



PUBLIC DISCLOSURE

February 18, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Security Federal Savings Bank
702578

314 Fourth Street
Logansport, Indiana 46974

Office of the Comptroller of the Currency

8777 Purdue Road, Suite 105
Indianapolis, Indiana 46268

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, and should not 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.

Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	2
Discriminatory or Other Illegal Credit Practices Review.....	5
State Rating.....	6
State of Indiana.....	6
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in the State of Indiana. Security Federal Savings Bank (Security or bank) originated a substantial majority of its loans in the assessment areas (AAs) with an excellent overall distribution among borrowers and geographies of different income levels.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is more than reasonable. Security's quarterly LTD ratio, as calculated on a bank-wide basis, averaged 86.7 percent over the 18-quarter period ending December 31, 2018. During this timeframe, the LTD ratio ranged from a low of 79.6 percent to a high of 93.9 percent. Security's LTD ratio ranks third among nine banks with offices in the AA and total assets between \$150.0 and \$350.0 million. The LTD ratio for the other eight banks averaged 75.8 percent and ranged from 59.6 percent to 101.5 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs. Security originated 93.8 percent of its total loans to borrowers inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The table below summarizes the number and dollar volume of lending inside and outside the bank's AAs. The data includes all home mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and a random sample of 40 business loans selected by examiners. All loans in this analysis were made between January 1, 2016, and December 31, 2018.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%	\$	%	\$	%		
Home Mortgage	798	94.1	50	5.9	848	96,903	92.5	7,834	7.5	104,737
Business	35	87.5	5	12.5	40	6,266	89.2	761	10.8	7,027
Total	833	93.8	55	6.2	888	103,169	92.3	8,595	7.7	111,764
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 HMDA Data and Business Loan Sample Due to rounding, totals may not equal 100.0</i>										

Description of Institution

Security is a federally chartered, mutual savings bank headquartered in Logansport, Indiana. As a full-service bank, Security offers a variety of personal and business products and services. These include commercial loans, home mortgage loans, consumer loans, home equity loans, checking and savings accounts, certificates of deposit, individual retirement accounts, health savings accounts, electronic banking, online banking, mobile banking, and trust services.

Security serves 14 contiguous counties in north central Indiana and offers all banking products and services at each of its six offices. The main office and a branch are in Logansport, Indiana, which are in Cass County. In addition, the bank has two offices in Tippecanoe County, one in Carroll County, and one in Howard County. Each office location has a deposit-taking automated teller machine (ATM). All counties in which Security has offices and deposit-taking ATMs, along with the ten surrounding counties, comprise three AAs. Most of the counties are part of the nonmetropolitan statistical area (Non-MSA) within Indiana. However, three counties are part of the Lafayette-West Lafayette, IN MSA, and one county is in the Kokomo, IN MSA.

As of December 31, 2019, Security had total assets of \$293.7 million and tier 1 capital of \$32.6 million. Total deposits equaled \$237.5 million or 80.8 percent of total assets, while gross loans and leases of \$215.9 million represented 73.5 percent. Approximately 72.0 percent of total deposits are assigned to Security's two offices in Cass County. Loan originations and loan portfolio composition indicate diversified lending among residential real estate, business, farm, and consumer loans. Based on the number and dollar volume of loan originations, residential real estate and business loans are considered the primary loan products for this evaluation.

The following tables provide a summary of Security's deposit data, loan originations, and the loan portfolio composition.

Deposit Data June 30, 2019		
Assessment Area	Deposit Amount (000s)	% of Total Deposits
IN Non-MSA	\$ 158,997	71.9%
Kokomo MSA	\$ 28,040	12.7%
Lafayette MSA	\$ 33,948	15.4%
Total	\$ 220,985	100.0%

Source: FDIC Summary of Deposits Report for June 30, 2019

Loan Originations January 1, 2016 through December 31, 2018		
Loan Category	% of # of Loans Originated	% of \$ of Loans Originated
Residential Loans	46.8%	38.5%
Business Loans	31.0%	56.7%
Farm Loans	1.2%	2.9%
Consumer Loans	21.0%	1.9%
Total	100.0%	100.0%

Source: Internal Bank Report on Loan Originations in 2016, 2017, and 2018

Loan Portfolio Composition December 31, 2019			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Loans	\$ 131,384	60.8%	44.7%
Farm Loans	\$ 10,559	4.9%	3.6%
Business Loans	\$ 66,817	31.0%	22.7%
Consumer Loans	\$ 2,827	1.3%	1.0%
Other Loans & Leases	\$ 4,322	2.0%	1.5%
Total Gross Loans & Leases	\$ 215,909	100.0%	73.5%

Source: Call Report for December 31, 2019

Security does not have any legal, financial, or other impediments that hinder its ability to meet the credit needs of its AAs. Security was assigned an “Outstanding” rating at its prior CRA Evaluation dated October 7, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation addresses Security’s CRA performance from January 1, 2016, through December 31, 2018. The OCC assessed this performance using Small Bank examination procedures that consist of a Lending Test which includes an analysis of:

- the LTD ratio,
- percentage of originated and purchased loans made inside the AAs,
- lending to borrowers of different income levels and/or businesses of different sizes,
- lending in low- and moderate-income areas within the AAs, and
- the bank’s record of taking action on written complaints regarding its performance in helping meet the credit needs of the AAs.

To analyze Security’s performance, examiners considered data from a representative sample of the primary loan products. Based on the number and dollar volume of lending, examiners determined the primary products were home mortgage and business loans. Therefore, the sample included all HMDA-reportable mortgage loans originated or purchased and randomly selected business loans from each AA for both analysis periods (2016 and 2017-2018).

A separate analysis of 2016 and 2017-2018 was performed due to changes in census data that became effective in 2017. Examiners compared the bank’s lending performance in 2016 to demographic data from the 2010 U.S. Census, 2016 Aggregate Data, and 2016 Dunn and Bradstreet (D&B) Data. For 2017-2018, examiners compared the bank’s performance to demographic data from the 2015 American Community Survey (ACS) census, 2018 Aggregate Data, and 2018 D&B Data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. Security operates in a single state, so its overall rating is the same as the rating for the State of Indiana. The State of Indiana rating is based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings. The 2017-2018 analysis period represents the majority of the evaluation period and received more weight than the 2016 analysis 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 AA 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 Bureau of Consumer Financial Protection, 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.

State Rating

State of Indiana

CRA rating for the State of Indiana¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- an excellent overall distribution of loans among both borrowers and geographies of different income levels,
- a more than reasonable LTD ratio, and
- a substantial majority of originated and purchased loans were made inside the AAs.

Description of Institution's Operations in Indiana

Security conducts business from six office locations in north central Indiana. See the Description of Institution section for additional details. Based on this footprint, Security has delineated three AAs. These AAs are the Indiana Non-MSA, Lafayette MSA, and Kokomo MSA.

Indiana Non-MSA AA

The Indiana Non-MSA AA includes the counties of Cass, Clinton, Fulton, Grant, Miami, Montgomery, Pulaski, Tipton, Warren, and White. The following tables provide a summary of demographic information for the Indiana Non-MSA for 2016 and 2017-2018.

Table A – Demographic Information of the Assessment Area for 2016						
Assessment Area: Indiana Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	0.0	17.9	67.9	14.1	0.0
Population by Geography	300,603	0.0	17.7	67.5	14.8	0.0
Housing Units by Geography	132,254	0.0	18.9	66.9	14.3	0.0
Owner-Occupied Units by Geography	85,896	0.0	14.2	69.4	16.4	0.0
Occupied Rental Units by Geography	29,287	0.0	28.4	62.6	9.0	0.0
Vacant Units by Geography	17,071	0.0	25.9	61.3	12.8	0.0
Businesses by Geography	14,555	0.0	18.3	67.5	14.2	0.0
Farms by Geography	1,967	0.0	3.5	72.8	23.7	0.0
Family Distribution by Income Level	80,332	19.0	19.7	22.4	39.0	0.0

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Household Distribution by Income Level	115,183	22.3	18.0	19.2	40.4	0.0
Median Family Income Non-MSAs - IN		\$53,037	Median Housing Value			\$96,055
			Median Gross Rent			\$594
			Families Below Poverty Level			9.8%
<i>Source: 2010 U.S. Census and 2016 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>						

Table A – Demographic Information of the Assessment Area for 2017-2018						
Assessment Area: Indiana Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	0.0	24.4	66.7	9.0	0.0
Population by Geography	296,492	0.0	24.3	66.7	9.1	0.0
Housing Units by Geography	131,157	0.0	24.3	66.4	9.2	0.0
Owner-Occupied Units by Geography	82,959	0.0	19.3	70.6	10.2	0.0
Occupied Rental Units by Geography	29,876	0.0	36.3	57.6	6.1	0.0
Vacant Units by Geography	18,322	0.0	27.7	62.1	10.2	0.0
Businesses by Geography	14,449	0.0	25.2	64.9	9.9	0.0
Farms by Geography	1,927	0.0	4.3	78.8	16.9	0.0
Family Distribution by Income Level	76,769	19.3	19.1	22.5	39.1	0.0
Household Distribution by Income Level	112,835	22.2	17.7	19.7	40.5	0.0
Median Family Income Non-MSAs - IN		\$55,741	Median Housing Value			\$94,961
			Median Gross Rent			\$653
			Families Below Poverty Level			10.8%
<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>						

Based on 2010 census data, the Indiana Non-MSA AA had no low-income, 14 moderate-income, 51 middle-income, and 13 upper-income geographies. Several of these income designations changed in 2017 as a result of the updated 2015 ACS census data. This AA still has no low-income geographies, but there are now 19 moderate-income, 52 middle-income, and 7 upper-income census tracts.

Population and Employment

According to census data, the total population has declined slightly since 2010. The population was 300,603 in 2010 and 296,492 based on the 2015 ACS. There was also a modest decline in the number of families. However, the rate of poverty for families increased by 1.0 percent to 10.8 percent.

The unemployment rates for each county in the Indiana Non-MSA AA generally trended with the statewide unemployment rate and showed improvement during the evaluation period. The following table summarizes the annual unemployment rates:

Unemployment Rates			
Area	2016	2017	2018
Cass County	4.6%	3.8%	3.7%
Clinton County	3.9%	3.1%	2.8%
Fulton County	4.7%	3.5%	3.4%
Grant County	4.9%	3.9%	3.9%
Miami County	4.7%	3.9%	4.0%
Montgomery County	3.8%	3.1%	3.0%
Pulaski County	4.5%	3.5%	3.1%
Tipton County	3.8%	3.1%	2.8%
Warren County	4.8%	3.4%	3.2%
White County	4.0%	3.3%	3.1%
State of Indiana	4.4%	3.6%	3.5%

Source: Bureau of Labor Statistics

Business demographic data indicates the primary business industries in the area are services, retail trade, and agriculture, forestry, and fishing. Some of the major employers in the AA are Tyson Fresh Meats (Cass County), Frito Lay, Inc. (Clinton County), Rochester Metal Products (Fulton County), General Motors (Grant County), and Schneider Electric Square D (Miami County). RR Donnelley (Montgomery County), Braunability (Pulaski County), Miller's Merry Manor (Tipton), St. Vincent Williamsport Hospital (Warren), and Indiana Beach Water Park (White County) are also major employers.

Affordability

Homeownership affordability was an issue that limited mortgage demand, particularly among low-income borrowers. Based on the 2016 FFIEC median family income of \$57,100, low-income families made less than \$28,550. At \$96,055, the median housing value was at least 3.4 times the annual income of a low-income family. The median housing value declined to \$94,961 per the 2015 ACS, while the 2018 FFIEC median family income increased to \$61,000. Thus, the housing value decreased slightly to 3.1 times the annual income of low-income families.

Competition

Competition for deposits is considerable due to the number and size of financial institutions with offices in the AA. As of June 30, 2019, FDIC Deposit Data showed Security and 33 other national, regional, and state banks operated 94 offices in the ten-county area. Security's two offices with deposits of almost \$159.0 million represent a market share of 3.6 percent; this market share ranks Security tenth.

Notable competition for loan products also exists. Aggregate HMDA data for 2018 shows 292 lenders originated or purchased 7,180 home mortgage loans in the AA. Aggregate CRA data shows 78 lenders originated or purchased 3,057 business loans in 2018.

Community Contacts

Examiners considered comments from three community contacts regarding potential credit and community development needs. The contact from a government planning agency in Cass County stated there is a need for working capital loans to both farms and small businesses. The contact from a

community action agency in Grant County noted needs for workforce development, used auto loans, and affordable housing. The contact from a government housing authority that serves Warren County mentioned the need for affordable housing and small business loans.

Lafayette MSA AA

The Lafayette MSA AA includes the counties of Benton, Carroll, and Tippecanoe. The following table provides a summary of demographic information for the Lafayette MSA for 2016 and 2017-2018.

Table A – Demographic Information of the Assessment Area for 2016						
Assessment Area: Lafayette MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	6.4	25.5	51.1	12.8	4.3
Population by Geography	201,789	6.4	22.5	50.3	15.8	5.0
Housing Units by Geography	83,092	6.6	26.7	49.9	16.4	0.4
Owner-Occupied Units by Geography	44,950	0.7	18.8	61.1	19.4	0.0
Occupied Rental Units by Geography	30,734	13.9	38.5	33.3	13.8	0.5
Vacant Units by Geography	7,408	11.7	26.6	51.2	8.7	1.8
Businesses by Geography	9,673	5.6	33.7	44.9	15.4	0.5
Farms by Geography	828	0.2	5.6	87.2	7.0	0.0
Family Distribution by Income Level	45,163	20.9	17.8	22.0	39.3	0.0
Household Distribution by Income Level	75,684	25.5	15.5	16.6	42.4	0.0
Median Family Income MSA - 29200 Lafayette-West Lafayette, IN MSA		\$60,301	Median Housing Value			\$117,626
			Median Gross Rent			\$740
			Families Below Poverty Level			9.6%
<i>Source: 2010 U.S. Census and 2016 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>						

Table A – Demographic Information of the Assessment Area for 2017-2018						
Assessment Area: Lafayette MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	6.4	21.3	40.4	25.5	6.4
Population by Geography	209,718	5.2	17.7	37.7	31.5	7.9
Housing Units by Geography	86,499	5.9	20.6	40.1	30.6	2.8
Owner-Occupied Units by Geography	44,467	0.9	15.0	44.0	40.0	0.1
Occupied Rental Units by Geography	34,511	11.8	27.6	34.3	20.5	5.8
Vacant Units by Geography	7,521	8.7	21.2	43.8	21.6	4.7
Businesses by Geography	9,805	4.2	28.9	34.4	28.9	3.7
Farms by Geography	800	0.5	6.0	61.5	32.0	0.0

Family Distribution by Income Level	45,419	20.4	16.3	23.1	40.2	0.0
Household Distribution by Income Level	78,978	25.3	15.2	17.9	41.6	0.0
Median Family Income MSA - 29200 Lafayette-West Lafayette, IN MSA		\$62,506	Median Housing Value			\$131,116
			Median Gross Rent			\$829
			Families Below Poverty Level			10.7%
<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>						

Based on 2010 census data, the Lafayette MSA AA had three low-income, 12 moderate-income, 24 middle-income, and 6 upper-income geographies. Several of these income designations changed in 2017 as a result of the updated 2015 ACS census data. This AA still has three low-income geographies, but there are now 10 moderate-income, 19 middle-income, and 12 upper-income census tracts.

Population and Employment

According to census data, the total population has increased since 2010. The population was 201,789 in 2010 and 209,718 based on the 2015 ACS. There was little change in the number of families. However, the rate of poverty for families increased by 1.1 percent to 10.7 percent.

The unemployment rates for each county in the Indiana Non-MSA AA generally trended with the statewide unemployment rate and showed improvement during the evaluation period. The following table summarizes the annual unemployment rates:

Unemployment Rates			
Area	2016	2017	2018
Benton County	4.2%	3.4%	3.2%
Carroll County	4.2%	3.4%	3.3%
Tippecanoe County	4.1%	3.2%	3.2%
State of Indiana	4.4%	3.6%	3.5%

Source: Bureau of Labor Statistics

Business demographic data indicates the primary business industries in the area are services, retail trade, and agriculture, forestry, and fishing. Some of the major employers in the AA are Kerkoff Associates (Benton County), Indiana Packers Corporation (Carroll), Purdue University (Tippecanoe), and Subaru of Indiana Inc. (Tippecanoe).

Affordability

Homeownership affordability was an issue that limited mortgage demand, particularly among low-income borrowers. Based on the 2016 FFIEC median family income of \$64,900, low-income families made less than \$32,450. At \$117,626, the median housing value was at least 3.6 times the annual income of a low-income family. The median housing value increased to \$131,116 per the 2015 ACS and the 2018 FFIEC median family income also increased to \$69,800. Thus, the housing value increased slightly to 3.8 times the annual income of low-income families.

Competition

Competition for deposits is strong due to the number and size of financial institutions with offices in the AA. As of June 30, 2019, FDIC Deposit Data showed Security and 17 other national, regional, and state banks operated 68 offices in the three-county area. Security's one office with deposits of almost \$34.0 million represent a market share of 1.0 percent; this market share ranks Security fourteenth.

Notable competition for loan products also exists. Aggregate HMDA data for 2018 shows 249 lenders originated or purchased 6,639 home mortgage loans in the AA. Aggregate CRA data shows 63 lenders originated or purchased 2,338 business loans in 2018.

Community Contacts

Examiners considered comments from two community contacts regarding potential credit and community development needs. The contact from an economic development organization in Tippecanoe County felt there is a need to make it easier for small businesses to get financing. The contact feels regulations limit lending to start-up businesses and said there are opportunities to participate in loans to small businesses. The contact from a government housing authority that serves Benton County mentioned the need for affordable housing and small business loans.

Kokomo MSA AA

The Kokomo MSA includes Howard County. The following table provides a summary of demographic information for the Kokomo MSA for 2016 and 2017-2018.

Table A – Demographic Information of the Assessment Area for 2016						
Assessment Area: Kokomo MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	35.0	35.0	30.0	0.0
Population by Geography	82,752	0.0	32.0	32.5	35.5	0.0
Housing Units by Geography	38,831	0.0	35.1	32.6	32.3	0.0
Owner-Occupied Units by Geography	24,187	0.0	25.4	36.1	38.5	0.0
Occupied Rental Units by Geography	10,143	0.0	53.8	28.1	18.2	0.0
Vacant Units by Geography	4,501	0.0	45.2	24.5	30.3	0.0
Businesses by Geography	4,181	0.0	37.8	32.1	30.1	0.0
Farms by Geography	263	0.0	6.8	26.6	66.5	0.0
Family Distribution by Income Level	23,419	21.7	16.6	20.9	40.8	0.0
Household Distribution by Income Level	34,330	22.9	17.1	18.0	42.0	0.0
Median Family Income MSA - 29020 Kokomo, IN MSA		\$55,479	Median Housing Value			\$108,256
			Median Gross Rent			\$635
			Families Below Poverty Level			13.1%

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.

Table A – Demographic Information of the Assessment Area for 2017-2018**Assessment Area: Kokomo MSA AA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	10.0	20.0	45.0	25.0	0.0
Population by Geography	82,765	8.7	16.7	46.6	28.0	0.0
Housing Units by Geography	38,649	10.0	19.0	46.2	24.9	0.0
Owner-Occupied Units by Geography	23,731	6.3	14.2	48.7	30.8	0.0
Occupied Rental Units by Geography	10,682	16.4	23.0	45.2	15.4	0.0
Vacant Units by Geography	4,236	14.6	35.3	34.3	15.8	0.0
Businesses by Geography	4,220	11.5	19.1	46.6	22.7	0.0
Farms by Geography	241	1.7	5.0	46.9	46.5	0.0
Family Distribution by Income Level	22,281	22.2	16.6	21.1	40.0	0.0
Household Distribution by Income Level	34,413	24.3	16.6	16.2	42.8	0.0
Median Family Income MSA - 29020 Kokomo, IN MSA		\$59,111	Median Housing Value			\$95,275
			Median Gross Rent			\$634
			Families Below Poverty Level			13.3%
<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>						

Based on 2010 census data, the Kokomo MSA AA had no low-income, seven moderate-income, seven middle-income, and six upper-income geographies. Several of these income designations changed in 2017 as a result of the updated 2015 ACS census data. This AA now has two low-income, four moderate-income, nine middle-income, and five upper-income census tracts.

Population and Employment

According to census data, the total population has been stable since 2010. The population was 82,752 in 2010 and 82,765 based on the 2015 ACS. There was a slight decline in the number of families and the rate of poverty for families inched up 0.1 percent to 13.3 percent.

The unemployment rate for Howard County generally trended with the statewide unemployment rate and showed improvement during the evaluation period. The following table summarizes the annual unemployment rates:

Unemployment Rates			
Area	2016	2017	2018
Howard County	4.6%	3.8%	4.1%
State of Indiana	4.4%	3.6%	3.5%

Source: Bureau of Labor Statistics

Business demographic data indicates the primary business industries in the area are services, retail trade, and finance, insurance, and real estate. Some of the major employers in Howard County are Chrysler LLC, UAW, Community Howard Regional Health Systems, Haynes International Inc., and GM Components Holdings LLC.

Affordability

Homeownership affordability was an issue that limited mortgage demand, particularly among low-income borrowers. Based on the 2016 FFIEC median family income of \$60,900, low-income families made less than \$30,450. At \$108,250, the median housing value was at least 3.6 times the annual income of a low-income family. The median housing value decreased to \$95,275 per the 2015 ACS, while the 2018 FFIEC median family income increased to \$64,100. Thus, the housing value decreased to 3.0 times the annual income of low-income families.

Competition

Competition for deposits is moderate due to the number and size of financial institutions with offices in the AA. As of June 30, 2019, FDIC Deposit Data showed Security and nine other national, regional, and state banks operated 24 offices in Howard County. Security's one office with deposits of just over \$28.0 million represent a market share of 2.4 percent; this market share ranks Security eighth.

A high level of competition for loan products exists. Aggregate HMDA data for 2018 shows 176 lenders originated or purchased 2,628 home mortgage loans in the AA. Aggregate CRA data shows 51 lenders originated or purchased 782 business loans in 2018.

Community Contacts

Examiners considered comments from a contact regarding potential credit and community development needs. This contact from an economic development organization stated banks are supportive of the local community, although most are not headquartered in Howard County. The contact mentioned there still opportunities for financial institutions to provide further support. Specifically, the contact noted two revolving loan funds as a possible opportunity. The contact also identified being a partner for community development projects when planned by the city as another opportunity. The contact further commented that despite improving economic conditions, Howard County could still benefit from additional affordable housing and economic development.

Scope of Evaluation in Indiana

Examiners performed a full-scope review of all three AAs in Indiana. Refer to the table in Appendix A: Scope of Examination for additional information. The Indiana Non-MSA AA received more weight in the Lending Test as most of the bank's deposits and loan originations are within this area.

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Indiana Non-MSA and Lafayette MSA is excellent. The bank's performance in the Kokomo MSA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State of Indiana. Examiners placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Indiana Non-MSA

The overall geographic distribution of home mortgage loans in the Indiana Non-MSA was excellent. The geographic distribution of home mortgage loans in 2017 and 2018 was excellent. Security's percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing and the aggregate percentage for all reporting lenders. The geographic distribution of home mortgage loans in 2016 was consistent with the performance in 2017 and 2018.

Lafayette MSA

The overall geographic distribution of home mortgage loans in the Lafayette MSA was excellent. The geographic distribution of home mortgage loans in 2017 and 2018 was excellent. Security's percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies exceeded both the percentage of owner-occupied housing and the aggregate percentage for all reporting lenders in those geographies. The geographic distribution of home mortgage loans in 2016 was consistent with the performance in 2017 and 2018.

Kokomo MSA

The overall geographic distribution of home mortgage loans in the Kokomo MSA was reasonable. The geographic distribution of home mortgage loans in 2017 and 2018 was reasonable. Security's percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied units and the aggregate percentage for all reporting lenders in those geographies. Security's percentage of home mortgage loans originated or purchased in moderate-income geographies was below percentage of owner-occupied housing units, but near the percentage for aggregate reporting lenders in those geographies. The geographic distribution of loans in 2016 was weaker than performance in 2017 and 2018. In 2016, Security's percentage of small loans to businesses in moderate-income geographies was well below the both the percentage of owner-occupied housing units and the percentage for aggregate reporting lenders.

Refer to Table O in the State of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

Indiana Non-MSA

The overall geographic distribution of small loans to businesses in the Indiana Non-MSA is excellent. The geographic distribution of small loans to businesses in 2017 and 2018 was excellent. Security's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses and the percentage for aggregate reporting lenders in those geographies. The geographic distribution of small loans to businesses in 2016 was consistent with performance in 2017 and 2018.

Lafayette MSA

The overall geographic distribution of small loans to businesses in the Lafayette MSA is excellent. The geographic distribution of small loans to businesses in 2017 and 2018 was excellent. Security's percentage of small loans to businesses in both low- and moderate-income geographies exceeded both the percentage of businesses and the percentage for aggregate reporting lenders in those geographies. The geographic distribution of small loans to businesses in 2016 was consistent with performance in 2017 and 2018.

Kokomo MSA

The overall geographic distribution of small loans to businesses in the Kokomo MSA is reasonable. The geographic distribution of small loans to businesses in 2017 and 2018 was reasonable. Security's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses and the percentage for aggregate reporting lenders in these geographies. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses and the percentage for aggregate reporting lenders in those geographies. The geographic distribution of small loans to businesses in 2016 was consistent with the performance in 2017 and 2018. Due to the small number of loans in 2016, examiners considered one of four loans originated or purchased was to a business in a low-income geography.

Refer to Table Q in the State of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. Examiners considered housing costs in relation to the median family incomes in each AA, which limited affordability for some low-income borrowers. Examiners also considered the impact of the bank's high percentage of home mortgage loans for which income was not available due to the volume of loans made to corporate entities.

Home Mortgage Loans

Indiana Non-MSA

The overall borrower distribution of home mortgage loans in the Indiana Non-MSA is excellent. The borrower distribution of home mortgage loans in 2017 and 2018 was excellent. Security's percentage of loans to low-income borrowers was below the percentage of low-income families but exceeded the percentage for aggregate reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near the percentage for

aggregate reporting lenders. The borrower distribution of home mortgage loans in 2016 was consistent with performance in 2017 and 2018.

Lafayette MSA

The overall borrower distribution of home mortgage loans in the Lafayette MSA is reasonable. The borrower distribution of home mortgage loans in 2017 and 2018 was reasonable. Security's percentage of home mortgage loans to low-income borrowers was well below both the percentage of low-income families and the percentage for aggregate reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and percentage for aggregate reporting lenders. The borrower distribution of home mortgage loans in 2016 was stronger than the performance in 2017 and 2018. In 2016, the percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and was near to the percentage for aggregate reporting lenders.

Kokomo MSA

The overall borrower distribution of home mortgage loans in the Kokomo MSA is excellent. The borrower distribution in 2017 and 2018 was excellent. Security's percentage of home mortgage loans to low-income borrowers exceeded both the percentage of low-income families and the percentage for aggregate reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the percentage for aggregate reporting lenders. The borrower distribution of home mortgage loans in 2016 was consistent with performance in 2017 and 2018.

Refer to Table P in the State of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

Indiana Non-MSA

The overall borrower distribution of small loans to businesses in the Indiana Non-MSA is excellent. The percentage of small loans to businesses with revenue of \$1.0 million or less in 2017 and 2018 was excellent. Security's percentage of small loans to such businesses was near the percentage of small businesses in the AA and exceeded the percentage for aggregate reporting lenders. The borrower distribution of small loans to businesses in 2016 was consistent with performance in 2017 and 2018.

Lafayette MSA

The overall borrower distribution of small loans to businesses in the Lafayette MSA is excellent. The percentage of small loans to businesses with revenue of \$1.0 million or less in 2017 and 2018 was excellent. Security's percentage of small loans to such businesses was below the percentage of small businesses in the AA but exceeded the percentage for aggregate reporting lenders. The borrower distribution of small loans to businesses in 2016 was consistent with performance in 2017 and 2018.

Kokomo MSA

The overall borrower distribution of small loans to businesses in the Kokomo MSA is excellent. The percentage of small loans to businesses with revenues of \$1.0 million or less in 2017 and 2018 was excellent. Security's percentage of small loans to such businesses exceeded both the percentage of small businesses in the AA and the percentage for aggregate reporting lenders. The borrower distribution of small loans to businesses in 2016 was consistent with the performance in 2017 and 2018. Due to the small number of loans in 2016, examiners considered all four loans originated or purchased were made to a business with revenues of \$1.0 million or less.

Refer to Table R in the State of Indiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Responses to Complaints

Security did not receive any complaints regarding its CRA performance during the evaluation period.

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 MSAs and non-MSAs 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:	01/01/16 to 12/31/18	
Bank Products Reviewed:	Home mortgage and small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Indiana		
Portion of the IN Non-MSA	Full Scope	Counties of Cass, Clinton, Fulton, Grant, Miami, Montgomery, Pulaski, Tipton, Warren, and White
Kokomo, IN MSA	Full Scope	Howard County
Lafayette-West Lafayette, IN MSA	Full Scope	Counties of Benton, Carroll, and Tippecanoe

Appendix B: Summary of MMSA and State Ratings

RATINGS Security Federal Savings Bank	
Overall Bank:	Lending Test Rating
Security Federal Savings Bank	Outstanding
MMSA or State:	
State of Indiana	Outstanding

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, other secured consumer loans, and other unsecured consumer loans.

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 1 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.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

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
IN Non-MSA	146	13,418	100.0	6,416	0.0	0.0	0.0	14.2	17.1	10.9	69.4	82.9	69.9	16.4	0.0	19.2	0.0	0.0	0.0
Total	146	13,418	100.0	6,416	0.0	0.0	0.0	14.2	17.1	10.9	69.4	82.9	69.9	16.4	0.0	19.2	0.0	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
IN Non-MSA	271	24,295	100.0	7,180	0.0	0.0	0.0	19.3	27.7	16.5	70.6	63.5	70.7	10.2	8.9	12.9	0.0	0.0	0.0
Total	271	24,295	100.0	7,180	0.0	0.0	0.0	19.3	27.7	16.5	70.6	63.5	70.7	10.2	8.9	12.9	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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
IN Non-MSA	146	13,418	100.0	6,416	19.0	10.3	9.3	19.7	24.0	22.5	22.4	27.4	21.7	39.0	32.9	30.5	0.0	5.5	16.0
Total	146	13,418	100.0	6,416	19.0	10.3	9.3	19.7	24.0	22.5	22.4	27.4	21.7	39.0	32.9	30.5	0.0	5.5	16.0

*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 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
IN Non-MSA	271	24,295	100.0	7,180	19.3	7.7	10.4	19.1	20.7	22.9	22.5	24.7	21.9	39.1	29.9	28.7	0.0	17.0	16.1
Total	271	24,295	100.0	7,180	19.3	7.7	10.4	19.1	20.7	22.9	22.5	24.7	21.9	39.1	29.9	28.7	0.0	17.0	16.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
IN Non-MSA	20	1,622	100.0	3,051	0.0	0.0	0.0	18.3	35.0	14.7	67.5	65.0	66.3	14.2	0.0	18.9	0.0	0.0	0.0
Total	20	1,622	100.0	3,051	0.0	0.0	0.0	18.3	35.0	14.7	67.5	65.0	66.3	14.2	0.0	18.9	0.0	0.0	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
IN Non-MSA	20	2,419	100.0	2,985	0.0	0.0	0.0	25.2	60.0	21.9	64.9	40.0	66.9	9.9	--	11.2	0.0	0.0	0.0
Total	20	2,419	100.0	2,985	0.0	0.0	0.0	25.2	60.0	21.9	64.9	40.0	66.9	9.9	0.0	11.2	0.0	0.0	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
IN Non-MSA	20	1,622	100.0	3,051	79.7	75.0	46.7	5.5	25.0	14.8	0.0	
Total	20	1,622	100.0	3,051	79.7	75.0	46.7	5.5	25.0	14.8	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
IN Non-MSA	20	2,419	100.0	2,985	78.7	70.0	48.7	5.8	30.0	15.5	0.0	
Total	20	2,419	100.0	2,985	78.7	70.0	48.7	5.8	30.0	15.5	0.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

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
Lafayette MSA	86	13,359	100.0	6,342	0.7	3.5	1.4	18.8	22.1	16.8	61.1	61.6	60.4	19.4	12.8	21.4	0.0	0.0	0.0
Total	86	13,359	100.0	6,342	0.7	3.5	1.4	18.8	22.1	16.8	61.1	61.6	60.4	19.4	12.8	21.4	0.0	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
Lafayette MSA	214	39,786	100.0	6,639	0.9	4.2	1.2	15.0	24.8	15.6	44.0	42.1	40.2	40.0	28.0	42.8	0.1	0.9	0.3
Total	214	39,786	100.0	6,639	0.9	4.2	1.2	15.0	24.8	15.6	44.0	42.1	40.2	40.0	28.0	42.8	0.1	0.9	0.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Lafayette MSA	86	13,359	100.0	6,342	20.9	1.2	10.1	17.8	17.4	18.8	22.0	15.1	20.6	39.3	39.5	32.6	0.0	26.7	17.9	
Total	86	13,359	100.0	6,342	20.9	1.2	10.1	17.8	17.4	18.8	22.0	15.1	20.6	39.3	39.5	32.6	0.0	26.7	17.9	

*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	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Lafayette MSA	214	39,786	100.0	6,639	20.4	3.3	10.2	16.3	10.3	22.0	23.1	12.6	21.5	40.2	27.6	31.0	0.0	46.3	15.3	
Total	214	39,786	100.0	6,639	20.4	3.3	10.2	16.3	10.3	22.0	23.1	12.6	21.5	40.2	27.6	31.0	0.0	46.3	15.3	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Lafayette MSA	20	8,390	100.0	2,175	5.6	5.0	5.2	33.7	--	30.5	44.9	50.0	49.1	15.4	20.0	15.2	0.5	0.0	0.0
Total	20	8,390	100.0	2,175	5.6	5.0	5.2	33.7	25.0	30.5	44.9	50.0	49.1	15.4	20.0	15.2	0.5	0.0	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Lafayette MSA	20	3,270	100.0	2,291	4.2	5.0	4.4	28.9	25.0	30.2	34.4	50.0	33.0	28.9	20.0	30.6	3.7	0.0	1.8
Total	20	3,270	100.0	2,291	4.2	5.0	4.4	28.9	35.0	30.2	34.4	50.0	33.0	28.9	10.0	30.6	3.7	0.0	1.8

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lafayette MSA	20	8,390	100.0	2,175	80.5	75.0	41.7	5.3	20.0	14.2	5.0
Total	20	8,390	100.0	2,175	80.5	75.0	41.7	5.3	20.0	14.2	5.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lafayette MSA	20	3,270	100.0	2,291	79.9	75.0	45.0	5.4	20.0	14.6	5.0
Total	20	3,270	100.0	2,291	79.9	65.0	45.0	5.4	30.0	14.6	5.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA 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																				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	
Kokomo MSA	24	1,435	100.0	2,453	0.0	0.0	0.0	25.4	8.3	16.9	36.1	41.7	36.3	38.5	50.0	46.8	0.0	0.0	0.0	
Total	24	1,435	100.0	2,453	0.0	0.0	0.0	25.4	8.3	16.9	36.1	41.7	36.3	38.5	50.0	46.8	0.0	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	
Kokomo MSA	57	4,610	100.0	2,628	6.3	19.3	4.8	14.2	7.0	8.8	48.7	45.6	52.2	30.8	28.1	34.2	0.0	0.0	0.0	
Total	57	4,610	100.0	2,628	6.3	19.3	4.8	14.2	7.0	8.8	48.7	45.6	52.2	30.8	28.1	34.2	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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
Kokomo MSA	24	1,435	100.0	2,453	21.7	25.0	10.1	16.6	20.8	23.8	20.9	8.3	23.5	40.8	25.0	26.9	0.0	20.8	15.8
Total	24	1,435	100.0	2,453	21.7	25.0	10.1	16.6	20.8	23.8	20.9	8.3	23.5	40.8	25.0	26.9	0.0	20.8	15.8

*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
Kokomo MSA	57	4,610	100.0	2,628	22.2	28.1	10.7	16.6	15.8	22.6	21.1	17.5	23.7	40.0	26.3	25.5	0.0	12.3	17.5
Total	57	4,610	100.0	2,628	22.2	28.1	10.7	16.6	15.8	22.6	21.1	17.5	23.7	40.0	26.3	25.5	0.0	12.3	17.5

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kokomo MSA	4	387	100.0	816	0.0	0.0	0.0	37.8	25.0	34.4	32.1	0.0	32.4	30.1	75.0	33.2	0.0	0.0	0.0
Total	4	387	100.0	816	0.0	0.0	0.0	37.8	25.0	34.4	32.1	0.0	32.4	30.1	75.0	33.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kokomo MSA	16	3,218	100.0	775	11.5	6.3	11.0	19.1	43.8	18.3	46.6	31.3	45.5	22.7	18.8	25.2	0.0	0.0	0.0
Total	16	3,218	100.0	775	11.5	6.3	11.0	19.1	43.8	18.3	46.6	31.3	45.5	22.7	18.8	25.2	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kokomo MSA	4	387	100.0	816	79.9	100.0	44.1	4.6	0.0	15.5	0.0
Total	4	387	100.0	816	79.9	100.0	44.1	4.6	0.0	15.5	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kokomo MSA	16	3,218	100.0	775	79.2	93.8	48.0	5.0	6.3	15.8	0.0
Total	16	3,218	100.0	775	79.2	93.8	48.0	5.0	6.6	15.8	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0