL	\$490
	Walker	8	REGIONS BANK	\$1,138
	Wheeler	7	RENASANT BANK	\$24
GEORGIA Total				\$466,949
HAWAII	Hawaii	7	WELLS FARGO BANK, N.A.	\$5,053
		8	JPMORGAN CHASE BANK, NA	\$2,640
		10	BANK OF AMERICA, N.A.	\$2,090
	Honolulu	3	BANK OF HAWAII	\$279,426
		8	WELLS FARGO BANK, N.A.	\$15,453
		10	BANK OF AMERICA, N.A.	\$6,030
	Kauai	7	CITIBANK, N.A.	\$2,083
		9	WELLS FARGO BANK, N.A.	\$1,314
	Maui	7	WELLS FARGO BANK, N.A.	\$5,874
		8	JPMORGAN CHASE BANK, NA	\$4,432
		10	CITIBANK, N.A.	\$2,512
HAWAII Total				\$326,907
IDAHO	Adams	4	JPMORGAN CHASE BANK, NA	\$79
		6	ZIONS BANCORPORATION, N.A.	\$30
		9	WASHINGTON FEDERAL	\$3
	Bear Lake	1	ZIONS BANCORPORATION, N.A.	\$654
		3	US BANK NA	\$394
		4	KEYBANK NATIONAL ASSOCIATION	\$100
		6	JPMORGAN CHASE BANK, NA	\$61
		9	GLACIER BANK	\$51
		10	ALTABANK	\$35
	Benewah	3	UMPQUA BANK	\$719
		5	GLACIER BANK	\$360
	Bingham	5	GLACIER BANK	\$3,070
		8	US BANK NA	\$1,222
	Blaine	4	US BANK NA	\$9,176
		5	WELLS FARGO BANK, N.A.	\$8,846
		8	WASHINGTON FEDERAL	\$2,044
		10	BANK OF THE WEST	\$947
	Boise	4	US BANK NA	\$443
		7	ZIONS BANCORPORATION, N.A.	\$209
		8	GLACIER BANK	\$167
		10	JPMORGAN CHASE BANK, NA	\$137
	Bonner	5	US BANK NA	\$2,041
		8	FIRST INTERSTATE BANK	\$1,175
	Butte	4	ZIONS BANCORPORATION, N.A.	\$17
		7	GLACIER BANK	\$7
	Camas	6	ZIONS BANCORPORATION, N.A.	\$6
	Caribou	10	GLACIER BANK	\$105
	Custer	6	US BANK NA	\$134
	Elmore	10	FIRST INTERSTATE BANK	\$541

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Franklin	1	ALTABANK	\$2,106
		10	US BANK NA	\$192
	Fremont	5	ZIONS BANCORPORATION, N.A.	\$642
		6	US BANK NA	\$624
		7	KEYBANK NATIONAL ASSOCIATION	\$480
		10	JPMORGAN CHASE BANK, NA	\$158
	Gooding	6	US BANK NA	\$405
	Jerome	10	US BANK NA	\$283
	Kootenai	4	US BANK NA	\$20,808
		6	FIRST INTERSTATE BANK	\$8,427
		10	UMPQUA BANK	\$5,434
	Minidoka	8	US BANK NA	\$354
	Oneida	6	US BANK NA	\$158
	Shoshone	6	GLACIER BANK	\$826
	Teton	2	US BANK NA	\$2,972
		10	ZIONS BANCORPORATION, N.A.	\$265
	Twin Falls	9	US BANK NA	\$2,051
	Valley	2	US BANK NA	\$2,342
		3	WELLS FARGO BANK, N.A.	\$1,435
		4	KEYBANK NATIONAL ASSOCIATION	\$1,320
		9	WASHINGTON FEDERAL	\$613
		10	GLACIER BANK	\$605
IDAHO Total				\$85,273
ILLINOIS	Bond	9	FIRST MID BANK AND TRUST, NA	\$140
		10	US BANK NA	\$106
	Boone	6	STILLMAN BANCCORP N.A.	\$1,410
		7	FIRST NATIONAL BANK OF OMAHA	\$1,240
	Calhoun	5	UNITED COMMUNITY BANK	\$28
	Carroll	6	JPMORGAN CHASE BANK, NA	\$240
		8	US BANK NA	\$156
		9	WELLS FARGO BANK, N.A.	\$137
	Cass	10	US BANK NA	\$35
	Champaign	5	MORTON COMMUNITY BANK	\$7,476
	Christian	4	REGIONS BANK	\$318
		7	UNITED COMMUNITY BANK	\$199
	Clinton	2	GERMANTOWN TRUST & SAVINGS BAN	\$4,669
	Crawford	5	REGIONS BANK	\$336
	Cumberland	6	FIRST FINANCIAL BANK, NA	\$49
		8	WELLS FARGO BANK, N.A.	\$41
	DeKalb	4	OLD SECOND NATIONAL BANK	\$4,084
	DuPage	10	US BANK NA	\$82,290
	Edwards	6	JPMORGAN CHASE BANK, NA	\$34
	Fulton	7	WELLS FARGO BANK, N.A.	\$242
	Hardin	9	JPMORGAN CHASE BANK, NA	\$6
	Jefferson	7	US BANK NA	\$697
		10	FIFTH THIRD BK NA	\$296
	Jersey	8	BUSEY BANK	\$188
	Johnson	5	FIRST SOUTHERN BANK	\$156
		7	US BANK NA	\$105
		9	JPMORGAN CHASE BANK, NA	\$50
	Kendall	8	FIRST MIDWEST BANK	\$4,794

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Lee	8	US BANK NA	\$836
	Livingston	8	BUSEY BANK	\$480
	Logan	6	UNITED COMMUNITY BANK	\$328
	Marion	5	US BANK NA	\$893
	Marshall	8	JPMORGAN CHASE BANK, NA	\$174
	Massac	9	INDEPENDENCE BANK OF KENTUCKY	\$80
	McHenry	9	US BANK NA	\$9,514
	Menard	1	UNITED COMMUNITY BANK	\$488
		8	CARROLLTON BANK	\$33
	Mercer	9	US BANK NA	\$84
	Montgomery	9	UNITED COMMUNITY BANK	\$332
	Piatt	2	BUSEY BANK	\$989
		8	HEARTLAND BANK & TRUST CO	\$186
	Pope	4	WELLS FARGO BANK, N.A.	\$14
		10	US BANK NA	\$3
	Putnam	10	WELLS FARGO BANK, N.A.	\$63
	Scott	3	UNITED COMMUNITY BANK	\$142
		4	US BANK NA	\$75
	Union	5	US BANK NA	\$298
	Washington	6	REGIONS BANK	\$589
	Whiteside	4	US BANK NA	\$1,334
	Williamson	3	US BANK NA	\$4,324
ILLINOIS Total				\$130,781
INDIANA	Adams	5	FIFTH THIRD BK NA	\$941
	Benton	10	OLD NATIONAL BANK	\$73
	Boone	1	JPMORGAN CHASE BANK, NA	\$9,372
		2	THE HUNTINGTON NATIONAL BANK	\$9,322
		9	OLD NATIONAL BANK	\$4,128
	Brown	5	FIFTH THIRD BK NA	\$743
		7	OLD NATIONAL BANK	\$513
		8	JPMORGAN CHASE BANK, NA	\$507
		9	FIRST FINANCIAL BANK	\$426
	Carroll	5	REGIONS BANK	\$998
	Clinton	6	REGIONS BANK	\$749
	Dearborn	5	FIFTH THIRD BK NA	\$2,025
		8	THE HUNTINGTON NATIONAL BANK	\$795
	Decatur	6	FIFTH THIRD BK NA	\$1,672
	Dubois	5	FIFTH THIRD BK NA	\$1,213
	Franklin	1	FIRST FINANCIAL BANK	\$4,594
		10	THE HUNTINGTON NATIONAL BANK	\$299
	Gibson	3	FIFTH THIRD BK NA	\$1,604
		9	REGIONS BANK	\$381
	Grant	4	REGIONS BANK	\$1,436
	Greene	7	REGIONS BANK	\$898
	Hamilton	4	THE HUNTINGTON NATIONAL BANK	\$56,880
	Hendricks	4	THE HUNTINGTON NATIONAL BANK	\$11,860
	Huntington	10	FLAGSTAR BANK	\$316
	Jasper	9	FIFTH THIRD BK NA	\$720
	Jay	8	THE PARK NATIONAL BANK	\$288
	Jefferson	10	JPMORGAN CHASE BANK, NA	\$208
	Jennings	10	PNC BANK N.A.	\$398

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Johnson	7	THE HUNTINGTON NATIONAL BANK	\$12,562
	LaGrange	6	HORIZON BANK	\$761
	LaPorte	10	LAKE CITY BANK	\$2,181
	Marshall	6	CENTIER BANK	\$1,469
	Monroe	8	REGIONS BANK	\$3,448
	Montgomery	3	PNC BANK N.A.	\$2,136
	Morgan	6	JPMORGAN CHASE BANK, NA	\$2,183
	Newton	6	CENTIER BANK	\$175
		7	FIRST FINANCIAL BANK	\$162
		10	FIRST MIDWEST BANK	\$66
	Noble	8	JPMORGAN CHASE BANK, NA	\$1,086
	Ohio	2	FIRST FINANCIAL BANK	\$633
		4	CIVISTA BANK	\$184
	Orange	6	FIFTH THIRD BK NA	\$252
	Owen	10	THE HUNTINGTON NATIONAL BANK	\$115
	Parke	5	FIFTH THIRD BK NA	\$524
	Perry	7	INDEPENDENCE BANK OF KENTUCKY	\$184
	Porter	7	FIFTH THIRD BK NA	\$4,350
	Putnam	4	OLD NATIONAL BANK	\$989
		8	THE HUNTINGTON NATIONAL BANK	\$521
		9	JPMORGAN CHASE BANK, NA	\$497
	Scott	6	JPMORGAN CHASE BANK, NA	\$292
	Shelby	8	FIRST BANK RICHMOND	\$1,620
		10	KEYBANK NATIONAL ASSOCIATION	\$1,528
	Spencer	10	FIFTH THIRD BK NA	\$209
	Starke	3	FIRST FARMERS BANK & TRUST	\$946
		7	HORIZON BANK	\$553
	Sullivan	7	FIFTH THIRD BK NA	\$391
	Tippecanoe	8	THE HUNTINGTON NATIONAL BANK	\$5,132
	Vermillion	8	FIRST FARMERS BANK & TRUST	\$217
	Vigo	7	FIFTH THIRD BK NA	\$1,625
	Warren	5	HORIZON BANK	\$217
		6	FIRST FINANCIAL BANK	\$141
	Warrick	4	FIFTH THIRD BK NA	\$1,771
	Washington	10	WELLS FARGO BANK, N.A.	\$154
	White	7	OLD NATIONAL BANK	\$373
		8	JPMORGAN CHASE BANK, NA	\$336
INDIANA Total				\$163,342
IOWA	Adams	4	US BANK NA	\$27
	Benton	2	HILLS BANK AND TRUST COMPANY	\$1,330
		9	CITIZENS BANK, NA	\$150
	Boone	5	WELLS FARGO BANK, N.A.	\$688
	Bremer	2	LUANA SAVINGS BANK	\$937
	Buena Vista	2	NORTHWEST BANK	\$805
	Calhoun	4	NORTHWEST BANK	\$369
		7	WELLS FARGO BANK, N.A.	\$94
	Cass	10	BANK IOWA	\$110
	Cerro Gordo	2	WELLS FARGO BANK, N.A.	\$1,690
	Cherokee	9	NORTHWEST BANK	\$44
	Clarke	2	GREAT WESTERN BANK	\$429
		6	WELLS FARGO BANK, N.A.	\$66

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Clayton	1	LUANA SAVINGS BANK	\$2,302
	Clinton	4	US BANK NA	\$1,251
	Dallas	3	WELLS FARGO BANK, N.A.	\$10,171
		5	US BANK NA	\$7,054
	Davis	7	WELLS FARGO BANK, N.A.	\$54
	Decatur	4	BANK OF THE WEST	\$149
		9	WELLS FARGO BANK, N.A.	\$31
	Delaware	6	HILLS BANK AND TRUST COMPANY	\$162
	Des Moines	5	US BANK NA	\$944
	Dickinson	6	WELLS FARGO BANK, N.A.	\$359
		7	US BANK NA	\$287
	Grundy	4	US BANK NA	\$159
		7	WELLS FARGO BANK, N.A.	\$93
	Guthrie	3	WELLS FARGO BANK, N.A.	\$170
		7	GREAT WESTERN BANK	\$80
		9	BANKERS TRUST COMPANY	\$43
	Hamilton	3	WELLS FARGO BANK, N.A.	\$412
	Hancock	2	WELLS FARGO BANK, N.A.	\$273
		6	BANK IOWA	\$69
	Harrison	3	AMERICAN NATIONAL BANK	\$858
		10	FIRST NATIONAL BANK OF OMAHA	\$153
	Ida	4	BANK IOWA	\$71
	Jackson	4	MIDWESTONE BANK	\$548
		5	US BANK NA	\$511
	Johnson	10	BANKERS TRUST COMPANY	\$2,738
	Jones	2	HILLS BANK AND TRUST COMPANY	\$636
		6	MIDWESTONE BANK	\$137
	Keokuk	9	WELLS FARGO BANK, N.A.	\$78
	Lucas	3	US BANK NA	\$154
	Lyon	5	FIRST DAKOTA NATIONAL BANK	\$168
	Madison	3	WELLS FARGO BANK, N.A.	\$830
		4	LUANA SAVINGS BANK	\$728
		8	GREAT WESTERN BANK	\$243
		9	US BANK NA	\$198
	Mahaska	7	WELLS FARGO BANK, N.A.	\$379
	Marion	4	US BANK NA	\$1,166
		8	LUANA SAVINGS BANK	\$260
		10	GREAT SOUTHERN BANK	\$230
	Mills	1	FIRST NATIONAL BANK OF OMAHA	\$739
		6	BANK IOWA	\$132
		7	US BANK NA	\$115
		8	WELLS FARGO BANK, N.A.	\$108
	Mitchell	4	WELLS FARGO BANK, N.A.	\$129
		10	US BANK NA	\$37
	Montgomery	10	WELLS FARGO BANK, N.A.	\$87
	Osceola	1	US BANK NA	\$490
	Page	10	BANK OF THE WEST	\$23
	Palo Alto	1	NORTHWEST BANK	\$1,046
	Plymouth	6	US BANK NA	\$449
		8	CITIZENS BANK, NA	\$374
	Polk	3	WEST BANK	\$64,839

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Pottawattamie	3	FIRST NATIONAL BANK OF OMAHA	\$8,733
		5	WELLS FARGO BANK, N.A.	\$2,878
	Ringgold	8	WELLS FARGO BANK, N.A.	\$25
	Story	4	WELLS FARGO BANK, N.A.	\$4,925
		8	LUANA SAVINGS BANK	\$929
	Union	7	NORTHWEST BANK	\$100
	Warren	1	WELLS FARGO BANK, N.A.	\$3,457
		4	NORTHWEST BANK	\$2,153
		6	LUANA SAVINGS BANK	\$1,994
	Winnebago	10	WELLS FARGO BANK, N.A.	\$51
	Worth	1	WELLS FARGO BANK, N.A.	\$236
	Wright	1	WELLS FARGO BANK, N.A.	\$267
IOWA Total				\$135,204
KANSAS	Butler	6	FIDELITY BANK	\$3,082
	Clay	6	CENTRAL NATIONAL BANK	\$77
			SUNFLOWER BANK, N.A.	\$77
	Douglas	7	NBH BANK	\$6,790
	Elk	4	WELLS FARGO BANK, N.A.	\$20
	Finney	10	WELLS FARGO BANK, N.A.	\$361
	Ford	6	SUNFLOWER BANK, N.A.	\$532
	Geary	6	SUNFLOWER BANK, N.A.	\$301
	Harvey	10	BANK OF THE WEST	\$401
	Hodgeman	10	JPMORGAN CHASE BANK, NA	\$6
	Jackson	9	COREFIRST BANK & TRUST	\$65
	Jefferson	5	CAPITOL FEDERAL SAVINGS	\$352
	Meade	7	CITIBANK, N.A.	\$13
		8	JPMORGAN CHASE BANK, NA	\$9
	Miami	9	US BANK NA	\$1,114
	Morris	4	CENTRAL NATIONAL BANK	\$151
		7	COMMERCE BANK	\$82
	Norton	8	US BANK NA	\$25
	Osage	4	COREFIRST BANK & TRUST	\$149
	Ottawa	7	WELLS FARGO BANK, N.A.	\$15
		10	TRUIST FINANCIAL	\$7
	Pottawatomie	6	CENTRAL NATIONAL BANK	\$997
	Riley	9	SUNFLOWER BANK, N.A.	\$679
		10	WELLS FARGO BANK, N.A.	\$647
	Rush	10	EQUITY BANK	\$1
	Stafford	10	WELLS FARGO BANK, N.A.	\$15
	Wabaunsee	7	JPMORGAN CHASE BANK, NA	\$30
KANSAS Total				\$15,998
KENTUCKY	Allen	5	US BANK NA	\$302
	Ballard	4	REGIONS BANK	\$242
	Bath	8	US BANK NA	\$78
	Bell	10	WELLS FARGO BANK, N.A.	\$63
	Boone	3	THE HUNTINGTON NATIONAL BANK	\$17,658
		7	FIFTH THIRD BK NA	\$10,687
		9	US BANK NA	\$7,230
	Bourbon	3	COMMUNITY TRUST BANK, INC.	\$1,159
	Bracken	1	US BANK NA	\$491
	Bullitt	9	JPMORGAN CHASE BANK, NA	\$1,040

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		10	FIRST FINANCIAL BANK	\$782
	Butler	9	US BANK NA	\$44
	Caldwell	7	US BANK NA	\$49
		8	FIFTH THIRD BK NA	\$40
		10	CITIZENS BANK, NA	\$38
	Campbell	4	FIFTH THIRD BK NA	\$9,814
		8	THE HUNTINGTON NATIONAL BANK	\$4,663
	Casey	7	JPMORGAN CHASE BANK, NA	\$115
	Clark	5	COMMUNITY TRUST BANK, INC.	\$2,585
	Crittenden	4	INDEPENDENCE BANK OF KENTUCKY	\$60
	Daviess	9	FIFTH THIRD BK NA	\$1,277
	Edmonson	2	US BANK NA	\$170
		8	JPMORGAN CHASE BANK, NA	\$71
	Elliott	7	JPMORGAN CHASE BANK, NA	\$8
	Estill	7	US BANK NA	\$139
		9	COMMUNITY TRUST BANK, INC.	\$89
	Fleming	5	US BANK NA	\$389
	Franklin	6	COMMUNITY TRUST BANK, INC.	\$2,412
	Gallatin	4	US BANK NA	\$81
	Garrard	8	COMMUNITY TRUST BANK, INC.	\$162
		9	WELLS FARGO BANK, N.A.	\$101
	Grant	5	THE HUNTINGTON NATIONAL BANK	\$806
		9	US BANK NA	\$259
	Graves	8	REGIONS BANK	\$809
	Green	2	COMMUNITY TRUST BANK, INC.	\$340
	Greenup	8	FIFTH THIRD BK NA	\$260
	Hancock	4	US BANK NA	\$175
		7	OLD NATIONAL BANK	\$106
	Harlan	8	WELLS FARGO BANK, N.A.	\$73
	Henry	2	TRUIST FINANCIAL	\$193
		3	PNC BANK N.A.	\$174
		4	FIFTH THIRD BK NA	\$171
		6	WELLS FARGO BANK, N.A.	\$126
		9	STOCK YARDS BANK & TRUST COMPA	\$81
		10	JPMORGAN CHASE BANK, NA	\$78
	Hopkins	7	FIFTH THIRD BK NA	\$830
	Jessamine	9	COMMUNITY TRUST BANK, INC.	\$2,364
	Johnson	6	US BANK NA	\$308
	Kenton	6	THE HUNTINGTON NATIONAL BANK	\$17,374
	Knox	3	COMMUNITY TRUST BANK, INC.	\$534
	Lawrence	9	JPMORGAN CHASE BANK, NA	\$53
	Leslie	7	COMMUNITY TRUST BANK, INC.	\$43
	Lewis	5	US BANK NA	\$257
	Livingston	4	REGIONS BANK	\$115
		6	TRUIST FINANCIAL	\$97
		10	BANTERRA BANK	\$60
	Lyon	3	TRUIST FINANCIAL	\$547
		7	FIFTH THIRD BK NA	\$70
		9	OLD NATIONAL BANK	\$30
	Madison	3	COMMUNITY TRUST BANK, INC.	\$3,998
		6	US BANK NA	\$2,209

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Marion	3	US BANK NA	\$659
	Marshall	3	US BANK NA	\$1,872
	Martin	6	TRUIST FINANCIAL	\$78
		8	JPMORGAN CHASE BANK, NA	\$12
	McCreary	3	COMMUNITY TRUST BANK, INC.	\$73
	Meade	10	TRUIST FINANCIAL	\$79
	Mercer	5	FIRST FINANCIAL BANK	\$687
	Metcalfe	7	US BANK NA	\$28
		8	TRUIST FINANCIAL	\$24
	Morgan	10	TRADITIONAL BANK	\$13
	Nelson	6	PNC BANK N.A.	\$677
		10	JPMORGAN CHASE BANK, NA	\$448
	Nicholas	4	CITY NATIONAL BANK OF WV	\$197
		9	CENTRAL BANK & TRUST CO	\$20
	Ohio	8	US BANK NA	\$130
	Oldham	3	REPUBLIC BANK & TRUST	\$7,110
		6	JPMORGAN CHASE BANK, NA	\$3,695
		9	FIFTH THIRD BK NA	\$2,472
	Owen	4	THE HUNTINGTON NATIONAL BANK	\$149
		5	TRUIST FINANCIAL	\$135
	Pendleton	1	US BANK NA	\$837
		4	FIFTH THIRD BK NA	\$424
		6	COMMUNITY TRUST BANK, INC.	\$138
	Powell	8	COMMUNITY TRUST BANK, INC.	\$256
	Rockcastle	1	COMMUNITY TRUST BANK, INC.	\$1,104
		8	US BANK NA	\$83
	Scott	5	WESBANCO BANK INC.	\$2,985
		7	FIFTH THIRD BK NA	\$2,461
	Shelby	6	FIRST FINANCIAL BANK	\$1,985
		7	FIFTH THIRD BK NA	\$1,720
	Simpson	6	US BANK NA	\$419
	Spencer	1	REPUBLIC BANK & TRUST	\$922
		4	PNC BANK N.A.	\$373
		5	WESBANCO BANK INC.	\$356
		8	JPMORGAN CHASE BANK, NA	\$282
		9	US BANK NA	\$192
		10	TRUIST FINANCIAL	\$189
	Trigg	4	WELLS FARGO BANK, N.A.	\$128
		6	INDEPENDENCE BANK OF KENTUCKY	\$69
		8	US BANK NA	\$46
		9	TRUIST FINANCIAL	\$42
	Trimble	5	FIRST FINANCIAL BANK	\$97
		10	WELLS FARGO BANK, N.A.	\$55
	Washington	8	US BANK NA	\$150
	Wolfe	7	COMMUNITY TRUST BANK, INC.	\$63
		8	WELLS FARGO BANK, N.A.	\$38
KENTUCKY Total				\$128,551
LOUISIANA	Caldwell	8	ORIGIN BANK	\$47
	Franklin	10	IBERIABANK	\$53
	Jackson	3	ORIGIN BANK	\$354
		6	BANCORPSOUTH	\$122

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		7	JPMORGAN CHASE BANK, NA	\$113
	Lafourche	10	REGIONS BANK	\$1,534
	LaSalle	9	RED RIVER BANK	\$43
	Plaquemines	3	GULF COAST BANK AND TRUST	\$5,021
	Pointe Coupee	3	REGIONS BANK	\$1,194
	St. Charles	9	GULF COAST BANK AND TRUST	\$1,021
		10	REGIONS BANK	\$748
	St. Mary	5	IBERIABANK	\$1,970
	Tensas	4	REGIONS BANK	\$75
		9	CITIBANK, N.A.	\$22
	Vernon	8	WELLS FARGO BANK, N.A.	\$257
	West Carroll	9	JPMORGAN CHASE BANK, NA	\$43
	West Feliciana	9	REGIONS BANK	\$205
LOUISIANA Total				\$12,822
MAINE	Androscoggin	4	BANGOR SAVINGS BANK	\$5,147
	Cumberland	4	BANGOR SAVINGS BANK	\$47,908
	Franklin	1	BANGOR SAVINGS BANK	\$2,403
		3	CAMDEN NATIONAL BANK	\$1,272
		9	TD BANK N.A.	\$444
		10	WELLS FARGO BANK, N.A.	\$376
	Hancock	5	BANGOR SAVINGS BANK	\$4,497
		9	JPMORGAN CHASE BANK, NA	\$1,325
	Knox	5	BANGOR SAVINGS BANK	\$3,305
	Lincoln	6	BANGOR SAVINGS BANK	\$1,616
		9	KENNEBEC SAVINGS BANK	\$759
		10	TD BANK N.A.	\$672
	Penobscot	4	BANGOR SAVINGS BANK	\$27,597
	Piscataquis	5	BANGOR SAVINGS BANK	\$533
	Sagadahoc	6	KEYBANK NATIONAL ASSOCIATION	\$1,328
	Waldo	3	BANGOR SAVINGS BANK	\$5,868
		6	KEYBANK NATIONAL ASSOCIATION	\$1,609
		10	KENNEBEC SAVINGS BANK	\$634
	York	2	CAMDEN NATIONAL BANK	\$24,190
		9	BANGOR SAVINGS BANK	\$8,775
		10	BANK OF AMERICA, N.A.	\$8,025
MAINE Total				\$148,283
MARYLAND	Anne Arundel	6	WELLS FARGO BANK, N.A.	\$40,906
	Calvert	6	TRUIST FINANCIAL	\$9,238
	Carroll	7	WELLS FARGO BANK, N.A.	\$9,428
	Charles	7	WELLS FARGO BANK, N.A.	\$4,850
	Dorchester	10	WELLS FARGO BANK, N.A.	\$743
	Frederick	9	WELLS FARGO BANK, N.A.	\$9,429
	Garrett	3	TRUIST FINANCIAL	\$5,214
		6	WELLS FARGO BANK, N.A.	\$1,035
		9	FIRST NATIONAL BANK OF PA	\$706
	Harford	6	WELLS FARGO BANK, N.A.	\$13,281
		10	FULTON BANK, N.A.	\$7,338
	Howard	8	WELLS FARGO BANK, N.A.	\$34,242
	Kent	6	WELLS FARGO BANK, N.A.	\$942
	Montgomery	3	TRUIST FINANCIAL	\$175,239
		7	WELLS FARGO BANK, N.A.	\$77,185

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		8	EAGLEBANK	\$75,182
		9	CAPITAL ONE, N.A.	\$67,500
	Prince George's	10	CAPITAL ONE, N.A.	\$24,368
	Queen Anne's	6	TRUIST FINANCIAL	\$3,689
	St. Mary's	7	WELLS FARGO BANK, N.A.	\$2,376
	Talbot	4	BANK OF AMERICA, N.A.	\$4,489
		5	TRUIST FINANCIAL	\$3,211
MARYLAND Total				\$570,591
MASSACHUSETTS	Barnstable	1	CAPE COD FIVE CENTS SAVINGS BA	\$151,286
		3	THE COOPERATIVE BANK OF CAPE C	\$36,812
		4	BANK OF AMERICA, N.A.	\$30,215
		7	CITIZENS BANK, NA	\$26,077
		9	SANTANDER BANK N.A.	\$10,796
		10	WELLS FARGO BANK, N.A.	\$8,918
	Berkshire	10	WELLS FARGO BANK, N.A.	\$1,890
	Dukes	2	CAPE COD FIVE CENTS SAVINGS BA	\$9,520
		4	SANTANDER BANK N.A.	\$2,628
		5	WELLS FARGO BANK, N.A.	\$1,697
		6	BANK OF AMERICA, N.A.	\$1,226
	Essex	7	CITIZENS BANK, NA	\$63,574
	Hampshire	5	PEOPLESBANK	\$10,152
	Middlesex	10	TD BANK N.A.	\$87,372
	Nantucket	3	BANK OF AMERICA, N.A.	\$11,837
		5	HINGHAM INSTITUTION FOR SAVING	\$1,677
		6	FIRST REPUBLIC BANK	\$1,244
		8	CITIZENS BANK, NA	\$1,071
		9	JPMORGAN CHASE BANK, NA	\$686
		10	WELLS FARGO BANK, N.A.	\$574
	Norfolk	8	DEDHAM INSTITUTION FOR SAVINGS	\$36,994
	Plymouth	10	CAPE COD FIVE CENTS SAVINGS BA	\$12,932
	Suffolk	9	FIRST REPUBLIC BANK	\$47,423
		10	ROCKLAND TRUST COMPANY	\$41,265
MASSACHUSETTS Total				\$597,866
MICHIGAN	Alcona	5	TCF NATIONAL BANK	\$268
		8	INDEPENDENT BANK	\$63
		9	BANK OF AMERICA, N.A.	\$50
		10	WELLS FARGO BANK, N.A.	\$45
	Alger	7	THE HUNTINGTON NATIONAL BANK	\$85
		10	JPMORGAN CHASE BANK, NA	\$47
	Allegan	7	MERCANTILE BANK OF MICHIGAN	\$6,543
	Antrim	3	THE HUNTINGTON NATIONAL BANK	\$2,118
		4	FIFTH THIRD BK NA	\$1,218
		7	WELLS FARGO BANK, N.A.	\$717
		8	PNC BANK N.A.	\$454
		9	JPMORGAN CHASE BANK, NA	\$268
	Arenac	9	INDEPENDENT BANK	\$430
	Baraga	8	WELLS FARGO BANK, N.A.	\$69
	Barry	3	MERCANTILE BANK OF MICHIGAN	\$2,298
		4	THE HUNTINGTON NATIONAL BANK	\$2,103
		8	PNC BANK N.A.	\$887
		9	INDEPENDENT BANK	\$881

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Benzie	2	TCF NATIONAL BANK	\$1,233
		3	JPMORGAN CHASE BANK, NA	\$518
		5	INDEPENDENT BANK	\$401
	Charlevoix	1	TCF NATIONAL BANK	\$4,403
		2	THE HUNTINGTON NATIONAL BANK	\$3,645
	Cheboygan	4	MBANK	\$1,084
		6	THE HUNTINGTON NATIONAL BANK	\$732
		10	MERCANTILE BANK OF MICHIGAN	\$230
	Clinton	4	FIFTH THIRD BK NA	\$6,269
	Crawford	10	JPMORGAN CHASE BANK, NA	\$124
	Emmet	7	THE HUNTINGTON NATIONAL BANK	\$1,430
	Gogebic	7	FLAGSTAR BANK	\$389
	Grand Traverse	7	PNC BANK N.A.	\$5,564
	Gratiot	7	THE HUNTINGTON NATIONAL BANK	\$615
	Hillsdale	9	FLAGSTAR BANK	\$580
	Houghton	4	THE HUNTINGTON NATIONAL BANK	\$397
		6	WELLS FARGO BANK, N.A.	\$271
	Huron	9	THE HUNTINGTON NATIONAL BANK	\$342
	Iosco	6	WELLS FARGO BANK, N.A.	\$249
		8	JPMORGAN CHASE BANK, NA	\$220
	Iron	6	WELLS FARGO BANK, N.A.	\$177
		8	FLAGSTAR BANK	\$74
	Kalkaska	4	INDEPENDENT BANK	\$1,122
		8	FIFTH THIRD BK NA	\$466
	Keweenaw	9	PNC BANK N.A.	\$1
	Lake	4	ISABELLA BANK	\$119
		8	THE HUNTINGTON NATIONAL BANK	\$41
	Leelanau	3	THE HUNTINGTON NATIONAL BANK	\$4,927
		4	JPMORGAN CHASE BANK, NA	\$2,270
		6	FIFTH THIRD BK NA	\$1,937
		7	OLD NATIONAL BANK	\$931
	Lenawee	4	THE HUNTINGTON NATIONAL BANK	\$4,358
	Luce	3	WELLS FARGO BANK, N.A.	\$281
	Macomb	10	FLAGSTAR BANK	\$32,311
	Manistee	4	THE HUNTINGTON NATIONAL BANK	\$860
		8	PNC BANK N.A.	\$426
		10	WELLS FARGO BANK, N.A.	\$228
	Marquette	4	WELLS FARGO BANK, N.A.	\$1,247
		5	THE HUNTINGTON NATIONAL BANK	\$1,109
	Mason	6	FIFTH THIRD BK NA	\$373
		8	INDEPENDENT BANK	\$285
		10	THE HUNTINGTON NATIONAL BANK	\$246
	Menominee	9	ASSOCIATED BANK NA	\$277
	Midland	7	MERCANTILE BANK OF MICHIGAN	\$2,847
	Missaukee	5	FIFTH THIRD BK NA	\$556
	Monroe	3	THE HUNTINGTON NATIONAL BANK	\$10,446
	Montcalm	4	INDEPENDENT BANK	\$3,542
		7	THE HUNTINGTON NATIONAL BANK	\$1,594
	Montmorency	7	PNC BANK N.A.	\$64
	Newaygo	4	INDEPENDENT BANK	\$2,494
		6	FIFTH THIRD BK NA	\$1,333

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Oceana	10	MERCANTILE BANK OF MICHIGAN	\$267
	Ogemaw	10	WELLS FARGO BANK, N.A.	\$116
	Ontonagon	6	FLAGSTAR BANK	\$66
		7	INCREDIBLEBANK	\$51
	Ottawa	10	OLD NATIONAL BANK	\$6,816
	Presque Isle	7	THE HUNTINGTON NATIONAL BANK	\$142
	Roscommon	9	FLAGSTAR BANK	\$181
		10	BANK OF AMERICA, N.A.	\$156
	Schoolcraft	10	WELLS FARGO BANK, N.A.	\$20
	St. Joseph	6	THE HUNTINGTON NATIONAL BANK	\$1,486
	Van Buren	9	JPMORGAN CHASE BANK, NA	\$1,587
		10	HORIZON BANK	\$1,338
	Washtenaw	8	THE HUNTINGTON NATIONAL BANK	\$17,369
		10	KEYBANK NATIONAL ASSOCIATION	\$16,110
MICHIGAN Total				\$169,887
MINNESOTA	Aitkin	8	US BANK NA	\$152
	Anoka	7	ALERUS FINANCIAL NA	\$10,510
	Becker	3	WELLS FARGO BANK, N.A.	\$2,660
		5	FIRST INTERNATIONAL BANK & TRU	\$1,019
		9	MERCHANTS BANK, N.A.	\$738
		10	US BANK NA	\$712
	Beltrami	2	WELLS FARGO BANK, N.A.	\$1,545
		8	US BANK NA	\$347
	Brown	4	WELLS FARGO BANK, N.A.	\$801
	Carlton	3	BELL BANK	\$1,239
		4	US BANK NA	\$834
		9	BANK OF AMERICA, N.A.	\$125
	Carver	2	WELLS FARGO BANK, N.A.	\$14,234
		4	US BANK NA	\$8,441
		8	ALERUS FINANCIAL NA	\$4,643
	Cass	3	WELLS FARGO BANK, N.A.	\$1,577
		4	FRANSEN BANK & TRUST	\$1,271
		7	US BANK NA	\$470
		9	JPMORGAN CHASE BANK, NA	\$307
	Chisago	3	BELL BANK	\$6,192
		4	WELLS FARGO BANK, N.A.	\$5,557
	Clay	5	GATE CITY BANK	\$6,468
		8	US BANK NA	\$1,013
	Clearwater	10	US BANK NA	\$16
	Cook	3	WELLS FARGO BANK, N.A.	\$266
		9	US BANK NA	\$66
		10	BREMER BANK NA	\$46
	Cottonwood	10	US BANK NA	\$72
	Crow Wing	4	US BANK NA	\$2,695
	Dodge	6	THINK MUTUAL BANK	\$391
		8	MERCHANTS BANK, N.A.	\$289
	Douglas	4	US BANK NA	\$1,785
		8	GATE CITY BANK	\$1,188
	Fillmore	5	WELLS FARGO BANK, N.A.	\$721
		6	US BANK NA	\$302
	Goodhue	9	US BANK NA	\$483

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Grant	6	MERCHANTS BANK, N.A.	\$103
	Hennepin	7	BELL BANK	\$107,131
		8	ALERUS FINANCIAL NA	\$103,320
	Houston	5	WELLS FARGO BANK, N.A.	\$566
	Hubbard	1	WELLS FARGO BANK, N.A.	\$886
		2	BREMER BANK NA	\$511
		6	US BANK NA	\$157
		8	BELL BANK	\$100
	Isanti	3	WELLS FARGO BANK, N.A.	\$3,006
		4	US BANK NA	\$2,053
		8	BREMER BANK NA	\$934
		9	BELL BANK	\$835
	Kanabec	9	US BANK NA	\$254
	Kandiyohi	4	US BANK NA	\$1,517
	Kittson	7	BELL BANK	\$34
	Koochiching	7	US BANK NA	\$81
	Lake	3	FRANSEN BANK & TRUST	\$342
		4	US BANK NA	\$271
		10	BELL BANK	\$78
	Lake of the Woods	4	BREMER BANK NA	\$97
		8	US BANK NA	\$38
	Le Sueur	4	WELLS FARGO BANK, N.A.	\$1,813
	Lyon	10	GREAT WESTERN BANK	\$361
	Mahnomen	7	WELLS FARGO BANK, N.A.	\$45
	Marshall	7	CHOICE FINANCIAL	\$131
	McLeod	7	BELL BANK	\$701
		10	US BANK NA	\$523
	Meeker	7	BREMER BANK NA	\$416
	Mille Lacs	4	WELLS FARGO BANK, N.A.	\$881
	Morrison	7	WELLS FARGO BANK, N.A.	\$648
	Mower	9	FIRST BANK & TRUST	\$221
		10	THINK MUTUAL BANK	\$168
	Murray	7	MERCHANTS BANK, N.A.	\$109
	Nicollet	4	WELLS FARGO BANK, N.A.	\$2,149
		5	US BANK NA	\$1,777
	Norman	8	BANK OF THE WEST	\$52
	Olmsted	2	THINK MUTUAL BANK	\$24,389
		5	WELLS FARGO BANK, N.A.	\$13,361
	Otter Tail	7	GATE CITY BANK	\$1,030
		8	ALERUS FINANCIAL NA	\$906
	Pennington	8	GATE CITY BANK	\$100
	Pine	7	US BANK NA	\$641
	Polk	10	GATE CITY BANK	\$559
	Pope	3	BREMER BANK NA	\$471
		4	BELL BANK	\$412
	Ramsey	8	BELL BANK	\$21,311
		10	BRIDGEWATER BANK	\$17,929
	Redwood	9	US BANK NA	\$180
	Rice	3	WELLS FARGO BANK, N.A.	\$5,541
		7	BELL BANK	\$2,480
		9	US BANK NA	\$2,112

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State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Rock	9	FIRST PREMIER BANK	\$168
	Scott	2	WELLS FARGO BANK, N.A.	\$22,225
		3	US BANK NA	\$15,204
	Sherburne	1	WELLS FARGO BANK, N.A.	\$10,158
		4	US BANK NA	\$6,715
		9	BELL BANK	\$2,834
	Sibley	4	OLD NATIONAL BANK	\$446
		5	US BANK NA	\$279
		6	MERCHANTS BANK, N.A.	\$254
	St. Louis	4	US BANK NA	\$17,913
	Stevens	10	GATE CITY BANK	\$54
	Wabasha	4	BREMER BANK NA	\$879
		5	THINK MUTUAL BANK	\$872
	Waseca	7	US BANK NA	\$241
	Washington	1	US BANK NA	\$36,029
		2	WELLS FARGO BANK, N.A.	\$32,291
		4	BELL BANK	\$18,847
		6	OLD NATIONAL BANK	\$12,347
		9	ALERUS FINANCIAL NA	\$10,478
	Watonwan	6	US BANK NA	\$101
	Wilkin	5	GATE CITY BANK	\$235
	Winona	4	WELLS FARGO BANK, N.A.	\$3,252
	Wright	4	US BANK NA	\$9,914
		7	BELL BANK	\$5,239
	Yellow Medicine	10	WELLS FARGO BANK, N.A.	\$82
MINNESOTA Total				\$609,963
MISSISSIPPI	Attala	10	REGIONS BANK	\$146
	Carroll	3	RENASANT BANK	\$286
	Choctaw	7	REGIONS BANK	\$247
	Claiborne	5	TRUSTMARK NATIONAL BANK	\$90
	Clay	9	REGIONS BANK	\$180
	DeSoto	8	REGIONS BANK	\$6,938
		9	TRUSTMARK NATIONAL BANK	\$6,710
		10	PINNACLE BANK	\$6,347
	George	8	TRUSTMARK NATIONAL BANK	\$114
	Humphreys	9	COMMUNITY BANK OF MISSISSIPPI	\$31
	Jackson	9	TRUSTMARK NATIONAL BANK	\$1,522
	Jasper	4	TRUSTMARK NATIONAL BANK	\$405
	Kemper	10	BANCORPSOUTH	\$41
	Lafayette	3	REGIONS BANK	\$5,695
		4	TRUSTMARK NATIONAL BANK	\$5,459
		5	BANKPLUS	\$2,604
		7	ORIGIN BANK	\$1,695
		9	JPMORGAN CHASE BANK, NA	\$725
	Lamar	10	SOUTHERN BANCORP BANK	\$942
	Lawrence	6	REGIONS BANK	\$359
	Leake	9	RENASANT BANK	\$136
	Lowndes	6	BANCORPSOUTH	\$5,909
	Montgomery	5	REGIONS BANK	\$134
		7	BANCORPSOUTH	\$84
	Newton	7	REGIONS BANK	\$429

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Oktibbeha	3	BANCORPSOUTH	\$7,441
	Pearl River	10	REGIONS BANK	\$612
	Perry	8	BANCORPSOUTH	\$245
	Pontotoc	8	REGIONS BANK	\$419
		9	TRUSTMARK NATIONAL BANK	\$341
	Quitman	9	REGIONS BANK	\$39
	Scott	4	TRUSTMARK NATIONAL BANK	\$801
	Simpson	9	REGIONS BANK	\$278
	Smith	8	BANCORPSOUTH	\$102
	Tate	4	RENASANT BANK	\$577
		6	BANCORPSOUTH	\$485
		10	TRUSTMARK NATIONAL BANK	\$399
	Tippah	7	REGIONS BANK	\$264
		8	BANCORPSOUTH	\$189
	Webster	5	BANCORPSOUTH	\$315
		7	REGIONS BANK	\$187
	Yalobusha	8	REGIONS BANK	\$56
	Yazoo	7	TRUSTMARK NATIONAL BANK	\$374
MISSISSIPPI Total				\$60,352
MISSOURI	Adair	6	US BANK NA	\$316
	Andrew	9	WELLS FARGO BANK, N.A.	\$251
		10	US BANK NA	\$238
	Atchison	8	US BANK NA	\$145
	Barton	4	US BANK NA	\$278
	Caldwell	3	NBH BANK	\$253
		7	WELLS FARGO BANK, N.A.	\$123
	Camden	8	US BANK NA	\$1,484
	Cape Girardeau	6	US BANK NA	\$5,291
	Carroll	3	WELLS FARGO BANK, N.A.	\$101
	Chariton	7	US BANK NA	\$75
	Christian	8	ARVEST BANK	\$5,975
	Clark	2	UNITED COMMUNITY BANK	\$164
	Clinton	9	NBH BANK	\$246
	Dade	10	COMMERCE BANK	\$54
	Dallas	7	US BANK NA	\$482
	Daviess	6	JPMORGAN CHASE BANK, NA	\$60
	Douglas	2	GREAT SOUTHERN BANK	\$405
	Grundy	5	WELLS FARGO BANK, N.A.	\$69
	Hickory	6	US BANK NA	\$67
		10	GREAT SOUTHERN BANK	\$23
	Holt	2	US BANK NA	\$93
		10	COMMERCE BANK	\$18
	Howard	10	US BANK NA	\$43
	Iron	4	US BANK NA	\$59
	Jackson	10	BANK OF AMERICA, N.A.	\$40,943
	Lafayette	10	US BANK NA	\$614
	Lawrence	9	US BANK NA	\$764
	Lewis	1	UNITED COMMUNITY BANK	\$378
	Lincoln	9	US BANK NA	\$1,147
	Livingston	8	WELLS FARGO BANK, N.A.	\$244
	Macon	4	US BANK NA	\$614

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Madison	8	US BANK NA	\$83
	Marion	8	US BANK NA	\$286
	McDonald	10	US BANK NA	\$143
	Mercer	4	GREAT WESTERN BANK	\$27
		9	JPMORGAN CHASE BANK, NA	\$8
	Miller	8	US BANK NA	\$407
	Morgan	4	US BANK NA	\$688
	Nodaway	10	NBH BANK	\$291
	Osage	10	FIRST STATE COMMUNITY BANK	\$101
	Ozark	6	SOUTHERN BANK	\$167
	Perry	4	US BANK NA	\$882
		7	REGIONS BANK	\$400
	Phelps	4	US BANK NA	\$1,837
	Pike	5	US BANK NA	\$365
	Platte	10	US BANK NA	\$4,476
	Putnam	2	US BANK NA	\$77
		3	WELLS FARGO BANK, N.A.	\$60
	Ray	1	NBH BANK	\$1,337
	Saline	10	FIRST STATE COMMUNITY BANK	\$123
	Schuyler	5	US BANK NA	\$47
	St. Charles	4	US BANK NA	\$28,686
	St. Clair	7	US BANK NA	\$45
	Stone	5	US BANK NA	\$1,844
		10	GREAT SOUTHERN BANK	\$1,163
	Sullivan	9	US BANK NA	\$19
	Texas	4	ARVEST BANK	\$343
	Warren	4	US BANK NA	\$1,863
		8	BMO HARRIS BANK N.A.	\$619
		9	BANK OF AMERICA, N.A.	\$573
	Washington	9	US BANK NA	\$227
	Wayne	10	US BANK NA	\$48
	Worth	4	US BANK NA	\$36
MISSOURI Total				\$108,288
MONTANA	Blaine	4	STOCKMAN BANK	\$134
	Broadwater	4	STOCKMAN BANK	\$259
	Carbon	1	FIRST INTERSTATE BANK	\$1,384
		4	GLACIER BANK	\$784
		5	STOCKMAN BANK	\$412
		8	US BANK NA	\$168
	Chouteau	10	FIRST INTERSTATE BANK	\$50
	Deer Lodge	1	GLACIER BANK	\$1,731
	Fallon	8	FIRST INTERSTATE BANK	\$50
	Flathead	2	FIRST INTERSTATE BANK	\$17,852
		3	WELLS FARGO BANK, N.A.	\$11,462
		6	JPMORGAN CHASE BANK, NA	\$5,156
		7	BANK OF AMERICA, N.A.	\$3,250
		10	US BANK NA	\$2,295
	Gallatin	2	STOCKMAN BANK	\$42,302
		4	WELLS FARGO BANK, N.A.	\$21,107
		8	JPMORGAN CHASE BANK, NA	\$6,152
		10	BANK OF AMERICA, N.A.	\$2,426

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Granite	9	STOCKMAN BANK	\$47
	Jefferson	3	WELLS FARGO BANK, N.A.	\$995
		5	STOCKMAN BANK	\$425
		7	FIRST INTERSTATE BANK	\$328
		9	US BANK NA	\$163
	Lake	2	FIRST INTERSTATE BANK	\$2,920
		4	WELLS FARGO BANK, N.A.	\$1,077
		6	STOCKMAN BANK	\$561
		8	JPMORGAN CHASE BANK, NA	\$427
		10	BANK OF AMERICA, N.A.	\$354
	Lewis and Clark	2	FIRST INTERSTATE BANK	\$16,128
		4	WELLS FARGO BANK, N.A.	\$6,596
	Lincoln	5	WELLS FARGO BANK, N.A.	\$581
		10	US BANK NA	\$122
	Madison	1	GLACIER BANK	\$1,601
		2	WELLS FARGO BANK, N.A.	\$711
		3	STOCKMAN BANK	\$666
		4	BANK OF AMERICA, N.A.	\$471
		6	FIRST INTERSTATE BANK	\$434
		9	JPMORGAN CHASE BANK, NA	\$253
	McCone	5	WELLS FARGO BANK, N.A.	\$15
	Meagher	3	FIRST INTERSTATE BANK	\$26
		4	GLACIER BANK	\$22
	Missoula	2	STOCKMAN BANK	\$30,616
		4	WELLS FARGO BANK, N.A.	\$6,195
		5	US BANK NA	\$6,092
	Musselshell	1	STOCKMAN BANK	\$460
		3	FIRST INTERSTATE BANK	\$81
	Park	3	FIRST INTERSTATE BANK	\$2,178
		6	STOCKMAN BANK	\$554
		10	CHARLES SCHWAB BANK, SSB	\$125
	Powell	7	STOCKMAN BANK	\$61
		10	US BANK NA	\$15
	Ravalli	3	WELLS FARGO BANK, N.A.	\$3,149
		5	STOCKMAN BANK	\$1,725
		8	US BANK NA	\$805
		9	BANK OF AMERICA, N.A.	\$770
		10	JPMORGAN CHASE BANK, NA	\$722
	Rosebud	9	BANK OF AMERICA, N.A.	\$25
	Silver Bow	2	WELLS FARGO BANK, N.A.	\$2,146
		10	US BANK NA	\$367
	Stillwater	1	FIRST INTERSTATE BANK	\$1,618
		2	STOCKMAN BANK	\$1,292
		4	GLACIER BANK	\$844
	Valley	10	US BANK NA	\$24
	Yellowstone	3	FIRST INTERSTATE BANK	\$24,889
MONTANA Total				\$236,650
NEBRASKA	Adams	10	US BANK NA	\$404
	Antelope	5	WELLS FARGO BANK, N.A.	\$88
	Brown	3	UNION BANK AND TRUST COMPANY	\$137
		6	TRUIST FINANCIAL	\$10

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Buffalo	6	US BANK NA	\$1,693
	Burt	7	US BANK NA	\$28
		9	PINNACLE BANK	\$10
	Butler	4	US BANK NA	\$452
	Cass	5	FIRST NATIONAL BANK OF OMAHA	\$994
		6	UNION BANK AND TRUST COMPANY	\$871
		8	US BANK NA	\$639
	Cheyenne	6	WELLS FARGO BANK, N.A.	\$334
	Dakota	5	WELLS FARGO BANK, N.A.	\$440
		10	CITIZENS BANK, NA	\$85
	Dixon	7	PINNACLE BANK	\$20
		9	US BANK NA	\$10
	Fillmore	5	FIRST NATIONAL BANK OF OMAHA	\$77
	Furnas	9	US BANK NA	\$17
	Gage	9	US BANK NA	\$175
		10	WELLS FARGO BANK, N.A.	\$135
	Garden	6	US BANK NA	\$4
	Garfield	6	COMMERCE BANK	\$25
	Gosper	8	US BANK NA	\$8
	Howard	4	FIRST NATIONAL BANK OF OMAHA	\$159
	Kearney	5	FIRST NATIONAL BANK OF OMAHA	\$190
	Keith	9	US BANK NA	\$95
	Kimball	8	US BANK NA	\$12
	Knox	5	WELLS FARGO BANK, N.A.	\$95
		7	FIRST NATIONAL BANK OF OMAHA	\$82
	Lancaster	5	WELLS FARGO BANK, N.A.	\$19,285
	Lincoln	10	BANK OF THE WEST	\$199
	Loup	3	UNION BANK AND TRUST COMPANY	\$39
	Merrick	6	WELLS FARGO BANK, N.A.	\$207
		10	US BANK NA	\$83
	Morrill	8	US BANK NA	\$22
	Nemaha	2	UNION BANK AND TRUST COMPANY	\$158
		10	WELLS FARGO BANK, N.A.	\$20
	Nuckolls	7	PINNACLE BANK	\$55
		10	WELLS FARGO BANK, N.A.	\$30
	Pierce	3	WELLS FARGO BANK, N.A.	\$123
		8	US BANK NA	\$47
	Platte	4	US BANK NA	\$2,635
	Polk	5	FIRST NATIONAL BANK OF OMAHA	\$75
	Richardson	8	UNION BANK AND TRUST COMPANY	\$59
	Saline	2	UNION BANK AND TRUST COMPANY	\$868
		6	WELLS FARGO BANK, N.A.	\$118
	Sarpy	5	WELLS FARGO BANK, N.A.	\$11,306
		7	US BANK NA	\$9,350
	Saunders	2	PINNACLE BANK	\$2,162
		3	FIRST NATIONAL BANK OF OMAHA	\$2,086
		5	WELLS FARGO BANK, N.A.	\$663
		6	US BANK NA	\$634
		8	AMERICAN NATIONAL BANK	\$548
	Seward	8	WELLS FARGO BANK, N.A.	\$351
	Sheridan	6	BANK OF THE WEST	\$36

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		8	FIRST NATIONAL BANK OF OMAHA	\$26
	Sherman	9	PINNACLE BANK	\$10
	Stanton	8	FIRST NATIONAL BANK OF OMAHA	\$37
	Washington	9	US BANK NA	\$543
	Wayne	4	WELLS FARGO BANK, N.A.	\$102
	Webster	5	US BANK NA	\$37
		9	WELLS FARGO BANK, N.A.	\$18
NEBRASKA Total				\$59,221
NEVADA	Douglas	2	US BANK NA	\$9,139
		9	JPMORGAN CHASE BANK, NA	\$2,415
		10	UMPQUA BANK	\$695
	Lincoln	6	ZIONS BANCORPORATION, N.A.	\$81
		9	US BANK NA	\$28
	Mineral	7	US BANK NA	\$10
	Nye	2	WELLS FARGO BANK, N.A.	\$3,163
	Storey	10	UMPQUA BANK	\$159
	Washoe	8	JPMORGAN CHASE BANK, NA	\$25,665
NEVADA Total				\$41,355
NEW HAMPSHIRE	Belknap	5	JPMORGAN CHASE BANK, NA	\$2,969
	Carroll	7	WELLS FARGO BANK, N.A.	\$1,754
		9	BANK OF AMERICA, N.A.	\$1,663
	Coos	10	CITIZENS BANK, NA	\$606
	Grafton	7	BANK OF AMERICA, N.A.	\$2,565
	Merrimack	10	WELLS FARGO BANK, N.A.	\$3,965
NEW HAMPSHIRE Total				\$13,522
NEW JERSEY	Atlantic	8	WELLS FARGO BANK, N.A.	\$17,393
	Bergen	8	WELLS FARGO BANK, N.A.	\$91,243
	Cape May	2	OCEANFIRST BANK	\$21,312
		4	TD BANK N.A.	\$14,762
		5	BANK OF AMERICA, N.A.	\$8,038
		6	REPUBLIC FIRST BANK	\$7,833
		10	WELLS FARGO BANK, N.A.	\$4,275
	Essex	6	WELLS FARGO BANK, N.A.	\$74,386
	Hudson	7	WELLS FARGO BANK, N.A.	\$33,162
	Hunterdon	6	WELLS FARGO BANK, N.A.	\$14,738
	Monmouth	6	WELLS FARGO BANK, N.A.	\$101,877
	Morris	7	WELLS FARGO BANK, N.A.	\$71,553
	Ocean	5	WELLS FARGO BANK, N.A.	\$61,666
	Somerset	6	WELLS FARGO BANK, N.A.	\$41,847
NEW JERSEY Total				\$564,085
NEW MEXICO	Catron	10	US BANK NA	\$18
	Colfax	7	WASHINGTON FEDERAL	\$200
		9	HAPPY STATE BANK	\$118
	Lincoln	7	JPMORGAN CHASE BANK, NA	\$432
	Los Alamos	4	WELLS FARGO BANK, N.A.	\$419
		6	JPMORGAN CHASE BANK, NA	\$255
		9	SUNFLOWER BANK, N.A.	\$161
	Mora	10	BANK OF AMERICA, N.A.	\$12
	Rio Arriba	10	BANK OF AMERICA, N.A.	\$312
	San Miguel	9	JPMORGAN CHASE BANK, NA	\$174
	Sandoval	4	BOKF NA	\$5,191

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Santa Fe	8	BOKF NA	\$6,743
	Taos	6	WELLS FARGO BANK, N.A.	\$918
	Union	7	WELLS FARGO BANK, N.A.	\$16
	Valencia	8	BOKF NA	\$733
NEW MEXICO Total				\$15,702
NEW YORK	Albany	10	TRUSTCO BANK	\$21,127
	Cattaraugus	9	NORTHWEST BANK	\$1,212
	Columbia	6	JPMORGAN CHASE BANK, NA	\$2,422
		8	TRUSTCO BANK	\$1,774
	Delaware	8	JPMORGAN CHASE BANK, NA	\$710
	Dutchess	9	WELLS FARGO BANK, N.A.	\$10,831
	Greene	2	KEYBANK NATIONAL ASSOCIATION	\$2,779
		3	WELLS FARGO BANK, N.A.	\$2,026
		8	NBT BANK NA	\$916
	Hamilton	7	KEYBANK NATIONAL ASSOCIATION	\$96
		8	JPMORGAN CHASE BANK, NA	\$85
	Kings	7	CITIBANK, N.A.	\$114,347
	Niagara	10	FIVE STAR BANK	\$4,962
	Putnam	5	WELLS FARGO BANK, N.A.	\$7,321
	Richmond	9	CITIBANK, N.A.	\$17,570
	Saratoga	8	TRUSTCO BANK	\$10,690
	Suffolk	8	CITIBANK, N.A.	\$120,861
	Ulster	3	ULSTER SAVINGS BANK	\$14,499
		9	WELLS FARGO BANK, N.A.	\$4,963
	Warren	4	M&T BANK	\$3,907
		9	KEYBANK NATIONAL ASSOCIATION	\$2,550
	Washington	10	TRUSTCO BANK	\$869
	Westchester	3	BANK OF AMERICA, N.A.	\$102,241
		4	WELLS FARGO BANK, N.A.	\$91,378
		5	CITIBANK, N.A.	\$86,761
NEW YORK Total				\$626,897
NORTH CAROLINA	Alleghany	10	FIFTH THIRD BK NA	\$99
	Ashe	8	BANK OF AMERICA, N.A.	\$376
	Avery	1	UNITED COMMUNITY BANK	\$4,895
		6	FIRST CITIZENS BANK AND TRUST	\$1,907
		7	WELLS FARGO BANK, N.A.	\$1,758
		10	FIFTH THIRD BK NA	\$748
	Brunswick	1	TRUIST FINANCIAL	\$33,763
		5	BANK OF AMERICA, N.A.	\$5,528
		6	WELLS FARGO BANK, N.A.	\$5,445
		8	FIRST NATIONAL BANK OF PA	\$5,012
	Camden	6	WELLS FARGO BANK, N.A.	\$395
	Carteret	7	BANK OF AMERICA, N.A.	\$2,675
		8	PNC BANK N.A.	\$2,313
	Chatham	4	WELLS FARGO BANK, N.A.	\$6,806
		6	FIRST CITIZENS BANK AND TRUST	\$4,449
	Chowan	10	WELLS FARGO BANK, N.A.	\$259
	Clay	3	WELLS FARGO BANK, N.A.	\$349
		9	SOUTH STATE BANK, N.A.	\$121
		10	TRUIST FINANCIAL	\$97
	Cleveland	9	HOMETRUST BANK	\$2,309

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Currituck	4	WELLS FARGO BANK, N.A.	\$3,095
		5	TRUIST FINANCIAL	\$2,316
		10	BANK OF AMERICA, N.A.	\$649
	Dare	6	WELLS FARGO BANK, N.A.	\$5,963
	Franklin	6	WELLS FARGO BANK, N.A.	\$2,680
	Graham	5	TRUIST FINANCIAL	\$163
	Granville	7	WELLS FARGO BANK, N.A.	\$1,007
	Harnett	6	WELLS FARGO BANK, N.A.	\$2,806
	Haywood	6	HOMETRUST BANK	\$3,343
	Henderson	3	UNITED COMMUNITY BANK	\$13,317
		9	HOMETRUST BANK	\$4,190
	Hoke	7	WELLS FARGO BANK, N.A.	\$847
	Hyde	6	TOWNEBANK	\$122
		9	JPMORGAN CHASE BANK, NA	\$92
	Jackson	4	TRUIST FINANCIAL	\$1,403
	Johnston	4	WELLS FARGO BANK, N.A.	\$10,131
		9	TOWNEBANK	\$5,016
	Lee	9	WELLS FARGO BANK, N.A.	\$2,060
	Lincoln	7	WELLS FARGO BANK, N.A.	\$4,666
		10	CITIZENS BANK, NA	\$2,007
	Macon	6	REGIONS BANK	\$1,345
		9	JPMORGAN CHASE BANK, NA	\$703
	Madison	6	HOMETRUST BANK	\$687
	Mecklenburg	4	WELLS FARGO BANK, N.A.	\$182,295
	Montgomery	9	BANK OF AMERICA, N.A.	\$453
	Moore	5	WELLS FARGO BANK, N.A.	\$7,610
	New Hanover	5	WELLS FARGO BANK, N.A.	\$30,298
	Northampton	7	WELLS FARGO BANK, N.A.	\$171
	Orange	3	WELLS FARGO BANK, N.A.	\$15,342
		7	FIRST CITIZENS BANK AND TRUST	\$10,215
	Pender	6	FIRST BANK	\$2,975
		8	WELLS FARGO BANK, N.A.	\$2,294
		10	FIRST NATIONAL BANK OF PA	\$1,565
	Perquimans	8	WELLS FARGO BANK, N.A.	\$231
		10	TOWNEBANK	\$176
	Polk	8	TRUIST FINANCIAL	\$723
		9	HOMETRUST BANK	\$678
	Transylvania	5	FIFTH THIRD BK NA	\$946
		7	HOMETRUST BANK	\$902
		9	TD BANK N.A.	\$849
	Union	4	WELLS FARGO BANK, N.A.	\$23,520
	Wake	4	WELLS FARGO BANK, N.A.	\$147,568
	Warren	5	WELLS FARGO BANK, N.A.	\$905
	Washington	9	WELLS FARGO BANK, N.A.	\$123
	Watauga	7	BANK OF AMERICA, N.A.	\$3,605
	Wayne	4	WELLS FARGO BANK, N.A.	\$5,886
NORTH CAROLINA Total				\$587,242
NORTH DAKOTA	Benson	2	AMERICAN BANK CENTER	\$167
		3	BREMER BANK NA	\$160
		5	US BANK NA	\$46
	Bottineau	9	WELLS FARGO BANK, N.A.	\$70

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Burke	10	BANK OF AMERICA, N.A.	\$12
	Burleigh	6	GATE CITY BANK	\$7,842
	Cass	6	GATE CITY BANK	\$30,658
		9	US BANK NA	\$13,534
	Cavalier	7	US BANK NA	\$62
	Dickey	10	WELLS FARGO BANK, N.A.	\$38
	Eddy	3	GATE CITY BANK	\$103
	Emmons	6	CHOICE FINANCIAL	\$21
	Grand Forks	7	GATE CITY BANK	\$5,236
	Griggs	9	US BANK NA	\$10
		10	GATE CITY BANK	\$9
	Hettinger	10	US BANK NA	\$15
	Kidder	5	BREMER BANK NA	\$48
	LaMoure	3	WELLS FARGO BANK, N.A.	\$109
	McHenry	1	FIRST INTERNATIONAL BANK & TRU	\$762
		4	GATE CITY BANK	\$184
		7	AMERICAN BANK CENTER	\$105
		8	US BANK NA	\$46
	McLean	5	GATE CITY BANK	\$375
		7	STARION BANK	\$136
		10	US BANK NA	\$58
	Mercer	3	US BANK NA	\$233
		4	GATE CITY BANK	\$215
	Morton	5	FIRST INTERNATIONAL BANK & TRU	\$2,320
		7	GATE CITY BANK	\$1,537
	Nelson	5	GATE CITY BANK	\$57
		9	BREMER BANK NA	\$38
	Oliver	2	FIRST INTERNATIONAL BANK & TRU	\$64
		3	MERCHANTS BANK, N.A.	\$46
		9	US BANK NA	\$3
	Ramsey	6	GATE CITY BANK	\$167
	Richland	4	GATE CITY BANK	\$1,021
		9	CHOICE FINANCIAL	\$263
		10	US BANK NA	\$244
	Sargent	10	BREMER BANK NA	\$11
	Sheridan	8	STARION BANK	\$4
	Stark	9	US BANK NA	\$909
	Stutsman	3	GATE CITY BANK	\$2,375
	Traill	3	GATE CITY BANK	\$517
	Ward	3	GATE CITY BANK	\$9,081
	Williams	2	GATE CITY BANK	\$8,652
NORTH DAKOTA Total				\$87,563
OHIO	Adams	3	FIFTH THIRD BK NA	\$680
		10	US BANK NA	\$286
	Brown	3	FIFTH THIRD BK NA	\$1,472
	Carroll	1	THE HUNTINGTON NATIONAL BANK	\$4,124
		7	FARMERS NATIONAL BANK	\$746
	Champaign	9	JPMORGAN CHASE BANK, NA	\$292
	Coshocton	2	THE PARK NATIONAL BANK	\$4,017
	Delaware	1	THE HUNTINGTON NATIONAL BANK	\$62,830
		2	JPMORGAN CHASE BANK, NA	\$41,202

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State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		4	FIFTH THIRD BK NA	\$19,626
		5	FIRST COMMONWEALTH BANK	\$17,966
	Fairfield	9	FIFTH THIRD BK NA	\$2,943
	Hancock	6	THE STATE BANK AND TRUST COMPA	\$3,738
		7	JPMORGAN CHASE BANK, NA	\$2,842
	Hardin	9	FIFTH THIRD BK NA	\$166
			JPMORGAN CHASE BANK, NA	\$166
	Harrison	10	PREMIER BANK	\$70
	Henry	8	FIFTH THIRD BK NA	\$309
	Hocking	4	THE HUNTINGTON NATIONAL BANK	\$757
		6	US BANK NA	\$345
		7	FIFTH THIRD BK NA	\$301
		9	JPMORGAN CHASE BANK, NA	\$291
	Huron	5	PREMIER BANK	\$1,117
	Jackson	10	PNC BANK N.A.	\$246
	Jefferson	5	US BANK NA	\$1,832
	Knox	4	THE HUNTINGTON NATIONAL BANK	\$3,688
		8	JPMORGAN CHASE BANK, NA	\$854
	Licking	5	FIFTH THIRD BK NA	\$5,337
	Logan	1	THE HUNTINGTON NATIONAL BANK	\$4,605
		9	JPMORGAN CHASE BANK, NA	\$576
	Meigs	5	THE PARK NATIONAL BANK	\$156
		9	US BANK NA	\$70
	Monroe	6	THE HUNTINGTON NATIONAL BANK	\$87
	Morrow	6	THE HUNTINGTON NATIONAL BANK	\$1,280
	Muskingum	2	THE HUNTINGTON NATIONAL BANK	\$8,607
	Noble	7	THE HUNTINGTON NATIONAL BANK	\$69
		9	US BANK NA	\$53
	Ottawa	3	PREMIER BANK	\$2,864
		10	US BANK NA	\$1,153
	Paulding	3	THE STATE BANK AND TRUST COMPA	\$2,661
	Perry	1	THE HUNTINGTON NATIONAL BANK	\$1,059
		3	PNC BANK N.A.	\$991
		4	THE PARK NATIONAL BANK	\$820
	Pickaway	1	THE HUNTINGTON NATIONAL BANK	\$4,221
		6	FIFTH THIRD BK NA	\$1,218
		9	WESBANCO BANK INC.	\$784
	Pike	8	FIFTH THIRD BK NA	\$315
	Portage	8	PREMIER BANK	\$4,292
	Preble	9	FIFTH THIRD BK NA	\$776
	Putnam	9	THE CITIZENS NATIONAL BANK	\$310
	Ross	10	FIFTH THIRD BK NA	\$875
	Sandusky	9	FIFTH THIRD BK NA	\$1,015
	Union	2	JPMORGAN CHASE BANK, NA	\$8,673
		5	FIFTH THIRD BK NA	\$2,359
	Warren	2	THE HUNTINGTON NATIONAL BANK	\$31,845
	Wood	4	FIFTH THIRD BK NA	\$10,163
		10	CITIZENS BANK, NA	\$2,494
OHIO Total				\$272,634
OKLAHOMA	Adair	3	BANCFIRST	\$141
		10	CENTENNIAL BANK	\$40

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Carter	4	FIRST UNITED BANK AND TRUST CO	\$3,746
	Cleveland	6	BOKF NA	\$9,450
	Comanche	6	FIRST UNITED BANK AND TRUST CO	\$841
		8	BOKF NA	\$721
	Cotton	4	BANCFIRST	\$194
	Garfield	5	BOKF NA	\$1,118
		6	GATEWAY FIRST BANK	\$1,067
	Grady	4	FIRST UNITED BANK AND TRUST CO	\$1,929
	Greer	4	BANCFIRST	\$24
	Jackson	8	BANCFIRST	\$228
	Jefferson	2	BANCFIRST	\$124
	Latimer	2	ARVEST BANK	\$295
		5	FIRST UNITED BANK AND TRUST CO	\$153
	Lincoln	6	FIRST UNITED BANK AND TRUST CO	\$879
	Love	9	FIRST UNITED BANK AND TRUST CO	\$130
	Marshall	6	WELLS FARGO BANK, N.A.	\$156
	McCurtain	8	JPMORGAN CHASE BANK, NA	\$282
	McIntosh	5	BOKF NA	\$658
	Nowata	8	JPMORGAN CHASE BANK, NA	\$15
	Okfuskee	4	ARVEST BANK	\$98
	Oklahoma	10	FIRST UNITED BANK AND TRUST CO	\$41,933
	Roger Mills	4	INTERBANK	\$17
	Rogers	4	BOKF NA	\$4,149
	Wagoner	2	ARVEST BANK	\$7,059
		4	BOKF NA	\$2,262
	Washington	7	BOKF NA	\$668
OKLAHOMA Total				\$78,377
OREGON	Benton	1	UMPQUA BANK	\$11,030
		10	WASHINGTON FEDERAL	\$1,490
	Clackamas	6	UMPQUA BANK	\$46,986
	Clatsop	7	UMPQUA BANK	\$1,855
	Columbia	1	US BANK NA	\$4,751
		6	UMPQUA BANK	\$1,796
	Crook	4	FIRST INTERSTATE BANK	\$2,122
		6	WASHINGTON FEDERAL	\$940
		7	JPMORGAN CHASE BANK, NA	\$691
	Deschutes	4	WELLS FARGO BANK, N.A.	\$35,559
		5	UMPQUA BANK	\$35,405
	Grant	5	UMPQUA BANK	\$264
	Lincoln	4	WELLS FARGO BANK, N.A.	\$2,572
		5	UMPQUA BANK	\$1,939
		8	WASHINGTON FEDERAL	\$874
		10	JPMORGAN CHASE BANK, NA	\$763
	Morrow	4	UMPQUA BANK	\$304
		5	WELLS FARGO BANK, N.A.	\$200
	Polk	2	US BANK NA	\$6,655
		3	WELLS FARGO BANK, N.A.	\$4,649
		8	UMPQUA BANK	\$1,772
		9	KEYBANK NATIONAL ASSOCIATION	\$1,683
	Sherman	7	US BANK NA	\$53
	Tillamook	3	US BANK NA	\$3,932

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		4	WELLS FARGO BANK, N.A.	\$2,306
		8	BANK OF AMERICA, N.A.	\$403
		9	KEYBANK NATIONAL ASSOCIATION	\$367
	Wallowa	1	UMPQUA BANK	\$2,005
	Wasco	8	KEYBANK NATIONAL ASSOCIATION	\$766
	Washington	8	UMPQUA BANK	\$52,216
	Yamhill	7	JPMORGAN CHASE BANK, NA	\$4,800
		9	UMPQUA BANK	\$4,239
OREGON Total				\$235,387
PENNSYLVANIA	Adams	9	FULTON BANK, N.A.	\$1,804
	Butler	6	DOLLAR BANK, FSB	\$11,433
		10	NORTHWEST BANK	\$6,258
	Centre	5	NORTHWEST BANK	\$12,325
		7	CITIZENS BANK, NA	\$7,258
	Chester	7	CITIZENS BANK, NA	\$52,946
	Dauphin	10	CITIZENS BANK, NA	\$10,168
	Forest	10	CITIZENS BANK, NA	\$37
	Fulton	3	FARMERS & MERCHANTS TRUST	\$1,008
		10	ORRSTOWN BANK	\$318
	Huntingdon	3	FARMERS & MERCHANTS TRUST	\$976
		6	NORTHWEST BANK	\$661
	Montour	2	FULTON BANK, N.A.	\$2,310
		7	FIRST NATIONAL BANK OF PA	\$454
	Pike	4	BANK OF AMERICA, N.A.	\$1,669
		5	CITIZENS BANK, NA	\$1,394
		7	JPMORGAN CHASE BANK, NA	\$1,009
	Potter	3	NORTHWEST BANK	\$1,862
	Somerset	10	WELLS FARGO BANK, N.A.	\$1,587
	Sullivan	8	M&T BANK	\$57
	Washington	8	DOLLAR BANK, FSB	\$10,713
	Wayne	2	WELLS FARGO BANK, N.A.	\$2,044
		9	CITIZENS BANK, NA	\$671
		10	FIDELITY DEPOSIT & DISCOUNT BK	\$669
	York	8	WELLS FARGO BANK, N.A.	\$12,015
PENNSYLVANIA Total				\$141,646
PUERTO RICO	Aguadilla	3	FIRSTBANK PUERTO RICO	\$1,402
	Aguas Buenas	3	FIRSTBANK PUERTO RICO	\$97
	Barceloneta	5	FIRSTBANK PUERTO RICO	\$174
	Barranquitas	5	FIRSTBANK PUERTO RICO	\$56
	Canovanas	3	FIRSTBANK PUERTO RICO	\$474
	Ceiba	7	FIRSTBANK PUERTO RICO	\$27
	Comerio	4	FIRSTBANK PUERTO RICO	\$62
	Dorado	3	FIRSTBANK PUERTO RICO	\$2,580
	Florida	3	FIRSTBANK PUERTO RICO	\$21
	Gurabo	3	FIRSTBANK PUERTO RICO	\$1,016
	Jayuya	6	FIRSTBANK PUERTO RICO	\$7
	Juana Diaz	3	FIRSTBANK PUERTO RICO	\$777
	Loiza	3	FIRSTBANK PUERTO RICO	\$111
	Luquillo	3	FIRSTBANK PUERTO RICO	\$731
	Maunabo	4	ORIENTAL GROUP	\$6
	Orocovis	4	FIRSTBANK PUERTO RICO	\$115

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Patillas	2	FIRSTBANK PUERTO RICO	\$23
		4	ORIENTAL GROUP	\$19
	Penuelas	5	FIRSTBANK PUERTO RICO	\$51
	Quebradillas	4	FIRSTBANK PUERTO RICO	\$120
	Sabana Grande	3	ORIENTAL GROUP	\$108
	San Lorenzo	3	FIRSTBANK PUERTO RICO	\$486
	Toa Alta	3	FIRSTBANK PUERTO RICO	\$1,735
	Utuado	6	FIRSTBANK PUERTO RICO	\$27
	Vega Alta	3	FIRSTBANK PUERTO RICO	\$746
PUERTO RICO Total				\$10,971
RHODE ISLAND	Bristol	8	SANTANDER BANK N.A.	\$2,639
		9	BRISTOL COUNTY SAVINGS BANK	\$1,273
	Washington	3	CITIZENS BANK, NA	\$24,187
RHODE ISLAND Total				\$28,099
SOUTH CAROLINA	Abbeville	9	SOUTH STATE BANK, N.A.	\$344
	Aiken	8	QUEENSBOROUGH NATIONAL BANK &	\$5,800
	Anderson	8	THE PARK NATIONAL BANK	\$7,254
	Beaufort	3	WELLS FARGO BANK, N.A.	\$22,464
		7	BANK OF AMERICA, N.A.	\$14,447
	Berkeley	2	WELLS FARGO BANK, N.A.	\$17,035
		3	TRUIST FINANCIAL	\$16,038
	Charleston	5	WELLS FARGO BANK, N.A.	\$65,745
	Colleton	7	AMERIS BANK	\$556
		10	BANK OF AMERICA, N.A.	\$425
	Edgefield	2	QUEENSBOROUGH NATIONAL BANK &	\$1,374
		8	SOUTH STATE BANK, N.A.	\$869
	Georgetown	4	WELLS FARGO BANK, N.A.	\$5,224
		5	TRUIST FINANCIAL	\$4,606
		7	BANK OF AMERICA, N.A.	\$3,371
		9	SOUTH STATE BANK, N.A.	\$2,809
	Horry	6	WELLS FARGO BANK, N.A.	\$24,151
	Kershaw	6	AMERIS BANK	\$1,787
	Lexington	9	AMERIS BANK	\$14,305
	McCormick	4	WELLS FARGO BANK, N.A.	\$194
		5	QUEENSBOROUGH NATIONAL BANK &	\$147
	Oconee	3	TRUIST FINANCIAL	\$4,793
		4	SOUTH STATE BANK	\$3,532
		5	SOUTH STATE BANK, N.A.	\$2,885
		7	BANK OF AMERICA, N.A.	\$2,758
		9	TD BANK N.A.	\$2,118
	York	5	WELLS FARGO BANK, N.A.	\$28,048
SOUTH CAROLINA Total				\$253,079
SOUTH DAKOTA	Aurora	3	FIRST DAKOTA NATIONAL BANK	\$65
	Brookings	6	GREAT WESTERN BANK	\$1,300
	Butte	2	FIRST INTERSTATE BANK	\$1,127
	Campbell	9	FIRST INTERNATIONAL BANK & TRU	\$15
	Codington	10	FIRST BANK & TRUST	\$417
	Custer	2	FIRST INTERSTATE BANK	\$1,208
		4	US BANK NA	\$206
		6	WELLS FARGO BANK, N.A.	\$177
	Davison	7	US BANK NA	\$757

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Day	5	WELLS FARGO BANK, N.A.	\$120
		6	US BANK NA	\$111
	Deuel	3	FIRST PREMIER BANK	\$496
	Dewey	10	US BANK NA	\$5
	Edmunds	6	WELLS FARGO BANK, N.A.	\$73
		9	US BANK NA	\$36
	Faulk	8	FIRST PREMIER BANK	\$12
	Hamlin	5	FIRST BANK & TRUST	\$355
		8	GREAT WESTERN BANK	\$132
		10	FIRST DAKOTA NATIONAL BANK	\$111
	Jerauld	9	JPMORGAN CHASE BANK, NA	\$8
	Kingsbury	9	GREAT WESTERN BANK	\$165
	Lincoln	3	FIRST PREMIER BANK	\$20,762
		9	US BANK NA	\$3,813
	McCook	3	FIRST PREMIER BANK	\$423
		7	GREAT WESTERN BANK	\$150
		8	US BANK NA	\$122
	Minnehaha	9	FIRST BANK & TRUST	\$7,166
	Potter	8	FIRST DAKOTA NATIONAL BANK	\$19
		9	BANK OF THE WEST	\$17
	Roberts	9	WELLS FARGO BANK, N.A.	\$147
	Stanley	2	WELLS FARGO BANK, N.A.	\$95
	Sully	4	US BANK NA	\$35
	Tripp	10	FIRST PREMIER BANK	\$30
	Turner	4	FIRST PREMIER BANK	\$366
		9	GREAT WESTERN BANK	\$160
	Union	4	WELLS FARGO BANK, N.A.	\$1,062
SOUTH DAKOTA Total				\$41,263
TENNESSEE	Anderson	10	COMMUNITY TRUST BANK, INC.	\$1,510
	Bledsoe	8	FIRSTBANK	\$40
	Bradley	8	UNITED COMMUNITY BANK	\$3,129
	Campbell	1	COMMUNITY TRUST BANK, INC.	\$3,890
	Cannon	6	FIRSTBANK	\$680
		9	REGIONS BANK	\$405
	Carroll	5	REGIONS BANK	\$250
		10	WELLS FARGO BANK, N.A.	\$176
	Cheatham	6	US BANK NA	\$1,646
	Chester	3	REGIONS BANK	\$837
	Crockett	8	REGIONS BANK	\$264
	Cumberland	9	US BANK NA	\$904
	Davidson	5	CAPSTAR BANK	\$58,719
		8	FIRSTBANK	\$48,422
	Decatur	9	REGIONS BANK	\$154
	DeKalb	5	REGIONS BANK	\$885
	Fayette	1	BANCORPSOUTH	\$4,743
		4	PINNACLE BANK	\$2,858
		7	WELLS FARGO BANK, N.A.	\$2,121
	Fentress	7	WELLS FARGO BANK, N.A.	\$170
		9	TRUIST FINANCIAL	\$61
		10	JPMORGAN CHASE BANK, NA	\$56
	Franklin	4	REGIONS BANK	\$1,539

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		5	PINNACLE BANK	\$1,504
		8	US BANK NA	\$595
	Gibson	5	REGIONS BANK	\$1,808
	Giles	4	RENASANT BANK	\$766
	Grainger	10	TRUIST FINANCIAL	\$314
	Grundy	3	RENASANT BANK	\$282
		8	FIRSTBANK	\$100
		9	REGIONS BANK	\$80
	Hardin	2	PINNACLE BANK	\$431
		6	BANCORPSOUTH	\$294
		8	IBERIABANK	\$248
		10	WELLS FARGO BANK, N.A.	\$212
	Henry	4	REGIONS BANK	\$1,169
	Hickman	3	FIRSTBANK	\$1,904
		8	US BANK NA	\$179
	Houston	8	WELLS FARGO BANK, N.A.	\$26
		10	US BANK NA	\$22
	Jackson	3	WILSON BANK & TRUST	\$292
		8	FIRSTBANK	\$102
	Jefferson	8	US BANK NA	\$1,391
	Johnson	8	BANK OF AMERICA, N.A.	\$157
	Lincoln	4	FIRSTBANK	\$1,156
	Loudon	4	TRUIST FINANCIAL	\$3,127
		7	REGIONS BANK	\$1,894
	Macon	5	WILSON BANK & TRUST	\$204
	Marion	4	FIRSTBANK	\$700
		7	REGIONS BANK	\$495
	Marshall	9	FIRSTBANK	\$902
	Maury	5	REGIONS BANK	\$4,652
		7	FIRSTBANK	\$3,430
	McNairy	4	REGIONS BANK	\$956
	Meigs	6	REGIONS BANK	\$181
		10	WELLS FARGO BANK, N.A.	\$100
	Moore	2	SMARTBANK	\$217
		7	WELLS FARGO BANK, N.A.	\$90
	Morgan	9	PINNACLE BANK	\$67
	Overton	6	WILSON BANK & TRUST	\$339
	Polk	5	TRUIST FINANCIAL	\$202
		10	CAPSTAR BANK	\$85
	Roane	7	REGIONS BANK	\$1,744
	Robertson	6	US BANK NA	\$2,616
	Rutherford	4	FIRSTBANK	\$21,514
		5	REGIONS BANK	\$16,174
		6	US BANK NA	\$13,010
	Sequatchie	7	FIRST HORIZON BANK	\$138
		8	FIRSTBANK	\$136
		10	RENASANT BANK	\$66
	Sevier	8	US BANK NA	\$3,221
	Smith	8	WELLS FARGO BANK, N.A.	\$144
	Stewart	3	REGIONS BANK	\$515
		4	RELIANT BANK	\$318

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State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		6	US BANK NA	\$138
		9	CITIZENS BANK, NA	\$107
	Sumner	8	US BANK NA	\$8,522
	Trousdale	10	US BANK NA	\$102
	Union	10	HOME FEDERAL BANK OF TENNESSEE	\$183
	Van Buren	2	US BANK NA	\$96
		5	JPMORGAN CHASE BANK, NA	\$23
		7	WELLS FARGO BANK, N.A.	\$17
		9	FIRST HORIZON BANK	\$12
		10	BANK OF AMERICA, N.A.	\$9
	Wayne	9	WELLS FARGO BANK, N.A.	\$33
	White	9	FIRSTBANK	\$289
		10	PINNACLE BANK	\$271
	Williamson	3	REGIONS BANK	\$41,869
		4	FIRSTBANK	\$29,611
		5	BANK OF AMERICA, N.A.	\$25,296
		6	CAPSTAR BANK	\$24,325
		8	TRUIST FINANCIAL	\$21,498
		10	RENASANT BANK	\$20,042
	Wilson	5	FIRSTBANK	\$6,670
		9	WELLS FARGO BANK, N.A.	\$4,188
		10	US BANK NA	\$3,832
TENNESSEE Total				\$410,861
TEXAS	Aransas	10	JPMORGAN CHASE BANK, NA	\$400
	Austin	6	JPMORGAN CHASE BANK, NA	\$1,287
	Bandera	10	JPMORGAN CHASE BANK, NA	\$238
	Baylor	9	FIRST UNITED BANK	\$21
		10	FIRST BANK & TRUST	\$19
	Bell	4	FIRST NATIONAL BANK TEXAS	\$16,920
	Brazoria	8	BANCORPSOUTH	\$7,380
	Brazos	10	CITY BANK	\$7,393
	Burleson	10	JPMORGAN CHASE BANK, NA	\$274
	Camp	9	WELLS FARGO BANK, N.A.	\$160
	Comal	9	FIRST UNITED BANK AND TRUST CO	\$7,757
	Coryell	2	FIRST NATIONAL BANK TEXAS	\$1,701
		10	WELLS FARGO BANK, N.A.	\$559
	Crosby	7	FIRST BANK & TRUST	\$24
	Dawson	10	FIRST BANK & TRUST	\$155
	Franklin	8	PROSPERITY BANK	\$224
		9	JPMORGAN CHASE BANK, NA	\$215
		10	WELLS FARGO BANK, N.A.	\$141
	Hansford	9	BANK OF AMERICA, N.A.	\$24
	Hartley	8	AMARILLO NATIONAL BANK	\$143
	Henderson	10	JPMORGAN CHASE BANK, NA	\$1,813
	Hutchinson	10	JPMORGAN CHASE BANK, NA	\$107
	Jeff Davis	7	JPMORGAN CHASE BANK, NA	\$9
	Jim Hogg	4	TEXAS COMMUNITY BANK	\$53
	Jones	9	CITY BANK	\$181
	Kent	3	AMARILLO NATIONAL BANK	\$61
	Kimble	9	JPMORGAN CHASE BANK, NA	\$32
	Llano	3	FIRST UNITED BANK AND TRUST CO	\$1,949

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State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
			4 WELLS FARGO BANK, N.A.	\$1,852
	Lynn		2 FIRST BANK & TRUST	\$674
			3 CITY BANK	\$520
	Mason		10 BBVA USA	\$21
	Ochiltree		6 AMARILLO NATIONAL BANK	\$148
	Oldham		3 HAPPY STATE BANK	\$142
			5 WELLS FARGO BANK, N.A.	\$25
			6 AMARILLO NATIONAL BANK	\$23
	Real		9 WELLS FARGO BANK, N.A.	\$51
	Robertson		10 JPMORGAN CHASE BANK, NA	\$262
	Sabine		8 JPMORGAN CHASE BANK, NA	\$90
	Somervell		6 INTERBANK	\$679
	Williamson		7 BANCORPSOUTH	\$27,808
	Wise		10 FIRST UNITED BANK AND TRUST CO	\$1,470
TEXAS Total				\$83,005
UTAH	Cache		4 BANK OF UTAH	\$8,280
	Daggett		3 WELLS FARGO BANK, N.A.	\$53
	Garfield		10 US BANK NA	\$31
	Kane		5 WELLS FARGO BANK, N.A.	\$381
			8 JPMORGAN CHASE BANK, NA	\$97
	Morgan		4 ZIONS BANCORPORATION, N.A.	\$1,124
			10 KEYBANK NATIONAL ASSOCIATION	\$260
	Rich		3 WELLS FARGO BANK, N.A.	\$113
			7 KEYBANK NATIONAL ASSOCIATION	\$38
	Summit		2 JPMORGAN CHASE BANK, NA	\$20,432
			3 WELLS FARGO BANK, N.A.	\$18,542
			5 KEYBANK NATIONAL ASSOCIATION	\$7,117
			7 US BANK NA	\$6,058
	Utah		9 US BANK NA	\$18,045
	Wasatch		1 ZIONS BANCORPORATION, N.A.	\$15,796
			2 WELLS FARGO BANK, N.A.	\$5,482
			3 JPMORGAN CHASE BANK, NA	\$5,026
			10 CHARLES SCHWAB BANK, SSB	\$1,376
	Washington		6 US BANK NA	\$3,935
			8 BANK OF UTAH	\$3,195
			10 KEYBANK NATIONAL ASSOCIATION	\$2,683
	Wayne		8 US BANK NA	\$14
UTAH Total				\$118,078
VERMONT	Addison		10 BANK OF AMERICA, N.A.	\$528
	Bennington		7 WELLS FARGO BANK, N.A.	\$1,227
	Essex		6 BANK OF AMERICA, N.A.	\$79
			9 CITIZENS BANK, NA	\$61
			10 GERALD GRIMO	\$58
	Grand Isle		4 PEOPLES UNITED BANK, N.A.	\$638
			9 KEYBANK NATIONAL ASSOCIATION	\$81
			10 CITIZENS BANK, NA	\$80
	Lamoille		6 CITIZENS BANK, NA	\$782
			7 NORTHFIELD SAVINGS BANK	\$758
			8 JPMORGAN CHASE BANK, NA	\$648
	Washington		5 GERALD GRIMO	\$3,034
	Windham		8 JPMORGAN CHASE BANK, NA	\$1,359

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State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		9	WELLS FARGO BANK, N.A.	\$1,243
	Windsor	10	BANK OF AMERICA, N.A.	\$1,256
VERMONT Total				\$11,832
VIRGINIA	Albemarle	6	WELLS FARGO BANK, N.A.	\$10,321
		9	FULTON BANK, N.A.	\$2,165
	Alexandria city	5	WELLS FARGO BANK, N.A.	\$19,064
	Amelia	9	TRUIST FINANCIAL	\$497
	Appomattox	8	FIRST BANK AND TRUST COMPANY	\$257
	Arlington	4	WELLS FARGO BANK, N.A.	\$23,552
	Bath	8	FIRST CITIZENS BANK AND TRUST	\$16
	Bedford	9	CARTER BANK & TRUST	\$1,491
	Bland	10	ATLANTIC UNION BANK	\$19
	Botetourt	4	TRUIST FINANCIAL	\$1,255
	Brunswick	6	WELLS FARGO BANK, N.A.	\$180
		8	BANK OF AMERICA, N.A.	\$135
		9	TRUIST FINANCIAL	\$91
	Buena Vista city	3	TRUIST FINANCIAL	\$144
		5	WELLS FARGO BANK, N.A.	\$66
		10	JPMORGAN CHASE BANK, NA	\$11
	Charlottesville city	8	FULTON BANK, N.A.	\$3,865
	Clarke	8	WELLS FARGO BANK, N.A.	\$651
		9	BANK OF AMERICA, N.A.	\$422
	Craig	3	ATLANTIC UNION BANK	\$86
		5	WELLS FARGO BANK, N.A.	\$70
		7	TRUIST FINANCIAL	\$46
		10	PNC BANK N.A.	\$25
	Fairfax	4	WELLS FARGO BANK, N.A.	\$148,487
	Falls Church city	4	WELLS FARGO BANK, N.A.	\$3,046
	Fauquier	3	WELLS FARGO BANK, N.A.	\$8,100
	Fluvanna	3	WELLS FARGO BANK, N.A.	\$1,033
		6	BANK OF AMERICA, N.A.	\$417
		8	JPMORGAN CHASE BANK, NA	\$250
		10	FULTON BANK, N.A.	\$177
	Franklin	6	FIRST BANK AND TRUST COMPANY	\$1,819
		7	PINNACLE BANK	\$1,603
		8	WELLS FARGO BANK, N.A.	\$1,176
	Gloucester	3	TRUIST FINANCIAL	\$2,978
		5	WELLS FARGO BANK, N.A.	\$1,953
		9	BANK OF AMERICA, N.A.	\$329
	Grayson	5	WELLS FARGO BANK, N.A.	\$231
		6	TRUIST FINANCIAL	\$178
		8	FIRST COMMUNITY BANK	\$69
		9	BANK OF AMERICA, N.A.	\$64
	Greene	8	FULTON BANK, N.A.	\$488
	Highland	4	TRUIST FINANCIAL	\$44
	Hopewell city	10	TOWNEBANK	\$162
	Isle of Wight	4	WELLS FARGO BANK, N.A.	\$1,948
		6	BANK OF AMERICA, N.A.	\$787
	James City	5	WELLS FARGO BANK, N.A.	\$4,719
		8	BANK OF AMERICA, N.A.	\$2,884
		10	JPMORGAN CHASE BANK, NA	\$1,070

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	King and Queen	10	ATLANTIC UNION BANK	\$48
	King George	8	WELLS FARGO BANK, N.A.	\$643
	King William	7	TRUIST FINANCIAL	\$400
	Lancaster	4	TRUIST FINANCIAL	\$741
		5	WELLS FARGO BANK, N.A.	\$688
		8	JPMORGAN CHASE BANK, NA	\$212
	Loudoun	4	WELLS FARGO BANK, N.A.	\$54,962
	Louisa	3	WELLS FARGO BANK, N.A.	\$2,963
	Lynchburg city	7	ESSEX BANK	\$2,778
	Madison	4	TRUIST FINANCIAL	\$489
	Mathews	3	WELLS FARGO BANK, N.A.	\$335
		9	JPMORGAN CHASE BANK, NA	\$47
	Mecklenburg	4	TRUIST FINANCIAL	\$831
	Middlesex	6	WELLS FARGO BANK, N.A.	\$667
		8	TOWNEBANK	\$131
	Montgomery	10	PINNACLE BANK	\$1,439
	Nelson	8	FIRST BANK AND TRUST COMPANY	\$426
		10	FULTON BANK, N.A.	\$321
	Newport News city	5	WELLS FARGO BANK, N.A.	\$8,477
		9	FULTON BANK, N.A.	\$2,863
	Northampton	8	CALVIN B TAYLOR BANKING CO OF	\$606
		9	WELLS FARGO BANK, N.A.	\$363
	Northumberland	5	WELLS FARGO BANK, N.A.	\$680
		8	TRUIST FINANCIAL	\$193
	Orange	3	WELLS FARGO BANK, N.A.	\$2,316
	Poquoson city	3	WELLS FARGO BANK, N.A.	\$768
		9	BANK OF AMERICA, N.A.	\$93
	Powhatan	5	TRUIST FINANCIAL	\$3,041
		6	WELLS FARGO BANK, N.A.	\$3,006
	Rappahannock	2	WELLS FARGO BANK, N.A.	\$542
		3	TRUIST FINANCIAL	\$504
		10	JPMORGAN CHASE BANK, NA	\$77
	Richmond	10	WELLS FARGO BANK, N.A.	\$65
	Roanoke	6	WELLS FARGO BANK, N.A.	\$4,380
		9	BANK OF AMERICA, N.A.	\$1,262
	Rockbridge	4	WELLS FARGO BANK, N.A.	\$765
	Scott	6	FIRST BANK AND TRUST COMPANY	\$235
	Shenandoah	6	WELLS FARGO BANK, N.A.	\$1,253
	Suffolk city	5	WELLS FARGO BANK, N.A.	\$4,506
	Surry	8	TRUIST FINANCIAL	\$64
	Virginia Beach city	8	FULTON BANK, N.A.	\$13,727
		10	PNC BANK N.A.	\$8,058
	Westmoreland	9	BANK OF AMERICA, N.A.	\$184
	York	4	WELLS FARGO BANK, N.A.	\$5,213
		9	FULTON BANK, N.A.	\$1,558
VIRGINIA Total				\$381,361
WASHINGTON	Asotin	3	WELLS FARGO BANK, N.A.	\$1,321
	Benton	5	UMPQUA BANK	\$11,660
		9	WELLS FARGO BANK, N.A.	\$5,923
	Chelan	5	BANNER BANK	\$10,001
		7	KEYBANK NATIONAL ASSOCIATION	\$5,190

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State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		8	US BANK NA	\$4,368
		10	WASHINGTON FEDERAL	\$3,083
	Clallam	8	1ST SECURITY BANK OF WASHINGTO	\$1,945
	Clark	1	UMPQUA BANK	\$68,351
	Columbia	8	UMPQUA BANK	\$52
	Cowlitz	7	WELLS FARGO BANK, N.A.	\$3,157
	Douglas	2	BANNER BANK	\$5,434
		7	WELLS FARGO BANK, N.A.	\$1,627
		8	US BANK NA	\$1,076
		10	JPMORGAN CHASE BANK, NA	\$651
	Ferry	7	US BANK NA	\$45
		9	JPMORGAN CHASE BANK, NA	\$42
	Franklin	4	UMPQUA BANK	\$4,251
	Grant	9	WASHINGTON FEDERAL	\$1,911
		10	JPMORGAN CHASE BANK, NA	\$1,775
	Grays Harbor	6	KEYBANK NATIONAL ASSOCIATION	\$1,354
		7	UMPQUA BANK	\$1,269
		8	JPMORGAN CHASE BANK, NA	\$893
	Island	2	WELLS FARGO BANK, N.A.	\$6,149
		3	PEOPLES BANK	\$5,461
		4	US BANK NA	\$4,222
		5	BANNER BANK	\$3,671
		6	BANK OF AMERICA, N.A.	\$3,548
		7	KEYBANK NATIONAL ASSOCIATION	\$1,960
		10	JPMORGAN CHASE BANK, NA	\$1,569
	Jefferson	3	1ST SECURITY BANK OF WASHINGTO	\$2,527
		6	JPMORGAN CHASE BANK, NA	\$919
	King	2	US BANK NA	\$314,583
		3	JPMORGAN CHASE BANK, NA	\$312,972
		5	WELLS FARGO BANK, N.A.	\$254,801
		10	UMPQUA BANK	\$156,631
	Kitsap	2	WELLS FARGO BANK, N.A.	\$20,022
		5	JPMORGAN CHASE BANK, NA	\$14,624
	Kittitas	2	UMPQUA BANK	\$7,889
		4	US BANK NA	\$5,532
		9	WASHINGTON FEDERAL	\$1,704
		10	JPMORGAN CHASE BANK, NA	\$1,631
	Klickitat	2	UMPQUA BANK	\$4,214
		7	US BANK NA	\$1,002
	Lewis	5	UMPQUA BANK	\$3,326
	Lincoln	8	KEYBANK NATIONAL ASSOCIATION	\$188
	Mason	4	KEYBANK NATIONAL ASSOCIATION	\$3,721
		6	JPMORGAN CHASE BANK, NA	\$1,125
		9	UMPQUA BANK	\$691
		10	US BANK NA	\$686
	Pacific	2	WELLS FARGO BANK, N.A.	\$755
		5	US BANK NA	\$393
	Pend Oreille	4	WELLS FARGO BANK, N.A.	\$597
		9	US BANK NA	\$78
		10	BANNER BANK	\$65
	Pierce	6	WELLS FARGO BANK, N.A.	\$56,502

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		9	UMPQUA BANK	\$33,609
	San Juan	3	WASHINGTON FEDERAL	\$3,420
		5	WELLS FARGO BANK, N.A.	\$2,886
		6	US BANK NA	\$2,116
	Skagit	4	WELLS FARGO BANK, N.A.	\$10,122
		9	WASHINGTON FEDERAL	\$4,209
	Skamania	1	UMPQUA BANK	\$1,314
		4	US BANK NA	\$361
		10	KEYBANK NATIONAL ASSOCIATION	\$76
	Snohomish	5	WELLS FARGO BANK, N.A.	\$68,354
	Stevens	6	WASHINGTON TRUST BANK	\$1,698
	Thurston	6	WELLS FARGO BANK, N.A.	\$12,772
		9	JPMORGAN CHASE BANK, NA	\$10,337
		10	UMPQUA BANK	\$6,470
	Wahkiakum	9	US BANK NA	\$76
		10	UMPQUA BANK	\$69
	Whatcom	9	UMPQUA BANK	\$12,501
		10	WASHINGTON FEDERAL	\$11,983
WASHINGTON Total				\$1,511,510
WEST VIRGINIA	Barbour	8	FIRST COMMUNITY BANK	\$70
		9	JPMORGAN CHASE BANK, NA	\$68
		10	THE HUNTINGTON NATIONAL BANK	\$55
	Berkeley	6	CITY NATIONAL BANK OF WV	\$4,420
		7	WELLS FARGO BANK, N.A.	\$2,246
	Cabell	9	CITY NATIONAL BANK OF WV	\$4,179
	Doddridge	5	TRUIST FINANCIAL	\$20
	Greenbrier	7	FIRST COMMUNITY BANK	\$762
	Hampshire	8	TRUIST FINANCIAL	\$135
		9	M&T BANK	\$103
		10	JPMORGAN CHASE BANK, NA	\$88
	Harrison	4	WESBANCO BANK INC.	\$7,439
	Jackson	6	CITY NATIONAL BANK OF WV	\$1,089
	Jefferson	6	WELLS FARGO BANK, N.A.	\$1,827
	Lewis	6	THE HUNTINGTON NATIONAL BANK	\$807
	Lincoln	7	CITY NATIONAL BANK OF WV	\$217
	Marshall	5	THE HUNTINGTON NATIONAL BANK	\$287
		6	JPMORGAN CHASE BANK, NA	\$196
	Mineral	4	TRUIST FINANCIAL	\$412
	Monongalia	4	THE HUNTINGTON NATIONAL BANK	\$11,104
		5	WESBANCO BANK INC.	\$9,299
		9	PNC BANK N.A.	\$1,765
		10	CITY NATIONAL BANK OF WV	\$1,438
	Monroe	2	FIRST COMMUNITY BANK	\$536
		3	TRUIST FINANCIAL	\$354
	Morgan	6	TRUIST FINANCIAL	\$379
		9	CITY NATIONAL BANK OF WV	\$138
	Pendleton	5	TRUIST FINANCIAL	\$29
		10	JPMORGAN CHASE BANK, NA	\$13
	Pleasants	4	WESBANCO BANK INC.	\$28
	Pocahontas	8	THE HUNTINGTON NATIONAL BANK	\$58
		9	TRUIST FINANCIAL	\$48

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
	Preston	8	TRUIST FINANCIAL	\$448
	Putnam	6	CITY NATIONAL BANK OF WV	\$5,345
		9	PUTNAM COUNTY BANK	\$2,717
	Raleigh	7	THE HUNTINGTON NATIONAL BANK	\$3,099
	Ritchie	7	PEOPLES BANK	\$120
	Summers	9	THE HUNTINGTON NATIONAL BANK	\$68
	Taylor	4	WESBANCO BANK INC.	\$661
		6	THE HUNTINGTON NATIONAL BANK	\$581
	Tucker	3	THE HUNTINGTON NATIONAL BANK	\$356
		5	JPMORGAN CHASE BANK, NA	\$88
		8	FIRST COMMUNITY BANK	\$41
	Wirt	5	TRUIST FINANCIAL	\$20
	Wood	8	JPMORGAN CHASE BANK, NA	\$1,202
WEST VIRGINIA Total				\$64,355
WISCONSIN	Adams	2	BMO HARRIS BANK N.A.	\$506
		3	US BANK NA	\$324
		4	WELLS FARGO BANK, N.A.	\$292
		5	JPMORGAN CHASE BANK, NA	\$225
	Barron	9	BREMER BANK NA	\$473
	Bayfield	4	ASSOCIATED BANK NA	\$403
		6	WELLS FARGO BANK, N.A.	\$353
		7	JOHNSON BANK	\$339
		8	US BANK NA	\$264
	Brown	10	WELLS FARGO BANK, N.A.	\$9,511
	Buffalo	4	WELLS FARGO BANK, N.A.	\$195
	Burnett	2	US BANK NA	\$1,802
		5	WELLS FARGO BANK, N.A.	\$578
	Calumet	6	ASSOCIATED BANK NA	\$2,346
		7	US BANK NA	\$2,119
	Chippewa	5	US BANK NA	\$2,160
	Crawford	7	US BANK NA	\$183
	Dane	8	OLD NATIONAL BANK	\$19,473
	Dodge	10	US BANK NA	\$2,414
	Door	6	WELLS FARGO BANK, N.A.	\$1,465
		7	JPMORGAN CHASE BANK, NA	\$1,412
		9	NORTH SHORE BANK, FSB	\$955
		10	JOHNSON BANK	\$940
	Douglas	4	US BANK NA	\$1,439
		5	WELLS FARGO BANK, N.A.	\$1,413
	Dunn	5	ASSOCIATED BANK NA	\$800
	Eau Claire	4	US BANK NA	\$5,120
		7	ASSOCIATED BANK NA	\$3,378
	Florence	8	ASSOCIATED BANK NA	\$30
			WELLS FARGO BANK, N.A.	\$30
	Fond du Lac	3	US BANK NA	\$6,326
		6	ASSOCIATED BANK NA	\$4,271
	Forest	3	ASSOCIATED BANK NA	\$596
		8	WELLS FARGO BANK, N.A.	\$160
		9	BANK FIRST N.A.	\$125
		10	BMO HARRIS BANK N.A.	\$121
	Green Lake	4	US BANK NA	\$870

GeoDataVision: 2020 CRA Top Ten Small Business Lenders Failing to meet "Major Product Line" Definition by County

State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		6	ASSOCIATED BANK NA	\$631
		7	JPMORGAN CHASE BANK, NA	\$412
		9	WELLS FARGO BANK, N.A.	\$299
	Iron	3	ASSOCIATED BANK NA	\$999
		10	JPMORGAN CHASE BANK, NA	\$71
	Jackson	7	WELLS FARGO BANK, N.A.	\$168
	Jefferson	10	WELLS FARGO BANK, N.A.	\$1,758
	Juneau	7	BANK FIRST N.A.	\$449
		8	US BANK NA	\$304
	Kewaunee	8	ASSOCIATED BANK NA	\$570
	La Crosse	4	ASSOCIATED BANK NA	\$5,728
	Langlade	7	JOHNSON BANK	\$513
	Lincoln	9	WELLS FARGO BANK, N.A.	\$271
	Manitowoc	6	US BANK NA	\$2,337
	Marinette	3	ASSOCIATED BANK NA	\$1,635
		8	BANK FIRST N.A.	\$421
	Menominee	6	WELLS FARGO BANK, N.A.	\$17
		8	ASSOCIATED BANK NA	\$13
	Monroe	9	ASSOCIATED BANK NA	\$259
	Oconto	1	ASSOCIATED BANK NA	\$4,626
		2	NICOLET NATIONAL BANK	\$4,535
		9	US BANK NA	\$715
	Oneida	4	ASSOCIATED BANK NA	\$4,123
	Ozaukee	4	ASSOCIATED BANK NA	\$12,057
		6	BANK FIVE NINE	\$7,666
		7	JOHNSON BANK	\$6,606
	Pepin	4	ASSOCIATED BANK NA	\$153
	Pierce	4	BREMER BANK NA	\$2,919
		5	ASSOCIATED BANK NA	\$2,491
	Polk	4	US BANK NA	\$2,249
		6	WELLS FARGO BANK, N.A.	\$1,180
	Portage	5	US BANK NA	\$5,599
	Racine	8	ASSOCIATED BANK NA	\$6,475
		9	WELLS FARGO BANK, N.A.	\$3,320
	Richland	9	WELLS FARGO BANK, N.A.	\$168
	Rock	9	ASSOCIATED BANK NA	\$2,745
	Rusk	9	US BANK NA	\$62
		10	JOHNSON BANK	\$42
	Sawyer	3	WELLS FARGO BANK, N.A.	\$1,057
		6	FRANDSEN BANK & TRUST	\$649
		8	ASSOCIATED BANK NA	\$431
		9	BREMER BANK NA	\$395
	Sheboygan	7	ASSOCIATED BANK NA	\$4,380
		8	WELLS FARGO BANK, N.A.	\$3,993
	St. Croix	3	US BANK NA	\$8,873
		5	ASSOCIATED BANK NA	\$6,380
		9	BELL BANK	\$2,516
	Trempealeau	5	ASSOCIATED BANK NA	\$412
	Vernon	7	US BANK NA	\$172
		8	ASSOCIATED BANK NA	\$162
	Vilas	6	US BANK NA	\$1,483

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State_Name	CountyName	CRA Mkt Rank	CRA: Bank Name	SB Loan \$(000)
		7	WELLS FARGO BANK, N.A.	\$1,076
		8	JPMORGAN CHASE BANK, NA	\$558
	Walworth	6	JPMORGAN CHASE BANK, NA	\$8,737
	Washburn	4	WELLS FARGO BANK, N.A.	\$511
		6	US BANK NA	\$345
		7	BANK OF THE WEST	\$332
		10	JPMORGAN CHASE BANK, NA	\$169
	Washington	6	ASSOCIATED BANK NA	\$10,733
	Waupaca	7	ASSOCIATED BANK NA	\$1,235
	Waushara	6	NICOLET NATIONAL BANK	\$691
		7	WELLS FARGO BANK, N.A.	\$374
		8	JPMORGAN CHASE BANK, NA	\$357
WISCONSIN Total				\$214,018
WYOMING	Big Horn	1	GLACIER BANK	\$1,183
	Carbon	5	WELLS FARGO BANK, N.A.	\$372
		6	BANK OF THE WEST	\$356
	Converse	8	FIRST INTERSTATE BANK	\$228
	Crook	2	FIRST INTERSTATE BANK	\$187
		5	US BANK NA	\$59
	Fremont	10	US BANK NA	\$480
	Goshen	5	WELLS FARGO BANK, N.A.	\$78
		9	TRUIST FINANCIAL	\$47
	Johnson	1	FIRST INTERSTATE BANK	\$1,905
	Laramie	7	FIRST INTERSTATE BANK	\$4,640
		10	TRUIST FINANCIAL	\$1,380
	Lincoln	6	JPMORGAN CHASE BANK, NA	\$719
		10	ZIONS BANCORPORATION, N.A.	\$475
	Natrona	3	FIRST INTERSTATE BANK	\$17,878
	Niobrara	2	BANK OF THE WEST	\$38
		3	US BANK NA	\$29
	Park	7	US BANK NA	\$421
	Platte	4	FIRST INTERSTATE BANK	\$125
		6	BANK OF THE WEST	\$59
	Sheridan	1	FIRST INTERSTATE BANK	\$12,650
		9	US BANK NA	\$1,594
	Sublette	7	JPMORGAN CHASE BANK, NA	\$288
	Sweetwater	2	WELLS FARGO BANK, N.A.	\$3,249
		3	US BANK NA	\$1,696
	Teton	1	WELLS FARGO BANK, N.A.	\$10,588
		2	US BANK NA	\$8,519
		4	FIRST INTERSTATE BANK	\$5,118
		5	FIRST REPUBLIC BANK	\$4,968
		8	JPMORGAN CHASE BANK, NA	\$1,678
	Uinta	2	WELLS FARGO BANK, N.A.	\$1,470
	Washakie	4	WELLS FARGO BANK, N.A.	\$210
		6	US BANK NA	\$113
	Weston	8	FIRST INTERSTATE BANK	\$38
WYOMING Total				\$82,838
Grand Total				\$20,374,975

No. Counties: 1,332
 No. Top Ten Banks
 Fail 15% Standard: 2,189