# **PUBLIC DISCLOSURE**

July 31, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Mutual Federal Bank Charter Number 701330

2212 W. Cermak Rd. Chicago, IL 60608

Office of the Comptroller of the Currency

2001 Butterfield Rd., Suite 400 Downers Grove, IL 60515

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.

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## **Overall CRA Rating**

### Institution's CRA Rating: This institution is rated Satisfactory.

#### The lending test is rated: Satisfactory

The major factors that support this rating include:

- Mutual Federal Bank's (MFB) average loan-to-deposit (LTD) ratio is more than reasonable and greatly exceeds similarly situated institutions in Cook, DuPage, and Will counties.
- A majority of the bank's mortgage originations are in its assessment area (AA).
- The bank exhibits excellent loan distribution to moderate-income borrowers.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA the bank's loan-to-deposit ratio is more than reasonable.

MFB's average quarterly LTD ratio during the evaluation period was 101.5 percent. Examiners compared MFB's LTD ratio to similarly situated institutions in the AA with \$100-\$300 million total assets (16 total excluding MFB). The LTD ratios among the peer group averaged 75 percent and ranged from an average low of 33.9 percent to an average high of 113.6 percent.

#### Lending in Assessment Area

A majority of the bank's loans are inside its assessment area.

The bank originated 68.4 percent of its total number of loans inside the bank's 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.

|               | Ν     | Number o       | of Loans |       |       | Dollar A |              |         |      |          |
|---------------|-------|----------------|----------|-------|-------|----------|--------------|---------|------|----------|
| Loan Category | Insi  | Inside Outside |          | Total | Insid | e        | Outsi        | Total   |      |          |
|               | #     | %              | #        | %     | #     | \$       | %            | \$      | %    | \$(000s) |
| Home Mortgage |       |                |          |       |       | -        |              |         |      |          |
| 2019          | 274   | 71.4           | 110      | 28.6  | 384   | 66,930   | 74.4         | 22,990  | 25.6 | 89,920   |
| 2020          | 753   | 69.8           | 326      | 30.2  | 1,079 | 176,715  | 70.1         | 75,270  | 29.9 | 251,985  |
| 2021          | 474   | 64.8           | 257      | 35.2  | 731   | 113,250  | 63.9         | 64,035  | 36.1 | 177,285  |
| Subtotal      | 1,501 | 68.4           | 693      | 31.6  | 2,194 | 356,895  | <b>68.</b> 7 | 162,295 | 31.3 | 519,190  |
| Total         | 1,501 | 68.4           | 693      | 31.6  | 2,194 | 356,895  | <b>68.</b> 7 | 162,295 | 31.3 | 519,190  |

Due to rounding, totals may not equal 100.0%

## **Description of Institution**

MFB is a \$108 million (as of June 30, 2023) federal stock thrift institution, wholly owned by Mutual Federal Bancorp, Inc., of which Mutual Federal Bancorp, MHC is the majority owner. MFB has two operating subsidiaries, including 2212 Holding, LLC and EMEFES Service Corporation. Neither of the subsidiary's activities are considered for CRA purposes.

MFB is an intrastate bank headquartered in Chicago, Illinois (IL) in a moderate-income census tract (CT) within the Pilsen neighborhood with no other branches. In 2019, the bank acquired Oak Leaf Community Mortgage, and opened two loan production offices (LPO) in Naperville and Plainfield, IL, expanding their lending footprint to include DuPage and Will counties. Both locations are in upper-income geographies on the western side of the AA. MFB does not have any automated teller machines (ATMs) but allows customers to use ATMs in the Allpoint network free of surcharge fees.

MFB is a full-service thrift, with the primary loan product being residential mortgages. Loan products also include commercial real estate loans and home equity loans and lines of credit. Deposit products include checking, savings, money market, and individual retirement accounts and certificates of deposits. MFB engages in mortgage banking activities and sells residential loans into the secondary market. As of June 30, 2023, MFB's net loan portfolio totaled \$91.2 million, representing 85 percent of total assets. The loan portfolio largely consists of 1-4 family residential loans at approximately 84 percent, followed by multifamily loans at 11 percent, and the remaining 5 percent in commercial real estate and construction loans. Tier 1 capital totaled \$15.1 million or 20.8 percent of average assets.

MFB has one delineated AA comprised of three contiguous counties in Illinois, which include the entirety of Cook, DuPage, and Will counties. All three counties are part of the Chicago-Naperville-Evanston, IL, Metropolitan Division (MD) that is part of the Chicago-Naperville-Elgin, IL-IN-WI, Metropolitan Statistical Area (MSA). The AA does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income geographies. There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of the AA. The bank received a "Satisfactory" rating under the Small Bank CRA performance standards during the last CRA evaluation, dated May 28, 2019.

## Scope of the Evaluation

### **Evaluation Period/Products Evaluated**

We evaluated MFB's CRA performance using the Small Bank CRA examination procedures, to assess the bank's ability in meeting the credit needs of its AA. The evaluation period began January 1, 2019, and ended December 31, 2021. The loan product evaluated was home mortgages, as it is the bank's primary lending product.

### Selection of Areas for Full-Scope Review

We performed full-scope procedures on MFB's single AA.

### Ratings

The bank's overall rating is based on performance in the State of Illinois.

## **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 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 Illinois**

### CRA rating for the State of Illinois<sup>1</sup>: Satisfactory

#### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- MFB's quarterly average LTD ratio is more than reasonable at over 100 percent.
- The majority of the bank's loans are inside its designated AA.
- MFB exhibited excellent distribution of loans by borrower income.

### **Description of Institution's Operations in Illinois**

MFB is an intrastate bank in the State of Illinois. The AA consists of Cook, DuPage, and Will counties and contains 1,687 CTs, of which 15.6 percent (263 CTs) and 24.4 percent (412 CTs) are in low- and moderate-income geographies, respectively.

Throughout the evaluation period, unemployment rates fluctuated as a result of the COVID-19 Pandemic. In 2020, annual unemployment rates were at its highest, but improved in 2021 as the economy slowly recovered; however, not to the extent of 2019 unemployment levels.

MFB's acquisition of the mortgage banking group in 2019 significantly boosted loan production during the evaluation period and increased their footprint to DuPage and Will counties. Lending activity peaked in 2020 as a result of the low-rate environment and refinance boom.

There is significant competition in the AA. MFB competes with numerous national and state banks, credit unions, thrifts, along with other mortgage lenders. In 2021, MFB's loan market share was 0.14 percent, ranking 97 out of 750 lenders in the AA. There is also significant competition for deposits. Per the FDIC's 2021 Deposit Market Share Report, MFB held 0.02 percent market share of total deposits in the AA, ranking 102 out of 123 financial institutions.

Examiners relied on three community contacts from Cook, DuPage, and Will counties to better understand the bank's operating environment during the evaluation period. Organizations ranged from homeownership and counseling centers to economic development groups. Community contacts indicated the highly competitive housing market has increased the demand for affordable housing, presenting funding opportunities for banks. Contacts also communicated multi-family housing units are a present need within the Chicago region. Community contacts felt local financial institutions do an adequate job at identifying and meeting the credit needs of the AA.

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

## MFB AA

| 8 1 1      | formation  | of the Assessm   | ient Area   |  |  |
|------------|--|--|---|--|--|
| sessment A | rea: Mutu  | al Federal   |   |  |  |
| #          | Low<br>% of #  | Moderate<br>% of #   | Middle<br>% of #  | Upper<br>% of #  | NA*<br>% of #  |
| 1,687      | 15.6   | 24.4   | 27.3  | 31.8   | 0.8  |
| 6,850,800  | 11.6   | 24.5   | 29.7  | 33.9   | 0.3  |
| 2,772,797  | 11.8   | 23.4   | 29.4  | 35.1   | 0.4  |
| 1,538,269  | 5.2  | 18.8   | 33.5  | 42.3   | 0.2  |
| 966,413    | 18.7   | 29.4   | 24.5  | 26.6   | 0.8  |
| 268,115    | 24.5   | 27.9   | 23.0  | 24.1   | 0.5  |
| 622,867    | 7.0  | 17.7   | 26.8  | 47.9   | 0.6  |
| 7,309      | 5.0  | 17.1   | 32.6  | 45.2   | 0.1  |
| 1,595,098  | 24.5   | 16.3   | 18.2  | 41.0   | 0.0  |
| 2,504,682  | 26.4   | 15.3   | 16.8  | 41.5   | 0.0  |
|            | \$75,024   | Median Housi   | ng Value  |  | \$249,040  |
|            |  | Median Gross   | Rent  |  | \$1,050  |
|            |  | Families Belov   | w Poverty Lev   | /el  | 11.3%  |
|            | #<br>1,687<br>6,850,800<br>2,772,797<br>1,538,269<br>966,413<br>268,115<br>622,867<br>7,309<br>1,595,098 | #         Low<br>% of #           1,687         15.6           6,850,800         11.6           2,772,797         11.8           1,538,269         5.2           966,413         18.7           268,115         24.5           622,867         7.0           7,309         5.0           1,595,098         24.5           2,504,682         26.4 | #         % of #         % of #           1,687         15.6         24.4           6,850,800         11.6         24.5           2,772,797         11.8         23.4           1,538,269         5.2         18.8           966,413         18.7         29.4           268,115         24.5         27.9           622,867         7.0         17.7           7,309         5.0         17.1           1,595,098         24.5         16.3           2,504,682         26.4         15.3           \$75,024         Median Housi           Median Gross         1 | #         Low<br>% of #         Moderate<br>% of #         Middle<br>% of #           1,687         15.6         24.4         27.3           6,850,800         11.6         24.5         29.7           2,772,797         11.8         23.4         29.4           1,538,269         5.2         18.8         33.5           966,413         18.7         29.4         24.5           268,115         24.5         27.9         23.0           622,867         7.0         17.7         26.8           7,309         5.0         17.1         32.6           1,595,098         24.5         16.3         18.2           2,504,682         26.4         15.3         16.8           \$75,024         Median Housing Value         Median Gross Rent | #Low<br>$\% of #$ Moderate<br>$\% of #$ Middle<br>$\% of #$ Upper<br>$\% of #$ 1,68715.624.427.331.86,850,80011.624.529.733.92,772,79711.823.429.435.11,538,2695.218.833.542.3966,41318.729.424.526.6268,11524.527.923.024.1622,8677.017.726.847.97,3095.017.132.645.21,595,09824.516.318.241.02,504,68226.415.316.841.5\$75,024Median Housing Value\$75,02410.1 |

## **Scope of Evaluation in Illinois**

Examiners utilized full-scope procedures to assess the bank's CRA performance.

## LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Satisfactory.

## **Conclusions for Area Receiving Full-Scope Review**

Based on a full-scope review, the bank's performance in the AA is reasonable.

### Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in the State.

#### Home Mortgage Loans

Refer to Table O in the state of Illinois 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.

Examiners placed more weight on performance to moderate-income geographies due to the bank originating more loans to moderate-income tracts than low-income tracts, and there are more lending opportunities to moderate-income geographies.

The bank's distribution of loans to low-income tracts is reasonable. From 2019-2021, the bank's percentage of loans to low-income tracts was 2.1 percent, which is within a reasonable range from aggregate at 3.9 percent. While the percentage of bank's loans to low-income tracts is below the percent of owner-occupied housing (OOH) units at 5.2 percent, it remains consistent with aggregate.

The bank's distribution of loans to moderate-income geographies is poor. During the evaluation period, approximately 5.3 percent of MFB's loans were to moderate-income geographies, which is well below aggregate and the percent of OOH units at 14.6 and 18.8 percent, respectively. Throughout 2019-2021, the bank's distribution of loans to moderate-income census tracts was considerably below aggregate and the demographic data.

#### Lending Gap Analysis

Examiners noted MFB's loans during the evaluation period were concentrated in middle- and upperincome geographies. This is a result of the Oak Leaf Community Mortgage Banking group acquisition in 2019, competition, and employee turnover. The mortgage banking LPOs are located in upper-income geographies in the southwest suburbs of Chicago (Plainfield and Naperville, IL), which explains the concentration of loan originations in those respective areas. There is also significant competition surrounding the main branch, with multiple financial institutions within one mile of MFB. Turnover of mortgage loan officers at the branch was also a contributing factor in the bank's ability to lend to the surrounding communities that are low- and moderate-income geographies.

#### Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels.

#### Home Mortgage Loans

Refer to Table P in the state of Illinois 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.

The distribution of home mortgage loans to low-income borrowers is reasonable. MFB originated 5.1 percent of home mortgage loans to low-income borrowers during the evaluation period. This was well below the demographic data of 24.5 percent, but in line with aggregate lending data of 5.6 percent.

The distribution of home mortgage loans to moderate-income borrowers was excellent. Throughout 2019-2021, the bank originated 19.5 percent of home mortgage loans to moderate-income borrowers. This exceeded the demographic data of 16.3 percent and the aggregate lending data of 15.4 percent. Home mortgage loans made to moderate-income borrowers was well above demographic and aggregate

data in all three years of the evaluation period, primarily due to MFB actively pursuing partnerships with organizations located in Chicago's south suburbs that target low- and moderate-income borrowers.

#### **Responses to Complaints**

The bank has not received any CRA-related complaints 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:                | 12/31/2019 to 12/31/2021 |  |  |  |  |  |  |  |
|--------------------------------------|--------------------------|--|--|--|--|--|--|--|
| <b>Bank Products Reviewed:</b>       | Home mortgage loans      |  |  |  |  |  |  |  |
|                                      |                          |  |  |  |  |  |  |  |
| Affiliate(s)                         | Affiliate Relationship   | Products Reviewed                            |  |  |  |  |  |  |
| 2212 Holding, LLC                    | Operating Subsidiaries   | N/A  |  |  |  |  |  |  |
| EMEFES Service Corporation           |                          |  |  |  |  |  |  |  |
|                                      |                          |  |  |  |  |  |  |  |
|                                      |                          |  |  |  |  |  |  |  |
| List of Assessment Areas and Type of | of Examination           |  |  |  |  |  |  |  |
| <b>Rating and Assessment Areas</b>   | Type of Exam             | Other Information                            |  |  |  |  |  |  |
| Chicago-Naperville-Elgin, IL-IN-WI   | Full-Scope               | AA is the entirety of Cook, DuPage, and Will |  |  |  |  |  |  |
| MSA                                  | Гип-эсоре                | counties (IL)                                |  |  |  |  |  |  |
| States                               |                          |  |  |  |  |  |  |  |
| Illinois                             | Full-Scope               |  |  |  |  |  |  |  |

# **Appendix B: Summary of MMSA and State Ratings**

|                     | RATINGS | Mutual Federal Bank |
|---------------------|---------|---------------------|
| Overall Bank:       |         | Lending Test Rating |
| Mutual Federal Bank |         | Satisfactory        |
| MMSA or State:      |         |                     |
| Illinois            |         | Satisfactory        |

## **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.

## **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 30<sup>th</sup> 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<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of owner-occupied housing units throughout those geographies. The<br/>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<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of families by income level in each MMSA/assessment area. The<br/>table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

|                     | Total Home Mortgage Loans |         |               |                   | Low-l  | ncome | Tracts    | Moderate-Income Tracts                         |     |           | Middle   | -Incom | e Tracts  | Upper-   | Incom | e Tracts | Not Available-Income<br>Tracts                 |     |     |  |
|---------------------|---------------------------|---------|---------------|-------------------|--|-------|-----------|--|-----|-----------|--|--------|-----------|--|-------|----------|--|-----|-----|--|
| Assessment<br>Area: | #                         | \$      | % of<br>Total | Overall<br>Market | % of<br>Owner-<br>Occupied<br>Housing<br>Units |       | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units |     | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units |        | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units |       | 00 0     | % of<br>Owner-<br>Occupied<br>Housing<br>Units |     |     |  |
| Mutual              | 1,501                     | 356,895 | 100.0         | 348,638           | 5.2  | 2.1   | 3.9       | 18.8   | 5.3 | 14.6      | 33.5   | 38.8   | 30.9      | 42.3   | 53.7  | 50.5     | 0.2  | 0.0 | 0.2 |  |
| Total               | 1,501                     | 356,895 | 100.0         | 348,638           | 5.2  | 2.1   | 3.9       | 18.8   | 5.3 | 14.6      | 33.5   | 38.8   | 30.9      | 42.3   | 53.7  | 50.5     | 0.2  | 0.0 | 0.2 |  |

|                     | Tot   | al Home M | ortgage       | Loans             | Low-In        | come B             | orrowers  |               | Moderate-Income Middle-Income Borrower Borrowers |           |               | Middle-Income Borrowers Upper-Income Borrowers Not |           |               |                    | vailable<br>Borrowe | -Income<br>ers |                    |           |
|---------------------|-------|-----------|---------------|-------------------|---------------|--------------------|-----------|---------------|--|-----------|---------------|--|-----------|---------------|--------------------|---------------------|----------------|--------------------|-----------|
| Assessment<br>Area: | #     | \$        | % of<br>Total | Overall<br>Market | %<br>Families | %<br>Bank<br>Loans | Aggregate | %<br>Families | %<br>Bank<br>Loans                               | Aggregate | %<br>Families | %<br>Bank<br>Loans                                 | Aggregate | %<br>Families | %<br>Bank<br>Loans | Aggregate           | %<br>Families  | %<br>Bank<br>Loans | Aggregate |
| Mutual              | 1,501 | 356,895   | 100.0         | 348,638           | 24.5          | 5.1                | 5.6       | 16.3          | 19.5   | 15.4      | 18.2          | 24.8   | 20.7      | 41.0          | 49.2               | 42.2                | 0.0            | 1.3                | 16.2      |
| Total               | 1,501 | 356,895   | 100.0         | 348,638           | 24.5          | 5.1                | 5.6       | 16.3          | 19.5   | 15.4      | 18.2          | 24.8   | 20.7      | 41.0          | 49.2               | 42.2                | 0.0            | 1.3                | 16.2      |

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.