



PUBLIC DISCLOSURE

August 9, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fidelity FS & LA of Delaware
Charter Number: 703587

60 N Sandusky St
Delaware, OH 43015-1926

Office of the Comptroller of the Currency

655 Metro Place South
Suite 625
Dublin, OH 43017

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 3
STATE RATING..... 4
 STATE OF OHIO..... 4
APPENDIX A: SCOPE OF EXAMINATION..... 1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS..... 1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS 1
APPENDIX D: TABLES OF PERFORMANCE DATA 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 the state rating and the following overall conclusions:
 - The bank's quarterly average loan-to-deposit (LTD) ratio is reasonable
 - A majority of the bank's loans are inside the assessment area (AA).
 - The bank exhibits excellent distribution of loans in the AA, by both income level of the geography and income level of the borrower.

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 reasonable.

The bank's quarterly average LTD ratio over the 20 quarters since the previous Community Reinvestment Act (CRA) evaluation (January 1, 2016 through December 31, 2020) is 59.9 percent and is reasonable compared to similarly situated financial institutions. A review of 2 similarly situated financial institutions revealed average LTD ratios of 53 percent and 94.4 percent over the same period. Since the prior CRA evaluation, the bank's LTD ratio increased slightly from 56.8 percent to 59 percent as of December 31, 2020.

The bank implements a strategy of selling a significant portion of loans with over 20 years until maturity for purposes of managing interest rate risk. During the review period, the bank sold 45 loans totaling \$8.1 million. This strategy reduces the bank's LTD ratio.

Lending in Assessment Area

A majority of the bank's loans are inside the AA.

The bank originated and purchased 64.6 percent of its total loans inside the bank's AAs during the evaluation period. The bank also originated and purchased 68.3 percent of its total dollar amount of loans inside the bank's AA during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Type	Number of Loans					Dollar of Amount of Loans \$(000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage	73	64.6%	40	35.4%	113	11,508	68.3%	5,335	31.7%	16,843
Totals	73	64.6%	40	35.4%	113	11,508	68.3%	5,335	31.7%	16,843

Description of Institution

Fidelity Federal Savings and Loan Association of Delaware (Fidelity Federal, bank) is a federally chartered mutual savings association with total assets of \$122 million and a net loan and lease portfolio of \$58 million, as of December 31, 2020. The main office is located in the city of Delaware, Ohio, which is the county seat and serves Delaware County, OH. Fidelity Federal also has one branch office, which is also located in the City of Delaware. Both offices are located in middle-income geographies. No offices were opened or closed since the previous CRA evaluation.

Fidelity Federal offers a variety of checking accounts, savings accounts, and certificates of deposit, including individual retirement accounts. In addition, automated teller machine services and safe deposit boxes are available at both offices. The bank's primary lending product consists of loans secured by 1-4 family residential real estate. Fidelity Federal operates as a traditional bank with a focus on home lending. Loans are available for the purchase, refinance, construction, or improvement of residential property. Fidelity Federal also offers consumer and small business/commercial loans.

Presently, there are no financial or legal impediments that affect Fidelity Federal's ability to serve the credit needs of its community. Fidelity Federal's last CRA evaluation was conducted as of May 2, 2016 and resulted in an "outstanding" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a full scope CRA evaluation to assess the institution's record and performance of meeting the credit needs of its community, including low- and moderate-income areas. The OCC used the Small Bank CRA evaluation procedures to evaluate the institution's performance. The Lending Test includes loans originated from January 1, 2018 to December 31, 2020, which is the evaluation period. A data integrity examination of the bank's home mortgage loans, as reported in the Home Mortgage Disclosure Act Loan Applications Register (HMDA LAR), was performed on 2018 and 2019 lending data. The OCC found the data was accurate and reliable. The bank was not required to report loans in 2020; therefore, the OCC reviewed a sample of 20 loans originated in 2020 for evaluation.

The bank's primary loan product, based on discussions with management and a review of loan originations during the evaluation period, is residential real estate.

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. 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.

Fidelity Federal has one AA, the entirety of Delaware County, OH. The bank’s AA did not change since the previous CRA evaluation in 2016. The OCC completed a full-scope review of the AA.

Ratings

The bank’s overall rating is based on the state of Ohio Rating. The state rating is based on performance in the bank’s only AA, the Entirety of Delaware County, OH.

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 bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank’s next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in the performance evaluation.

State Rating

State of Ohio

CRA rating for the State of Ohio: Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- Fidelity Federal exhibits excellent geographic distribution of loans in the state.
- Fidelity Federal exhibits excellent distribution of loans to individuals of different income levels.

Description of Institution’s Operations in Ohio

Entirety of Delaware County

Table A – Demographic Information of the Assessment Area						
Assessment Area: Entirety of Delaware County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	2.9	34.3	62.9	0.0
Population by Geography	185,433	0.0	1.6	28.7	69.7	0.0
Housing Units by Geography	68,668	0.0	2.2	30.7	67.1	0.0
Owner-Occupied Units by Geography	53,523	0.0	1.1	26.1	72.8	0.0
Occupied Rental Units by Geography	12,125	0.0	6.7	48.3	44.9	0.0
Vacant Units by Geography	3,020	0.0	3.1	41.3	55.5	0.0
Businesses by Geography	15,419	0.0	1.2	23.5	75.4	0.0
Farms by Geography	566	0.0	0.4	32.3	67.3	0.0
Family Distribution by Income Level	50,267	9.1	11.4	15.9	63.5	0.0
Household Distribution by Income Level	65,648	11.4	10.9	13.3	64.3	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$255,704
			Median Gross Rent			\$970
			Families Below Poverty Level			3.1%

Source: 2015 ACS Census and 2019 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.

Fidelity Federal’s AA consists of the entirety of Delaware County, OH. The AA is located within the Columbus, Ohio Metropolitan Statistical Area (MSA). The AA does not arbitrarily exclude any low or moderate income (LMI) census tracts (CTs) and meets the requirements of the CRA.

As of December 2020, Delaware County, Ohio's unemployment rate was 3.3 percent (U.S. Bureau of Labor Statistics), which is below Ohio's statewide unemployment rate of 5.3 percent and below the national average of 6.7 percent. Delaware County is comprised of urban, suburban, and rural communities. Major employers in Delaware County include JP Morgan Chase & CO, Anthem, The Kroger Company, Ohio Wesleyan University, and the Delaware City School District.

Competition in the AA is moderately high with competition including national banks, branches of larger financial institutions, and savings and loan institutions. According to the June 30, 2020, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), Fidelity Federal had approximately a 1.9 percent deposit market share in Delaware County and was ranked 7th out of 14 financial institutions in the area.

2015 U.S. Census Data Information

According to the 2015 U.S. Census data, the AA has no low-income CTs, one moderate-income CT, 12 middle-income CTs, and 22 upper-income CTs. The total population of the AA was 185,433, comprised of 65,648 households and 50,267 families. Of these families, 9.2 percent are at the low-income level, 11.4 percent are at the moderate-income level, 16 percent are at the middle-income level, and 63.5 percent are at the upper-income level. The weighted average of the Median Family Income in the AA was \$109,468. Comparatively, the weighted average of the HUD Updated MSA Median Family Income was \$70,454.

The AA contains 68,668 housing units, with 95.6 percent occupied. Of the total occupied housing units, 81.53 percent are owner occupied. Based on the total households within the AA, 4.72 percent live at or below the poverty level and 1.44 percent receive some form of public assistance. Retirees comprise 17.81 percent of the AA's households and 21.82 percent of households receive social security benefits.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of the Entirety of Delaware County AA. Loans secured by 1-4 family residential real estate are the bank's primary product and were evaluated under the Lending Test. Refer to the "Scope of Evaluation" section for more details.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Entirety of Delaware County AA is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Ohio 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.

The AA contains no low-income CTs. The bank's offices are located near the only moderate-income CT in the AA. In addition, only 1.1 percent of owner-occupied housing units in the AA are located in the moderate-income CT. In 2019 and 2020, residential real estate loans as a percentage of total loan originations by number in the AA totaled 60 percent and 78 percent respectively. The bank's lending in the moderate-income CT from 2018 to 2019, as a percentage of total home mortgage loans (6.6 percent), significantly exceeded the percentage of owner-occupied housing units in the AA that are located in moderate-income CTs (1.1 percent). In 2020, the bank did not originate any loans in the moderate-income CTs but moderate-income CTs only account for 1.1 percent of owner-occupied housing units.

Distribution of loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels in the state.

Home Mortgage Loans

Refer to Table P in the state of Ohio 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 bank exhibits excellent distribution of loans to individuals of different income levels within the AA. In 2018, the bank made 0 percent of its loans to low-income borrowers; however, the percentage of families that fit within this category comprised only 9.1 percent and the aggregate of loans made to these individuals totaled only 2.6 percent. The bank made 20.8 percent of its loans within the moderate-income borrower category, which comprised 11.4 percent of families within the AA, and significantly exceeded the aggregate of 9.6 percent.

In 2019, the percentage of bank loans to low-income borrowers was 24.3 percent and significantly exceeded the aggregate of 2.4 percent. The percentage of bank loans to moderate-income borrowers was 13.5 percent, and significant exceeded the aggregate of 8.8 percent.

In 2020, the bank did not originate enough loans to be required to report HMDA data; however, the OCC sampled 20 loans and found the bank made 5 percent of its loans within the low-income borrowers category and 25 percent in the moderate-income category.

Responses to Complaints

The bank has not received any complaints about its CRA performance in helping meet the AA's credit needs 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:	1/1/18 – 12/31/20	
Bank Products Reviewed:	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Entirety of Delaware County	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS: Fidelity Federal Savings and Loan Association	
Overall Bank:	Lending Test Rating
Fidelity Federal Savings and Loan Association	Outstanding
State:	
Ohio	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 2018-19

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
Entirety of Delaware County	61	9,384	100	12,731	0.0	0.0	0.0	1.1	6.6	0.8	26.1	85.2	23.0	72.8	8.2	76.1	0.0	0.0	0.0
Total	61	9,384	100	12,731	0.0	0.0	0.0	1.1	6.6	0.8	26.1	85.2	23.0	72.8	8.2	76.1	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data, 2019 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																				2020
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	
Entirety of Delaware County	20	3,751	100	20,483	0.0	0.0	0.0	1.1		0.6	26.1	75	19.8	72.8	25.0	79.6	0.0	0.0	0.0	
Total	20	3,751	100	20,483	0.0	0.0	0.0	1.1	0.0	0.6	26.1	75.0	19.8	72.8	25.0	79.6	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2020 - 12/31/2020 Bank Data, 2020 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 **2018-19**

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
Entirety of Delaware County	61	9,384	100	12,731	9.1	14.8	2.4	11.4	16.4	8.8	15.9	21.3	16.5	63.5	36.1	59.4	0.0	11.5	12.9
Total	61	9,384	100	12,731	9.1	14.8	2.4	11.4	16.4	8.8	15.9	21.3	16.5	63.5	36.1	59.4	0.0	11.5	12.9

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2019 Bank Data, 2019 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 **2020**

	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
Entirety of Delaware County	20	3,751	100	20,483	9.1	5.0	1.9	11.4	25.0	7.8	15.9	45.0	17.5	63.5	20.0	57.7	0.0	5.0	15.0
Total	20	3,751	100	20,483	9.1	5.0	1.9	11.4	25.0	7.8	15.9	45.0	17.5	63.5	20.0	57.7	0.0	5.0	15.0

*Source: 2015 ACS Census ; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*