

## PUBLIC DISCLOSURE

December 10, 2018

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First FSB of Mascoutah Charter Number 706191

101 W Main St Mascoutah, IL 62258-2032

Office of the Comptroller of the Currency

500 N. Broadway Suite 1700 St. Louis, MO 63102

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

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# **Overall CRA Rating**

## INSTITUTION'S CRA RATING: This institution is rated Satisfactory

First FSB of Mascoutah (FFSB) demonstrates a satisfactory record in meeting the credit needs of its community. The major factors that support the satisfactory rating include:

- The average loan-to-deposit (LTD) ratio is reasonable.
- The majority of loans are inside the assessment areas (AAs).
- The overall borrower distribution of loans is reasonable among borrowers of different income levels.

#### **Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions

Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **DESCRIPTION OF INSTITUTION**

FFSB is a federally chartered mutual savings bank headquartered in Mascoutah, Illinois. FFSB offers traditional loan and deposit products and services at each of its three offices. The main office and one branch located in Lebanon, Illinois within St. Clair County and the second branch located in New Baden, Illinois within Clinton County are part of the St. Louis MSA. The institution has not opened or closed any branches since the last examination, and there have not been any major changes in FFSB's corporate structure, including merger or acquisition activities.

As of September 30, 2018, FFSB had total assets of \$103.6 million and tier 1 capital of \$13.5 million. Gross loans of \$61.7 million represented 59.6 percent of total assets. FFSB's loan originations and loan portfolio composition reflect its focus on single-family residential mortgage lending.

FFSB does not have any legal, financial, or other impediments that hinder its ability to meet the credit needs of its AAs. FFSB was previously assigned a CRA rating of Satisfactory, which was reported in its CRA Public Evaluation dated October 21, 2013.

# Scope of the Evaluation

#### **Evaluation Period and Products Evaluated**

This Performance Evaluation is an assessment of the record of FFSB in meeting the credit needs of the communities in which it operates. FFSB was evaluated under the Small Bank performance criteria, which includes a lending test. The lending test evaluates the institution's record of helping to meet the credit needs of its AA through its lending activities. The scope of the CRA evaluation period is October 22, 2013 through December 17, 2018. The lending test analysis includes loans originated and purchased from January 1, 2015 through December 31, 2017.

We reviewed all of the institution's loan originations and purchases in 2015, 2016, and 2017 to determine the primary products for the AA. For FFSB's AA, the primary product was residential lending.

#### **Data Integrity**

The lending test analysis included all residential loans reported under the Home Mortgage Disclosure Act (HMDA) for years 2015, 2016 and 2017. We performed separate analyses of 2015/2016 and 2017 due to changes in census data that became effective in 2017 as a result of updated information collected via the American Community Survey (ACS). To ascertain the data integrity of the reported HMDA loans, we reviewed a sample of 60 applications each for 2015, 2016, and 2017. We concluded that the publicly filed data was accurate and reliable.

#### Selection of Areas for Full-Scope Review

The bank's AA, St. Louis MSA, will receive a full-scope review.

## Ratings

The bank's overall rating is based on observed performance as well as context information from the St. Louis MSA AA.

# **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation

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

# **Conclusions with Respect to Performance Tests**

FFSB demonstrates a reasonable performance of meeting the credit needs of its AA given the demographics, economic factors, and competitive pressures faced by the bank.

#### **LENDING TEST**

#### Loan-to-Deposit Ratio

FFSB's loan-to-deposit ratio (LTD) is reasonable given its asset size, financial condition, customer base, competition, and AA credit needs. The quarterly LTD ratio, as calculated on a bank-wide basis, averaged 50.2 percent over the 21 quarters since the last CRA evaluation. During this timeframe, the LTD ranged from a high of 69.5 percent to a low of 39.4 percent. We considered the average LTD ratio of six other banks with offices in the AA. These six banks, with assets between \$20.0 million and \$390.1 million, had LTD ratios ranging from 43.9 to 103.5 percent.

#### **Lending in Assessment Area**

The majority of FFSB's lending was to borrowers within its designated AA (56 percent by number and 58 percent by dollar). The following table details the bank's lending inside and outside the AA by number and dollar amount of loans originated during the evaluation period.

	Lending Inside and Outside of the Assessment Area														
		Number	of Loans			Dollar									
Loan Category	Ins	side	Out	side	Total	Ins	ide	Out	side	Total					
	#	%	#	%	#	\$	%	\$	%	\$(000s)					
Home Mortgage				I				I		I					
2015	40	72.7	15	27.3	55	4,195	67.3	2,034	32.7	6,229					
2016	39	54.2	33	45.8	72	5,034	55.6	4,019	44.4	9,053					
2017	39	47.0	44	53.0	83	7,084	56.0	5,577	44.0	12,661					
Subtotal	118	56.2	92	43.8	210	16,313	58.4	11,630	41.6	27,943					

Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data

Due to rounding, totals may not equal 100.0

#### Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The overall distribution of loans to borrowers of different incomes is reasonable, which meets the standard for satisfactory performance. Refer to the data in Table P in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

#### St. Louis MSA AA

The distribution of home mortgage loans in the St. Louis MSA AA is reasonable. In 2015 and 2016, the proportion of loans to low-income borrowers was below the proportion of low-income families in the AA and above the aggregate. The proportion of loans to moderate-income borrowers was above both the proportion of moderate-income families in the AA and the aggregate. FFSB's distribution of home mortgage loans in 2017 was below 2015 and 2016 and was reasonable. In 2017, the proportion of loans to low-income borrowers was well below the proportion of low-income families in the AA yet comparable to the aggregate. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families in the AA and the aggregate.

#### **Geographic Distribution of Loans**

An analysis of the geographic distribution of loans within the AA would not be meaningful. There are no low- or moderate-income CTs in the AA.

#### **Responses to Complaints**

No CRA-related complaints have been received by the bank or the OCC since the prior CRA evaluation.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/15 to 12/31/17 Investment and Service Tests and CD Loans: Not Applicable					
Financial Institution		Products Reviewed				
First FSB of Mascoutah (FFSB) Mascoutah, Illinois		Residential Loans				
Affiliate(s)	Affiliate Relationship	Products Reviewed				
None	N/A	N/A				
List of Assessment Areas and Typ	e of Examination					
Assessment Area	Type of Exam	Other Information				
Illinois  Western portion Clinton County (CTs 9001, 9006.02), Eastern portion St. Clair County (CTs 5038, 5039.03, 5039.04, 5039.05, 5040.02, 5043.02, 5043.03, 5043.51, 5043.52, 5043.53, 5043.54, 5043.55) — Part of the St. Louis MO-IL MSA #41180	Full-Scope	Residential loans				

# **Appendix B: Community Profiles for Full-Scope Areas**

# Table A - Demographic Information of the Assessment Area

Assessment Area: First FSB St. Louis MO-IL MSA 2015-2016

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	14	0.0	0.0	64.3	35.7	0.0		
Population by Geography	75,607	0.0	0.0	74.6	25.4	0.0		
Housing Units by Geography	28,792	0.0	0.0	77.8	22.2	0.0		
Owner-Occupied Units by Geography	19,231	0.0	0.0	71.7	28.3	0.0		
Occupied Rental Units by Geography	7,373	0.0	0.0	90.8	9.2	0.0		
Vacant Units by Geography	2,188	0.0	0.0	87.8	12.2	0.0		
Businesses by Geography	3,169	0.0	0.0	80.3	19.7	0.0		
Farms by Geography	289	0.0	0.0	82.4	17.6	0.0		
Family Distribution by Income Level	19,966	14.0	16.6	20.1	49.3	0.0		
Household Distribution by Income Level	26,604	15.9	13.9	18.0	52.2	0.0		
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$66,798	Median Housing	Median Housing Value				
			Median Gross Re	ent		\$825		
			Families Below F	4.9%				

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A - Demographic Information of the Assessment Area

Assessment Area: First FSB St. Louis MO-IL MSA 2017

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	14	0.0	0.0	50.0	50.0	0.0			
Population by Geography	76,376	0.0	0.0	64.0	36.0	0.0			
Housing Units by Geography	29,597	0.0	0.0	66.9	33.1	0.0			
Owner-Occupied Units by Geography	20,173	0.0	0.0	63.2	36.8	0.0			
Occupied Rental Units by Geography	7,186	0.0	0.0	72.9	27.1	0.0			
Vacant Units by Geography	2,238	0.0	0.0	80.5	19.5	0.0			
Businesses by Geography	3,221	0.0	0.0	67.8	32.2	0.0			
Farms by Geography	283	0.0	0.0	74.2	25.8	0.0			
Family Distribution by Income Level	20,385	12.5	15.4	19.5	52.6	0.0			
Household Distribution by Income Level	27,359	15.6	13.0	15.8	55.6	0.0			
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing	Median Housing Value					
			Median Gross Re	Median Gross Rent					
			Families Below F	Poverty Level		5.3%			

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.

## **Description of Assessment Area**

FFSB's AA is defined as the 12 census tracts in the eastern portion of St. Clair County and two census tracts in the western portion of Clinton County. Based on 2010 census data, the AA is comprised of nine census tracts designated as middle-income and five census tracts designated as upper-income during the majority of the evaluation period. Two of the middle-income designations changed to upper-income in 2017 as a result of updated 2015 ACS census data. There are no low-income or moderate-income census tracts in the AA. As defined, FFSB's St. Louis MSA AA meets the requirements of CRA and does not arbitrarily exclude any low- or moderate-income geographies.

### **Population and Employment**

According to census data, the total population in the AA has not changed significantly since 2010. The population was 75,607 in 2010 and 76,376 based on the 2015 ACS. There was also minimal change in the number of households and families. However, the rate of poverty for both households and families increased. Households below poverty increased from 6.9 to 7.8 percent, while families below poverty increased from 4.9 to 5.3 percent. The unemployment rate in Clinton County improved each year during the evaluation period and compared favorably to the statewide unemployment rate. The unemployment rate in St. Clair County also improved each year during the evaluation period but fell below the statewide unemployment rate. The following table summarizes the annual unemployment rates:

Unemployment Rates														
Area	Area 2013 2014 2015 2016 2017 *2018													
Clinton County	6.8%	5.4%	4.5%	4.4%	3.5%	3.0%								
St. Clair County	9.8%	7.8%	6.6%	6.0%	4.9%	4.4%								
State of Illinois	9.0%	7.1%	6.0%	5.8%	5.0%	3.8%								

Source: Bureau of Labor Statistics

\*as of September 30, 2018

Business demographic data indicates the primary business industries in the area are services, retail trade, and agriculture. Major employers in the AA are Scott Air Force Base, Memorial Hospital, St. Elizabeth Hospital, and Southwestern Illinois College. Many residents of the AA commute to the St. Louis, MO area for employment.

#### **Housing and Affordability**

The number and composition of the housing stock was stable. According to census data, total housing units in the AA increased from 28,792 (2010 Census) to 29,597 (2015 ACS). The majority of these housing units remained owner-occupied with a slight decrease in renter-occupied and vacant units. The 2015 ACS indicated 68.2 percent of the total units were owner-occupied, 24.3 percent were renter-occupied, and 7.6 percent were vacant.

Homeownership affordability was an issue that limited mortgage demand, particularly among low-income borrowers. Based on the 2016 FFIEC median family income of \$66,798, low- income families made less than \$35,000. At \$165,818, the median housing value was 4.7 times the annual income of a low-income family. The median housing value increased to \$167,158 per the 2015 ACS, low-income families made less than \$37,150. The 2017 FFIEC median family income also increased to \$70,718. The housing value to the annual income of low-income families slightly decreased to 4.5 times.

#### Competition

Competition for deposits is limited due to the number and size of the financial institutions within the AA. The FDIC Market Share Report as of June 30, 2018, showed FFSB and 35 other financial institutions had 106 branches in the AA. FFSB's three offices with \$89.8 million of deposits represented a market share of 1.8 percent, which ranked them 16<sup>th</sup> overall. Regions Bank ranked first with the majority or 14.3 percent of the deposit market share. Unlike the majority of its competitors, FFSB's offices are concentrated in Clinton and St. Clair Counties.

Competition for home mortgage loans was strong in both 2016 and 2017. Based on 2016 aggregate HMDA data, 225 lenders originated or purchased a total of 3,531 home mortgage loans in the AA. The top five lenders accounted for approximately 25.7 percent of the total. In 2017, aggregate HMDA data indicated 212 lenders originated or purchased 2,912 home mortgage loans. The top five lenders accounted for 27.6 percent of the total. FFSB ranked 24<sup>th</sup> with a market share of 1.1 percent in 2016 and 20<sup>th</sup> with market share of 1.2 percent in 2017.

#### **Community Contact**

A community contact from a non-profit organization that serves the AA provided insight on potential credit or community development needs. The contact stated a large portion of their tenants do not utilize basic banking services. The contact further noted their clients often face barriers related to blemished credit scores due to past delinquency issues. This information suggests there are credit and community development opportunities for credit builder and financial literacy programs.

# **Appendix C: Tables of Performance Data**

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan areas 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 loans are treated as originations/purchases; (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data 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. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

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

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

2015-16

Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Ir	ncome	Borrowers	Not Available-Income Borrowers				
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
First FSB St Louis MO- IL MSA AA - 2016	79	9,229	100.0	3,531	14.0	8.9	2.8	16.6	19.0	12.1	20.1	21.5	19.4	49.3	35.4	40.2	0.0	15.2	25.4
Total	79	9,229	100.0	3,531	14.0	8.9	2.8	16.6	19.0	12.1	20.1	21.5	19.4	49.3	35.4	40.2	0.0	15.2	25.4

Source: 2010 U.S Census; 01/01/2015 - 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

-																			
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
First FSB St Louis MO-IL MSA AA - 2017	39	7,084	100.0	2,912	12.5	5.1	5.0	15.4	7.7	13.7	19.5	15.4	22.4	52.6	53.8	38.2	0.0	17.9	20.7
Total	39	7,084	100.0	2,912	12.5	5.1	5.0	15.4	7.7	13.7	19.5	15.4	22.4	52.6	53.8	38.2	0.0	17.9	20.7

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0