



PUBLIC DISCLOSURE

March 25, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings Bank of Angola
Charter Number 702324

212 E Maumee St
Angola, IN 46703-1923

Office of the Comptroller of the Currency

Indianapolis Field Office
8777 Purdue Road
Suite 105
Indianapolis, IN 46268-3104

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

The Lending Test is rated: Satisfactory.

The factors supporting this rating are:

- A more than reasonable loan-to-deposit ratio;
- A substantial majority of loans originated inside the bank's AA, and;
- A reasonable distribution of loans to borrowers of different income levels.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

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

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

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

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

First Federal Savings Bank of Angola (FFSB or bank) is a federally chartered mutual thrift operating in Angola, Indiana. As of December 31, 2018, the bank had total assets of \$131.6 million and tier 1 capital of \$26.5 million. FFSB was established in 1933 as a community-oriented financial institution, which it remains to this day. FFSB offers traditional loan and deposit products to the local community. The bank's primary focus is residential real estate loans and other secured consumer loans.

FFSB operates one branch and two deposit-taking automated teller machines (ATMs). The assessment area (AA) consists of all of Steuben County, Indiana, located in a non-Metropolitan Statistical Area (non-MSA) portion of the state (Steuben County non-MSA AA). The AA is made up of nine CTs. There are no low- or moderate-income CTs in the bank's AA. According to the June 30, 2018 FDIC Deposit Market Share Report, the bank had \$108.2 million in deposits, for a 19.6 percent market share. FFSB ranked second, out of eight deposit taking institutions, for deposit market share. Of these institutions, they are the only bank operating out of a sole location.

At December 31, 2018, the bank's loan portfolio totaled \$92.8 million. The table below shows the loan portfolio composition:

Loan Portfolio Composition			
Loan Category	Amount (\$000s)	Percent of Total Loans	Percent of Total Assets
Residential Loans	\$ 86,162	92.9%	65.5%
Consumer Loans	\$ 5,098	5.5%	3.9%
Business Loans	\$ 1,523	1.6%	1.2%
Total Gross Loans	\$ 92,783	100.00%	62.03%

Source: Call Report as of December 31, 2018

FFSB does not have any legal, financial, or other factors that would impede its ability to meet credit needs in the AA. FFSB received a "Satisfactory" rating at their previous CRA evaluation, dated December 9, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FFSB was evaluated using the Small Bank procedures to assess the bank's record of meeting the credit needs of its community. Small Bank procedures include an evaluation of:

- The bank's loan-to-deposit (LTD) ratio;
- The percentage of loans within the bank's AA;
- The bank's record of lending to borrowers of different income levels;
- The geographic distribution of the bank's loans; and
- The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its AA.

The evaluation period for this review is from December 10, 2013 through December 31, 2018. Examiners utilized the bank's loan register to identify home mortgage loans originated from January 1, 2016 through December 31, 2018. The bank is not subject to the HMDA. Examiners sampled 20 home mortgage loans originated during 2016, and 20 home mortgage loan originated during the period beginning January 1, 2017 through December 31, 2018. Home mortgage loans include home purchase, home refinance, and home improvement loans. Two separate analyses were performed, one for 2016 loan originations and one for 2017 through 2018 originations. This is due to the changes instituted by the 2015 American Community Survey (ACS), which updated population and housing information. The ACS also resulted in changes to the income designations of some CTs. FFSB did not change its lending strategy during the two analysis periods.

Selection of Areas for Full-Scope Review

FFSB has only one AA, and we performed a full-scope review of the AA. The full-scope review considers performance context, quantitative, and qualitative factors. Refer to Appendix A: Scope of Examination section for more information.

Ratings

As FFSB has only one AA, the overall rating is based on the performance in this area. The 2017 through 2018 analysis period received more weight than the 2016 analysis period, as this represents the majority of the evaluation period.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the lending test is rated Satisfactory.

Loan-to-Deposit Ratio

FFSB's LTD ratio is more than reasonable considering its asset size, financial condition, competition, and AA credit needs. FFSB's quarterly LTD ratio, calculated on a bank-wide basis, averaged 82.9 percent during the 21 quarter period ending December 31, 2018. The LTD ratio fluctuated from a low of 74.7 percent at September 30, 2017, to a high of 88.8 percent at June 30, 2014. The bank's average ratio is higher than the peer group's average ratio of 80.6 percent for the same period. We considered the average LTD ratios of four other banks with offices in the AA. These banks had asset sizes between \$321.7 million and \$1.1 billion, with average LTD ratios between 71.2 percent and 84.6 percent.

FFSB's average LTD ratio is understated due to its continued maintenance of a property tax collection deposit account for Steuben County. This deposit account fluctuates throughout the year as tax payments are made and is offset on the asset side of the balance sheet with short-term investments. Adjusting deposits for this account, the average LTD ratio for the 21 quarters increases to 91.0 percent.

Lending in Assessment Area

FFSB originated a substantial majority of home mortgage loans inside its AA. Lending in the AA is calculated on a bank-wide basis. Based on a sample of loans, the bank originated 92.5 percent of loans by number and 95.6 percent of loans by dollar inside its AA. The following table details the number and dollar volume of loans originated inside and outside of the bank's AA:

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	37	92.5%	3	7.5%	40	\$6,864	95.6%	\$316	4.4%	\$7,180
<i>Source: 01/01/2016 – 12/31/2018 Bank Data</i>										

Lending to Borrowers of Different Incomes

Overall, the distribution of home mortgage loans to borrowers of different incomes is reasonable.

Based on a sample of 20 loans originated by the bank during the 2017-2018 analysis period, the distribution among borrowers of different incomes is reasonable. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage falls within a reasonable range below aggregate lending. The percentage of loans to moderate-income borrowers is significantly below moderate-income families in the AA and significantly below aggregate lending. While lending to low- and moderate-income borrowers is below comparators, when considering the need, competition, and opportunities for lending in the AA, the bank's performance is reasonable. In the AA, 7.3 percent of families live below the poverty level and the median housing value is \$138,955. This makes it difficult for many families to achieve home ownership. There is also significant competition in the AA. Based on 2017 Peer Mortgage Data, there were 162 HMDA reporting banks competing for 1,265 loans in the AA. Please note, this only accounts for HMDA reporting banks, FFSB is not a HMDA reporter. FFSB operates one branch in the AA and must compete with larger regional and national banks for loans. The bank's performance in 2016 was not inconsistent with its performance in 2017 through 2018.

Refer to Table P in appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

Geographic Distribution of Loans

An analysis of the geographic distribution of loans is not meaningful. The bank has no low- or moderate-income CTs in its AA.

Refer to Table O in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

Responses to Complaints

During the evaluation period, FFSB did not receive any complaints related to its performance in helping to meet the credit needs of its AA.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test: January 1, 2016 – December 31, 2018	
Financial Institution		Products Reviewed
First Federal Savings Bank of Angola (FFSB) Angola, IN		Home Mortgage Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
No affiliate products reviewed.	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Steuben County non-MSA	Full-Scope	All of Steuben County

Appendix B: Community Profiles for Full-Scope Areas

Steuben County non-MSA AA

2016

Table A – Demographic Information of the Assessment Area						
Assessment Area: Angola						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	34,185	0.0	0.0	91.3	8.7	0.0
Housing Units by Geography	19,280	0.0	0.0	87.4	12.6	0.0
Owner-Occupied Units by Geography	11,013	0.0	0.0	90.7	9.3	0.0
Occupied Rental Units by Geography	2,931	0.0	0.0	93.6	6.4	0.0
Vacant Units by Geography	5,336	0.0	0.0	77.2	22.8	0.0
Businesses by Geography	2,108	0.0	0.0	91.8	8.2	0.0
Farms by Geography	127	0.0	0.0	96.1	3.9	0.0
Family Distribution by Income Level	9,900	15.9	17.5	23.9	42.7	0.0
Household Distribution by Income Level	13,944	17.3	16.7	21.7	44.3	0.0
Median Family Income Non-MSAs - IN		\$53,037	Median Housing Value			\$142,655
			Median Gross Rent			\$644
			Families Below Poverty Level			7.7%

Source: 2010 U.S. Census and 2016 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

2017-2018

Table A – Demographic Information of the Assessment Area						
Assessment Area: Angola						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	34,267	0.0	0.0	93.5	6.5	0.0
Housing Units by Geography	19,474	0.0	0.0	91.2	8.8	0.0
Owner-Occupied Units by Geography	10,457	0.0	0.0	92.3	7.7	0.0
Occupied Rental Units by Geography	3,028	0.0	0.0	96.5	3.5	0.0
Vacant Units by Geography	5,989	0.0	0.0	86.4	13.6	0.0
Businesses by Geography	2,151	0.0	0.0	91.2	8.8	0.0
Farms by Geography	132	0.0	0.0	93.9	6.1	0.0
Family Distribution by Income Level	9,375	16.1	20.9	23.0	40.0	0.0
Household Distribution by Income Level	13,485	18.6	17.3	21.1	43.1	0.0
Median Family Income Non-MSAs - IN		\$55,741	Median Housing Value			\$138,955
			Median Gross Rent			\$686
			Families Below Poverty Level			7.3%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Steuben County non-MSA AA consists of nine CTs and encompasses all of Steuben County, Indiana. FFSB has one branch and two deposit-taking ATMs in the AA. According to the 2010 US Census, there were eight middle-income CTs and one upper-income CT in the AA. There were no low- or moderate-income CTs in the AA. Information was updated in 2017, as seen in the tables above, due to the 2015 ACS Census. However, these changes did not impact the CT designations. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Competition

Competition for deposits in the AA is low. According to the June 30, 2018 FDIC Deposit Market Share Report, there are eight deposit-taking institutions in the AA. FFSB ranks second in deposit market share, with 19.6 percent of deposits. Farmers State Bank has the most deposits in the AA, with 38.7 percent of deposits.

Competition for loans in the AA is strong. While FFSB is not a HMDA reporter, the level of competition for loans was reviewed based on 2017 Peer Mortgage Data (the most recent data available). There were 162 HMDA reporting lenders in the AA in 2017, reporting 1,265 home mortgage loans. The top five reporting lenders were Well Fargo, Profed Federal Credit Union, Hallmark Home Mortgage, Farmers State Bank, and Quicken Loans. These institutions accounted for 31.6 percent of HMDA reported loans.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the average annual unemployment rate for Indiana and for Steuben County improved during the evaluation period. The unemployment rate for Steuben County was well below the state of Indiana's average for all years under review. The table below summarizes the average annual unemployment rate for Indiana and Steuben County.

Average Unemployment Rate					
	2014	2015	2016	2017	2018
State of Indiana	6.0%	4.8%	4.4%	3.5%	3.4%
Steuben County	4.8%	3.9%	3.7%	2.9%	2.7%

Source: Bureau of Labor Statistics; Not Seasonally Adjusted

According to the website *Hoosiers by the Numbers*, in 2017 (the most recent information available) the leading industries in the area are manufacturing, retail trade, government, hotel and food service, and health care. The top five area employers are Rieke Corp., Ti Group, Automotive Systems, Trine University, Tenneco Inc., and Cameron Memorial Community Hospital.

According to the 2010 US Census, the total population of the AA was 34,185, with 7.7 percent of families living below the poverty level. Low-income families represented 15.9 percent of families in the AA and moderate-income families represented 17.5 percent of families. According to the 2015 ACS Census, the total population of the AA was 34,267, with 7.3 percent of families living below the poverty level. Low-income families increased to 16.1 percent of families in the AA and moderate-income families increased to 20.9 percent of families.

Housing

According to the 2010 US Census, 57.1 percent of housing in the AA was owner-occupied, 15.2 percent were rental properties, and 27.7 percent were vacant. Seasonal housing is included in the percentage of vacant housing, due to lake properties in the area seasonal housing could account for a significant portion of vacant housing in the area. The median age of the housing stock in the AA was 38 years and the median housing value was \$136,164. According to the 2015 ASC, 53.7 percent of housing in the AA was owner-occupied, 15.6 percent were rental properties, and 30.8 percent were vacant. The median age of the housing stock in the AA was 43 years and the median housing value was \$136,027.

Community Contacts

One new community contact was performed for this evaluation and an existing community contact performed for a different CRA evaluation was reviewed. One contact was with a grassroots community organization, which supports local philanthropic work. The second was with a community action agency, which helps to create sustainable communities. Both contacts noted that local and regional banks in the area have historically done a good job of supporting community initiatives and filling needs. One contact noted the need for expansion capital for several growing businesses in the area and continued donations to support the community.

The other contact noted a need for workforce development, used automobile loans, and affordable housing.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included in this Performance Evaluation:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Steuben County AA	20	2,952	100.0	1,258	0.0	--	0.0	0.0	--	0.0	90.7	84.2	85.2	9.3	15.8	14.8	0.0	--	0.0
Total	20	2,952	100.0	1,258	0.0	--	0.0	0.0	--	0.0	90.7	84.2	85.2	9.3	15.8	14.8	0.0	--	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Steuben County AA	20	4,228	100.0	1,265	0.0	--	0.0	0.0	--	0.0	92.3	94.4	88.5	7.7	5.6	11.5	0.0	--	0.0
Total	20	4,228	100.0	1,265	0.0	--	0.0	0.0	--	0.0	92.3	94.4	88.5	7.7	5.6	11.5	0.0	--	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Steuben County AA	20	2,952	100.0	1,258	15.9	20.0	6.4	17.5	5.0	17.6	23.9	5.0	19.2	42.7	70.0	42.5	0.0	--	14.4
Total	20	2,952	100.0	1,258	15.9	20.0	6.4	17.5	5.0	17.6	23.9	5.0	19.2	42.7	70.0	42.5	0.0	--	14.4

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Steuben County AA	20	4,228	100.0	1,265	16.1	5.0	7.0	20.9	5.0	19.4	23.0	15.0	19.0	40.0	75.0	39.6	0.0	--	15.0
Total	20	4,228	100.0	1,265	16.1	5.0	7.0	20.9	5.0	19.4	23.0	15.0	19.0	40.0	75.0	39.6	0.0	--	15.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0